"Learning from Others": English proposals for early years' education and care reform and policy transfer from France and the Netherlands, 2010-2015

Introduction

Early childhood education and care (ECEC) is widely seen as a key 'social investment' that allows countries to reap the economic benefits of mothers' employment, and also to promote children's development, and hence more equal life chances (e.g., Heckman, 2006; Esping-Andersen et al., 2012; Author). However, ECEC systems differ cross-nationally and are historically rooted (Morgan, 2002). Indeed, comparative work has highlighted the complexities of the main policy instruments by which 'investment' in ECEC is made, for example in the extent to which services are publicly funded, publicly provided and regulated (Author, Brennan et al., 2010; Plantenga, 2012; Penn, 2013; Mclean, 2014) .

In comparison with most of Western Europe, ECEC policy in the UK[i] was slow to develop after the Second World War. The New Labour Government's 1998 National Childcare Strategy was the first attempt to provide strategic direction in England, and between 1998 and 2010 expenditure on ECEC and the availability of 'childcare'[ii] places increased hugely, largely due to Government funding for part-time early years education, together with some subsidy for additional hours of care (Author).

It might have been anticipated that the Conservative-Liberal Democrat Coalition of 2010-15 would not continue to develop ECEC policy. Indeed following the financial and economic crisis of the late 2000s, European comparative scholars predicted that the rise in social expenditure on childcare and other forms of 'social investment' (Hemerijck, 2012; Bonoli and Natali 2012) since the 2000s would falter. However, Labour's promises to extend the free hours of early years education for 3- and 4-year-olds to 15 per week for 38 weeks a year, together with an extension to disadvantaged 2-year-olds, were honoured. Furthermore, the Coalition continued to try to tackle the availability, affordability and quality of childcare, which have been commonly agreed to be the main policy issues by English childcare policy documents since the mid-2000s (HMT et al., 2004), by academics (e.g. Gambaro et al., 2014), and by trans-national organisations (OECD, 2006; EC, 2011).

More surprisingly still, the Conservative-led Coalition also appealed to what they regarded as similar Dutch and French policies and practices to support their two key policy proposals: first, to increase the number of (self-employed) childminders by establishing 'childminder agencies' and second, to relax the staff/children ratios for childminders and other private providers measures intended to tackle the issues of availability, affordability and quality. Indeed, the title of a policy speech by Elizabeth Truss, the (Conservative) Minister for Childcare made to accompany the launch of these proposals was 'Learning from Others' (Truss, 2013a). Even though the UK has been by any measure a laggard in developing childcare policy, it was nevertheless relatively unusual in any field of policymaking to find explicit reference of this kind to other European countries (Rose, 1991; Legrand, 2015).

While there appears to be continuity of commitment to ECEC in the form of the Coalition's acceptance of Labour Party policy, bolstered by a preparedness to transfer ECEC policies from other Western European countries, the Coalition nevertheless approached the development of ECEC policy very differently from Labour. The Coalition's overarching policy goal in proposing further ECEC reform was to promote childcare businesses within its wider framework of commitment to develop markets in human services (Author). Thus both its motivation and its vision for the development of the ECEC system differed profoundly from other Western European countries.

We seek to understand the transfer of the two ECEC policies from the Netherlands and France and to explore why neither was successful. We have undertaken historical analysis of government documents relating to the two key policy developments for both England and France, asking the 'who, what and why' questions that are fundamental to the work of historians and also to some political scientists (e.g. Dolowitz, 2017). For England we have also analysed House of Commons' Debates and Ministerial speeches and secondary published material, produced by government, think tanks and pressure groups. For the Netherlands we have relied mainly on secondary published work in English. The first substantive section offers a 'thick description' (Ryle, 1949; Geertz, 1973) of the key English ECEC reforms in the UK, alongside the extent and nature of the appeal to follow the example of the Dutch and French. Following McConnell's (2015: 237) working definition of failure: 'namely that a policy fails, even if it is successful in some minimal respects, if it does not fundamentally achieve the goals that proponents set out to achieve, and opposition is great and/or support is virtually non-existent', we show that both policies failed albeit at different stages. The first (childminder agencies) although enacted, failed rapidly to increase the number of childminders, which was a specific aim of the policy; and the government chose not to enact the second policy (relaxed ratios). We examine the way in which domestic actors mobilised against these proposed policies, and look more closely at how other countries' policies and practices were invoked. In particular, we use the literature on policy learning and policy transfer to understand the failure in more depth, in terms both of the motivation of the UK Government and its lack of due attention to context in the form of the very different underpinnings of the English, Dutch and French childcare systems.

ECEC policy development in England and 'learning from others'

The Coalition's approach to ECEC policy development was set out clearly in 2012 and 2013 by the Conservative Minister for childcare. Her proposals were designed primarily to promote availability and affordability by first, increasing the number of (self-employed) childminders and second, by relaxing the staff/children ratios for childminders and other private providers. The proposed changes were designed to shift the balance from provision in formal settings towards cheaper home-based care by childminders, [iii] and to address the main issues in childcare provision, quality included, by 'cutting red tape' and relaxing regulations.

(i)'Learning from Others': reforming childminding

Before becoming Minister responsible for childcare, Truss had identified the failings of Labour's ECEC policy as a loss of flexibility and high costs for parents. In particular: 'One of the major causes of the massive childcare inflation over the last decade has been the squeezing-out of childminders, the most affordable and flexible providers' (Truss 2012a). Identifying the main policy goal as increasing mothers' employment (over and above child development), Truss also referred to the Dutch creation of local 'childminder agencies' (which train, support and monitor the childminders who care for children under 4) and the way in which they had resulted in an increase in childminder numbers and childcare affordability, while at the same time the labour participation rate of Dutch mothers with children under three had overtaken their English counterparts (albeit that the proportion of Dutch women working part-time and often relatively few hours was greater). In 2013, the creation of childminder agencies emerged as a key policy proposal, aimed primarily at increasing availability and affordability, but also, it was suggested, at improving quality.

In England, the extension of the free early education entitlement to 15 hours a week for 3- and 4-year-olds and to the most disadvantaged 2-year-olds from 2013 had brought the availability of places to the top of the political agenda, while affordability in terms of the cost to parents of extra hours of care continued to be problematic. Borg and Stocks (2013) found that a third of parents who were not in work or working part-time could not afford the formal childcare necessary to increase their hours.

Despite the fact that registered childminders were more likely to offer flexible hours and also tended to provide the most affordable early years education and care, their numbers had decreased, from 103,000 in 1996 to 57,000 in 2010, stabilised between 2010 and 2011, and then continued to decline (Brind et al., 2014). The reasons for this are generally agreed to have included discontent on the part of childminders with both their pay and job security, and more diverse opportunities for women seeking employment (e.g. Faith et al., 2011), as well as the introduction of the Early Years Foundation Stage in 2008 and an obligatory 'curriculum'.

Because of their low overheads and generally lower qualifications, the fees charged by childminders have always been somewhat less than those charged by formal ECEC settings. Thus the immediate policy issue addressed by the Minister was to increase the number of places available by increasing the number of childminders, who would also become a real alternative to formal childcare provision, thus alleviating the costs to parents. In the mid-2010s, the Minister framed the issues of ECEC provision in terms of failing to secure value for money, arguing that increasing the number of childminders would help in this respect. She praised the radical Dutch reform of childcare that had taken place in 2005 (which instigated demand-side funding and put provision of all early years care into the private market sector (Plantenga, 2012)), stating that while it was

> not appropriate to import an entire model from another country…aspects of the Dutch reforms, especially the [childminder] agency structure could be beneficial for improving the value for money of childcare in Britain. In particular, it could enable the provision of more childminding places improving affordability and availability (Truss 2012b: 7).

It was also clear that Truss saw in the Dutch decentralised model of childminder agencies the possibility for the English inspection agency, Ofsted, to inspect the agencies rather than individual childminders, and so reduce costs (Truss, 2012b).

The Dutch model for childminders works via 'gastouder' ('guest parents') agencies, which register all childminders and informal caregivers, such as grandparents (so long as they also care for children who are not kin). They are responsible for controlling qualifications (requiring a minimum three year post-18 qualification in care and welfare), the health and safety aspects of the childminder's home, the maximum number of children they care for at any one time *(*4 children under the age of 12), and also their financial accountability and insurance status. The Dutch agencies act as 'one-stop shops' for parents and childminders. They administer the fees charged by childminders and also provide support, training and advice. In turn, they levy a small fee on the childminders. However, they are not privately run as was being proposed for England, but instead are funded by the state and employers (Author).

But, as Cooke and Henehan (2012) pointed out, while the numbers of Dutch childminders increased 200% between 2004 and 2008, this was due in large part to grandparents taking advantage of their new right to public subsidies as carers (see also Lloyd, 2012). Furthermore, the overall quality of Dutch childcare had declined significantly, with the percentage of providers judged unsatisfactory increasing from 6% to 49% between 2001 and 2008 (Plantenga, 2012). Cooke and Henehan (2012) expressed particular concern about the dilution of individual childminder inspection in the Netherlands.

Nevertheless, the creation of childminder agencies was included in the Coalition's main ECEC document 'More Great Childcare' (DfE, 2013a). In contrast to the Netherlands, the proposed agencies would help childminders with setting up a business, matching childminders and parents, and arranging cover in times of illness. They were not intended to offer support (something that was a local authority responsibility, albeit subject to austerity cuts). However, the agencies would offer sixteen hours of continuous professional development training per year. Childminder agencies would, it was argued, aid the entry of new childminders to the ECEC market and also raise the quality of their provision (notwithstanding the lack of a support role), as well as making inspection cheaper. However, perhaps in response to the criticism of the Dutch model, reference was also made to 'similar' arrangements for childminders that existed in France, a country with a well-regarded, but very different publicly provided and financed ECEC system (Fagnani and Lloyd, 2013; Author). [iv]

However, the French 'equivalent' to childminder agencies, which were neither named nor discussed in the text of the UK Government document, bore relatively little resemblance to the proposals for English agencies. The 'relais assistantes maternelles' (RAMs – 'childminding support centres' (Fagnani and Lloyd, 2013)) began to be developed in 1989 and were legally constituted in 2005. There are about 3000 of them, distributed unevenly throughout France (ONPE, 2015). They provide a place where parents and childminders can meet, activities for children, and act as a resource centre for childminders, supporting them in their practice; the manager of the RAM has a qualification in early childhood.[v] Inspection is focused on the individual childminder and while childminders sign a contract with parents, childminding remains a public service in France (Fagnani, 2012).

The support offered by the RAMs is thus confined to everyday practice; all aspects of childminder regulation and funding are undertaken by the state, while the RAMs are the responsibility of the Caisse D'Allocations Familiales (the family branch of the French social security system). Indeed, the RAMs bear more of a resemblance to the 'Childminder Networks' set up by the Labour Government in the 2000s to improve the quality of everyday practice than to the agencies proposed in 2013 (Author). Furthermore, the largest expansion in French childminder numbers took place in the 1990s, when RAMs were only just beginning to be developed, with a rise from 69,400 in 1990 to 232,200 in 2000. This was largely due to the determination of the French Government to take this work out of the unregulated market (travail non-déclaré) to the advantage of childminders, who gained paid holiday and social security entitlements; the state, which could collect income tax (Martin et al., 1998); and parents who were reimbursed for a substantial part of their costs via a new benefit (Fagnani, 2012). Legislation passed in 2004 to enhance the profession has also increased the numbers. In 2013, nearly 327,000 childminders were employed by parents and cared for 19% of children under 3 (ONPE, 2015).

English childminder agencies began to be set up in 2014, but by February 2016 there were only eight registered agencies. The reaction to them by both the childminders' professional association, the Professional Association for Childhood and Early Years (PACEY), and parents, particularly the web-based group 'Netmums', was highly critical. Childminders expressed concern about the development of a two-tier service, comprised of those in agencies and those who remained in independent practice, with two different types of regulation. In a survey carried out in 2013, 77% of the respondents identified a conflict between the drive of the agencies to make a profit and the quality of childminder practice (Parker, 2013). They also feared that the agencies would charge much larger fees than Ofsted for simple registration, meaning that the cost would have to be passed to parents. 'Netmums' reported that 80% of the parents replying to their online survey said that the regulation of individual childminders by Ofsted gave them confidence; 75% said they would be less likely to use an agency than an independent childminder (PACEY, 2013).

English childminder agencies were conceived above all as a means to promote childminder businesses, whereas their role in the Netherlands went beyond this, with the agencies themselves funded by the state and employers, while in France the RAMs offered mainly support to childminders, who remained part of the predominantly publicly provided and financed ECEC system.

(ii)'Learning from Others': relaxing the ratios

A move to relax the ratios of staff to children for all forms of early years care and education was also put forward in 2013, for which the examples of the Netherlands and particularly France were again cited. The Coalition Government was committed to de-regulating the childcare market as a means to promoting its growth. Furthermore, the idea of relaxing the ratios became central to the Government's argument that it could tackle all three of the main issues bedevilling ECEC policy – availability, affordability and quality – by easing the burden of regulation placed on the childcare market.

In 2012, it was argued that relaxing ratios would increase the numbers of childminders and reduce childcare costs (by allowing each childminder to take more children). For example, for children under one the staff/child ratio was 1:2 in the Netherlands and 1:1 in England. Truss used what became a well-worn example when she drew attention to the fact that childminders would not be able to care for twins if they were under one (Truss, 2013b). As Cooke and Henehan (2012) observed, there was no mention of the fact that Dutch childminders were trained to a much higher standard than their English counterparts. Indeed, the whole early years' workforce in England has low qualifications compared to most other Western European countries (DfE, 2013b; EC et al., 2014).

At the turn of 2012/2013, Truss argued that England had 'the most restrictive adult-child ratios' in relation to 'comparable European countries' (Truss, 2013c) in all ECEC settings. Here the argument shifted somewhat to relaxing ratios in order to allow professionals more freedom in their practice (Truss 2012c). It was also felt that by bringing in more fees paid by parents, a relaxation would enable staff salaries to be increased, thus permitting the recruitment and retention of better qualified people (Truss, 2013c).

The government document 'More Great Childcare' (DfE, 2013a) advocated relaxing staff/child ratios for all forms of ECEC. In the case of 2-year-olds, the Minister proposed relaxing the ratio for childminders to match that in formal institutional settings.[vi] Ratios used in other countries, including

France and the Netherlands were cited to support her case. However, these figures were misleading as they were not closely linked to another crucial contextual factor pertinent to both the Dutch and French ECEC systems: the higher qualifications held by staff. In the Netherlands, childminders, like all early years workers, are required to have three years of training beyond the upper secondary education level. In France, they are required to undertake 120 hours of training, paid for by the state, in various aspects of childcare and development, 60 hours after their initial inspection which entitles them to practice, and a further 60 hours during their first two years of work. Continuing professional development is also funded by the state. In contrast, English childminders are only required to undergo an inspection by Ofsted and to take an initial course, which may amount to as little as 18 hours on how to set up a home-based childcare service and paediatric first aid, for which they usually pay, [vii] although some local authorities provide it free of charge.[viii]

In the case of early years institutional settings for 3- and 4-year-olds in England, the existing ratio was 1:8, but the presence of a qualified teacher allowed this to move to 1:13.[ix] This was compared to ratios of 1:8 in the Netherlands, and 1:8 or 1:26 (when led by a teacher) in France (DfE, 2013b: 19). But information regarding qualifications was not wholly correct. Thus, in France, a minimum of 40% of staff in formal early years settings must have a 12 month diploma, and some staff, including managers, will have higher qualifications. Furthermore, no ratios are stipulated for *écoles maternelles* (IGEN and IGAENR, 2011); these employ a fully qualified teacher (with, since 2010, a Master's degree) and an assistant for parts of the day (Eurydice, 2015; Author; Fagnani, 2014). In England, although virtually all state nursery classes and schools had at least one member of staff qualified to degree level in 2013, the figure was only 13% in formal (usually private) childcare settings (Brind et al., 2014).

The Minister thus saw an opportunity to encourage the employment of teachers: their capacity to take more children would offset their higher pay and also drive up quality: 'providers will only be able to operate with more children per adult if they employ high quality staff' (DfE, 2013a: 8 and 29). Evaluations of quality in English ECEC settings had provided clear evidence that (the small amount) of state provision in the form of nursery schools in particular – which all employed trained teachers - secured better long-term outcomes for children (Sylva et al., 2004). The Labour Government's response had been to provide earmarked funds to support staff training and to increase the number of graduates, however these were abandoned by the Coalition Government (Author).

'More Great Childcare' promised that the Government would 'consult on exactly what qualification requirements will enable providers to operate our proposed higher ratios' (DfE, 2013a: 30). While the document cited research findings that better qualifications (particularly the leadership provided by a graduate (Mathers et al., 2010)) are crucial to outcomes for children, the Government was very far from advocating the kind of highly trained workforce that was common in other countries, the Netherlands and France included. Truss cited a letter from the special advisor on education policy at the OECD, in support of the UK Government's approach to improving qualifications (HC, 2013a), but the letter was carefully equivocal, noting only that the best early education systems prioritise the quality of staff over class sizes (Schleicher, 2013).

There was concerted opposition to relaxing ratios from a variety of policy actors – academics, parents and private sector providers – who came together to back the 'Rewind on Ratios' campaign (HC, 2013b, col. 231). Cathy Nutbrown who had been commissioned to review the qualifications of the ECEC workforce (Nutbrown, 2012) published a report opposing any relaxation in the ratios (Nutbrown, 2013); and academics closely associated with research on child outcomes defended the existing ratios as a means to providing better support for children's language and learning development (Eisenstadt et al., 2013).

Opposition by private providers was also intense. The Pre-School Learning Alliance (PSLA) criticised the model used to predict that relaxing ratios would result in a substantial (28%) drop in fees charged (DfE, 2013c), pointing out that the figure was based on the false assumption that providers were open for 52 weeks a year at 100% occupancy and also failed to make any allowance for investment in future staff training (PSLA, 2013). A survey of the Alliance's members showed additionally that 94% did not believe that they would be able to maintain quality standards if staffing levels fell (NCB, 2013), while the childminders' professional body reported 93% of their members saying that if they got more money by taking more children, they would not reduce fees for parents (Parker, 2013). The director of the Busy Bees private for-profit childcare chain opposed change to the ratios (Jozwiak,2013), while the managing director of the Bright Horizons childcare chain said that 'much of the time' a 1:8 ratio continued to be necessary even when a teacher was present (Family and Childcare Trust, 2014). Most damagingly, the Liberal Democrat Coalition partners withdrew their support in face of this opposition (HC, 2013b, cols. 236-7) and this proposal for de-regulation was dropped.

The main reason why the debate over ratios was so intense was that the Minister responsible for childcare saw it as a particularly important opportunity to tackle all the main issues of affordability, availability and quality while also promoting the ECEC market by deregulation: the higher ratio permitted by the presence of a teacher would make it possible to take more children, which in turn would financially benefit private providers and hence it was hoped, both parents (by making it possible to lower the fees charged) and staff (by making it possible to raise pay), thus securing better quality childcare (DfE, 2013a, 2015). However, as the debate over the ratios showed, these assumptions were optimistic in respect of a system reliant on private providers.

Policy Transfer

Truss's use of 'learning' in the title of her 2013 speech referred to learning from practices in other countries. But there are many dimensions and interpretations of policy learning (Stone, 2004; Dunlop, 2017). In an influential article Hall (1993: 278) stated that policy learning may be seen 'as a deliberate attempt to adjust the goals or techniques of policy in response to past experience and new information', although as Greener (2002) observed, in practice policy learning is about adaptation of ideas or techniques to local circumstances. Hall (1993) also said that policy learning may result in a more coherent transfer of ideas, policies and practices, whereas mere copying may well be *ad hoc* and piecemeal. This is to infer that learning is accompanied by deeper understanding than the kind of policy transfer that consists essentially of the 'policy pinching' (Deleon and Resnick-Terry, 1999; Dwyer and Ellison, 2009) that characterised English ECEC development under the Coalition.

Motivation and Context

Indeed, policy transfer may be undertaken by a variety of actors for very different reasons (Bennett, 1991; Dolowitz and Marsh, 1996). However, the literature on policy transfer has shown that this may take many forms and may be motivated in many different ways*.* In England the ECEC reform proposals were made, as we have seen, by a Minister seeking a solution to particular policy issues (see also Dwyer and Ellison, 2009) – namely, the availability, affordability and quality of childcare – initially in conjunction with Policy Exchange, a think tank[x], and referenced practices in the Netherlands and France to justify and legitimise the proposals for change. As Bennett (1991: 38) has said, the policy experience of other countries can be used to legitimise conclusions already reached: 'Evidence is used in the policy process in highly selective ways to reinforce positions and to legitimate decisions already taken…with little regard to accepted canons of methodological reliability and validity…'. The result can be, as Marmor (2017) has observed, 'mis-learning' rather than learning, and 'naïve transplantation'.

However, opposition on the part of parents and providers to the proposed policy transfers stemmed from the very different nature of the ECEC system in England which made these transfers inappropriate. The importance of context has been stressed in the literature. Effective policy learning and lesson drawing takes context on board, as Gornick and Meyers (2004) argued in their article on the possibilities for the US to learn from the European experience of parental leave (see also Page, 2000). However, policy transfer to legitimise a particular position is likely to ignore the nature of contextual differences (Wolman, 1992), particularly in the public/private mix in provision, and the fact that contextual factors are inter-related (Phillips, 2012), particularly in respect of the importance of staff qualifications. Both of these are likely to make implementation difficult. Deleon and Resnick-Terry (1999) have argued that successful 'policy pinching' only happens if the contextual issue is given due consideration. Even if the broad policy goals (to encourage mothers' labour market participation and children's development) and the policy issues for ECEC (of availability, affordability and quality) are similar, insufficient attention to differences in context will likely render the policy transfer 'inappropriate' (Dolowitz and Marsh, 2000). As Hulme (2005: 488) has commented policies and practices may not be transferable 'since they have grown out of the legal, educational and social systems of their "host state".'

Contributions to the policy transfer literature have been criticised for an overly rationalist and linear approach, and for paying insufficient attention to the complexity and the politics of the process by which transferred policies are 'translated' into practice (e.g. Freeman, 2009; Stone, 2012, 2016; Clarke et al., 2015; Peck and Theodore, 2015; Dunlop, 2017*).* Nevertheless, they do provide a useful framework for a fine-tuned policy analysis, which, if it is also to investigate the crucial question of differences in context between the lending and borrowing countries, requires the kind of 'thick description' that we have provided in the last section (see also, de Jong, 2009).

Discussion and Conclusion: inappropriate policy transfer

The Coalition sought to justify their ECEC policy proposals by appealing to Dutch and French policies and practices. However, the differences between these three ECEC systems and in the workings of the particular parts of those systems that the UK wanted to transfer was such that it was impossible either to justify the appeal in the first place or to expect successful transfer. The first section has shown the extent to which the Coalition ignored evidence from the Netherlands and France about the nature of the policies they wanted to transfer, how they fitted into the wider ECEC systems, and how the characteristics of those systems – most importantly the extent of public and private provision and the higher qualifications of the ECEC staff – related to them.

Above all, the Coalition Government wanted to solve the issue of securing availability, affordability and good quality ECEC within the framework of the existing English system of largely private providers, by actively promoting 'childcare businesses' and freeing market providers from 'red tape' by pursuing de-regulation. While comparative analysis of ECEC policies has drawn attention to the possibilities of policy transfer (e.g. Gornick and Meyers, 2004), the case of transfer that is studied in this paper was subject to politics that harnessed the policies to different policy preoccupations – in particular to the overarching goal of promoting markets – while ignoring the context in terms of the differences in the nature of the childcare systems.

The attempt to transfer the childminder agency model from the Netherlands and, it was said, France, stemmed from the desire to increase the number of childminders, who tended to be cheaper than formal childcare provision and who also offered more 'flexible' care, which helped mothers especially fulfil their paid work commitments and to increase their working hours. A relaxation in ratios appeared to offer the possibility of squaring the availability, affordability and quality circle by making heroic assumptions as to how any extra income gained by private providers (including childminders) of ECEC would be spent. The failure of the attempts to 'transfer' childminder agencies and less favourable staff/child ratios from the Dutch and French childcare systems was due above all to the inappropriateness of abstracting these particular elements, which had been established within different ECEC systems for different reasons and purposes. While the responsible Minister eschewed copying the whole Dutch or French ECEC systems, context also matters in any attempt to import any dimension of policy.

The Coalition first used the Netherlands, where childcare for children under 4 is provided by private for-profit and not-for-profit providers (Author) – to legitimise its policy proposals. England and the Netherlands were late to adopt ECEC policies and in both the market plays a large role in provision (Plantenga, 2012; Penn, 2013). To this extent the appeal to the Dutch example could be defended in terms of the broad similarities of the two ECEC systems (Cox, 1993). However, the motivation for establishing agencies in England and the kind of agency that was proposed differed. In England, the immediate policy issue was availability and the decreasing number of childminders. It was thought that the creation of childminder agencies would make it easier for them to set up their businesses. However, the increase in the numbers of childminders in the Netherlands owed most to the new subsidies given to informal carers, particularly grandparents. Increasing the affordability of childcare was also an important goal in both countries, but childminder agencies had little to do with this in the Netherlands. Indeed in the Netherlands as in England, the level of government subsidies to parents buying care was a key factor in determining affordability for parents, and in both countries these were cut (Yerkes, 2014; Stewart and Obolenskaya, 2015). The Dutch agencies serve both kin carers and self-employed childminders. They were not set up as for-profit entities, and while childminders pay fees to cover inspection and monitoring, these were substantially less than were envisaged for English agencies. In addition, Dutch childminders are obliged to have the same qualifications as all childcare workers, which means that they tend to be substantially better qualified than their English counterparts. Above all, the focus of English policymakers, unlike the Dutch, who backed away from a market approach after 2005, was placed squarely on the role of agencies in assisting new childminders to enter the childcare market.

The attraction of any appeal to French 'childminder agencies' lay in the fact that it was a country commonly to have a highly regarded ECEC system, but it lacked a defensible rationale both at the level of the ECEC system and at the level of the particular part of provision that was to be transferred. It is impossible to avoid the fact that the whole French ECEC system, overwhelmingly publicly provided and funded, is fundamentally different from the English system, which relies on both public money and unregulated parents' fees for early years care, and predominantly private providers. Thus, entities which could be identified as performing a somewhat similar role to what was being proposed for England – the RAMs – operated entirely differently in practice. While proposals for English reforms were conceived in a framework that presumed that the state would play as small a role as possible in provision and in regulating the market, the French state assumed an ongoing role in stimulating provision with, for example, grants for new childminders to help meet the required standards for childcare in the home, and financial support for established childminders wishing to enlarge their practice (ONPE, 2015). The RAMs bore little relation to the English proposals for childminder agencies: their role is one of support, with highly qualified managers committed to raising the quality of practice. Furthermore, it was above all the formalisation of childminders' work and state provision of new ways in which to compensate parents who hired childminders that had increased their numbers, not the French 'agencies'.

The issue of relaxing staff to child ratios was central to the English Minister's wider strategy for addressing the main issues of availability, affordability and quality via de-regulation of the ECEC market. The more relaxed ratios operating in the Netherlands and France were used to legitimise the proposals for England. However securing quality, ever the Achilles' heel of markets for human services, proved the main impediment to this policy. While the Minister recognised that English ECEC staff were disproportionately low qualified and low paid compared to both their Dutch and French counterparts, for whom the training and qualifications of all staff (childminders included) are much more strictly regulated, the implications of this for relaxing ratios were not properly considered. Rather, the Minister's hopes regarding quality rested on private providers using the extra money that was thought would result from higher ratios to hire better qualified and better paid staff. In the debate following the proposals, private providers themselves made it clear that this was unlikely.

Both proposed policies– childminder agencies and relaxed ratios – were transferred to legitimise policy decisions made by the Coalition Government. Successes of the Dutch and French ECEC systems were invoked to support 'learning from others'. Predictable problems of implementing transfer, which stemmed from the differences in context, were ignored. The overarching policy goal in England was to encourage the growth of the childcare market, which was assumed to be the framework within which all policy development would take place. While the Dutch Government backed away from the 2005 decision to leave quality control substantially to the market, in England, confidence in the childcare market to deliver on all three of the main issues – availability, affordability *and* quality - remained undimmed. However, the attempts to set up childminder agencies and to relax ratios were both opposed by parents and providers on the grounds that they would be detrimental to quality. For a while there was some effort to raise the level of qualifications – crucial to achieving quality – but it fell far short of both the Netherlands and France. Furthermore, the desire to promote childcare businesses became even stronger over time and was, despite the absence of evidence, held to have the power to address all the fundamental problems of availability, affordability and quality. But promotion of a childcare market was not the motivation for childminder agencies or relaxed ratios in either the Netherlands or France. Nevertheless, the Conservative Ministers responsible for ECEC in 2013 and in 2015, made it clear that the Government wished to encourage 'childcare businesses' (HC, 2013b, col. 229), and that childminder agencies were regarded as 'commercial organisations, independent of government' (Gyimah, 2015). Similarly, the intention to 'free' the childcare market from excessive regulatory 'red tape', including the relaxation of staff/child ratios marked out the English Government's overarching policy goal as different from its continental counterparts. While ECEC had become embedded as a policy and Labour's reforms were accepted by the Coalition, a role for the state beyond financing early years education and subsiding early years care (to a reduced extent) was not.

This case of policy transfer manifests little by way of learning in the sense of understanding how the policies worked in practice in the lending countries and the complexities inherent in transferring them. Rather it provides evidence of yet another attempt to find a 'quick fix' e.g. (Hulme, 2005), by this time looking to continental Europe rather than the US. While the more recent policy transfer literature has stressed the complexity of the process of transfer, this case was more one of 'naïve transplantation' (Marmor, 2017). The policy changes were communicated in a top-down fashion by the Minister. Key professional actors and interests were not incorporated into the process of transfer (see also Park et al., 2014), and their opposition proved decisive. The attempt to relax ratios failed completely while the development of childminder agencies was slow, such that the Chief Executive of the PSLA commented that 'with only eight childminder agencies registered after two years, it is clear that this initiative is a damp squib and has done nothing to stem the flow of childminders exiting the sector' (Nursery World, 2016). Above all, the Minister failed to appreciate the major differences in the national contexts for the two policy changes, particularly in terms of the overarching policy goal, which in England alone centred on marketisation and looser regulation.

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[i] ECEC policy is devolved in the UK; some policy dimensions remain UK-wide and some differ (Author).
[ii] The 2006 Childcare Act included early years education in the term ‘childcare’, allowing policymakers to conflate early years education and early years care.
[iii] In 2012-13, 25% of 0-2 year-olds attended private (for-profit or not-for-profit) settings; 7% a nursery school or class; and 6% were looked after by a childminder. 35% of 3-4 year olds attended nursery schools or classes; 22% reception classes in primary schools; 31% private providers; and 5% were cared for by a childminder (Huskinson et al., 2014).
[iv] Provision for children under 3 is provided by home-based childminders (assistant(e)s maternel(le)s agréé(e)s) and by centre-based provision particularly crèches; a small proportion of 2-year-olds attend nursery schools (écoles maternelles) which are attended by virtually all 3-5-year-olds (IGEN and IGAENR, 2014; ONPE, 2015).
[v] This involves three years study beyond the age of 18.
[vi] With ratios increased from 1:3 to 1:4.
[vii] See for example, Seine et Marne (2015) for France and Wandsworth (2016) for England.
[viii] Longer initial training courses, for example that offered by the childminders’ professional organisation (which constituted part of a level 3 diploma), costs the childminder £220.
[ix] 4-year-olds entering primary schools in the year in which they turn five, could be in classes of up to 30.

[x] Stone (2004) has stressed the importance of these, and Peck and Theodore (2015) have drawn attention to the possibility for 'fast-policy' development.