



Submission

to the Department of Education and Skills Statement of Strategy 2016-2018
8th June 2016

Early Childhood Ireland welcomes the opportunity to submit the following considerations as part of the Department of Education and Skills Statement of Strategy 2016-2018 consultation. Our submission focuses on the following priority points as set out in the Government's *Programme for a Partnership Government*: Prioritising Early Years; Tackling Disadvantage; and Making Better use of Educational Assets within Communities.

Prioritising Early Years

Early Childhood Ireland welcomed the substantial childcare package announced in Budget 2016 and the launch of AIM, the new inclusion model for children with disabilities in the ECCE programme. It represents a significant first step on the road to achieving affordable and quality childcare that is accessible to all children. However, the package falls significantly short of the level of increased investment the early years care and education sector needs in order to deliver a consistent high quality experiences for children in their early years. The sector remains chronically under resourced and this deficit manifests itself through a range of other problems faced by the sector, including: the affordability of childcare for parents; low pay in the sector; the fragmented nature of pre-school and out of school care; and the lack of viability and sustainability for services.

As the central Government Department for early years education and care, the majority of these concerns fall within the remit of the Department of Children and Youth Affairs (DCYA). Early Childhood Ireland continues to engage with DCYA concerning the key issues facing the sector and is currently conducting a major piece of research into the real cost of childcare, which will form the basis of our pre-budget 2017 submission. Accordingly, this submission has been tailored to address issues specific to the Department of Education and Skill's (DES) remit.

Driving Quality through Professionalisation

Early Childhood Ireland consistently advocates for a system that trains and retains well qualified staff on fair salaries and annual contracts which include non-contact time and Continuous Professional Learning (CPL) days. Qualifications and expertise within the sector have risen significantly but pay and conditions have not. This creates a very real problem of retaining staff within the sector and attracting new staff, as not only are wages low but many employees are tied to contracts which only run over the Early Childhood Care and Education (ECCE) 38 week schedule.

Early Childhood Ireland is concerned that current childcare funding does not take adequate account of the numbers of staff available to deliver the expanded programmes. We recommend an immediate audit of the number of Level 5 and 6 students coming out of all training institutions and Education and Training Boards this year and for DES to take the lead in strategically planning for sufficient staff numbers for the sector moving forward.

High quality adult-child interactions are most often found where the people working with children are highly qualified and where wages are sufficiently high to minimise staff turnover and to reward staff for the investment they make in their education and training. The qualifications of the whole staff team are key to quality provision. Clearly we must strive towards a graduate-led sector across all setting types and in respect of all age groups *i.e.* birth to six years.

Early Childhood Ireland is concerned that distinction current programmes, such as the ECCE Programme and its accompanying inspection regime, are creating a distinction between the 0-3 and 3-6 years cohorts. DES needs to be mindful of the 0-6 age grouping identified in *Better Outcomes Brighter Futures, the National Policy Framework for Children and Young People 2014-2020*. The Government, through DCYA and DES, must deliver on its commitment to develop and implement a National Early Years Strategy for all children aged 0-6 years. In this regard Early Childhood Ireland notes the excellent Report of the Expert Advisory Group on The Early Years Strategy, *Right from The Start (2013)*.

Under Regulation 9(4) of the *Child Care Act 1991 (Early Years Services) Regulations 2016*, all employees must have a minimum QQI Level 5 in Early Childhood Care and Education by December 2016. The ECCE contract (2014) stipulates that all staff working with children in a service must hold a certificate for a major award in childcare/early education at a minimum of Level 5 on the National Framework of Qualifications (NFQ) of Ireland or equivalent, all Pre-School Room Leaders delivering the ECCE scheme require a minimum Level 6 or equivalent, and in order to receive the higher capitation payment, settings require a staff member to have a bachelor degree in childhood/early education (minimum of Level 7 on the NFQ or equivalent).

While the increasing professionalisation of the childcare sector is welcome, the way in which the minimum qualification requirement has developed means that the most qualified staff are working directly with the ECCE group and the least qualified staff working with the under threes. Given the importance of the first three years in a child's development, and the universal recognition of "early years" spanning 0-6 years, Early Childhood Ireland believes that the new qualification requirements should be extended to include those working with under threes.

We are concerned that the existing incentive for people to complete Level 7 through the ECCE capitation payment might act as a disincentive for people to strive for Level 8, which is usually required to pursue a Master's Degree. Consideration should be given to introducing an additional capitation to encourage people on to Level 8 and Master's.

Professionalisation could be further encouraged by the introduction of a Graduate Staffing Fund to every service employing a graduate. This grant should be used as a direct salary supplement with the goal of moving toward parity of pay with Primary Teachers.

Training

Early Childhood Ireland notes that the principal concern from respondents to the DES *Survey of Early Years Practitioners* (May 2016) was around quality and consistency in the implementation and delivery of Aistear and Síolta through some of the education and training programmes currently available. This concern mirrors that of our own members and Early Childhood Ireland likewise recommends the mainstreaming of Aistear and Síolta into all early years education and training programmes.

In addition, the Learner Fund, which has been a very successful policy initiative, needs to continue and be expanded to allow applications from early years educators who wish to engage in Level 7 and 8 courses.

Continuous Professional Learning

Access to Continuous Professional Learning (CPL) is also an important component of improving quality in early education. International best practice suggests that staff should have guaranteed access to funded CPL and training. The *Survey of Early Years Practitioners* confirms the importance of CPL to practitioners themselves, with the overwhelming majority of respondents (91%) indicating that they would like more on-the-job training. Respondents also noted that training is mainly organised outside of work hours and recommended the adoption of the CPL model used for the teaching profession, i.e. where time for CPL is incorporated into their contracts/annual salaries and where a range and variety of learning processes are valued, as set out in *Cosán: The National Framework for Teachers' Learning*.

To help drive the quality agenda, when reviewing services the DES Early-years Education-focused Inspection (EYEI) should identify any weaknesses that would benefit from, or be rectified by, CPL.

Non-Contact Time

The lack of funded non-contact time was a major concern in Early Childhood Ireland's recently conducted Flash Survey of members (May 2016), which sought views on the current ECCE contract and the new contract being drawn up by DCYA. Respondents recognised that paid non-contact time is necessary to plan and evaluate curriculum; to engage with the national frameworks Aistear and Síolta; to work with parents; to participate in staff meetings; to complete required recording and documentation; and for good governance. In addition, educators/practitioners will be required to profile children with additional needs in conjunction with parents as part of the AIM model. Non-contact time also featured strongly in the *Survey of Early Years Practitioners*. Many of the respondents to the latter survey who are also employers, while acknowledging the potential benefits, said they simply couldn't afford to pay for non-contact time during the working day. As

such, non-contact time must currently be accommodated outside the working day. This is a significant and growing problem within the sector.

Inspections

Early Childhood Ireland is concerned about the disparity in early years specific qualifications and expertise between the DES EYEI and Tusla's Early Years (Pre School) Inspectorate. For example, a candidate applying for the position of inspector with EYEI is required to have:

(A) An honours primary degree (Level 8, NQF) in Early Childhood Care and Education plus at least 5 years' experience within early years settings (0-6 years) leading on the delivery of quality service provision,

Or

(B) An honours primary degree and a post graduate qualification (Level 8, NQF) which is directly relevant to the duties of this role together with at least 5 years experience within early years settings (0-6 years) leading on curriculum and assessment, self-evaluation frameworks, pedagogy, education policy or early years setting management issues.

The Early Years (Pre School) Inspectorate in Tusla is responsible for ensuring that all pre-school settings in Ireland comply with the with the *Child Care Act 1991 (Early Years Services) Regulations 2016*. In accordance with Labour Court Recommendation 18522 in 2006, and further communicated in HSE HR Circular 13/2008, a pre-school inspector must be a registered Public Health Nurse (PHN) with a minimum of 5 years experience and is paid in their inspectorate role on the Public Health Nurse (PHN) pay scale.

PHNs provide a range of extremely important health services in the community. Their early access to expectant mothers, new born babies in the home and at primary school health screenings makes them very well placed to identify upstream issues in relation to young children.

PHNs are not however, in the main, experts in early years care and education or pedagogy for early childhood education. The childcare sector is becoming increasingly professionalised. As outlined above, under Regulation 9(4) of the 2016 Regulations, all employees must have a *minimum* QQI Level 5 in Early Childhood Care and Education by December 2016. The ECCE contract (2014) stipulates that all staff working with children in a service must hold a certificate for a major award in childcare/early education at a minimum of Level 5 on the National Framework of Qualifications (NFQ) of Ireland or equivalent, all Pre-School Leaders a minimum Level 6 or equivalent, and in order to receive the higher capitation payment, all Pre-School Leaders need a bachelor degree in childhood/early education (minimum of Level 7 on the NFQ or equivalent).

There is an increasing and legitimate expectation from early years educators that the personnel charged with the inspection of early care and education services have specific and shared expertise. They are eager to engage in robust and professional dialogue as part of the inspection process, which would be in keeping with the policy of continuous professionalisation in the sector. In the words of one Early Childhood Ireland member "not being inspected by peers with Level 8 and higher qualifications in early years care and education, but instead HSE nurses, impacts on our professional identity".

Early Childhood Ireland believes that the Tusla Pre-School Inspectorate and the DES EYEI should engage in a process to assess the possibility of developing a reconstituted single care-and-education inspectorate for all early years settings, regardless of whether they take up ECCE schemes or not. This would ensure a holistic care and education focused oversight of the 0-3 years cohort, who are currently outside the scope and oversight of EYEI. This is in keeping with the principles of *Better Outcomes Brighter Futures, the National Policy Framework for Children and Young People 2014-2020*, which recognises that children's best interests in early years spans from 0-6 years and requires cross-government and interagency collaboration and coordination.

A reconstituted joint inspection process has the potential to: develop an inspection system that is fit for purpose; removes confusion and uncertainty for providers around different inspection thresholds; and achieves an integrated and consistent approach nationwide.

We already know of settings that have been visited by both inspectorates and have found themselves in the highly unsatisfactory position of having been deemed compliant in the area of quality in one inspection, and uncompliant in the same area in the other inspection. We need shared training across both inspectorates to arrive at a shared understanding of quality which is underpinned by existing Frameworks.

In this regard, Early Childhood Ireland echoes the recommendation in *Right from The Start, Report of the Expert Advisory Group on The Early Years Strategy (2013)* that:

“With the roll-out of Síolta and Aistear, training in these frameworks must be provided to all those who are involved in inspections, both for early care and education services and for primary schools. In addition, the composition of the Pre-School Inspectorate must be broadened to other relevant disciplines, including staff with expertise in early care and education.”

We are aware of the difficulty currently faced with the frequency of inspections nationwide. At present, there are approximately 60 Tusla Early Years Inspectors and only 10 in the EYEI. The number of services throughout Ireland (over 4,300, Pobal, 2014) compared to the number of inspectors (approximately 70) means that the frequency of inspection is a geographical lottery. One service might be inspected once in five years and another twice in one year. The current understaffing, particularly of the EYEI, must be addressed to ensure the proper balance in a merged inspectorate. More immediately Early Childhood Ireland calls on DES to expedite the recruitment of additional EYEI inspectors.

The joint inspection regime should be developmental in its approach, and inspectors should be recruited on the basis of qualifications and experience in early care and education. Existing resources should be redirected to fund this reconstituted Inspectorate.

Tackling Disadvantage

The provision of opportunities for early years education and care is recognised as an essential element in a suite of interventions by the State in tackling educational disadvantage. While responsibility for the key elements of this work is housed in DCYA, it is important that DES is cognisant of the need to ensure coherence and consistency between these efforts and its own programmes and schemes aimed at tackling educational disadvantage in primary schools and other sectors.

Community Based Childcare provide early years education and care for disadvantaged children in many areas of the country, under the Community Childcare Service (CCS), ECCE and other programmes. They play a vital role in ensuring that many children who would otherwise not be able to avail of quality early education and care can do so, often provided by organisations that also provide a range of additional supports to families at risk of poverty or facing other disadvantages. The key challenges facing this work include insufficient funding, the heavy administrative burden on providers and difficulties with governance. Without additional state funding and supports they cannot reach their full potential in ensuring that disadvantaged children in their care and their families receive the supports they deserve.

Making Better use of Educational Assets within Communities

The use of school buildings to develop an Out of School service in Ireland, envisaged as part of the new Minister for Education Richard Bruton's recently announced strategy for Education and Skills 2016-2018, may be the easy place to start the conversation but it's not the right place to start.

Rather than talking solely about afterschool care, the focus needs to shift to 'out of school care' by which we mean the wraparound services of breakfast clubs, afterschool clubs and what happens in between during midterm and school holidays. Alarming, especially since children using these services can be as young as four and five years old, after school and out of school services are currently completely unregulated despite years of advocacy from Early Childhood Ireland for this to be addressed.

At first glance, parents of school age children might see the move toward the increased use of school premises for afterschool care provision as a godsend. We are living in an increasingly demanding and fast paced world where the pressures of work and financial responsibilities on parents is immense and a quick fix can look appealing, on the surface. But we've got to look deeper.

First and foremost, we must focus on the out of school experience for the child and get the child's voice into this debate, as set out in Article 12 of the UN Convention on the Rights of the Child. So what is it that children want to do after school? Of course this might not tally with what adults want them to do. Is it to kick off their shoes, relax, have a snack, get their homework done, play with their friends, get away from the school desk? We need to hear from children themselves. That's why the research currently being spearheaded by the Citizen Participation Unit in the Department of Children and Youth Affairs on what children want on afterschool is so important, and needs to be fed into any decision-making on what happens next.

If we locate afterschool care in schools – there is a real danger that, for the child, it feels like an extended school day. School buildings bring with them a culture – a culture of work and discipline

and large group activity. The culture is linked to the building and doesn't suddenly end when the bell goes at 2.30 pm. Maybe we can change this by introducing soft areas, different play spaces and an emphasis on relaxation - but at present Irish primary schools don't have the facilities.

We know that children need time and space to relax after a school day. Time to chill out and play. Like adults, they need a space that is different to the work space. We have to be fair to children. We know that children are becoming more and more stressed, driven by school exam pressure, by competition in the sports field, etc. We need to consider how their time spent when school ends impacts on their wellbeing.

Then we have to ask parents what they want and need because they are under pressure too. We need to be careful that our parenting doesn't focus on managing children so that we can cope with our busy lives. Parenting is about giving children a childhood – helping them to build a store of memories and experiences that will sustain them throughout life. Parents need choice, and maybe there's a role for schools – but we must put children and their rights to a childhood at the centre of our decision making. Parents are relying on us to ensure that the system we develop is good for their children. Children are definitely relying on us to make good decisions for their life chances.

We must also consult the people delivering the service. It's reasonable to assume that we would build on the good service models already available. That means analysing the best afterschool / out of school models and using that bank of experience, with the people who are already doing it. What supports and investment do they need to build and possibly expand their service?

We need to plan smartly, setting realistic and achievable targets, by using the Pobal figures that are readily available to estimate the number of places required in afterschool / out of school, to build a scalable model that meets demand. We've got to plan based on population demographics and demand in each area, otherwise this won't be a sustainable model. We cannot have duplication of services and displacement and we must not use our limited resources in the wrong locations. We can't afford bad education economics.

Today, there is a patchwork of school age childcare facilities around the country, some school-based but many in private and community childcare settings, which employ excellent practices and have invaluable expertise. It is important that we don't lose this expertise. Rather, it needs to be harnessed and included in the development of a national model with a variety of options for parents underpinned by quality standards, state subsidies and regulation similar, for example, to New Zealand's Out of School Care and Recreation (OSCAR) model.

The Australian 'My Time, Our Place' model provides a comprehensive framework from which educators can extend and enrich children's wellbeing and development in school aged care settings. Closer to home,

We can learn from other countries in this analysis of what Ireland needs, with evidence of successful afterschool care provision in locally based and school settings from other jurisdictions like Northern Ireland, Scotland and Scandinavia. However, the success is linked to approach and facilities, for example afternoon clubs in Helsinki where the emphasis is on unstructured play, pursuing interests with friends, partaking in art and playing instruments, where the facilities in question have canteens and food storage, leisure rooms for children and wonderful outdoor spaces. Currently, many schools

in Ireland simply don't have the facilities to ensure a focus on care, recreation and play over containment.

The inter-departmental consultation process and the report produced by the Department of Children 'Future Investment in Early Years and School Age Care and Education' will also inform this debate and analysis. As will the core principles from the quality standards framework for youth work outlined in 2010 by the Office of the Minister for Children and Youth Affairs.

We can't build a quality, sustainable, afterschool model that prioritises a quality experience for children without the people delivering the service being qualified and experienced, and recognised and rewarded by a fair salary and an inspection process that inspects and respects their work. However, to date, successive governments have failed to recognise and reward the skills and dedication of the people delivering afterschool provision for children. The capitation and support on offer just isn't enough. Insufficient capitation has meant that the ambitious target of 6,000 subsidised places targeting low-income families announced in 2012, and launched two years ago, has so far only resulted in some 100 children availing of the scheme.

Minister Bruton's strategy around the use of school buildings is not the panacea for afterschool care provision. There is a danger, in the absence of a carefully developed care and recreation model, that afterschool and homework clubs on school premises will simply merge into an extension of the school day where children are managed, instructed and curtailed from 7.30 or 8.00 am to 6.30 pm.

In designing the right afterschool / out of school system for Ireland, we are making very big decisions about children's lives and our future as a society. Realistically no single model can meet the needs and best interests of all children, which will differ depending on their age, maturity and personality. Parents need affordable and flexible options within a high quality and sustainable system. Fragmenting settings and separating them into daycare, preschool and aftercare neither lends to quality nor sustainability and is unlikely to meet families' needs.

The experience of children must remain front and centre of our planning, and the views of providers must be listened to. As the people who shape that experience for children, theirs are the shoulders on which the after school / out of school model will be built.

Recommended Actions for Making Better use of Educational Assets within Communities

1. Audit

Undertake an audit of afterschool / out of school provision in Ireland. This should ascertain: the extent of existing provision across all the different provision models; the numbers and ages of the children availing of the various services; capacity and demand; where current gaps in provision exist; good practices (with a view to replication); and all other data necessary to ensure against the displacement of existing school and locally based provision in the future.

At present, afterschool / out of school provision falls into three broad categories. Firstly, early years educators operating out of their own premises or rented spaces in schools. Secondly, services provided by a school within the school. Thirdly, private childminders and fourthly community out of school care. We know that the City/County Childcare Committees are currently assisting Pobal with demand versus supply data in the context of additional ECCE places in 2016/2017, but they may not

have access to data to establish capacity in the second and third categories mentioned. In order to overcome this barrier, and to include relevant provision in the Youth Work sector, the audit would best be undertaken independently.

The voice and experience of the child must inform all stages of planning and development in this area, including the audit. As the consultation with children committed to in Budget 2016 nears completion, it is essential that the findings be published and inform the audit as soon as possible.

2. Current Expenditure and Capital Funding

Develop systems to channel both current and capital funding for afterschool / out of school provision. The provision of afterschool / out of school services must be about ensuring the best interests of children and families, and not a mechanism by which additional capitation is provided for schools. Any additional expenditure in this area needs to be developed and integrated within the Single Affordable Childcare Programme, with responsibility for its rollout clearly vested with the Minister for Children and Youth Affairs and her Department.

We must learn from the failure of the After-School Childcare (ASCC) Programme to increase the provision of funded after school places, due to unsustainable capitation levels. The success of an afterschool / out of school system will require increased State investment throughout the childcare sector.

Additional capital funding for afterschool / out of school provision should also be provided, and compliment capital funding for other early childhood education, to ensure coherence and consistency.

3. Regulations

Develop regulations and guidelines for afterschool / out of school provision. The development of a formal afterschool / out of school system throughout Ireland must be accompanied by specific regulations and guidelines, which could be fashioned from the existing Child Care Act 1991 (Early Years Services) Regulations 2016. While these regulations and guidelines are being developed, Tusla's oversight function could be established through a contractual condition of funding.

4. Training

Provide relevant training to practitioners. School age care is distinct from early years care and requires a different set of skills from those for working in early years services. A new policy directive to expand afterschool / out of school provision should see specific and relevant training made available to providers, such as the former QQI Level 5 training in School Age Childcare, which was discontinued by FETAC in December 2012.

5. Stakeholder Consultation

Involve stakeholders in guiding the development of afterschool / out of school provision. The experience of children must remain front and centre of our planning, and the consultations with children themselves are essential to any further developments. The views of providers, as the people who shape that experience for children, must also be listened to. In this regard, a process of consultation needs to be undertaken with early years educators and other stakeholders in afterschool / out of school provision on the development of a new system.