



Consultation on Ireland's Draft National Action Plan for the EU Child Guarantee

Submission

January 2022

Introduction

Early Childhood Ireland is the leading membership organisation in the early years sector in Ireland, focused on our compelling vision of putting the child at the centre of our work. Our track record spans over five decades, and we currently have 3,900 members, who support over 120,000 children and their families through preschool, afterschool, and full day-care provision nationwide. Our work includes quality enhancement through the provision of training, support and information for a sector that employs over 30,000 qualified people. Early Childhood Ireland is also involved in policy development, and we campaign for greater public investment in early years and school-age childcare.

Early Childhood Ireland believes in children's rights. Keeping children at the centre of national policy frameworks is essential to achieving better outcomes for children and their families. We also maintain that the provision of universal access to high-quality, affordable and sustainable early childhood education and care is a crucial lever in combatting child poverty and social exclusion. The EU Child Guarantee identifies the provision of free access to early childhood education and care as one of the 5 core pillars to combat child poverty, recognising the critical role of early learning in the lives of children and their families. This EU Child Guarantee offers an opportunity for Ireland to commit to delivering a more resilient early childhood system that not only meets the needs of all children and their families but can provide early intervention supports to vulnerable young children and babies experiencing disadvantage and social exclusion.

Early Childhood Ireland welcomes the opportunity to respond to the Consultation on Ireland's National Action Plan for the EU Child Guarantee. As the leading membership organisation in the early years sector, we provide our thoughts and observations exclusively in relation to *Key Service – Pillar 1: Providing free access to early childhood education and care.*

Background and Context

Historically, Ireland has had a fragmented approach to early childhood development. Recent developments have reflected a recognition of the critical importance of high-quality early years

provision. *'First 5, A Whole-of-Government Strategy for Babies, Young Children and their Families 2019-2028'* has taken on board key recommendations from evaluations of the ABC and The Nurture Programmes, but further investment, as well as a robust monitoring system, are needed to realise the ambitious proposals set out in the strategy. The National Childcare Scheme, a proposed new funding model, as well as a stronger policy focus on provision for under 3s together have the potential to transform service provision in Ireland and ensure that every child regardless of family income has access to high-quality care and education as soon as they need it.

'First 5', the Whole-of-Government Strategy for Babies, Young Children and their Families describes how many young children spend much of their day being cared for by people other than their parents. The individuals involved in providing learning and care are the key determinant of quality and, for children to thrive, they must be equipped to foster the types of relationships and create environments that characterise positive experiences. High-quality Early Learning & Care (ELC) is invaluable for all children but particularly for children experiencing disadvantage or who have challenges at home. An effective early childhood system will ensure that those caring for young children are equipped to support early childhood development. In paid-for provision, this means an appropriately qualified and valued workforce, a consistently implemented curriculum framework and adherence to quality standards and regulations, particularly for publicly subsidised ELC.

The recently published report by the OECD, [Strengthening Early Childhood Education and Care in Ireland: Review on Sector Quality](#) gives an additional contextual picture of the Irish Early Childhood Education & Care (ECEC) sector from an international lens.

Enrolment, funding and provision

According to the OECD report, nearly all children aged 3 to 5 in Ireland (who were not enrolled in primary education) were enrolled in ECEC in 2019, which is above the OECD average; and 25% of children under age 3 were enrolled, which is close to the OECD average. Despite an increase in public investment over the past decade, the average expenditure per child aged 3 to 5 is below the OECD average. Moreover, among OECD countries, Ireland has one of the highest levels of childcare costs for parents.

However, if recent trends in public investment and commitments announced in the Budget 2022 were maintained over the longer term, Ireland would be making progress in catching up with OECD averages in future years. Given the market-driven nature of the ECEC sector, increased funding should be accompanied by mechanisms to ensure that it translates into higher quality.

The report goes further to say that Ireland is currently pursuing a strong policy agenda for Early Childhood Education and Care (ECEC), with the adoption of a long-term Whole-of-Government Strategy for Babies, Young Children and their Families, *'First 5'*. With this strategy, the country has committed itself to improve access, affordability and quality of ECEC provision. Related work and reforms are ongoing on the ECEC workforce, the funding system, home-based ECEC provision and governance of the sector. Implementing plans to increase public funding substantively to make ECEC more affordable for families, to strengthen the workforce and to support the policy agenda for quality improvement is an important step towards addressing the challenges of Ireland's ECEC sector.

Workforce development

Raising the levels of qualifications of staff working in the sector and the quality of their preparation has been a core element of Ireland's recent policies to improve the quality of provision for children. As a result of these efforts, the qualifications of staff in ECEC centres have risen, with the percentages of both staff holding the minimum qualification to work with children (ISCED 4 or NFQ Level 5) and staff with an ISCED Level 6 qualification (bachelor's degree) increasing over recent years. The government has made efforts to raise the quality of initial education programmes for ECEC staff, for instance, by setting standards and requiring the inclusion of a practical component.

The relatively strong focus on formal types of education to raise the qualification of the workforce would nevertheless benefit from being embedded in a more comprehensive approach that reflects the different needs of different staff. This requires a clear strategy involving employers, training providers and workforce representatives to facilitate access to training and also support more informal and centre-embedded learning, which can be demanding in terms of commitment, cost and time. The government has recently taken a more direct involvement in steering professional development, notably with the creation of a dedicated agency, Better Start, and the National Síolta Aistear Initiative. The recognition of prior learning is another important component that needs to be further developed.

The market-driven nature of the sector and the low level of public funding have resulted in low wages and precarious working conditions for staff (with a significant part of them working part-time and on temporary contracts), causing a high turnover in the sector. The establishment in 2021 of a Joint Labour Committee (JLC) tasked to develop and propose requirements for pay and working conditions in ECEC was established in 2021. It will be important that the JLC covers several aspects of terms and conditions of employment, including fixed-term contracts and working time.

Developing leadership will be an important condition for the success of ongoing policy initiatives to improve quality in ECEC in Ireland, be it through further staff development, greater consistency in the implementation of the curriculum and quality frameworks, or a greater focus on self-evaluation.

Quality assurance and improvement

In recent years, the Irish government has established a range of quality assurance arrangements for the Irish Early Childhood Education and Care sector. In addition to monitoring compliance with the regulatory standards that cover both structural and process quality, education-focused inspections were introduced for the publicly funded Early Childhood Care and Education Scheme (ECCE) programme to reinforce the focus on process quality. Ireland plans to extend education-focused inspections to non-ECCE provision and to bring a larger percentage of home-based settings within the scope of regulation and inspection through the recently published Childminding Action Plan.

Responsibilities and functions are allocated across different institutions, which has translated into an increased burden for providers, taking too much time away from staff focusing on children's experiences. Streamlining the activities of the range of bodies engaged in inspection and regulation and developing a single integrated framework to be used as the common reference point for all inspection activities and self-evaluation should be a priority going forward.

Complementing the role of the inspectorates, several organisations provide ongoing support and guidance to providers on quality. They advise on how to respond to issues identified in inspections and develop improvement strategies independently of inspections. However, access for providers to external guidance and support for improvement is limited and patchy. While potentially

challenging, the objective should be to establish a more easily accessible 'one-stop-shop' approach to directing providers to all relevant guidance and sources of support.

Several national bodies gather and analyse data and evidence to monitor the quality of the ECEC sector. Strengthening arrangements for appropriate data sharing between the national bodies with an interest in quality monitoring and improvement would allow for a more holistic view of performance in the sector. Early Childhood Ireland has campaigned for a single agency for the sector and the government has committed to the establishment of Childcare Ireland. We hope that the functions of data and evidence collection for monitoring the quality of service provision will be a role for this agency.

1. What is working well and enables children in need to effectively access these services?

The Access and Inclusion Model (AIM)

The Access and Inclusion Model (AIM) programme was launched in June 2016. It provides essential supports to both children and their pre-schools to ensure all children of all abilities can access and meaningfully participate in the ECCE free pre-school programme in a mainstream setting. Based on an ethos of inclusion of all children, its primary focus is the full participation of children with disabilities in the programme. AIM supports benefit not only children with disabilities but all children participating in the early learning and care service.

AIM is a good practice example of an ECEC schemes in Ireland that for children are:

- Based on a model of progressive universalism, the AIM model has 7 levels, moving by degrees from universal to targeted.
- The levels support both the child and the Early Learning and Care setting.
- It takes an interagency and interdepartmental approach to development, policy, strategy and implementation. AIM is an excellent example of a whole of government approach to children's policy and governance as outlined in *'Better Outcomes, Brighter Futures'* and *'First 5', A Whole of Government Strategy for Babies and Young Children*.
- Applying for AIM targeted supports is a simple process. This supports access and inclusion, which compares favourably with other more complex processes required for access of alternative ECEC schemes in Ireland, for example; the National Childcare Scheme (NCS).
- A formal diagnosis of a disability is not required to receive AIM targeted supports. This maintains a child-centred approach by focusing on the needs of each child which is a more effective and inclusive approach. The requirement of a diagnosis to access targeted supports can allow children to slip through the net and Ireland's long waiting lists for medical diagnoses means that essential early interventions in childhood may not be achieved for all children.
- AIM supports one of the goals of the EU Child Guarantee, as children are not segregated. Two levels of the AIM programme provide additional staff to services, and the staff work with all children in the room.
- Applications for targeted supports are made by the pre-school provider in collaboration with the parent, which increases parental involvement and requires a partnership approach.

Overall, AIM is an example of an effective access and inclusive ECEC model that can be replicated beyond issues of disability/additional needs. Since the launch of the scheme, over 12,100 children in over 3,300 services nationally have benefited directly from targeted supports. In addition, tens of

thousands more children have benefited from the universal supports and inclusive culture that AIM has helped to foster within preschool services. In an independent review carried out in the second year of AIM's operation, 78% of parents reported their child had benefited, and 76% of services said that AIM had made the culture at their preschool more inclusive.

The budget for the AIM programme was increased under Budget 2020, from €33 million to €43 million per year. This additional funding enabled up to 1,000 more children to benefit directly from targeted supports, as well as strengthening universal supports through increasing the proportion of preschool services with an Inclusion Coordinator. In Budget 2022, the government committed to the continued implementation of AIM which enables more than 5,000 children with a disability to participate in the ECCE. The recently published report on a new funding model, *'Partnership for the Public Good A New Funding Model for Early Learning and Care and School-Age Childcare'*, includes a commitment to extending AIM beyond the ECCE programme.

Early Childhood Ireland welcomes this renewed commitment to a mechanism that facilitates inclusive ELC. Recent reviews of AIM have found that it has enabled children with disabilities and their families to access essential services, improved staff to children ratios and developed staff capacity to care for children of all abilities. In the case of children with additional learning needs, we believe that AIM, which currently only applies to the ECCE programme, should be extended to all ELC and School-Aged Childcare (SAC) settings. We suggest that this option be examined as part of the current evaluation of AIM.

2. How effective are the current levels of access for children in need to these services and supports?

Early Childhood Care and Education Programme (ECCE)

The government's free pre-school programme (ECCE), which launched in 2009, has transformed early learning for children over the past decade. Through universal supports, it has provided important development opportunities for all young children. This has particularly benefited children from disadvantaged backgrounds and has raised the school starting age. It now supports over 100,000 children every term.

In the *'Growing Up in Ireland'* research report, parents who availed of the Free Preschool Scheme (96% of parents interviewed) were asked whether they would have been able to send their child to preschool had this policy not been in place. Just over one in five parents reported that they would not have been able to send their child to preschool without the ECCE. The same research report highlighted the particular importance of the ECCE Programme for less advantaged children who would not have enrolled in and benefitted from pre-school education without it. The research found that 39% of children from families in the lowest income quintile would not have had access to pre-school education without the ECCE Programme

'First 5', the whole-of-Government Strategy for Babies, Young Children and their Families contains a range of ECCE Programme related actions, including: *'Carry out a detailed assessment of the ECCE programme to identify groups of children with lower-than-average enrolment and participation rates and take steps to raise enrolment and participation among these groups.'*

Currently, there is no central planning or data collection mechanism to inform the delivery of targeted services to meet the needs of disadvantaged children and their families. The recently published report on a new funding model, *'Partnership for the Public Good A New Funding Model for*

Early Learning and Care and School-Age Childcare, recommends four core elements in a revised system, including a more targeted approach for low-income families:

- '1. Core Funding, a new supply-side payment for providers designed to support quality (including improved staff pay), sustainability, and enhanced public management, with associated conditions in relation to fee control and cost transparency, incorporating funding for administration and to support the employment of graduate staff;*
- 2. Funding for new universal and targeted measures to address socio-economic disadvantage;*
- 3. The ECCE programme, but with funding to support the employment of graduate staff incorporated into Core Funding, and AIM extended beyond the ECCE programme.;*
- 4. An amended NCS to provide enhanced universal support to all families, tailor additional supports to high volume users of services, and resolve certain issues arising from the NCS work/study test or wraparound policy.'*

Early Childhood Ireland welcomes these recommended measures in the new funding model report. A key factor in implementing effective targeted services to address the needs of disadvantaged children and their families will be the development of a baseline data collection system. We outline this in more detail in question 3.

3. Are outcomes for children in need in accessing these services currently being achieved?

Insufficient Data

There is a scarcity of data on children's early years especially under 3 years, including sufficient disaggregated data. The new funding model report, *'Partnership for the Public Good - A New Funding Model for Early Learning and Care and School-Age Childcare'* identifies the European Pillar of Social Rights 11th principle, that all children have the right to affordable early childhood education and care of good quality. It lists five key components that quality Early Learning and Care (ELC) and School-Aged Childcare (SAC) systems should ensure including the transparent monitoring and evaluation of service provision.

We hope that the new system of monitoring and evaluation of ELC and SAC service provision, recommended by the new report will provide the necessary baseline data though it is not clear if this will include outcomes for young children.

If we are to provide positive ECEC experiences and to influence positive outcomes for children, the lack of integrated consistent data and information on the quality of services, at both a service and a system level, needs to be addressed. We also need to find ways to identify those babies and children who are most in need of early intervention. In a recent presentation to the Joint Oireachtas Committee on Children, Disability, Equality and Integration, Early Childhood Ireland sought the Committees' action in responding to the worsening crisis of baby room closures in ELC settings. The closures themselves are of concern but this is also a key capacity metric about which no data is being collected. Baby room closures impact families across all demographics, but if there is decreased service provision for very young children, this will have a particular effect on those who are disadvantaged. Early Childhood Ireland asked Members of the Committee to request that the Department of Children, Equality, Disability, Integration, and Youth immediately begin to gather data on room closures, and to use this data to develop a robust policy response so that all families can have access to quality early years care and education.

A recently published ESRI report, [‘Measuring Childhood Disability And Aim Programme Provision In Ireland’](#), illustrates the importance of capturing early years data to plan for future educational and care supports for all young children, including children with disabilities. The collection of data, with a particular focus on the 3–5-year-old pre-school population, is essential to inform policy on the provision of accessible, inclusive, affordable and quality ELC and SAC services

As part of its Goal to achieve an effective early childhood system of services and supports, ‘First 5’ includes the following strategic actions under Building Block 4:

‘A strong national infrastructure for research and data that is used to inform policy and practice alongside an ongoing programme of monitoring and evaluation:

4.A Continue to fund and support the use of research on the lives of babies, young children and their families.

4.B Develop and enhance administrative data systems on babies, young children and their families to assess the quality and support the delivery of integrated supports and services.

4.C Put in place robust systems of monitoring and evaluation across Government.’

Early Childhood Ireland calls on the government to stand by its commitments in ‘First 5’ and to deliver a plan that will map out the implementation of a regional and national data strategy for babies, young children and their families accessing ELC and SAC services.

Child Poverty

The number of children at risk of poverty or who are experiencing consistent poverty remains unacceptably high in Ireland. There are over 200,000 children are currently at risk of poverty and among these, more than 90,000 are in consistent poverty. Child poverty must be addressed with proactive and comprehensive policy solutions.

The National Childcare Scheme (NCS) is the first-ever statutory entitlement to financial support for childcare for parents in Ireland and aims to:

- improve outcomes for children and support lifelong learning
- reduce poverty
- facilitate labour market activation
- tangibly reduce the cost of early learning and childcare in Ireland

However, in the recent 12-Month Review of The National Childcare Scheme, commissioned by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) an emerging issue on the impact of the NCS on disadvantaged families was identified. One of the four policy priorities of the NCS is to reduce poverty and more specifically to narrow the gap between more and less advantaged children by enabling all children to access high-quality, affordable childcare. The Review reported that positive impacts were substantially higher for families with lower incomes and families living in more disadvantaged areas. However, the proportion of families which reported negative impacts on family finances was highest in extremely/very disadvantaged areas, where 14% of families reported they had less money to spend because of the NCS. In addition to lower subsidy rates, many families were reported to be receiving fewer subsidised hours because of the higher threshold of need for the NCS sponsorship and because children in families not meeting the work-study test were only entitled to standard hours. This was seen as detrimental for preschool children from vulnerable families who benefit developmentally from more childcare hours and for school children from vulnerable families who benefit socially and educationally from after-school care. It

also found that the sponsor referrals process suffers from a number of weaknesses, including a lack of clarity in the criteria for support, parental reluctance to engage and share information with government bodies, a lack of knowledge or engagement by sponsor bodies and confusing bureaucracy.

The government needs to prioritise the poverty reduction objective of the NCS. This would help the most disadvantaged families as well as support the wider objective to reduce child poverty overall. It is hoped that the next review of the NCS will address the above issues.

The new funding model report, *'Partnership for the Public Good A New Funding Model for Early Learning and Care and School-Age Childcare'*, incorporates four core elements including a commitment for an amended NCS which will provide enhanced universal support to all families, tailor additional supports to high-volume users of services, and resolve issues arising from work/study or wraparound policy. Early Childhood Ireland has welcomed these developments which will help ensure that children's needs are at the centre of the NCS.

4. What key processes lead to the achievement of desired outcomes?

The key processes that will lead to the provision of free access to quality early childhood education and care to every child are dependent on the continued cross-government commitment to fulfil the goals and actions set out in *'First 5'* to build an effective early childhood system. Some of these actions include:

Investment

Ireland is among the lowest investors in ECEC across the OECD. However, increased investment in recent years and the funding commitments made in Budget 2022 demonstrate that the current Government recognises the importance of our sector and the scale of reform needed. The two recently published reports on funding reform and workforce development have the capacity to deliver real change however further investment must follow to realise the vision set out in these reports.

Data

There is a scarcity of data on children's early years especially under 3 years, including sufficient disaggregated data. The new funding model report, *Partnership for the Public Good - A New Funding Model for Early Learning and Care and School-Age Childcare* identifies the European Pillar of Social Rights 11th principle, that all children have the right to affordable early childhood education and care of good quality. It lists five key components that quality ELC and SAC systems should ensure including the transparent monitoring and evaluation of service provision.

We hope that the new system of monitoring and evaluation of ELC and SAC service provision, recommended by the new report will provide the necessary baseline data though it is not clear if this will include outcomes for young children.

Establishment of a Single Agency

Early Childhood Ireland called for the establishment of a single agency for early years and school-age childcare in 2019. The 2020 Programme for Government committed to establishing a new agency

called Childcare Ireland which will spearhead reform in our sector. The new agency should integrate all aspects of the ECEC sector including supply, quality, planning, programme delivery, administration, regulation and funding. The recommendations in the recent funding model report, *'Partnership for the Public Good'*, support this goal. It also discusses the role of local structures and the need for a sophisticated monitoring and evaluation framework to be introduced. We propose that the monitoring and evaluation framework would inform the supply, quality, planning, programme delivery functions of Childcare Ireland.

The EU Child Guarantee

The EU Child Guarantee and the EU Strategy of the Rights of the Child, both ground-breaking initiatives, present the timely opportunity to take real action on early childhood education and care at a national level. As we know, the EU Child Guarantee recognises early education and care as a key lever to ending child poverty. With 24.2% of children at risk of poverty and social exclusion in 2020 and the full extent of the impact of the Covid 19 pandemic yet to be understood, the effective implementation of the EU Child Guarantee in Ireland will be essential in developing integrated cross-sector approaches to achieving free access to quality education and care for every child.

Member States can draw on EU funding to support their actions under the EU Child Guarantee, in particular from the European Social Fund Plus (ESF+) and Next Generation EU. This will be crucial funding to support the development of a trained and sustainable early years workforce that can deliver quality education and care to children. The Guarantee goes further asking that when identifying children in need and designing their national measures, Member States should consider the specific needs of children from disadvantaged backgrounds, such as those experiencing homelessness, disabilities, those with precarious family situations, a migrant background, a minority racial or ethnic background or those in alternative care.

The EU Child Guarantee has progressed significantly at an EU level since 2015 when the European Parliament put forward the first resolution for free access to key services for every child at risk of poverty in Europe. Since then, a period of negotiation between the Member States has commenced in which Ireland has played a significant role. The next phase will be the implementation of the EU Council recommendations, which include:

1. Improve access to high-quality early childhood education and care systems in line with the statements set out in the 'Quality framework for early childhood education and care' presented in the 11th principle of the European Pillar of Social Rights.
2. Work towards ensuring that early childhood education and care services are accessible, affordable and inclusive.
3. Support the professionalisation of early childhood education and care staff, including leaders. Depending on the existing level of professional qualification and working conditions, successful efforts can include: (a) raising the status of the early childhood education and care profession by creating high professional standards, offering attractive professional status and career prospects to early childhood education and care educators, striving to reach a better gender balance and creating professionalisation pathways for staff with low or no qualification as well as specific pathways to qualify assistants; (b) improving initial education and continuous professional development to take full account of children's well-being, learning and developmental needs, relevant societal developments, gender equality and a full understanding of the rights of the child

(c) providing time for staff for the purpose of professional activities such as reflection, planning, engaging with parents and collaborating with other professionals and colleagues; (d) aiming at equipping staff with the competences to respond to the individual needs of children from different backgrounds and with special educational needs, including disabilities, preparing staff to manage diverse groups.

4. Enhance the development of early years' curricula in order to follow children's interests, nurture their wellbeing and meet the unique needs and potential of each individual child, including those with special needs or in a vulnerable or disadvantaged situation.

5. Promote transparent and coherent monitoring and evaluation of early childhood education and care services at the appropriate levels with a view to policy development and implementation. Effective approaches could include: (a) using self-evaluation tools, questionnaires and observation guidelines as part of quality management at system and service level; (b) using adequate and age-appropriate methods to foster children's participation and listen to their views, concerns and ideas and take the children's perspective into account in the assessment process; (c) implementing existing tools to improve the inclusiveness of early childhood education and care provision such as the Inclusive Early Childhood Education Learning Environment Self-Reflection Tool developed by the European Agency for Special Needs and Inclusive Education.

6. Aim at ensuring adequate funding and a legal framework for the provision of early childhood education and care services. Consideration could be given to: (a) scaling up investment in early childhood education and care with a focus on availability, quality and affordability, including making use, where appropriate, of the funding opportunities offered by the European structural and investment funds; (b) creating and maintaining tailored national or regional Quality Frameworks; (c) promoting better cooperation among services or further integration of them for families and children, most importantly with social and health services as well as schools, at national, regional and local levels; (d) embedding robust child protection/safeguarding policies within the early childhood education and care system to help protect children from all forms of violence; (e) developing a system that strives at: (1) a strong culture of dialogue and reflection, fostering a continuous process of development and learning between actors at all levels; (2) a high-quality of early childhood education and care infrastructures and appropriate geographical distribution in relation to the children's living environment.

7. Report through existing frameworks and tools on experiences and progress regarding access to and quality of early childhood education and care systems.

Quality development

High-quality early childhood education and care has been widely shown to provide a wide range of benefits for individual children, especially the most disadvantaged. In the *'Early Childhood Education: Equity, Quality and Transitions Report for the G20 Education Working Group'*, the benefits of quality early childhood education and care are examined in some detail. These benefits include supporting children's social and emotional well-being, lowering risks of school dropout and contributing to higher learning and employment outcomes later in life. Children's participation in early childhood education and care also offers greater opportunities for mothers and other caregivers to participate in the workforce, increasing household earnings and breaking stubborn cycles of intergenerational poverty.

The report also includes neuroscience research which shows that during the early years of a child's life (from birth until six years of age), children's brains have an extraordinary capacity for learning.

By the time a child is six, the same time most early childhood education programmes end, their brain has already reached about 90% of its adult volume. Early childhood education and care spans a critical development window which sets the foundation for later success in school, career and life. It is clear that early learning and care settings are best placed to provide critical interventions for children during this pivotal developmental period. It is essential that high-quality ELC and SAC services are provided to all children and that they are delivered by a trained, educated, consistent and valued workforce. The interlinked actions set out in the *'Nurturing Skills'* aim to deliver on this ambition for children. They are organised under five pillars:

1. Establishing a career framework, which includes actions to:

- > Set out a career framework, with clarity on roles and qualification requirements.
- > Strengthen leadership development opportunities, including through supports for managers and for distributed leadership responsibilities.
- > Move incrementally to introduce an induction process to support those entering the profession.

2. Raising qualification levels, which includes actions to:

- > Provide funded places on flexible education programmes at levels 6 to 8 on the National Framework of Qualifications (NFQ) for Early Years Educators and level 5 for SAC Practitioners, supporting staff to upskill while continuing to work.
- > Provide financial support to service providers to help meet the costs of releasing staff to go on student practice placements and study leave.
- > Introduce a funded special purpose award for SAC Practitioners who already have related qualifications (including in ELC) to meet a new SAC level 5 qualification requirement.
- > Finalise Professional Award-Type Descriptors for a level 5 award in SAC, and seek the development of combined level 5 programmes in ELC and SAC that will qualify an individual to work in either or both areas.
- > In line with the National Action Plan for Childminding 2021-2028, introduce funded childminder-specific Foundation Training and a Quality Development Programme to support childminders to meet new pre- and post-registration training requirements.
- > Support the development of initial professional education programmes or modules that are conducted through the medium of Irish (at levels 5-8).

3. Developing a national Continuing Professional Development (CPD) system, which includes actions to:

- > Implement a 'whole system' approach to CPD, coordinated by one agency.
- > Develop a single national gateway for access to quality-assured CPD resources, and to enable the recording and tracking of CPD engagement by services and staff.
- > Roll out Síolta, Aistear, the National Quality Guidelines for SAC and any future practice frameworks fully, supported by redevelopment of Síolta and Aistear CPD resources into a new blended format.
- > Introduce resources and training to support reflective practice and a single, national self-evaluation framework.
- > Embed the Key Person Approach across all ELC and SAC settings.
- > Strengthen structures and processes for the quality assurance of CPD resources.
- > Make CPD resources available in both Irish and English.

4. Supporting recruitment, retention and diversity, which includes actions to:

- > Develop a central hub or 'one-stop-shop' approach to careers and training opportunities in ELC and SAC.
- > Promote careers in the sector.
- > Promote gender-balance and diversity in the workforce.
- > Examine development of a range of entry-routes into the sector, including through work-based

learning and access programmes in further and higher education.

> Examine the scope for targeting potential Early Years Educators / SAC Practitioners from groups that are less well represented in the workforce.

5. Moving towards regulation of the profession, which includes actions to:

> Continue moving incrementally towards regulation of the profession.

> Consider bringing within a single professional standards body the work of the Qualifications Advisory Board and the qualification recognition process.

> Introduce a regulatory requirement for English language proficiency for Early Years Educators and SAC Practitioners in English-medium settings over an appropriate timescale.

Successful delivery on the commitments set out in the *'Nurturing Skills'*, the workforce development plan will rely on key enablers that lie outside the scope of the Plan but will be shaped by parallel reform processes currently underway. These include:

- Improvement in levels of pay and conditions of employment, which will rely on the progress of a Joint Labour Committee for Early Years Services that was established in 2021 and will be supported by the introduction of a new Core Funding stream for ELC and SAC services from 2022.
- Greater coordination of the quality support infrastructure, through reforms to be undertaken on foot of the Review of the ELC and SAC Operating Model.
- On-going engagement with the profession, including through a stakeholder engagement and communications plan, workforce representation on a Monitoring Committee for the Plan, and ongoing consultation and research involving the workforce.

5. What is not working well and/or presenting barriers for children in need trying to access to these services?

[The National Childcare Scheme](#)

The National Childcare Scheme (NCS) is the first-ever statutory entitlement to financial support for childcare in Ireland. Some issues were identified in the recently published Review of the scheme, including barriers for some families accessing supports, through the current sponsorship arrangements.

[The Work-Study Test](#)

In parallel with the publication of the Review of the National Childcare Scheme, the Department also published a Work-Study Test Evidence Review. This evidence review generated two key findings for the use of the work-study test in the NCS. Firstly, there is strong evidence that free or subsidised ELC for part-time hours is beneficial to both children's outcomes and parental employment. Secondly, the weight of evidence suggests that disadvantaged families benefit more from enhanced hours than more affluent families.

[Insufficient Early Learning and Care Places](#)

In the absence of a central planning and monitoring system, there is very mixed data on capacity within the early years system.

6. What could be done to improve the effectiveness and efficiency of each relevant service?

As discussed above, we've identified a number of measures that would improve services for children. These include:

- Much improved monitoring and evaluation;
- Local data collection;
- 'Supply and demand' and other data at a local level, as per commitments made in 'First 5'. This will support the sustainability and viability of publicly funded services.

7. Are there gaps in access provision for children in need to any of these services?

Due to the absence of comprehensive data collection in the early years sector, we rely mostly on data provided by Pobal to indicate gaps in access provision. According to the most recent Pobal Sector Profile report, only 0.5% of all services are in extremely disadvantaged areas, although 2.9% of the population reside in these locations.

Additionally, some issues were identified in the recently published review of the National Childcare Scheme, including barriers for some disadvantaged families accessing supports. One of the four policy priorities of the NCS is to reduce poverty and more specifically to narrow the gap between more and less advantaged children by enabling all children to access to high-quality, affordable childcare. The Review reported that positive impacts were substantially higher for families with lower incomes and families living in more disadvantaged areas. However, the proportion of families which reported negative impacts on family finances was highest in extremely/very disadvantaged areas, where 14% of families reported they had less money to spend because of the NCS. In addition to lower subsidy rates, many families were reported to be receiving fewer subsidised hours due to the higher threshold of need for the NCS sponsorship and the fact that children from families who do not meet the work-study test were only entitled to standard hours. This was seen as detrimental for preschool children from vulnerable families which benefit developmentally from more childcare hours and for school children from vulnerable families which benefit socially and educationally from after-school care. It also found that the sponsor referrals process suffers from a number of weaknesses, including a lack of clarity in the criteria for support, parent reluctance to engage and share information with government bodies, a lack of knowledge or engagement by sponsor bodies and confusing bureaucracy.

8. What are the three main priorities which you think should be addressed strategically to enable children in need to access these services?

1. Actions arising from the 12 Month Review of the National Childcare Scheme

The Department identified a series of actions to increase awareness of the NCS and increase support for families in accessing the Scheme. These include:

- Engaging with the named sponsor bodies around referral pathways and criteria for sponsorship
- Undertaking a rolling 6-month uptake review of sponsor arrangements
- In the longer term, introducing a DEIS-type model for early learning and childcare

- From 2022, discontinuing the practice of deducting hours spent in pre-school or school from the entitlement to NCS subsidised hours (as announced in Budget 2022)
- Increasing the availability of supports for vulnerable families through the following measures: A dedicated NCS Parent Centre is already available to assist families with applying to the NCS. City/County Childcare Committees (CCC) are available to families who require more intensive supports. The Department is currently engaging with those Committees towards enhancing these supports and working with hard-to-reach families and families experiencing difficulties accessing the NCS.

2. Establishment of a Single Agency

Early Childhood Ireland called for the establishment of a single agency for early years and school-age childcare in 2019. The 2020 Programme for Government committed to establishing a new agency called Childcare Ireland which will spearhead reform in our sector. The new agency should integrate all aspects of the ECEC sector including supply, quality, planning, programme delivery, administration, regulation and funding. The recommendations in the recent funding model report, *'Partnership for the Public Good'*, support this goal. It also discusses the role of local structures and the need for a sophisticated monitoring and evaluation framework to be introduced. We propose that the monitoring and evaluation framework would inform the supply, quality, planning, programme delivery functions of Childcare Ireland.

3. Sufficient Year on Year Investment for Quality and Accessible Early Education and Care

The funding commitments made in Budget 2022 demonstrated that this Government recognises the importance of our sector and the scale of reform needed. The two newly published reports on funding reform and workforce development 'have the capacity to deliver real change' however further investment must follow.

9. What are the most common issues, both positive and negative, in your experience, impacting on children in need accessing these services?

The Workforce

Despite the hitherto levels of state underinvestment, which were insufficient to support a well-qualified, skilled, diverse and valued professional workforce, the recommendations set out in the *'Nurturing Skills'* workforce development report can help to build a sustainable workforce that can deliver quality to children if implemented with sufficient resourcing.

'Nurturing Skills' recognises the central role that the ELC AND SAC workforce plays in achieving good outcomes for children and families. It also notes that despite its crucial value to young children's development and wellbeing, the workforce remains undervalued and many of those taking up employment in the sector do not see a future for themselves within the profession.

The vision underpinning the *'Nurturing Skills'*, the workforce development plan is: *'A well-qualified, skilled, diverse and valued professional workforce that is centred on children's rights, needs and potential and that provides quality experiences for children in partnership with families, and which continues to advance its professional development within a coherent and competent system'*. The vision and actions of the plan also align with the EU Quality Framework for Early Childhood Education and Care (which calls on EU Member States to achieve both well-qualified staff with the

training that enables them to fulfil their professional role and supportive working conditions) and with the commitment in *'First 5'* to develop an effective early childhood system that will help all babies and young children to have positive early experiences. Early Childhood Ireland welcomes this report and its recommendations as a development that can positively impact children and the essential ELC and SAC services that support them.

Lack of provision

Further Government considerations are needed with regard to the planning for childcare places and service provision at both a local and national level. We would hope that a single national childcare agency, Childcare Ireland, will fulfil this role under its remit. Though we are pleased that the current government has committed to establishing Childcare Ireland, we seek to ensure that it will be responsible for quality, information, programme delivery, financial management and strategic planning. Our current early years and school-aged childcare system is fragmented, with multiple relevant authorities and no central body. As well as drawing together all the disparate strands and integrating functions relating to quality, administration, and funding, Childcare Ireland should ensure that sufficient supply of childcare places in both centre-based care and childminders homes is provided nationwide to meet the needs of all children and their families.