



Representing Independent Early Years Professionals Nationwide

<https://acchildminders.co.uk/protect-home-based-childcare>

April 2026

An Open Statement to the Department for Education and The Lullaby Trust

To the policymakers at the Department for Education and the advisory board at The Lullaby Trust,

We write to you as professional early years educators, specifically independent home based childminders, regarding the strengthened safer sleep requirements being written into the EYFS for September 2026.

We want to first acknowledge the tireless Campaign for Gigi and the tragic loss of Genevieve. Every single practitioner shares the profound heartbreak over any loss of a child, and we agree that safety is non negotiable. However, it is crucial to note that recent high profile tragedies in nurseries were extreme safeguarding and abuse failures, not standard safe sleep practice accidents. We must urgently address the disproportionate and unworkable reality of forcing clinical, nursery style regulations onto independent family homes based on these isolated safeguarding failures.

The Statistical Reality of Early Years Safety Before implementing massive regulatory changes, we must look at the actual data. According to official UK Parliament notifications, across tens of thousands of registered early years settings, there were just eleven recorded child deaths over a recent five year period from all causes combined. During that exact same timeframe, well over five million children safely passed through professional early years care. Childminders are already managing daily risks at an elite, statistically proven level.

One Size Does Not Fit All The most critical flaw in the new guidance is the assumption that a single blanket rule can apply to the entire early years sector. Childminders operate entirely unique, community integrated settings from domestic family homes. We do not operate in purpose built commercial buildings, and we do not have floating support staff to cover breaks.

Many children specifically need the quiet, nurturing, one to one focus that only a real family home environment can provide. Nurseries and childminders are fundamentally different by design, and our regulations must reflect that fact. A single rule for early years simply does not work.

The Impossibility of Clinical Rules in a Family Home The new EYFS expectations demand that babies under twelve months must strictly sleep in a cot, that babies under six months must be in the exact same room as an adult while asleep, and that children who fall asleep in buggies must be immediately transferred to a firm flat surface. In a home environment, these rules create active dangers and impossibilities:

- **Fire Safety and Evacuation:** If a solo practitioner has three sleeping children upstairs in rigid cots, safely evacuating all of them alongside older awake children during a fire is an immense logistical risk. In contrast, children sleeping on the ground floor in safety approved buggies can be wheeled out of a burning building immediately and safely.
- **Physical Space and Exits:** Small domestic homes physically cannot store multiple rigid cots or large waterproof mattresses. Forcing practitioners to set up travel cots in hallways actively blocks crucial fire exits.
- **The Impact on Awake Children:** If a solo practitioner is forced to sit in a quiet, dimly lit room to supervise a sleeping baby, the older awake children miss out entirely. They cannot engage in noisy play, sensory activities, or outdoor learning. We cannot be in a sleep room and simultaneously supervise older children eating lunch in the kitchen.

- **Sleep Deprivation and Development:** If a baby falls asleep in a buggy on the walk back from school, transferring them to a cot the moment we step inside will almost always wake them. As early years educators, we know that depriving young children of their vital sleep prevents them from learning effectively, developing properly, and reaching their full potential. Furthermore, a suddenly woken, sleep deprived infant causes significant disruption to the other children in the setting.
- **Basic Human Needs:** Mandating unbroken physical presence in the same room means a solo practitioner cannot safely use the bathroom, prepare food, or even clean up.

Constructive Solutions for Home Settings We are highly trained professionals who complete rigorous, dynamic risk assessments tailored exactly to our individual homes. We urge you to implement practical frameworks that trust our professional judgment:

- **Permit True Lie Flat Prams:** Explicitly allow the use of safety approved, true lie flat prams and carrycots for regular sleep. This is especially vital for the highly beneficial practice of outdoor sleeping in the fresh air, which is a staple of childminding.
- **Contextual Supervision via Monitors:** Officially recognize the use of high quality video and audio monitors in domestic settings as fulfilling the sight and hearing requirement, used alongside our mandatory physical checks every ten minutes. This allows solo practitioners to safely use the bathroom, prepare meals, or supervise messy play in an adjacent room while maintaining absolute visual and auditory supervision of a sleeping infant between physical checks.
- **Protect Individual Needs:** Recognize that some children, including those with suspected SEND requirements, will only settle in a pram and will wake immediately if touched. We must be allowed to meet their individual developmental need for sleep.

The Looming Childcare Crisis Finally, we must warn you about the breaking point of our sector. Childminders are already leaving the profession in record numbers due to extreme financial pressures, the loss of our wear and tear allowance, and the rising cost of living.

If you impose unworkable, clinical sleep rules on top of these existing burdens, thousands of dedicated professionals will simply close their doors forever. This will devastate local families and push the national childcare crisis to a point of no return, leaving parents entirely unable to work.

We urge you to consult properly with independent solo practitioners. Please let us continue providing the exceptional, active care that families rely on, rather than blindly regulating us out of existence.

Ashleigh Crouch

On behalf of independent early years professionals across the UK