SOSCN Member Feedback Reduced Summary

Online Networking Event – 11th February 2026

96 members from across Scotland joined our online networking event to discuss the Scottish Government and Care Inspectorate feasibility study on the future regulation of school-age childcare (SACC). Here's a quick summary of what members told us.

Model A – Clear Definition of SACC

Strongly supported

- 98% of regulated services said Model A would help their service.

Why?

Members welcomed:

- Review of current regulation, including qualifications
- Greater distinction between SACC and ELC
- Recognition of the unique role of play in SACC

Key message:

Members support reform — but want qualification requirements (and other regulatory requirements) to be:

- Proportionate
- Play-focused
- Relevant to SACC
- Flexible enough to retain experienced staff

Model C – Lighter-Touch Oversight for Unregistered Provision

Significant concern

- 86% of regulated services said Model C alone would hinder their service.

Why?

The main concern was fairness and financial sustainability.

Members are worried that:

- If parents can access tax-free childcare or other funding streams to help pay for unregistered services, whilst these services do not have to meet the same regulatory standards, this would only exacerbate the uneven playing field between the fully regulated sector and the unregistered sector.

There were also strong safeguarding concerns, with many members saying any service providing care to children should meet consistent standards.

Some members did acknowledge that:

- Greater clarity around activity clubs would be helpful

Model A + Model C Together

When asked about both models being implemented together, responses were split almost evenly.

This suggests:

- Members are open to reform
- But funding parity and safeguarding standards are critical
- Implementation details will determine whether reform strengthens or destabilises the sector

Current Regulation – What Members Said

Areas that feel overly burdensome:
- Qualification requirements (particularly degree-level expectations and timescales)
- Volume of paperwork and personal planning
- Being regulated in ways that mirror ELC rather than reflect SACC
- Environmental standards applied to services operating in school premises

Areas that work well and should stay:
- Safeguarding and child protection
- Safer recruitment and PVG requirements

- SSSC registration

- Mandatory training subjects (first aid, child protection, food hygiene, etc)

- Quality assurance and self-evaluation

Members are not seeking deregulation, they value professionalism and high standards.

Where regulation needs to be stronger:
- Consistency between inspectors

- Clearer distinction between SACC and ELC

- Regulation of currently unregistered provision

- Greater understanding of SACC by regulators

- Support for additional support needs (ASN)

The Big Picture

Across all feedback, five consistent themes emerged:
- Support for strong safeguarding and professional standards

- Desire for proportionate, SACC-specific regulation

- Concern about fairness between regulated and unregulated provision

- Need for greater consistency in inspection practice

- Concern about financial sustainability

Members are not asking for less regulation. They are asking for:
- **Clarity**

- **Consistency**

- **Parity**

- **Proportionality**

- **Recognition of SACC's distinct identity**

SOSCN Member Feedback Full Report

On Wednesday 12th February 2026, SOSCN held an online Networking Event for our members.

The 96 attendees represented a wide geographical spread from across Scotland, with the majority being managers or practitioners of registered school age childcare (SACC) services. Also in attendance were development officers from a range of local authorities, and a manager of an unregistered provider.

The purpose of the meeting was to update members on news in the sector, such as the potential impact of the Scottish Government's budget, and to recap the findings of the joint feasibility study carried out by the Scottish Government and the Care Inspectorate, looking at the regulatory landscape of school age childcare in Scotland.

The feasibility study and ongoing discussion about the future regulatory framework for school-age childcare represents a significant moment for the sector. As a membership body representing regulated SACC services across Scotland, SOSCN sought to capture members' views to inform ongoing policy discussions and ensure the lived experience of providers is reflected in future decision-making.

We gathered feedback from members through live polling and written comments on the proposals for Model A and Model C from the study, as well as feedback on what levels and areas of current regulation they'd like to see improved.

The following is a summary the questions we asked and the answers our members provided during the event.

Not all attendees responded to every question.

Feedback on Model A

Overall sentiment

Model A was viewed positively by the vast majority of services, as reflected in responses to the following question:

If only Model A was implemented, do you think this is likely to help or hinder your service?

- As a regulated service, this would help – 46 (98% of regulated services)
  As a regulated service, this would hinder – 1 (2% of regulated services)

- As a non-regulated service, this would help – 1 (2% of total responses)
  As a non-regulated service, this would hinder – 0 (0% of total responses)

(48 total responses)

Reasons participants gave for supporting Model A

The strongest and most consistent theme related to qualification requirements and workforce sustainability.

Qualifications and Recruitment

There was a strong view that current qualification requirements:

- Are forcing some experienced managers out of their roles, as they are not prepared to undertake a degree-level qualification at their stage of their career
- Have not necessarily improved their effectiveness as a manager
- Are perceived as too focused on ELC
- Have contributed to a perception that the status and recognition of playwork qualifications has diminished

Therefore, a review of qualification requirements would be welcomed, with the hope that they would be:

- Set at an appropriate level suited to SACC
- Relevant to and focused on SACC
- Inclusive of a broader range of qualifications, not just Childhood Practice (for management) or Health and Social Care (Children & Young People) (for practitioners)

Members noted that widening the range of acceptable qualifications could also support recruitment by broadening who can work in SACC and register with SSSC.

Identity of SACC

Members welcomed the opportunity to strengthen clarity around the purpose of SACC and highlighted the importance of recognising playwork and the wider scope of what regulated SACC provides to children and families.

There was hope that Model A would encourage greater distinction between Early Learning and Childcare (ELC) and School-Age Childcare (SACC), with members viewing this as beneficial for:

- Professional identity
- Sector recognition
- Clearer understanding of the unique role SACC plays

Reasons participants gave for not supporting Model A

There were not many reasons to oppose Model A. However, one member cautioned that any changes to qualification requirements should be handled carefully and should not "devalue people who have already worked through their qualification."

This suggests that while members broadly support reform, there is sensitivity around recognising existing workforce investment and professional achievement.

Feedback on Model C

Overall sentiment

Model C caused considerable concern amongst the majority of regulated services, with 86% indicating it would hinder their service.

If only Model C were implemented, do you think this would likely help or hinder your service?

- As a regulated service, this would help – 6 (12% of regulated services)
  As a regulated service, this would hinder – 42 (86% of regulated services)

- As a non-regulated service, this would help – 1 (2% of total responses)
  As a non-regulated service, this would hinder – 0 (0% of total responses)

(49 total responses)

Reasons participants gave for supporting Model C

While the majority of responses expressed concern about Model C, some participants acknowledged that greater clarity and oversight of activity clubs would be helpful, particularly where services currently operate within a perceived grey area. One rural service also highlighted the challenges of registering due to premises constraints, suggesting that greater flexibility within the regulatory framework may benefit some contexts.

Reasons participants gave for not supporting Model C

The majority of respondents expressed concern about Model C if implemented on its own or along with Model A. These concerns centred primarily on issues of fairness, financial sustainability and safeguarding.

Funding and Competitive Parity

The most consistent concern related to the potential for unregistered or lightly regulated services to access tax-free childcare or other government funding schemes.

Participants expressed concern that:

- This would exacerbate the already uneven playing field between regulated and unregulated provision
- Families will move to lower-cost provision
- Services already under financial pressure could face further destabilisation or closure

Ultimately, members are concerned that the regulatory requirements placed on SACC providers make it extremely difficult to reduce costs and compete with less regulated services. Several comments emphasised that the regulated out-of-school care sector remains financially fragile, particularly following the impact of COVID-19, during which many services continued operating to support the country through one of the most challenging periods in recent history.

Meanwhile, members felt unregulated provision can already operate at a much lower cost (or free in many cases) as a result of minimal regulatory requirements, as well as direct government funding. There is the view that allowing parents to access tax-free childcare or other government funding schemes would widen this financial imbalance, leading to serious destabilisation of the regulated SACC sector.

Safeguarding and Duty of Care

A number of responses focused on safeguarding and accountability. There was a strong view among some participants that:

- Any service providing care to children should be regulated to consistent standards
- Safeguarding expectations should not vary depending on the type of provider
- There should be clarity around duty of care and accountability in all settings

Model C was seen by some as failing to address these concerns if lighter-touch oversight did not equate to equivalent standards.

Risk of Unintended Consequences

Participants also raised concerns about potential unintended consequences, including:

- Registered services potentially shifting toward a lighter regulatory model if this reduced administrative burden, resulting in the erosion of the professionalism that has been built over the last 3 or 4 decades
- Increased competition for school premises and lets
- Holiday provision being particularly vulnerable to displacement

Feedback on Model A and Model C Implemented Together

Overall sentiment

When asked whether implementing both Model A and Model C together would help or hinder their service, responses were almost evenly split.

If both Model A and Model C were implemented, do you think this would likely help or hinder your service?

As a regulated service, this would help – 28 (50% of regulated services)
As a regulated service, this would hinder – 27 (48% of regulated services)

As a non-regulated service, this would help – 1 (2% of total responses)
As a non-regulated service, this would hinder – 0 (0% of total responses)
(56 total responses)

Interpretation of the Split Response

The near-even split suggests that members view the interaction between the two models as significant.

Combining Model A, with some form of regulation for unregistered services as mentioned in Model C appears to be supported.

However, the aspect of Model C proposing to allow parents to use government funding streams to pay for unregistered services appears to be a significant concern with little support from the regulated SACC sector.

Key Issues Highlighted

Across responses addressing both models, members emphasised:

- The need for a level playing field across all services providing care

- The importance of maintaining professionalism and safeguarding standards
- The risk of unintended consequences if funding mechanisms are not aligned with regulatory expectations
- The need to ensure reform does not destabilise an already financially fragile sector

Current Levels of Regulation

In addition to views on the proposed models, members were asked to reflect more broadly on the current regulatory framework. We asked members their views on the following questions:

1. Which areas of current regulation feel overly burdensome and could be reduced?
2. Which areas of regulation work well and should stay as they are?
3. Where do you think regulation needs to be stronger to better support children and services?

Below is a summary of the answers for each question.

1. ***Which areas of current regulation feel overly burdensome and could be reduced?*** (68 responses)

Responses to this question identified several consistent themes, with qualification requirements and paperwork burden emerging as the most significant concerns.

Qualifications

The most frequently raised issue related to qualification requirements. Participants highlighted concerns including:

- The requirement for degree-level qualifications for managers, particularly for long-serving staff approaching later stages of their careers
- Reduced timescales for achieving qualifications
- Qualification requirements for predominantly part-time staff
- Lead practitioner qualification expectations

- Limited recognition of other potentially relevant qualifications such as playwork, youth work, sports coaching and overseas qualifications
- A perceived emphasis on ELC-aligned qualifications rather than SACC-specific skills

At the same time, several respondents emphasised that qualifications remain important and that professionalism should be maintained. The prevailing view was not that qualifications should be removed, but that they should be:

- Proportionate
- Play-focused
- Recognised as distinct from ELC
- Inclusive of a broader range of relevant pathways

Paperwork

The second major theme related to administrative burden. Respondents frequently described paperwork as overwhelming, particularly in relation to:

- Six-monthly personal plan updates
- Detailed personal plans for children attending limited hours
- Observations and learning documentation
- Annual returns and notifications

Several services reported significant administrative time required to remain compliant, with concern that this reduces time spent directly with children.

ELC Alignment and Emphasis on Learning

Many responses expressed concern that SACC is regulated in a way that mirrors ELC, despite significant differences in purpose and delivery.

Concerns included:

- Emphasis on literacy and numeracy outcomes during inspections
- Learning-driven inspection frameworks

- Environment expectations aligned to nursery provision

There was a strong call for greater recognition of play-based practice and the distinct identity of SACC.

Environment and School Premises

Participants noted frustration where services operating in school premises are assessed against environmental standards that are outwith their control, including toilets, storage, displays and outdoor access.

It was noted that if such environments are acceptable for children to be in during the school day, then why are these same environments and premises not acceptable for a SACC to use?

Other Views

A small number of respondents indicated that regulation is broadly appropriate and should not be reduced, particularly in relation to safeguarding and child wellbeing.

Current Imbalance

It was felt that these areas of regulation all place financial and time commitments on registered SACC services, whilst unregistered services are not required to meet any of them, again, highlighting the imbalance in parity.

2. Which areas of regulation work well and should stay as they are? (54 responses)

Responses to this question demonstrated strong support for many core aspects of the current regulatory framework, particularly those relating to safeguarding, professionalism and quality assurance.

Safeguarding and Child Protection

The most consistent theme was strong support for safeguarding measures.

Participants highlighted the importance of:

- Child protection procedures
- Safeguarding training
- Safer recruitment standards
- PVG requirements
- Medication administration processes
- Monitoring of medical and care plans
- Ensuring venue safety and suitability
- Staff deployment
- Appropriate adult-child ratios

Several responses emphasised that safeguarding should remain central to regulation, with some noting that all services providing care or activities for children should be subject to regulation on this basis.

There was clear agreement that these areas should not be weakened.

Professional Registration and Qualifications

Many respondents expressed support for:

- SSSC registration
- Professional codes of practice

- Qualified staff teams
- Mandatory training requirements (First Aid, Food Hygiene, Child Protection, Infection Prevention & Control)

While qualification requirements were identified as burdensome in the previous question, responses here indicate that members still value a trained and professional workforce.

The emphasis was on ensuring qualifications are fit for purpose and relevant to SACC, rather than removing qualification expectations altogether.

Self-Evaluation and Quality Assurance

Self-evaluation was repeatedly cited as a positive and valuable aspect of regulation. Participants supported:

- Ongoing self-evaluation
- Quality indicators
- Quality assurance frameworks
- Clear vision, aims and policies

The new Care Inspectorate framework for SACC was welcomed as a positive step, although some noted that further differentiation from ELC would be beneficial. There was broad agreement that structured quality frameworks support consistency and service improvement.

Medication and Personal Planning

Medication procedures and personal planning were widely recognised as essential for ensuring children's safety and wellbeing.

Although personal planning requirements were identified as overly detailed in the previous question, many respondents still supported the principle of having personal plans and medical plans in place.

This suggests that concerns relate to proportionality rather than the removal of such processes.

Play and Children's Experience

A number of responses emphasised:

- The importance of children's positive experiences
- Play observations and responsive planning
- The need for frameworks to reflect Playwork Principles

There was support for maintaining quality standards, but with greater recognition of play-based practice.

Other Strongly Supportive Views

Several responses stated that regulation is broadly appropriate as it stands and is required to ensure:

- Continuity of care
- A high-quality service
- A professional workforce

This reinforces that members are not seeking deregulation, but refinement and alignment.

3. Where do you think regulation needs to be stronger to better support children and services? (48 responses)

Responses to this question did not suggest widespread demand for additional layers of regulation. Instead, participants most frequently highlighted the need for greater consistency, clarity and parity in how regulation is applied.

Consistency of Inspection and Regulation

The most frequently raised issue was consistency across inspections and inspectors.

Participants repeatedly highlighted:

- Variability between inspectors
- Different interpretations of requirements
- Inconsistent grading
- Differences in scrutiny within the same locality
- Frequent changes in inspecting officers
- Lack of continuity in relationships

Many responses emphasised that all services caring for children should be scrutinised to the same high standard, but in a consistent and predictable way.

There was a clear desire for:

- Greater alignment across inspectors
- Consistent application of quality indicators
- More stability in inspector relationships
- Less perceived "nitpicking" on minor environmental issues

Clearer Distinction Between SACC and ELC

A strong theme was the need for regulation to more clearly reflect the identity of school-age childcare, rather than being aligned too closely with Early Learning and Childcare (ELC).

Participants called for:

- Inspections tailored specifically to SACC
- Stronger recognition of play-based practice
- Moving away from an early years "learning" agenda
- Greater understanding of the age range and nature of SACC provision

Several responses emphasised that SACC should be inspected as SACC, not as ELC.

Regulation of Unregistered Provision

A significant number of responses stated that regulation should be stronger in relation to:

- Any group providing care where children are present
- Unregistered services, such as activity clubs and holiday camps

There was a strong safeguarding emphasis, with concern expressed about perceived gaps in oversight, particularly where large numbers of children are supervised without the same professional standards applied to regulated SACC services, such as staff deployment and ratios.

This reinforces earlier themes around parity and safeguarding.

Greater Understanding of SACC by Regulators

Participants expressed a desire for:

- Regulators to have a deeper understanding of the SACC context
- Recognition of the challenges of operating in shared or school premises
- More supportive engagement when addressing barriers to registration
- Opportunities for dialogue and forums with the Care Inspectorate

There was a sense that regulation should be applied with contextual understanding, particularly where services do not control their physical environment.

Support for Additional Needs and Funding

Several responses highlighted areas where regulation or wider policy could be strengthened to better support children and services, including:

- Greater support for children with additional support needs (ASN)
- Recognition of the need for smaller ratios in some cases
- More consistent or accessible funding for families
- Improved local authority cooperation

These responses suggest that stronger regulatory or policy support in these areas could enhance inclusion and sustainability.

Children's Voice and Experience

A number of responses emphasised that regulation should place stronger emphasis on:

- Children's views
- Families' experiences
- The lived experience within the setting

There was concern that inspection processes can sometimes prioritise compliance over meaningful engagement with children's perspectives.

Other Views

A small number of responses indicated that regulation is already comprehensive and does not necessarily need to be stronger.

Emerging Themes from Member Feedback

Across all questions, several consistent themes emerged:

- Strong support for proportionate, play-focused and SACC-specific regulation
- Clear concern about parity between regulated and unregistered provision
- Support for safeguarding, professional registration and quality assurance
- Desire for greater consistency in inspection practice
- Concern about financial sustainability and unintended consequences of reform

Members are not seeking deregulation. Rather, they are seeking:

- Clarity
- Consistency
- Parity
- Proportionality
- Recognition of SACC's distinct identity

This feedback reflects a sector committed to safeguarding and professionalism, while seeking reform that strengthens rather than destabilises existing provision.