



Response to the Department of Children & Youth Affairs Public Consultation on the
Regulations and a Quality Improvement Framework for School-Age Childcare
June 2019

Introduction

Early Childhood Ireland is the national membership organisation for the early years sector in Ireland. We represent more than 3,800 early years providers who support children and their families through preschool, school age childcare, and full day-care provision nationwide. Our work includes quality enhancement, publications, advocacy, training, support & information for a sector that employs over 25,000 people.

We are responding to the Department of Children & Youth Affairs' Public Consultation on Regulations and a Quality Improvement Framework for School-Age Childcare. In devising our response, we have considered the following:

- The initial [School Age Childcare Regulations](#) and draft [School Age Childcare Standards](#) including guidelines about responding to the Consultation;
- The Department's questions as set out in the call for submissions and in the online survey;
- Our members' needs and views.

Early Childhood Ireland has responded to the Online Survey and so this submission is purposefully short and set out in a format that, we believe, will make it easier for the Department to take account of when further developing the Regulations and Draft Standards for School Age Childcare.

The best interests of children availing of school age childcare are of utmost importance to Early Childhood Ireland and we work to ensure that all children thrive in quality school age childcare settings. We believe that our members, many of whom have been providing school age childcare services for some time, have a particular expertise in advising the Department on the future development of the Regulations and Draft Standards. To this end we undertook a series of regional consultation events with our members as well as an online survey to capture their views on the key aspects around quality of school age childcare provision. This submission, and our response to the Department's Online Survey, have been informed by the views of member school age childcare providers.

Early Childhood Ireland welcomes the move to regulate school age childcare which has the potential to improve services for children and ensure consistency of quality to all children attending centre-based childcare. In developing the Regulations, we would ask that the Department makes a clear distinction between Early Learning and Care and School Age Childcare and acknowledges the diverse nature of services providing care for children to this different age group with different needs and

requirements. The school age childcare sector is not one of homogenous provision. There are a variety of distinct models providing a range of services to children, which require a greater degree of flexibility and autonomy for providers. Accordingly, there is a need for a differentiated set of Standards and Regulations to be developed for distinct types of provision as is the case for the Quality Regulatory Framework for the Early Learning and Care sector.

Cross-Departmental Approach

In order to ensure the perspective of the child is central to the development of the sector, any future Standards and Regulatory Framework must take a holistic view of the child in the context of the whole 'school' day. While this necessitates greater collaboration between schools and school age childcare providers it will also require a close policy relationship between the Department of Education and Skills and the Department of Children & Youth Affairs. There is a need for agreement on, and clarity of, roles and responsibilities of each Department with regard to service provision and funding. Particular areas for collaboration include food provision, transport, transitions, homework policy and supports for children with additional needs.

Ensuring a focus on inclusion and particularly the provision of supports for children with additional needs in school age childcare services will require collaboration across a number of stakeholders including the Department of Children & Youth Affairs, the Department of Education & Skills, Better Start, HSE and Tusla. It is critical that this collaboration explicitly sets out the roles and responsibilities of each stakeholder in ensuring children have access to quality school age care. For example, if a child is receiving support of a Special Needs Assistant in school, they are also going to need this support after school. Early Childhood Ireland would like to see the AIM model extended to school age childcare. If a child has been allocated a Special Needs Assistant, this right should be extended to the school age childcare service the child is attending. Additional supports should also be expanded to enable children who may be experiencing adversity at home or those coming from various cultures fully participate in school age childcare.

Early Childhood Ireland believes that homework should be removed as a component under staff and professional practice in the draft standards in order to allow settings have autonomy over the programme of activities relevant for their particular setting. Article 31 of the UN Convention on the Rights of the Child sets out children's right to rest and leisure. DCYA's consultations also highlighted children's expressed needs and preferences in relation to homework. School age childcare providers may decide to cater for homework but that should be a decision based on the type of service rather than a standard across all school age childcare.

Introduction of Regulations

Early Childhood Ireland appreciates that the Regulations were introduced in February 2019 to incorporate school age childcare into the forthcoming National Childcare Scheme. However, the limited communication and the short lead-in introduction time had an unnecessarily negative impact for providers. Providers begin planning for the following academic year at least 12 months in advance and so require a minimum of 12-months advance notice in order to plan for any necessary changes they may have to make to their service. An adequate engagement and communications

strategy will be critical in ensuring providers can implement any future Regulations. Through engagement with our members we found that 82% of services are operating a ratio of 1 to 12 or less and we welcome this measure in the best interests of children. However, in the absence of any statutory regulation a number of providers had been providing a service to children at a higher ratio and will have to amend their service provision to comply with the regulation. In addition, the introduction of any space regulation introduced at short notice could result in the closure of school aged childcare services. New space regulation should be introduced with a grant offer for upgrading work. A transition period is now required, and the introduction of future regulations must be within a realistic timeframe, aligned with the academic year to allow for adequate planning by providers to ensure no adverse impact on their capacity to continue to provide school age childcare. Early Childhood Ireland calls on the Department to provide clarity on the inspection process regarding the Regulations and the Draft Standards which should encompass a coherent and cohesive system across the school age childcare sector to ensure consistency of approach for providers.

Minimum Qualification

Early Childhood Ireland welcomes the introduction of an infrastructure to enhance the professionalism of those working in the school age childcare sector. The Department has an opportunity to enhance quality throughout the sector by investing in the professionalisation of the workforce. By creating an appropriate qualification framework, the Department can ensure that staff working in school age childcare have the appropriate skills and knowledge to work with children at any stage of development from the age of 4 to 14. School age childcare practitioners work with children from early childhood through middle childhood and adolescence, which marks practice and service development in this sector as being different from that of the Early Learning and Care sector. This framework will ensure there are clear career pathways for those working in the sector and will support those working in the sector to fully appreciate the impact that their role has on child development ([OECD, 2011](#))

We believe that the move to introduce a minimum qualification at Level 5 is appropriate. However, given the expertise of those already working in the sector, we believe there must be recognition of prior learning under a defined assessment process and that a range of qualifications should be considered by DCYA including for example play¹ and recreation, social care, youth work, family support and community development. Early Childhood Ireland has previously developed modules on school age childcare and was part of the Collaborative which developed the full SAC award, the School Age Childcare Collaborative Initiative Award. We are, therefore, in a position to inform the development of an accredited course for school age childcare. The availability of a specific accredited module as paid CPD for staff already working within the sector is important and will help drive quality. We recommend that for new entrants a minimum level 5 qualification specific to school age childcare (or equivalent) is a prerequisite. This requirement should be phased in over a three-year period so as not to impact the ongoing staffing crisis. The introduction of a new 'Learner Fund' aimed at supporting existing staff working within SAC to meet a mandatory minimum qualification and support staff who have an ECCE Major Award Qualification at Level 5 or above to attain further training. Along with this an additional five days Continuing Professional Development each year will be critical in improving the professionalisation of the sector.

¹ For example, [Northern Ireland Playwork Qualification](#)

NCS funding

Early Childhood Ireland is concerned that there are inconsistencies with regard to the information available on the National Childcare Scheme website and the Background Paper provided by the Department of Children & Youth Affairs at the Open Policy Debate. Early Childhood Ireland has requested a meeting with the Department as a matter of urgency to clarify the number of hours of subsidised childcare available to children at each education stage.

Conclusion

The government is confronting a series of significant challenges, many of which are undermining the economic viability and sustainability of both School Age Childcare and Early Learning and Care settings. At the same time, fees to parents are among the highest in Europe and pose a real threat to employment feasibility for parents. Adequate and accessible funding from government is required to ensure the cost of implementing new standards does not have the unintended consequence of limiting the sector's capacity for quality provision.