



20th September 2019

Submission to the Department of Children and Youth Affairs

on the

DCYA's Statement of Strategy 2020-2022

Introduction

Early Childhood Ireland welcomes the invitation from the Department of Children and Youth Affairs (DCYA) to submit our views to the DCYA the preparation of its *Statement of Strategy 2020-2022*.

Early Childhood Ireland is the largest organisation in the Irish early years sector. We represent 3,800 childcare members, who support over 100,000 children and their families through preschool, school-age and full day-care provision nationwide. Our work includes evidence-based quality enhancement, policy and advocacy, education and training, business support and information. We aim to be effective champions for quality in practice, putting children and their rights at the core of our work and advocating strongly for them, their families and all early childhood professionals.

Early Childhood Ireland brings to this submission the knowledge, expertise and from-the-ground intelligence gained through these activities and through our close relationship with early years sector stakeholders. Early Childhood Ireland took account the contents of *First 5: The Whole-of-Government Strategy for Babies, Young Children and their Families 2018-2028*, *Better Outcomes, Brighter Futures*, and *A Programme for Partnership Government* in framing this submission.

Early Childhood Ireland recommends two Strategic Objectives:

Strategic objective 1: That the *First 5 Implementation Plan 2019-2021* is fully implemented.

Strategic objective 2: Implement the proposed phase one of the Childminding Action Plan 2019-2019.

A series of priority actions are recommended under each objective. The context for these recommendations is also provided.

Context for the Statement of Strategy 2020-2022

The DCYA, over the period of the *Statement of Strategy 2016-2019*, has led, coordinated or been directly responsible for a series of welcome landmark 'firsts' in Irish policy and provision for babies, young children and their families, including:

- The publication of Ireland's first national whole-of-government, ten-year strategy for babies, young children and their families and the first three-year implementation plan.
- The development of first income-based, mechanism providing a parental entitlement to a childcare subsidy, including the first universal subsidy towards childcare costs - the National Childcare Scheme.
- The expansion of the universal ECCE Programme to two full years per child.
- The introduction of two-weeks paid paternity leave and benefit.
- The development of the first (draft) national childminding action plan and the establishment of the childminding Learner Fund.
- The first national action plan for school-age childcare (SAC) and the development and implementation of the first SAC regulations for settings.
- The mainstreaming of new DES's Early Years Education Inspections in settings/rooms offering the ECCE Programme.
- The implementation of the successful AIM Programme, including the LINC Programme, to develop inclusive settings. The development of the Universal Design Guidelines for ELC settings also represents an international milestone.
- The strengthening of the Tusla Early Years Inspectorate and the establishment of the Registration Unit; the introduction of new Early Years Regulations in 2016, and the development of the Quality Regulatory Framework to support implementation.
- The substantial speed at which the ELC workforce has met the QQI level 5 minimum qualification requirement, and has radically exceeded it, supported by the Learner Fund.
- The publication of the Award Criteria and Guidelines for Initial Professional Education (Level 7 and Level 8) Degree Programmes for the Early Learning and Care (ELC) Sector.
- The development of the first paid ELC CPD infrastructure, implemented by Better Start.
- By early 2020, the introduction of Ireland's first paid parental leave entitlement.

Early Childhood Ireland welcomes the gains made over the last three years in developing the complex system and infrastructure necessary to fund ELC and SAC and to improve access for children, from, birth to ELC and SAC settings. The recent formation of the Workforce Development Steering and Stakeholder Groups to develop a Workforce Development Plan for the ELC/SAC sector and the Expert Group to develop a new Funding Model for ELC and SAC are particularly welcome, and crucial, developments for the future of the sector.

First 5, and the above achievements, have the potential to contribute to the development of quality ELC and SAC systems and thus have the potential to improve children's experiences of and in settings. Early Childhood Ireland wants to support and empower our members to deliver the highest standard of care and education possible, and our members need high-quality systems that support them be the best that they can be.

The improved staffing levels and capacity of the DCYA are very welcome, and they illustrate a Governmental commitment to children. The establishment of an Early Years Division in the DCYA, including the development of a Quality Unit, in the lifetime of the current Statement of Strategy also stands out as an achievement.

There remain considerable challenges, the mitigation of which should form the basis of the DCYA's forthcoming Statement of Strategy's strategic objectives and priority actions.

- The ELC and school age childcare system is fragmented and lacks coherence. An outcome is that problems in services can slip through the cracks as relevant authorities are not fully engaged with each other. There is currently no central body responsible for quality, information, programme delivery, financial management, oversight, or strategic planning. A complete picture of how a setting operates from a regulatory, educational and financial perspective cannot easily be seen. Settings face three separate and uncoordinated inspection processes (using sometimes unaligned inspection tools) from three agencies with three distinct remits under the aegis of three different Government Departments. This results in inefficiencies and a potential duplication of resources. We need an agency that can be a guarantor of quality for children. Such unitary agencies exist in ELC systems in other advanced economies.
- Birth to threes were largely forgotten in ELC policy, which is partly the unintended consequence of the ECCE Programme as it became the focus of public quality improvement measures. Additionally, our members were (and remain) challenged by the extension of the ECCE Programme eligibility to younger children which did not come with the supports needed by settings to meet the practical and developmental requirements of this younger age group. There is much work to do over the next three years to set educators and settings up for success in meeting babies and young children's learning and care needs and rights, and to make it feasible and sustainable for settings to offer services to this age group and their parents. Provision for under threes requires a strategy to bolster it in order to make the NCS universal subsidy and a statutory entitlement to the ECCE Programme fully viable. The development by the DES of an educational inspection process and tool for this age group requires careful crafting.
- The lack of services models for ELC/ SAC is a challenge for *First 5* - what is the blueprint for services, based on research evidence of what children require to meet their full potential and based on common social values?
- SAC remains without a strategy on where and how it should be delivered, and by whom, at a time when we need provision and supply to expand.
- The challenge of getting to the 30 percent graduate workforce target, particularly in the context of an educator retention crisis, and to do it in a way that meets the professional award criteria and guidelines for QQI levels 7 and 8, and the outcomes of the redevelopment of levels QQI 5 and 6 in ECEC/childcare.
- Inadequate terms and conditions of employment for educators, alongside a lack of defined training and career pathways.
- There is no registration board to regulate the early years educator profession.
- A home-based childminding sector that is largely unregulated and of unknown safety and quality for children, unlike centre-based settings that at least have the benefit of oversight to identify problems, and mechanisms to improve safety, practice and quality
- The scale of the challenge in moving childminding from an invisible, informal sector to a regulated, formal sector that sits within the ELC and SAC system.
- Due to the historical lack of a funded implementation plan, Aistear and Síolta implementation are only in early implementation phase and have yet to have the impact that they need to on pedagogy and practice.
- There are critical sustainability issues for providers due to inadequate funding levels, the lack of a funding model that resources services in an equitable way and implements the national policy of progressive universalism, and due to the lack of a national model identifying and influencing supply and demand.

- Educator turnover, at 25 percent nationally, is negative developmentally for children, and goes against the relational nature of early childhood pedagogy.
- That, as yet, the infrastructure to deliver the DCYA's flagship National Childcare Scheme has yet to be finalised and is untested nationally.
- Early learning partnerships between settings and parents have yet to take hold in Ireland and parents require support in understanding early learning and their role in it.
- Allocating the necessary funding through the annual budgetary process to implement *First 5* in this uncertain political and economic climate.

Recommendations

Strategic objective 1: That the *First 5 Implementation Plan 2019-2021* is fully implemented.

Recommended priority activities:

- Accelerate the establishment of a national Early Years and School-Age Childcare Agency. This Agency would be responsible for coordinating and integrating quality assurance, planning and administrative work across the early years sector. This new agency would align and integrate all functions relating to quality, planning, administration and funding.
- Move towards a single 'whole-setting' inspection to examine all aspects of provision, alongside financial compliance. A new single inspection framework would be developed to replace those of Tusla's Early Years Inspectorate and the DES Education inspections.
- Publish the Workforce Development Plan for SAC and ELC, alongside a clear funded implementation plan for its achievement.
- Support the redevelopment of QQI levels 7 and 8 ECEC courses to meet the professional awards criteria and guidelines. This is required to meet the *First 5* target is a graduate-led workforce of at least 30 percent of educators by 2021 through quality educational inputs.
- Take the initial administrative steps required to establish a registration body for the early years profession.
- Co-create an evidence-based new Funding Model for ELC/SAC with the sector, parents, children and other stakeholders and develop a blueprint for services that would be operated through the funding model. Publish the Model.
- Ensure that by 2021 paid parental leave will equal seven weeks per parent and fourteen weeks for a parent and named other in the case of parenting alone.
- Legislate for eligible children to have an entitlement to the ECCE Programme, as per *First 5*, and ensure that settings are provided with the resources necessary to deliver this new right for all eligible children in Ireland.
- Fund the time that educators require to implement Aistear and Síolta, and to engage in research and professional dialogue. Again and again, research evidence tells us that providing such time and space is essential to improving the professionalism of staff, the quality of the pedagogy, and the implementation of national frameworks. We should not be asking educators to do this on their own time: we want them to professionalise, and we must respect them as professionals. Requiring free labour adds to educator churn in settings, as it would in any workforce.
- Undertake a public campaign aimed at parents and grandparents on early learning.
- Develop CPD and resources to encourage partnership with parents by ELC and SAC educators and settings.

- Develop and implement a robust system to monitor and predict supply and demand, and child and family need, through community assessment and the analysis of existing national data.
- Develop a strategy to improve the supply of ELC places and the quality of provision and pedagogy with children from birth to three years, to include levelling out the funding differences by age group, and the development of a capital funding programme to retrofit settings or develop new facilities to meet the needs of babies and young children.
- Develop a capital funding programme to implement the Universal Design Guidelines for ELC settings
- Provide seven weeks paid parental leave per parent by 2021, to include a mechanism to ensure that children being parented alone do not lose out on these 14 weeks based on their family type.

Strategic objective 2: Implement the proposed phase one of the Childminding Action Plan 2019-2019.

Recommended priority activities:

- Make the necessary legislative amendments to ensure that all childminding services caring for one or more children is subject to registration and regulation from 2021.
- As part of the legislation, permit Tusla's Early Years Inspectorate to establish a childminding registration unit.
- Develop appropriate and proportionate regulations, based on international evidence on what works in home-based care, to provide a child's right to safety and quality in the context of a home- and family-based ecology.
- Provide Tusla's Early Years Inspectorate with the human, IT and financial resources to operate an effective inspection regime.
- Childminding services should also come within the remit of the National ELC and SAC Agency being proposed here.