

# Annual Childcare Sufficiency Assessment Report

2016

Rutland Annual CSA 2016 v7 240816

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Please note any reference to 'parents' in this report should be taken to mean parents, carers or those

with parental responsibility for children.

## 1. Introduction

Rutland County Council has a statutory duty under the Childcare Act 2006 to secure 'as far as is reasonably practicable', sufficient childcare to meet the requirements of working parents or parents undertaking education or training that will lead to work.

The Authority is also required to complete an annual report which assesses the sufficiency of childcare in the local authority area and identifies gaps in provision. The assessment must also consider whether sufficient childcare is available to meet the needs of disabled children. Further information relating to matters such as local labour market characteristics must also be included.

The assessment is based on evidence gathered during the period June 2015 – May 2016. The findings of this assessment will be used to develop an action plan for the local authority and its partners to address any development work required. The plan will be available in autumn 2016.

It should be noted that the assessment does not address the possible increase in numbers for the "30 hour offer" (described below). This follows the advice of central government who are currently piloting procedures and means of assessing demand.<sup>1</sup>

Actions taken in response to the 2015 Assessment can be found in Appendix Two.

# 2. Capacity and distribution

#### 2.1 Capacity and range of childcare

Childcare in Rutland is provided by a large number of different providers which include: schools; day nurseries; pre-schools; and childminders.

Rutland settings currently offer 977 early years nursery/pre-school places. Since the CSA Report was published last year, this figure has included a small increase in provision. A primary academy took advantage of recent legislation allowing school governing bodies to accept children from two years of age. This has led to the creation of 16 additional part time places within the academy.

In addition, Rutland has 27 childminders who are registered with Ofsted. During 2015, Rutland County Council registered the first childminding agency within its borders, following participation in the DfE Pilot in 2013. Rutland Early Years Agency Limited (REYAL) was set up by a group of 'Leading Childminders' who are now working in partnership with Rutland County Council to help recruit and support Rutland childminders. Currently, one childminder is registered with the Agency.

Provision	Number of places		
23 x Nurseries/ Preschools	977		

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<sup>&</sup>lt;sup>1</sup> See, however, Appendix One.

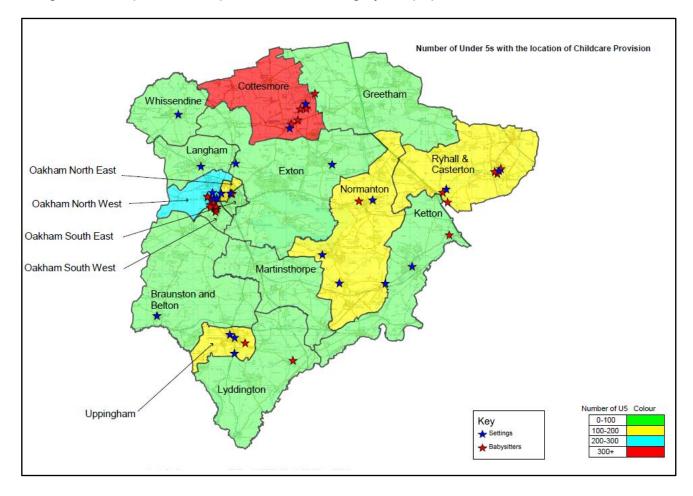
27 x Ofsted registered childminders	133
1 x REYAL childminder	5
Total number of registered childcare places	1115

All providers can take children with disabilities. The requirements of the Early Years Foundation Stage ensure that childcare providers have arrangements in place to support children with SEN or disabilities. Additional advice and support to meet the individual needs of children are offered by the local authority Early Years Inclusion Team, Children's Centre and Aiming High. This provision is monitored by Ofsted.

#### 2.2 Location of childcare providers

#### 2.2.1 Childcare match to population.

The provision of childcare is spread across Rutland as shown in the map below (fig 1). Green and yellow areas are lower density of population; red and blue the highest. The provision of places matches largely the population distribution.<sup>2</sup>



<sup>&</sup>lt;sup>2</sup> Consultation with parents indicated that "proximity to home" was the second most important consideration when choosing childcare provider (See Section 4 *The key considerations of parents in choosing childcare*). No parent indicated that that childcare was too distant.

Fig 1 The location of childcare provision and population density in Rutland.

#### 2.2.2 Childcare match to deprivation.

The location of childcare provision also generally matches the differing levels of deprivation within the County. Where deprivation levels are higher childcare is more locally available. In the map below the darker shading indicates the areas that are more deprived (fig 2). This, too, is where the childcare provision is concentrated.

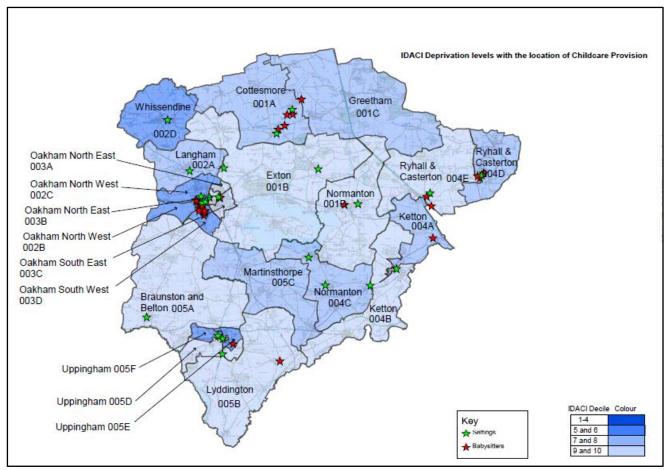


Fig 2 The location of childcare and deprivation levels in Rutland.

# 3. Quality

#### 3.1 Quality: good or outstanding

The quality of provision in Rutland is high:

- 90% of Rutland settings are rated as "good" or "outstanding" by Ofsted at May 2016;
- this does not include the new Oakham nursery which opened in 2014;

- Rutland has the highest percentage of "good" or "outstanding" early years settings in the East Midlands.
- Rutland is the 6th highest county in England on the criterion of percentage of children leaving the Early Years Foundation Stage with a "Good Level of Development (GLD)".

Rutland: 75% England: 66%

East Midlands: 64%

#### 3.2 Quality: local authority support for early years childcare providers

Rutland County Council offers a package of comprehensive support for both existing early year childcare providers and those wishing to set up new provision. This quality assurance support is delivered via:

- initial support visits to new practitioners;
- early years networks;
- annual EYFS visits by LA specialists to all settings;
- an early years conference;
- an early years managers' training day;
- early years core training;
- email and telephone support.

## 4. Parents' views of childcare provision

#### 4.1 Consultation procedures

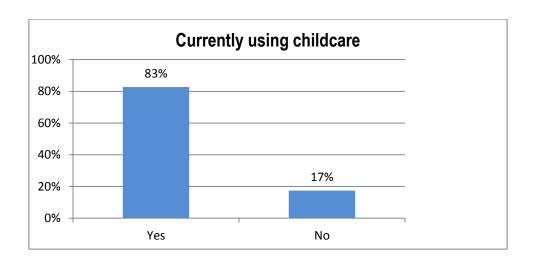
An initial consultation with Rutland families took place in March 2016. This consultation resulted in only seven responses. It was decided to re-run the consultation in April 2016, with increased promotion and publicity.

The consultation was promoted via schools, settings, colleagues in the health services and Rutland County Council. Families were encouraged to respond electronically although other response methods were also made available. A much fuller response was obtained which allowed a range of conclusions to be drawn.

#### 4.2 Responses

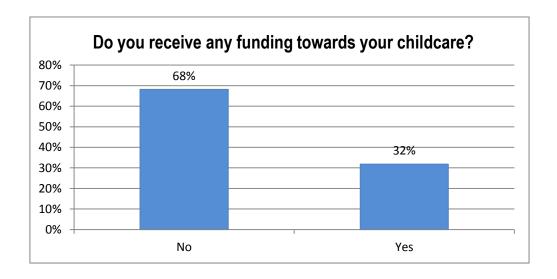
The second survey produced a far better response: 235 parents completed the questionnaire. 96% of parents heard about the survey through their child's school or early years setting.

- 197 respondents (83%) currently use Rutland based childcare;
- 210 were females;
- 25 were males;
- 33 indicated that they are a 'lone parent'.



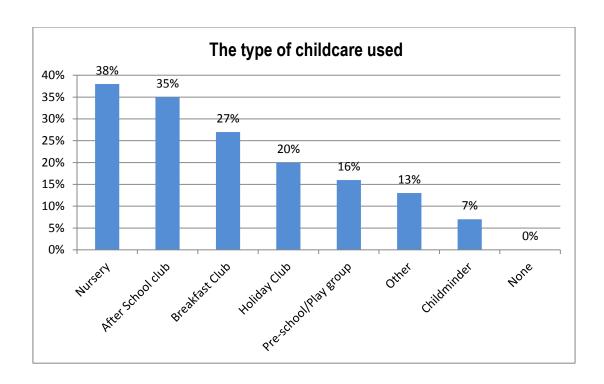
## 4.3 Take-up of childcare funded by government

- 32% of parents currently claim government funding to access the two-, three-and four-year-old entitlement.
- 68% (153 parents) pay for their childcare provision.



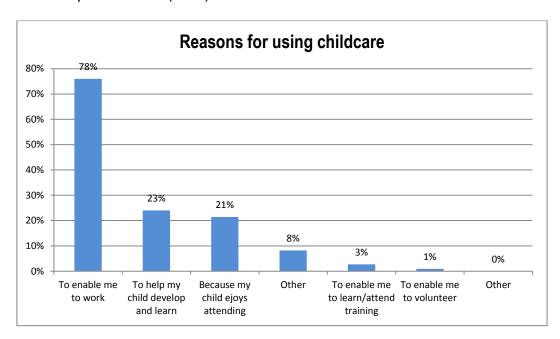
## 4.4 Types of childcare

- Nursery provision is the most popular form of childcare (38% of parents).
- After school clubs are the second most popular (35%).



## 4.5 The main reason for using childcare: work

- The prime reason for using childcare was to enable parents to work (78%).
- This far exceeds the second most important reason "to help my child develop and learn" (23%).



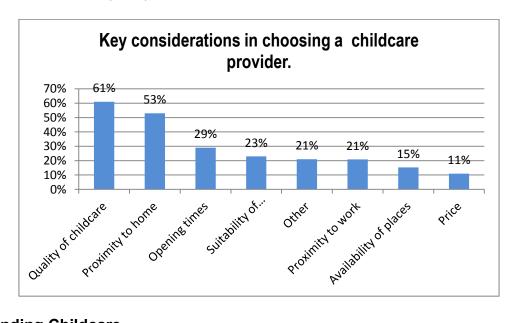
#### 4.6 Hours worked by parents who choose childcare

- 31% of people work between 31 and 40 hours per week.
- 97% of their partners also work the same hours.

This information is significant for assessing childcare sufficiency as the Government intends to extend the offer of free childcare (Childcare Act 2016). This is the target group of parents for the Government's offer.

## 4.7 The key considerations of parents in choosing childcare

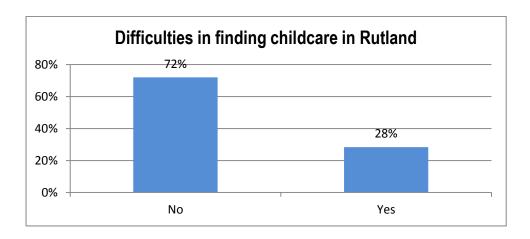
- For 61% of parents quality of provision is the key consideration.
- Proximity of childcare to the family home was the second most important consideration (53%).



#### 4.8 Finding Childcare

Of the 216 parents answering this question:

• 72% stated that they did not have any difficulties finding childcare.



- 48% indicated childcare is too expensive;<sup>3</sup>
- 31% stated 'no childcare is available at the times needed'. (Similar comments were identified from people who work shift patterns, weekends and longer days.)
- 28% parents indicated that difficulties finding childcare had prevented them from working.

## 4.9 Parents' views of sufficiency of childcare

When asked if they felt there was sufficient childcare in Rutland to meet their families' needs, parents' views were:

- 59% stated there was sufficient childcare:
- 20% partially; and
- 21% felt that there is not sufficient childcare.

#### 4.10 Suggested improvements to provision

#### **Holiday periods**

Of the 216 respondents to the childcare users' questionnaire, 42 made additional comments on the problems they faced with obtaining childcare. Of these, 16 made comments about childcare during holiday periods.

- Seven respondents said that holiday childcare was not available.
- Three respondents said that the childcare hours per day were too short.
- Three respondents said that childcare was not offered for enough weeks during the holiday period.
- Two respondents said that the limited holiday childcare was too expensive.
- Individual respondents referred to: limited options; ad hoc and poorly advertised arrangements; unsuitable for older children.
- See also the comments by Rutland businesses on holiday childcare (see 5.2 below).

#### Other improvements

Other comments were made by individual parents and do not necessarily represent wider views:

- more suitable childcare is required for older children;
- there is sufficient childcare for all children but not special needs;
- inflexibility of opening and closing times of settings;
- childcare costs plus the cost of commuting makes work unfeasible.

<sup>&</sup>lt;sup>3</sup> The Private, Voluntary and Independent sector (PVI) vary in how they charge for childcare provision. Some charge at an hourly rate; others charge at a weekly rate. (See also *7 Childcare costs* below.)

## 5. Local businesses' views of childcare provision

#### 5.1 Consultation with businesses

To understand the childcare needs of shift workers and those with unusual working patterns, the LA contacted ten of Rutland's largest businesses. The majority of responses indicated that accessing childcare was not a concern for working parents.

#### 5.2 Key comments from larger businesses

The following comments were made:

- parents in volunteering roles indicated that the cost of childcare was a problem for them;
- some working parents have to take their annual leave during school holidays in order to look after their children - as the cost of childcare is so expensive.
   This has a significant impact on staffing levels for some businesses;
- weekend childcare would be welcomed by parents.

#### 5.3 Consultation with small and medium sized businesses

A further thirty SMEs were contacted of whom twenty-four responded.<sup>4</sup>

- Seventeen businesses reported they or their staff had no dependent children and had no recent experience of childcare matters.
- Six businesses were able to provide some useful feedback.
- In three businesses staff currently used childcare.

#### **5.4 Key comments from SMEs**

- Finding childcare has not been a problem.
- The fees are expensive (mentioned twice). For example, one working services mother with a husband frequently on detachment has no extended family nearby to help with childcare. This carries a significant cost implication for the family.
- Employees rely on extended family to help with childcare.
- Lack of school holiday care in Rutland; one parent is obliged to access childcare in Stamford.
- One company indicated they did not know that RIS existed but knew about the planned 30 hours provision through their own research.

<sup>&</sup>lt;sup>4</sup> Belton: 1; Oakham: 21; Exton; 1; South Luffenham: 1; Uppingham: 5; Cottesmore: 1

# 6. Vacant childcare places

The number of vacant places available at any one time impacts upon the choice of childcare for parents and the sustainability of providers. For this reason the number of childcare places in settings continues to be monitored.<sup>5</sup>

## 6.1 Take-up of the 2 year-old, 3 and 4 year-old offer

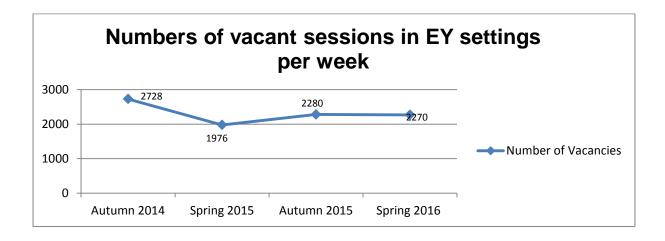
Rutland County Council continues to fund 2-year-olds qualifying for the 'Free Entitlement'. During 2015-16 Rutland exceeded the DfE's target of 65 places. During the year, the numbers of places taken up rose from 81% to 108%. In doing this, Rutland achieved the highest take-up of places in the East Midlands.

The 2015 universal take-up of the 3 year old entitlement was 101%. 118% of 4 year olds took up a funded place.<sup>6</sup>

#### 6.2 Information on vacant childcare places

Information on vacancies is requested from the settings twice a year – during one week in autumn and spring.

The chart below indicates that of the total number of 9,670 sessions, 2728 were vacant in the sample week in autumn 2014. This fell to 1976 as children joined settings in spring 2015. Spare places are high at the start of each autumn term due to the intake into primary schools and fall during the year.



<sup>&</sup>lt;sup>5</sup> The DfE does not recommend a percentage of vacant places in childcare. However, in relation to pupil places in schools, the Audit Commission indicated that 10% spare capacity was a prudent use of resources that still allowed parent choice.

<sup>&</sup>lt;sup>6</sup> A figure in excess of 100% was caused by out of county children attending Rutland early years provision.

In the sample week of spring 2016 (9,770 total sessions) vacancies recorded show there was a total of approximately 8% vacant capacity for 2 year-olds and 12% for 3 and 4-year-olds.

#### 6.3 Other information on take-up and vacancies

- Attendance is higher in morning sessions than afternoon sessions.
- The numbers of vacancies vary from day to day. The most popular day for accessing childcare is Wednesday; the least popular is Friday.
- There has been a 1% increase in vacant capacity between March 2015 and March 2016.
- All but two settings have childcare vacancies on all days of the week.
- Spare childcare places are available in all areas of Rutland on all days of the week.
- There is less capacity for babies and under 2s possibly reducing parental choice.
- Choice is reduced for parents on Wednesdays and Thursdays.
- There is limited capacity for under 2 year olds on Wednesdays and Thursdays in north-east Rutland. (Vacancies in only one nursery at time of writing.)

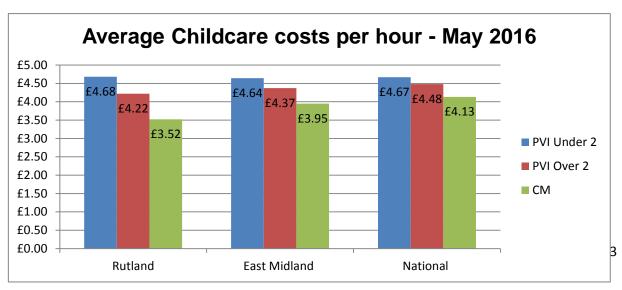
# 7. Childcare costs and funding

#### 7.1 Average costs

The average cost for parents of a childcare place in Rutland is:

- nursery for children under 2: £4.68;
- nursery for children over 2: £4.22;
- childcare place with a childminder in Rutland: £3.52.

Childcare costs in Rutland are lower than the East Midlands and national averages except for PVI provision for under 2 year olds. This contrasts with the views of parents of whom 48% said childcare is too expensive (see 4.8 below). However, price was a key consideration to only 11% of parents.



#### 7.2 Payment to providers of childcare

Rutland County Council pays the providers of free entitlement childcare. This entitlement provides 15 hours of funded education for 38 (or 51) weeks of the year totaling 570 hours per child.

The levels of payment to providers are as follows:

• 2 year olds: £4.85 per hour;

• 3 and 4 year olds: £ 4.60 per hour.

In line with the provider agreement, an indicative budget is set for the financial year and payments are made to providers once a term in advance. The payment is based on an assessment of the numbers of eligible children expected to attend the early years setting for the forthcoming period. It also covers any under- or over-payments from the previous period. The provider agreement also requires the setting to inform the LA immediately if it falls into financial difficulties which might threaten its viability.

# 8. Future population predictions

#### 8.1 Population information

At the time of the 2011 census there were 37,369 residents in Rutland, a growth of 2806 (8.1%) since the 2001 census.

- 7,373 were under the age of 16.
- 26% of all households in Rutland included dependent children (including 16-18 if still in full time education).
- 35% of these were pre-school aged children.

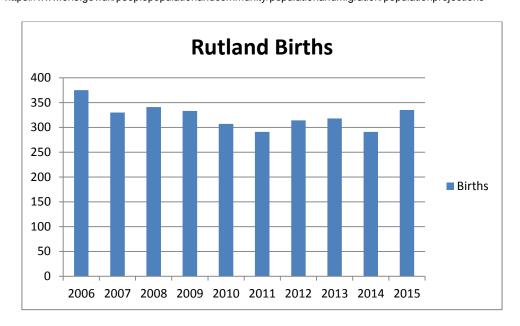
#### 8.2 Live birth data - impact on childcare

Retrospective birth data for Rutland is tracked year on year and a forecasting method is used to predict the number of births in the coming years. These are given in the tables below.

Retrospective Live Birth Data 2006-2015			
Calendar Year	Actual Birth Data	% Difference year on year	
2006	375	12.3	
2007	330	-12.0	
2008	341	3.3	
2009	333	-2.3	
2010	307	-7.8	

2011	291	-5.2
2012	314	7.9
2013	318	1.3
2014	291	-8.5
2015	335	14.0

Source: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections



The birth rate figures show a little variation over time – as in the diagram above. However, when viewed over a longer period and then rounded for future predictions, the trend is level.

#### 8.3 Key conclusions on birth rate

- Current figures of children 0-4 year old: 1,779.
- Over the next 10 years the 0-4 age population is projected to remain fairly stable.
- The 2015 increase of 14% is unusual but still within the scope of usual oscillation. Its impact on demand for childcare is being monitored.

#### 8.4 Large scale housing developments – impact on childcare demand

A number of large scale housing developments are taking place in Rutland. These are taken into account in assessing childcare sufficiency.

Forecasts of the impact of housing developments are based on the number of 0-4 year olds living in recently-built developments in Rutland.

The projected number of completions in Rutland from 2016 to 2026 is 1319.<sup>7</sup> These new dwellings will result in an increase of 196 children aged 0-4 by the end of this period.

Assumption	No. of new build completions April 2016- March 2026	Estimated increase in 0-4 year olds based on recent new build completions	Number of sessions needed based on 15 hours per week per child	Number of sessions needed based on 30 hours per week per child
2016-2026 Housing Trajectory	1319	196	980	1960
250 houses per annum	2500	372	1860	3720

## 8.5 Key conclusions on housing developments

- Given the current level of vacancies of childcare places (1976-2728 across the year<sup>8</sup>) there are sufficient places in Rutland to match the housing growth.
- The actual build rate varies and will be monitored to assess childcare demand.

## 8.6 Labour market changes

Labour market information provides a possible insight into the demand for childcare. Where employment figures are high, demand for childcare is likely to be higher. Where households have few dependent children, demand for childcare will be low. Where adults are unemployed but have dependent children, childcare may be a key consideration in their plans for employment; these are also the key candidates for the increased childcare offer.

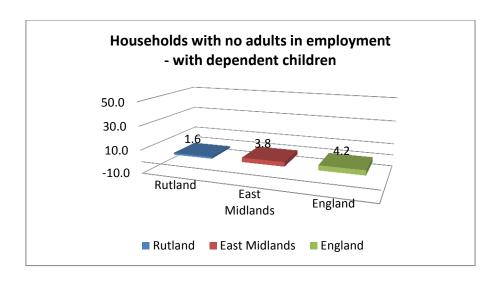
Labour market figures relate to Rutland in 2011.

- 33% of Rutland households<sup>9</sup> had no employed adults. This is comparatively high.
- 1.6% of households (235) have dependent children and no employed adults. This is lower than the regional average (3.8%) and national average of 4.2% (see diagram below).

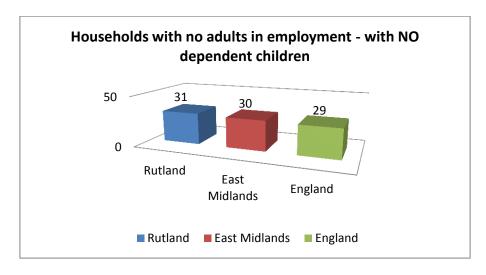
<sup>&</sup>lt;sup>7</sup> Rutland's Housing Trajectory report 2016 – 2026

<sup>&</sup>lt;sup>8</sup> See 6.2 Vacant childcare places, above.

<sup>&</sup>lt;sup>9</sup> In 2011: 15,002 households.



• 31% of households (4696) have no employed adults and no dependent children. This is higher than the regional average (30%) and national figures (29%).



(Rutland Census Report 2011)

- 4.7% (713) are lone parent households with dependent children.
- Of these, 547 are in some form of employment. This is 15% above the national average and well above the regional average.

#### 8.7 Labour market changes – impact upon childcare

Current provision of childcare matches well the level of demand. Conversely, as levels of employment are high in Rutland, the numbers of parents who might in the future take up the full 30 hour of free childcare might be correspondingly high. This may have significant impact on the sufficiency of places.

#### 8.8 Military services personnel

Changing numbers of service personnel at Kendrew and St George's Barracks – as troops come and go - can cause fluctuations on childcare requirements in Rutland.

It is expected that troop movements in Rutland will increase over the next few years. However, movements in and out will be similar in size and so the total number of children at any one time is expected to remain roughly stable. Current information indicates that approximately 102 children under 5 years of age will be affected by these movements. These movements will be closely monitored.

## 8.9 Military service personnel - impact upon childcare

The overall numbers of children and their ages is expected to remain similar, despite the changes in troops. No significant impact on childcare demand is foreseen.

# 9. Policy Changes

#### 9.1 Summer-born children

Recent policy changes mean that parents of summer-born children now have the right to defer entry to primary school until the beginning of the academic year in which the child turns 6. They can also request to remain a year behind their natural year group. The consequences of this are that children may remain within their early years setting a year longer. The September 2016 admissions round indicated that there are 177 summer born children in the cohort of whom 153 are Rutland residents. The impact of this new development requires monitoring.

#### 9. 2 The level of Government funding of childcare

Providers are expressing the view nationally, that the current level of government funding is insufficient and does not cover the true costs incurred by the providers. There is some evidence of this within Rutland. The possible impact of this will be monitored.

#### 9.3 Proposed "30 hour" offer

The government made the pledge in February 2016 that from September 2017 free entitlement childcare would be extended from 15 to 30 hours a week for each child for 38 (or 51) weeks of the year for working parents. The new offer could have a significant impact on the sufficiency of childcare places in Rutland. If parents, both working a minimum of 16 hours per week (or 16 hours for a lone parent), all take up this offer a substantial increase in childcare places will be required. An additional number of parents may return to work when childcare becomes free 10.

<sup>10</sup> In line with Government recommendations, this assessment does not take this new proposal into account. A further assessment will be undertaken once the Government releases the results of its pilot.

## 10. Conclusion

#### 10.1 Sufficiency and accessibility

- There are sufficient, accessible childcare places and vacancies to meet childcare needs within Rutland to 2026, taking into account birth forecasts, housing plans and other considerations.
- This current pattern of provision still allows choice and flexibility for parents.
- There are no gaps in provision, with the possible exception of holiday periods.

#### 10.2 Changes in supply of places

 There has been a small increase of 1% in surplus capacity between March 2015 and March 2016.

#### 10.3 Outcomes of consultation

- The majority of parents have not had difficulties in finding childcare in Rutland.
- The main reason for parents' use of childcare is to enable them to work.
- The second most important reason is the learning and development opportunity this offers for their child.
- Almost half the parents were of the view that childcare is too expensive.
- However, childcare fees in Rutland are below the national and regional average.
- Only 11% of parents considered price to be the key consideration in choosing a childcare provider.
- The most consistent improvement parents would like to see is increased provision of childcare during holiday periods.

#### 10.4 Further action

- A further assessment will be undertaken regarding the 30 hour offer once central government instructions are received.
- The LA will continue to monitor the impact of:
  - large housing developments;
  - possible deferred entry of summer-born children into primary schools;
  - the turnover of services children in Kendrew and St Georges Barracks;
  - > the increase of live births in 2015 and their impact on demand in 2017;
  - the adequacy of central government funding for providers;
  - the demand for additional childcare during school holiday periods.

#### 10.5 Action Plan

In the light of this assessment and its conclusions, a draft action plan will be prepared for approval by autumn 2016.

# Appendix One - Possible actions to be taken for the "30 hour offer"

The introduction of the "30 hour offer" may mean a very large expansion of childcare. Forecasting the level of demand and then ensuring there is sufficient childcare are complex tasks, especially given the complexity of the market and providers' worries over the level of government funding.

Central government has advised LAs not to take any action until the current pilots of procedures and demand are complete. However, likely actions include:

#### Demand side:

- 1. Analysis of likely demand by current users (those already using 30 hour childcare; likelihood of gaining government funding);
- 2. Analysis of numbers of likely new users attracted to extended childcare;
- 3. Analysis of likely numbers of parents who will extend their work hours to once 30 hours' childcare is free:
- 4. Analysis of likely growth in childcare at periods such as school holidays once 30 hour childcare is widely available.

#### Supply side

- 1. Assessing likely interest amongst current providers in extending provision;
- 2. Analysis of impact of free offer upon current providers of extended childcare (profitability);
- 3. Identifying a timetable to match supply to demand and ensure sustainability of supply;
- 4. Safeguarding the supply market;
- 5. Analysis of conditions, constraints on extending provision (space, regulatory, buildings);
- 6. Staffing requirements, training and supply;
- 7. Capital needs and constraints;
- 8. Impact upon quality of provision;
- 9. Assessing (possibly encouraging) new sources of childcare;
- 10. Extending information and advices services.

These are not intended to be exhaustive list but simply illustrative of the kinds of actions needed in preparation for the 30 hour offer.

# Appendix Two: Action plan following 2015 Childcare Sufficiency Analysis and update

#### Target:

To write an Action plan to support the implementation of the issues and priorities for development identified in the 2015 audit.

Aims	Actions	Responsibility	Timescale	Budget – Resources	Moni	toring
The Action Plan will support the development and implementation of gaps in the sufficiency of Early Years Provision as	To collect data for all children attending an Early Years Provision prior to claiming funding.	Early Years Advisor and Senior Early Intervention Officer	September 2016	Officer Time	Full Council Scrutiny	Summer
identified in the 2015 audit and review.	Gather information regarding the number of children attending Early Years Provision for more than 15 hours per week, for 38 weeks of the year.	Performance and application support team	September 2016	Officer Time	CEL's Monitoring	Autumn
	Survey Parents to identify and predict the number would return to 8 hours of paid employment and access the additional 15 hours of 'Funded Provision'.	Early Years Advisor and Senior Early Intervention Officer	September 2016	Officer Time		Spring
	Develop early years advice and support for schools considering reducing their starting age to 2 years old	Early Years Advisor Childcare and Children's Centre Officer	September 2015	Officer Time		Summer
	<ul> <li>To establish responsibility for Local Authority advise and support for 'Providers' of 'Out of School Care.</li> </ul>	Head of Service for Education	December 2015	Officer Time		

Measurable Impact: the actions of the plan have been implemented to support and meet the gaps in early years and out of school provision a identified in the 2015 report

# Actions taken in the light of the Childcare Sufficiency Analysis 2015

Actions 1 & 2: To increase data collection in order to monitor the hours paid for by parents and those being grant-funded for each child.

**Action taken**: Data are collected and shared across teams. The LA is now able to identify children who access 2, 3 and 4 year old funded hours.

Action 3: survey to predict impact of new 30 hours offer.

**Action taken:** No action following recommendations from central government. A trial 30 hours offer is now in operation in eight areas of England. The purpose is to research the implementation arrangements and gather learning. RCC applied to be part of the national trial but was unsuccessful. Once the findings from the eight areas are published (anticipated October 2016) the LA will use this information for its own plans.

Rutland County Council successfully submitted an expression of interest for capital funding and is therefore eligible to take part in the full bidding process. This funding will support the delivery of the government commitment to provide 30 hours free childcare for working parents of 3 and 4 year olds from September 2017.

**Action 4**: To develop early years advice and support for schools considering reducing their starting age to 2 years old.

**Action taken**: support and advice were made freely available. Three schools have now reduced their starting ages to 2 years old:

- Little Ospreys (Edith Weston);
- Little Saints (North Luffenham); and
- Catmose Pre School (Oakham).

Action 5: To identify who is responsible within RCC for out of school provision and for children aged 5 and over. 11

Action taken: This remains to be formally identified.

**Additional action**: To ensure childcare needs are taken into account when considering Section 106 funding from new developments.

Action taken: LA personnel currently aware.

<sup>&</sup>lt;sup>11</sup> '.to secure sufficient childcare, so far is reasonably practicable, for working parents, of parents who are studying or training for employment, for children 0-14 (or up to 18 for disabled children". Early Education and Childcare – Statutory Guidance for Local Authorities, September 2014.

A Large Print or Braille Version of this Report is available upon request – Contact 01572 722577. (If requested Large Print Version should be printed in Arial 16 to 22 pt.)