



## Early Childhood Ireland's Response to the Department of Children & Youth Affair's Public Consultation on the Draft Childminding Action Plan

### 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 the Draft Childminding Action Plan. In devising our response, we have considered the following:

- Draft Childminding Action Plan (August 2019);
- 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 also responded to the Online Survey.

The best interests of children are of the utmost importance to Early Childhood Ireland and we work to ensure that all children thrive in quality learning and care settings. Early Childhood Ireland welcomes the move to regulate the current informal childminding sector in Ireland in the interests of children. The current 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, and mechanisms to improve safety, practice and quality. Currently there are only 81<sup>1</sup> out of an estimated 19,000 childminders registered with Tusla, the Child and Family Agency. Early Childhood Ireland recognises 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 and detailed below are a number of recommendations informed by our experience of the transition towards a formal regulated system of centre-based Early Learning and Care.

### Introduction of Regulations and Inspections

The Draft Childminding Action Plan proposes the establishment of a working group to develop the regulations governing childminding settings. Early Childhood Ireland urges the DCYA to place child development and well-being at the heart of regulations and to include childminding's unique features in the design of the regulations. For example, research with children under two years ([Dalli et al, 2011](#)) has found that group size is the strongest predictor of home care providers' behaviour; childminders are more positive and responsive to children when fewer children are present. There is also a balance to be struck between children's health, safety and development, and the preservation and enhancement of the homely, intimate environment that is highlighted by parents and

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<sup>1</sup> [Response to parliamentary question](#) (01/10/2019)

childminders as one of the advantages of home-based services in Danish research (Rostgaard, 2015). The mixed age group feature of childminding also requires consideration. What is clear is that the current situation where a childminder can mind 7 school age children (aged from 4 to 15 years) and 1 child from birth to school entry at the same time is not in children's best interests.

Furthermore, it is also necessary when introducing regulation into homebased education and care settings to consider 'risk' and distinguish between risks and hazards. It is also important to consider the balance of risk under the different ages and stages of development, considering the individual needs of children including children with additional needs. While there is an undoubtable link between regulation and quality, an overemphasis on management, and less regard for the importance of interactions and the pedagogical quality of a setting has an adverse outcome for children.

Our learning from, and experience of, the move from an unregulated centre-based informal childcare sector to a regulated, publicly-funded one highlights the importance of the availability of appropriate supports, and phased transition periods. It is imperative that the registration process is a smooth transition for childminders. The phases will need to be signalled well in advance to the childminding sector, and to the statutory and non-governmental organisations tasked with supporting the sector, so that they can be ready. The Department of Children & Youth Affairs will need to make 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 these legislative changes, a new childminding registration unit will need to be established in Tusla, in the first instance.

#### National Quality Framework

Early Childhood Ireland recommends the development of an overarching National Quality Framework that incorporates National Quality Standards (a re-development of Síolta), National Curriculum Framework (Aistear), national legislation and proportionate regulations applicable to home-based education and care and school age-childcare. However, Early Childhood Ireland recommends that a new Early Years Agency ([Early Childhood Ireland](#), 2019) would have responsibility for this unit and given the necessary human, IT and financial resources to operate an effective regime. Early Childhood Ireland called on government to establish a single Early Years and School- Age Agency to align and integrate all functions relating to quality, planning, administration and funding. The agency would act as a 'one-stop shop' for parents and providers, whether centre based or home based. This national agency would guide the implementation of the NQF. The agency would also 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.

#### Minimum Qualification and Training

Early Childhood Ireland understands from the draft Action Plan that a Working Group is to be established to make recommendations on an appropriate training level - QQI levels 5 and 6 awards - through accessible, local, flexible training. Childminders work alone: levels 5 and 6 are the right levels of training then as set out by the National Qualifications Framework. Training for childminders will need to also encompass school-age childcare given that a feature of the childminding approach is a mixed-age group of children, and some childminders may choose to specialise in SAC. The training and education system is moving from prescribed centrally developed modules to an awards descriptors approach where institutions and partnerships develop descriptors across the areas of early childhood education and care. We recommend that awards be transferable across home- and centre-based settings. This would allow professionals to move between home- and centre-based services for personal reasons and for childminders to undertake work placements in both childminding and centre-based settings, to allow for career progression.

All training, qualifications, and skills should be underpinned by a National Quality Framework, comprising: The National Curriculum Framework – Aistear, the National Quality Standards – Síolta, and legal and regulatory requirements. The school-age childcare quality standards, developed by the Working Group, chaired by the DCYA, should also underpin the descriptors guiding the shape of the qualification. A distinguishing feature of childminding is mixed-age child groups, as would be the case in any family home. Furthermore, an email from one of Early Childhood Ireland’s partners in an EU-funded projects (Sandra Van Der Mespel 2019, personal communication, 21 September) suggests there is learning for Ireland from the Flemish government, which is currently investing in the support and professional development of family day carers. By 2024, each family day carer should have a qualification as a childcare worker. In the intervening period family day carers (without a qualification) are being supported by a mentor, who coaches and supports them through an adapted qualification path, including accreditation of prior learning. The DCYA could explore this model.

### Training

Access to training through freely available online resources could be an important stage of the transition phase. Online training creates a flexible pathway to learning and development and will enable childminders to achieve the pre-requisite foundational training. The EU Commission- funded Erasmus + [Child in Mind project](#) provides a free and accessible online course to childminders. There is an opportunity to further adapt the course content to the Irish context and include a module on school age childcare/mixed age groups. As a partner in Child in Mind, Early Childhood Ireland is in a position to develop this course content for the Irish context. That Irish policymakers would not be starting from the beginning in developing a foundational course that could begin their path to regulation could accelerate the implementation of the draft action plan.

The Child in Mind course offers learners an opportunity to gain essential theoretical perspectives and practical skills; the course content introduces the learner to foundational concepts and ideas. The programme focuses on play-based learning and introduces the learner to useful information to facilitate learning activities in the home. It aims to provide information to support the holistic development of children from birth to six years with a focus on the themes of Aistear.

Early Childhood Ireland welcomes the funding that the DCYA has already invested in first aid training for a cohort of childminders. This fund requires expansion over the coming three years so that childminders can be ready to register and offer the National Childcare Scheme.

### Mentoring Model

Childminder’s may experience isolation in their role, in turn making it more difficult to access supports and training. Early Childhood Ireland recommends the consideration of a mentoring model to provide childminders access to peer support, information, training and resources. A mentoring model would need to be led by suitably qualified and experienced mentors, with relevant training in home-based education and care. Previous research in this area can offer guidance to the development of such a network within the Irish context. The Family Child Care Network Impact Study<sup>2</sup> is the first study to examine staffed networks—programmes that provide services and support to family child care (FCC) providers affiliated with the network through at least one paid

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<sup>2</sup> Bromer, J. & Porter, T. (2017). Staffed family child care networks: A research-informed strategy for supporting high-quality family child care. Washington, DC: National Center on Early Childhood Quality Assurance, Office of Child Care, Administration for Children and Families, U.S Department of Health and Human Services.

staff person. The study examines the relationship between affiliation with a staffed network and quality of family child care among affiliated providers in Chicago. ELC services within Ireland provide opportunities to establish onsite group training and to establish communities of practice.

### International Evidence

There is no current system of Recognition of Prior Learning (RPL) in Ireland. Early Childhood Ireland believes that the development of an RPL system for childminders is critical to supporting the professionalisation journey of childminders. Early Childhood Ireland is a partner country in a current European funded project entitled ValChild, which aims to address the lack of a common European mechanism to assess, validate and classify the learning outcomes of prior learning. The project will develop a mechanism for validating the knowledge, skills and competencies of childminders through materials and tools, with a view to:

- facilitating assessment and recognition of prior learning; and
- and defining validation requirements, criteria and a recommendation for a certification scheme for the recognition of prior learning.

The development of a system of the validation of prior learning (VPL) provides opportunities for a process-orientated instrument that recognises and values what childminders have learned so far in their lives.

Ireland is not the only country making this transition from the informal to the formal. In Flanders (Sandra Van Der Mespel 2019, personal communication, 21 September), the transition from informal to formal childcare started in 1970 when the Flemish government started to develop the sector through family day care networks). Outstanding policy discussions remain, including adult/child ratios and the need for legislation tailored to family day care.

### Conclusion

This submission makes a range of recommendations for consideration in the future development of the Childminding Action Plan. Adequate and accessible planning and funding from government is required to ensure smooth transition towards the regulation of the current informal childminding sector and to ensure that the challenge of implementing new standards does not have the unintended consequence of limiting childminders' capacity for quality provision. It is important that families availing of both centre-based and home-based services can avail of the relevant funding supports under the forthcoming National Childcare Scheme.