ECS 30 Hours' Free Childcare – Frequently Asked Questions

The purpose of this Q&A is to answer the most commonly asked questions about 30 Hours' Free Childcare and the use of the ECS. This Q&A is not intended to provide extensive guidance, but will answer some of the most frequently asked questions. The questions have been grouped into the following 3 sections: technical, policy and Digital Accelerate funding.

Section 1 – Technical Queries

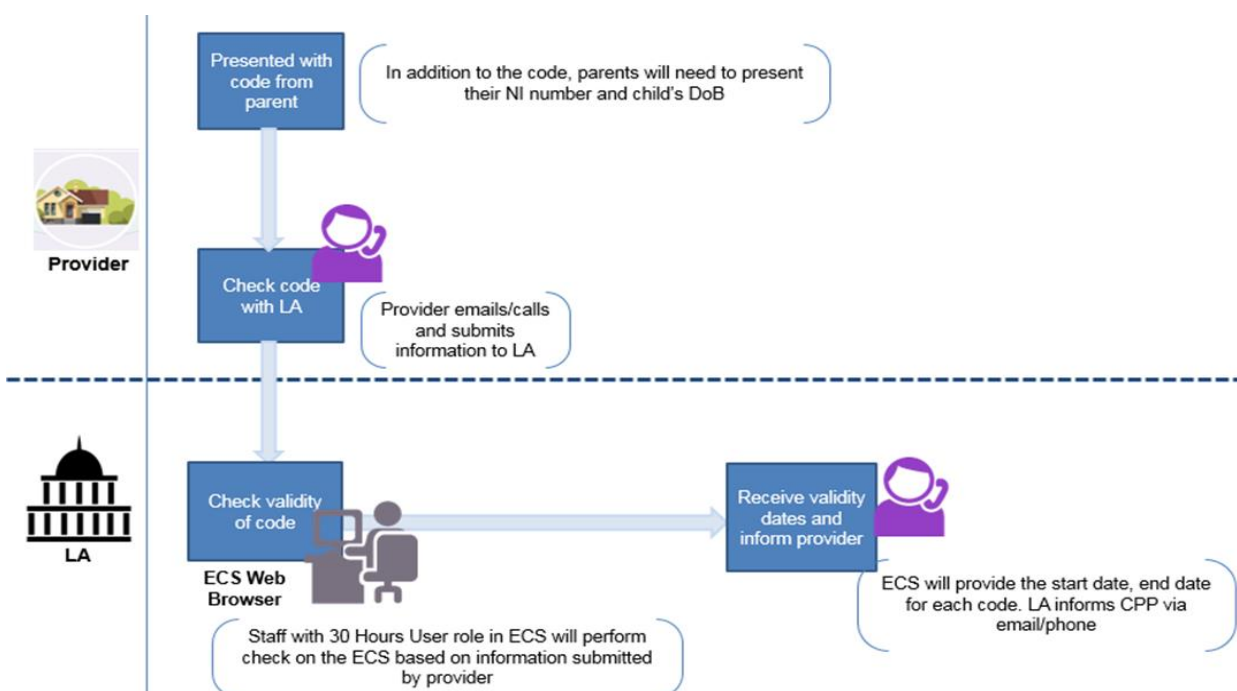### Are providers required to validate the code with their Local Authority?

The role of LAs in the end-to-end journey is to provide a validity checking service to providers either manually, via the ECS web browser or a web services interface that enables providers to carry out their own checks. Providers have to validate eligibility codes before offering childcare places under 30 Hours. LAs are required to provide guidance on the mechanisms providers are to use to validate codes, based on an LA's chosen method (web browser and web services).

Can providers be given access to the ECS to perform checks directly?

The ECS is not a public-facing service; therefore, LAs are required to provide a validity checking service for childcare providers using the ECS.

How quickly is a response given to childcare providers when validating an eligibility code?

The speed of responses depends on an LA's chosen validation process. If an LA decides to use the ECS web browser to perform manual checks, the journey may reflect the below:

The ECS will give instant responses to LAs, however, there may be a delay between a provider submitting a parent's details and the LA contacting the provider with the outcome of the validity check.

The approach which is strongly preferred is for the LA to adopt a system-to-system interface between the ECS and a local system (software solution) which will enable providers to perform checks themselves without the need for manual ECS queries.

Once a parent reconfirms eligibility, does the childcare provider re-input the eligibility code via the web services interface and new start and end dates along with grace period dates are supplied and LAs' systems updated i.e. Servelec?

The childcare provider is not required to re-validate eligibility codes when a parent reconfirms via HMRC. Childcare provision should continue without interruption or the need for the parent to resubmit details for providers to check.

New eligibility events/dates are pushed to the ECS when a parent reconfirms and will be available for LAs to query when auditing. LAs will identify any ineligible parents when they perform their periodic audits and are expected to inform childcare providers when a parent is in their grace period.

If an LA already has ECS accreditation for Free School Meals, will they be required to accredit for 30 Hours?

LAs are required to accredit the systems they implement for 30 Hours, as this will be a new check type. There are now accreditation tests specific to 30 Hours which must be completed as well as certifying that the system meets legal, compliance and other technical requirements. LAs should request a copy of the Connection Requirements document and start this process as soon as possible to avoid delaying connection. Some details can be completed before the system is live.

Will the ECS allow bulk validation of codes?

LAs are able to use the bulk upload functionality on the ECS to validate eligibility codes and to facilitate audits. This is available via the web browser interface and the services interface.

How many Super Users and Users can each LA have on the ECS for 30 Hours?

There is no limit to the number of Super Users and Users an LA can set up on the ECS for 30 Hours' checks though LAs should not set up more than is needed and should delete unused accounts.

Section 2 – Policy Queries

How does a parent apply to receive an eligibility code, if they do not have online access?

HMRC will have a dedicated helpdesk where parents who are unable to complete the application online can call and go through the application with a HMRC representative.

Are parents required to use their national insurance numbers as part of the application and validation process or can NASS number be used instead?

In order for eligibility codes to be validated via the ECS, a parent's national insurance number is mandatory; NASS numbers cannot be used as a substitute.

Do parents have to register with childcare service for each child, for example twins?

Twins will receive individual eligibility codes if parent and/or partner are found to be eligible following an application via HMRC's joint online childcare application.

Who determines who is the lead parent if both parents have joint responsibility but are financially independent (two households)?

The lead parent should be the parent whom the 30 Hours funded childcare will benefit, in terms of enabling them to take up more working hours or entering full time employment. This will usually be the parent with whom the child usually lives.

Is the validity period 3 months?

Validity periods will be typically be three months. HMRC may vary the length in certain circumstances where the validity periods of multiple children in a family need to align. For example, if a parent has a 3 year old and a 4 year old, HMRC may shorten the validity period when the parent applies for 30 Hours for the 3 year old so that it aligns with the 4 year old. This is aimed to prevent confusion for parents of having to manage two validity end dates. On reconfirmation, parents can therefore reconfirm for both children at the same time.

How often will LAs need to perform audits?

The Department for Education (DfE) will provide guidance to all Local Authorities (LAs) on how often periodic audits of all previously checked eligibility codes, should take place.

If there is a discrepancy between two or more providers who mediates, HMRC or LA?

LAs

What are the official DfE funded term dates?

The Department for Education (DfE) will be under a duty to fund places from the 1st January/1st April/1st September following a child's third birthday, just like the existing 15 hour entitlement. However, a parent will also need to have a 'yes' decision from HMRC as well as this will demonstrate that they meet the broader eligibility criteria (in addition to the age of the child).

If a parent meets the eligibility criteria part-way through a term, the DfE will be under a duty to fund places from the 1st January/1st April/1st September following a 'yes' decision from HMRC unless their respective LA or provider is able to fund a place in the interim.

There are circumstances where a parent could present a code to their LA or provider but need to reconfirm they are still eligible before they take up a place (e.g. in advance of 1stt January/April/September following their child's 3rd birthday). In these circumstances, if a parent reconfirms and is found to be ineligible before they are due to take up a place, they should not be funded for the additional hours (i.e. they are only eligible for the universal 15 hour entitlement).

Can you please explain what is meant by "the eligibility code may be used by one parent in lieu of the other"?

When a parent is making an initial application for 30 Hours via HMRC, they have to declare the income/employment details of the household, this will include a residing partner/parent. HMRC will make an assessment on eligibility based on the information submitted by a parent. Parents are required to take eligibility codes along with their National Insurance (NI) number and child's date of birth to their chosen childcare providers. In this scenario, the partner is able to take the eligibility code along with their own personal information, in place of the lead parent, for the validation to be made on the ECS.

When are schools and childcare providers able to sign up with HMRC so that parents can deposit funds into their accounts for Tax Free Childcare?

HMRC have already invited childcare providers nationally to register for Tax Free Childcare to enable parents to start depositing funds into their accounts from Spring 2017.

If a parent is already in receipt of the universal 15 hours entitlement and apply and receive a validation code can they claim 30 Hours immediately?

The Department for Education (DfE) will be under a duty to fund places from the beginning of the term following a 'yes' decision from HMRC where this was made partway through a term. The parent will be able to take up the additional 15 hours' funded place at the start of the following term, unless their respective LA or provider is able to fund a place in the interim.

How many providers can a parent split a 30 Hours' provision between?

There will be no limitation on the number of providers. However, the 30 hours will be limited to two sites in a single day to avoid the potential negative impact on children of multiple transitions between sites.

How will HMRC assess applications from parents applying for 30 Hours that are on zero hours contracts and those that are self-employed?

30 hours' free childcare will be available to families where both parents are working (or the sole parent is working in a lone parent family), and each parent expects to earn, on average, a weekly minimum equivalent to 16 hours at national minimum wage (NMW) or national living wage (NLW), and has an income of less than £100,000 per year. Working will include employed and self-employed persons.

Although the limit is based on earning the equivalent of 16 hours wages per week, there is no requirement to work any particular hours, or to earn any particular amount, in each week. Parents need only expect to earn the stated amount (which will be £120 a week at based on the NLW rate from April 2017) on average over the 3 months then starting. So, for example, parents on zero contract hours can meet the criteria when they know they will not get work every week but they reasonably expect to earn enough on average over the three months.

In looking at whether parents reasonably expect to earn the minimum income in the coming 3 months HMRC will look at various data. This may include looking at previous earnings. Where previous earnings suggest the parent may not meet the eligibility requirements in the coming 3 months HMRC may contact the parent for more information before determining whether the parent is eligible. Where the information provided by the parent shows that they are just starting work, HMRC will be unlikely to want to seek further information before determining eligibility.

The Government recognises that many small businesses struggle to generate a regular income when they first start up. Therefore, to support newly self-employed parents, the Government will not expect self-employed parents to meet the scheme's minimum income rule in their first year of trading. This 'start-up' period removes the pressures relating to parents having to predict future income in the earliest days of their business.

Section 3 – Digital Accelerate (Funding) Queries

Will there be any registration or certification process for IT software suppliers and their systems so that LAs know which IT solutions have already been vetted and approved as being eligible for funding support?

Software suppliers will not need to go through a registration or certification process – but we encourage suppliers and LAs to work together in order to ensure the systems being developed meet the needs of the individual LAs, whilst adhering to our common features.

Once developed, all systems will need to go through the connection requirements to test their functionality and make sure they are fit for purpose.

Will the digital accelerate funding be only available for systems, or are LAs permitted to use the funding for training of providers or the purchase of equipment for them?

Funding is limited to the development and delivery of IT solutions for Local Authorities. DfE will not be providing direct funding for training of providers or equipment for them.

If an LA has already purchased or developed a system for 30 Hours, are they still able to apply for funding?

Those LAs who have digital solutions or are currently working on implementing one can still apply for funding; they may be asked to share some of their time and share experiences/ knowledge with other LAs as a condition of the funding.

Do you have any feedback for DfE or the ECS Change Team? Do you need help to tackle a particular challenge or issue? Post a question to the ECS Change mailbox (ecs.change@education.gov.uk).