

Submission to Public Consultation on the review of the initial implementation of the Child Care Act 1991 (Early Years Services) (Childminding Services) Regulations 2024

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Contents

Introduction 3
Background 3
Need for regulation 4
Review of Implementation 4
Recommendations 5
Conclusion 7

Introduction

Early Childhood Ireland welcomes the opportunity to make a submission during the public consultation on the review of the initial implementation of the Child Care Act 1991 (Early Years Services) (Childminding Services) Regulations.

Early Childhood Ireland is the leading children's advocacy and membership organisation in Ireland. We work in partnership with our members to achieve quality experiences for every child in Early Years, School Age Care settings, and childminders' homes. We advocate for an effective and inclusive Early Years and School Age Care system which values, supports, and invests in childhood, children and services.

Early Childhood Ireland welcomed the introduction of the proposed new Childminding regulations, which we believe offer the chance for a new era in the Early Years and School Age Care of children in home-based settings and have the potential to finally recognise the significant role childminders play.

We previously made a submission on the Department of Children, Equality, Disability, Integration and Youth's Draft Childminding Regulations.

Background

Early Childhood Ireland has considerable expertise in the research and development of Childminding. In 2025, we led Childminding research reports funded by the Department of Children, Disability and Equality:

Aistear and Síolta: Exploring childminders' perspectives and application. This research sought to explore whether the principles of Aistear (2024) and Síolta (2017) are reflected in dimensions of childminders' practice, in ways that may be intentional or unintentional, explicit or implicit, and particular to Childminding.

Learning together: Exploring children's and childminders' experiences of mixed-age communities in home-based settings. This participatory research with children and childminders explored their perspectives and experiences of mixed-age groups in home-based settings.

Early Childhood Ireland also commissioned the Centre for Educational Achievement, Stranmillis University College, to undertake a 'rapid review' of the research evidence in 2024 on the determinants of positive experiences and outcomes for children from birth to 15 years who participate in Childminding services. The full report is available here.

In collaboration with partners in Belgium and Denmark, we published our final report on *Enhancing Quality in Family Day Care (Childminding) in* 2022. This European Union-

funded peer learning project focused on enhancing quality in Childminding through exploring effective approaches to developing competent multi-level systems in Childminding governance and quality management, enabling professionalisation and workforce development, and generating Childminding recruitment and retention strategies.

Need for regulation

Childminding is almost entirely unregulated in Ireland. Even though an estimated 52,000 children are cared for by approximately 13,000 childminders nationwide, fewer than 1 per cent are currently registered with Tusla, the Child and Family Agency[1].

To date, in Ireland, there is no requirement for unregistered childminders to carry out a risk assessment of their service, nor for unregistered childminders or other adults living in their home to be Garda vetted. The introduction of greater child safeguarding measures through these regulations is welcome. It is also welcome that families who avail of Childminding will be able to benefit from the National Childcare Scheme (NCS) under these regulations.

Childminders will also finally receive the recognition they deserve from the State for their invaluable role in providing care and education to children in every community, and benefit from funding and other supports, such as Childminding-specific training and professional development.

Review of Implementation

Since the introduction phase, every County/City Childcare Committee (CCC) has contracted a Childminding Development Officer (CMDO) to assist with implementing the new regulations and deliver pre-registration training, which is an important development. Nevertheless, we are aware that there have been several challenges in implementing the regulations during the transition period following consultation with childminders and stakeholders.

At the time of writing, we understand that 179 childminders are fully registered with Tusla, and 814 childminders have completed the Pre-Registration Training[2]. This represents a very small proportion of childminders operating in Ireland. Early

[1] Childcare Services – Tuesday, 14 Apr 2026 – Parliamentary Questions (34th Dáil) – Houses of the Oireachtas

[2] Childcare Services – Tuesday, 23 Jun 2026 – Parliamentary Questions (34th Dáil) – Houses of the Oireachtas

Childhood Ireland is concerned that this means most childminders will wait until next year, which will be overwhelming for the CCCs.

This was noted at a meeting of the Joint Oireachtas Committee on Children and Equality, where there was a wide-ranging discussion about the implementation of the new regulations[3].

Recommendations

1. *Keep resources in place beyond the transition period*

   Considering the current registration rates and the concerns raised by CCCs, the Department should keep CMDOs in place after the deadline and allow them to continue running pre-registration courses nationwide to help more childminders register with Tusla. This may require an allocation of additional resources from the Department to guarantee continuity of delivery of the necessary pre-registration training and other supports.

2. *National Communications Campaign*

   While Early Childhood Ireland welcomes the progression to the next stage of consultation, we have repeatedly called on the government to run a national communications campaign regarding the upcoming 2027 deadline for childminders to register with Tusla.

   The government's National Action Plan on Childminding included a commitment to run such a campaign. While there has been communication with childminders and CCCs on the matter, Early Childhood Ireland believes that a broader national communications plan should be rolled out to increase awareness amongst childminders and parents of the upcoming changes and the new access to the National Childcare Scheme, which could benefit their families.

   Such a campaign would need to reach childminders working across Ireland. Platforms such as online news sites, social media, local & national papers and broadcasters should be utilised to increase awareness of the changes. Both the need to register for child safeguarding purposes, and the benefit of access to the NCS should be emphasised in such communications.

[3] Joint Committee on Children and Equality debate - Thursday, 19 Mar 2026

3. Adult-to-child ratio

The new regulations should align with the EU Quality Framework for Early Years and School Age Care and include conditions to make these services accessible and provide childminders with specialised training opportunities. We continue to recommend that a maximum number of 4, including up to 2 children under the age of 2 years, as outlined in the draft regulations, is an appropriate adult-to-child ratio. This contrasts with the draft proposal, which allows one adult per six children.

We know from our research in countries such as Denmark that lower adult-to-child ratios lead to higher-quality provision and ultimately benefit children. Early Childhood Ireland recommends reducing the proposed ratio of one adult to every six children to one to four, bringing us in line with our Nordic peers. We feel strongly that this change warrants consideration.

4. Safeguarding

Early Childhood Ireland notes Schedule 1 of the S.I 494 of 2024, Regulation 5. We acknowledge that, in our previous submission[4], we raised issues regarding safeguarding and offered draft amendments to address this lacuna. We welcome the fact that these have been considered within the regulations, which now require Garda Vetting for all persons aged 16 and over who normally reside in the home during the hours of operation of the proposed Childminding service. We look forward to its full implementation.

5. Other

While not directly connected to any one area provided for within the new Regulations, Early Childhood Ireland believes several outstanding issues should be addressed within the remainder of the transition period, or as a matter of priority following the transition period's conclusion:

- **Equal Participation:** programmes such as AIM should be extended to registered childminders.
- **Training level:** To ensure quality, childminders should complete a QQI Level 5 Special Purpose award training.
- **Support Network:** The establishment of a support system for Childminders where they can be mentored and network with local Childminders should be established through the County Childcare Committees (CCCs).

[4] https://www.earlychildhoodireland.ie/wp-content/uploads/2021/08/ECI-Submission-Child-Care-Act-Review-Feb2018.pdf

Conclusion

It is critical that childminders continue to be brought into the Early Years and School Age Care system as outlined in the National Action Plan. The Department of Children, Disability and Equality and other key stakeholders have taken on board findings from previous consultations as well as from international experience, and this is to be commended. Early Childhood Ireland believes that to date regulatory and other developments have also indicated an underlying recognition of the unique and important role of Childminding within the system. This is also noteworthy and will support effective implementation.

It is also vital for children, their families and childminders that the Plan is implemented effectively and as per the original timetable. Early Childhood Ireland believes that the progress made in the early stages of implementing the Plan has been somewhat stifled by an overall lack of awareness among childminders, parents, families and communities. Significantly more work remains to bring more childminders on board. We hope our recommendations will be seen as helpful to this.