



**5 November 2020**

Submission to the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) on the Statement of Strategy 2021-2023

#### Introduction

Early Childhood Ireland welcomes the invitation from the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) to submit our views on the preparation of its Statement of Strategy 2021-2023.

Early Childhood Ireland is the leading organisation in the Irish early years sector. We have over 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 recommends a series of changes to the outputs under Strategic Objective 2 of the 2016-2019 Statement of Strategy (“High quality early years care and education is accessible and affordable”). The context for these recommendations is also provided.

### Context for the Statement of Strategy 2021-2023

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.
- Initiatives to promote affordability, the main one being the introduction of 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 to improve access for children, from, birth to ELC and SAC settings. The 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.

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 Department'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 and strategic planning. The latter includes annual regional assessments of demand, which are used to allocate funds according to local needs. Settings face separate and uncoordinated inspection processes (using sometimes unaligned inspection tools) from different agencies under the aegis of different Government Departments. This results in inefficiencies and a potential duplication of resources. The 2020 Programme for Government has committed to establishing a new single agency called "Childcare Ireland", but concrete plans for its establishment have not yet been made public.
- Around the world, the countries that have been able to promote universal access to ELC/SAC systems developed their policies on a universalistic basis. Access to high quality ELC/SAC services supports children's cognitive, social, and emotional development and a truly child-centred system is one that promotes and facilitates access for all children.

In Ireland, there has been a historical trend towards the strengthening of the universal components within the basket of ELC/SAC policies - the biggest expression of this being the ECCE scheme. But the amount of public resources available to fund the system outside the ECCE programme are scarce<sup>1</sup>. Outside ECCE access is financed by private resources and/or targeted subsidies. Two problems then emerge: first, there are various issues of targeting, which include stigma, the administrative complexities of reaching the target population on the side of the government, and the associated complexities in accessing the benefit on the side of the public. Those factors help explain why targeted policies fail to reach a significant share of the targeted population, which in our case, means that the ELC/SAC sector largely excludes children from disadvantaged backgrounds. Second, even parents who in principle have the resources to pay for ELC/SAC services may choose not to do so, given the high costs they face. As a result, the Irish ELC/SAC sector is highly dependent on ECCE. There are virtual universal enrolment rates in settings for 3- and 4-year olds, but most of them are not attending early years services for the full day or for the full year<sup>2</sup>. Moreover, enrolment rates of under 3's in Ireland – who have no ECCE and no AIM - are significantly below the OECD average.

- Besides not being conducive to universal access, a system that is characterised by very low levels of public investment cannot promote workforce development – and the quality of the workforce has been extensively linked to the quality of practice. On the one hand, ELC/SAC services are expensive to provide. The sector is labour intensive and there is very limited space for cutting costs via productivity increases. If 'output per hour', a standard measure of productivity, were increased by compelling workers to look after more children in each period, the quality of the service would be diminished. On the other hand, if fees are high enough, parents will tend to care for their children at home, which puts a limit on what providers can charge. As a result, providers in general face low and unpredictable margins. This hinders their capacity to pay appropriate wages. The unacceptable terms and conditions

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<sup>1</sup> Ireland only spends about 0,1% of its GDP on ELC/SAC, which is the lowest level in the EU. In recent years, more than half of this budget has been allocated towards ECCE and AIM.

<sup>2</sup> According to Growing up in Ireland survey, in the 2011/2012 academic year three-quarters of ECCE participants attended for only the 15 hours per week provided by the scheme. Although this estimated is outdated, the trend of over-reliance on the universal entitlement is also supported by the limited operating hours of providers. According to Pobal (2019), 46% of all services operate up to 20 hours during term-time. In addition, over half of services (52%) are open for up to 38 weeks only.

of employment for educators, alongside a lack of defined training and career pathways, have been extensively highlighted by Early Childhood Ireland.

- The low levels of public investment in services also lead to a high dependence on services that are informally provided. The home-based childminding sector 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.
- The low levels of public investment lead to critical sustainability issues for providers.
- 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.

### Recommendations

Early Childhood Ireland recommends a series of changes to the outputs under Strategic Objective 2 of the 2016-2019 Statement of Strategy (“High quality early years care and education is accessible and affordable”). It follows from the arguments previously exposed that Ireland should pursue a universal ELC/SAC system which is financed by high levels of public resources. There are various ways in which this can be done, one being a significant expansion of the current infrastructure of provision (through a substantial enlargement of the ECCE programme, for example). However, this option will ultimately be more costly to the government and will also perpetuate the administrative burden that providers have to deal with on a daily basis. Moreover, it may not necessarily lead to increased wages and sustainability.

If a high quality and accessible ELC/SAC system is to be reached, a radical transformation is required. Early Childhood Ireland advocates for a fully publicly funded ELC/SAC system, in which:

- Children have a legal right to a place from the time paid parental leave comes to an end. The structure of provision is not skewed towards a specific age group;
- Providers retain their managerial role over settings;
- Providers receive adequate financial compensation for personal property utilised;
- Providers are paid by the state according to occupational scales that consider their managerial responsibilities;
- Staff are paid according to pay scales comparable to primary school teachers. Permanent contracts of employment are the norm, with access to maternity, sick leave, and pension schemes. Pedagogically Síolta and Aistear would be maintained;
- Staff have funded time to implement Aistear and Síolta, and to engage in research and professional dialogue. They also participate in accredited CPD, which is fully funded;
- A professional body for the sector’s workforce is established;
- Compared to the current system, the administrative burden is naturally reduced. In addition, there would be administrative and IT departments, creating economies of scale;
- A single agency, currently envisaged as ‘Childcare Ireland’, and under DCEIDY as its parent department, oversees the sector. Among many other roles, the agency develops and implements a robust system to monitor and predict supply and demand, and child and family needs, through community assessment and the analysis of existing national data;
- There are administrative and governance structures at a local level to support the system;
- Public campaigns are implemented, aimed at parents and grandparents on early learning. They also promote ECEC at a wider societal level, highlighting its intrinsic value to babies and children. They are also aimed at supporting the development of a professional identity

amongst ELC/SAC staff. Communication plans create awareness of the profession and reposition the profession in the minds of the key stakeholders, general public, parents and the workforce;

- AIM supports are available to all eligible children, and cover a broader range of additional needs, to include, but not limited to disabilities;
- The system is free-of-charge for parents;
- As Providers would have a choice to enter or not the public system it is possible/likely that a fully private system, funded by parental fees would emerge. Purely private systems are known to be more flexible to parents' demands, regarding activities and hours. Parents should have the right to choose this flexibility;
- Further develop the School Age Childcare system, with a whole-of-government approach, to include the development of a further SAC action plan, SAC CPD and initial training and education, based on standards, rights of the child, and child-centred values;
- The Statement of Strategy should commit to develop and publish a whole-of-Government plan, led by the DCEIDY in its BOBF and First 5 coordination and governance roles, to implement the Project 2040 goal on "Access to Quality Childcare, Education and Health Services". The 2040 policy<sup>3</sup> states: "Project Ireland 2040 is the government's long-term overarching strategy to make Ireland a better country for all of us. Project Ireland 2040 is about doing things differently. We have changed how we invest in public infrastructure in Ireland, moving away from the approach of the past which saw public investment spread too thinly and investment decisions which didn't align with a clearly thought out and defined strategy". Project 2040, and associated National Development Plan 2018-2027 funding, provides the once-in-a-generation opportunity to take a strategic approach to develop a fit-for-purpose ELC and SAC sector. This plan should be developed in consultation with stakeholders. This plan should take early education (0-6 years) as part of the educational continuum, and not just invest in services that provide childcare to parents. This plan is vital to regional development. The plan should be based on data on population, disadvantage supply and demand and need. It provides an opportunity for ELC and SAC services to integrate around children and families in their communities in hub formats, as set out in First 5. It supports the implementation of DCEIDY's Universal Design Guidelines. This integrated approach to planning for the ELC and SAC sector should be reflected in BOBF 2.
- Childminders have an important role to play in the new public system. Childminding is in many ways distinctive of centre-based provision, as it offers a more individualised service, that tends to be more flexible in terms of hours and that keeps strong ties with local communities. Childminders should also be offered the choice to participate in the new public system, in which case they will be employed by the state and be subject to standardised pay scales and contractual arrangements. This way, parents who are not able to pay for private settings will also be able to choose the type of service that best fits the needs of their children;
- Publication of the Childminding Action Plan and, within the first year, introduction of a statutory scheme of registration and provision of the training and legal requirements (eg Garda Vetting). Increased childminding regulation will require an expansion of the childminding advisory team as well as a significant expansion of inspectorate and Better Start's capacities.

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<sup>3</sup> <https://www.gov.ie/en/policy/project-ireland-2040-policy/>