



## Joint Oireachtas Committee on Children and Youth Affairs

### Contribution by Early Childhood Ireland

19<sup>th</sup> October, 2016

#### Introduction

Early Childhood Ireland welcomes the invitation to present to the Joint Oireachtas Committee on Children and Youth Affairs and to discuss how we can best contribute to the development of a robust and comprehensive Early Years Strategy and ensure a bright and sustainable future for early education and care in Ireland.

There are three major and interconnected challenges facing the ECE sector in Ireland: quality for children; sustainability for services and their staff; and affordability for parents.

Well qualified staff are essential for the delivery of a quality early education and care system. The difficulty faced by providers in retaining and recruiting well qualified staff will not be resolved without dealing with the low pay and poor conditions in the sector. Low pay cannot be addressed without proper funding that also supports sustainable business models for childcare provision.

There can be no positive progression in any of these areas without recognition of their interconnectedness and significant targeted investment by Government.

Our input today is based on our contributions to the recently established “National Collaborative Forum for the Early Years Care and Education Sector” (The Early Years Forum). It is also informed by our analysis of Budget 2017 and our new report “Doing the Sums: The Real Cost of Providing Childcare in Ireland”, which was launched by Minister Zappone on 29<sup>th</sup> September.

The previous Joint Oireachtas Committee made a very useful policy contribution in its ["Report on Affordable and Quality Childcare"](#) in January this year. We look forward to continuing to work with this new Committee, now dedicated exclusively to children and youth affairs issues during its term.

In this submission we focus on the strategic priorities for the sector.

## Strategic Priorities

We believe that investment in early education and care must focus on achieving progress across three key areas: quality, sustainability and affordability.

### 1. Quality: The best quality care and education provision for children in the most formative years of their development

In our recent Budget Submission we set out the immediate requirements to ensure we can build the quality of early education and care. We argued that improvements to ECCE will contribute to quality as they will address the professionalisation of the sector, including through

- an increase in the level of capitation with a ring-fencing mechanism to ensure both service sustainability and staff wages are addressed, which are currently inadequate;
- the extension of the programme contract by three weeks in 2017, reflecting an investment in non-contact time for early years professionals;
- creating a new permanent and comprehensive system for supporting learners to access further education and training that builds on the existing 'Learner Fund' model, caters for all levels and lead to the provision of a minimum of three CPD days per year for Early Years Educators.

These investments in the infrastructure of the sector are essential to underpin quality. Budget 2017 partially addressed the second aspect of this quality agenda, i.e. the extension of the programme contract by 1.4 weeks (7 days) through the provision of an additional €14.5 million, representing a significant recognition of 'non-contact time'. We warmly welcome this development which, we believe, can be built on in the coming years. We are disappointed that the other suggestions relating to ECCE capitation and CPD have not been advanced in Budget 2017 and consider these as matters for urgent attention.

### **Paid Parental Leave**

There is growing research evidence on the beneficial outcomes, for a child, of being cared for by a parent for at least the first 12 months of life and ECI strongly advocates this position. Prior to the introduction of two weeks paid paternity leave from September 2016, Ireland was one of only nine European countries that had no paid paternity leave. Since its introduction and together with the provision of 26 weeks paid maternity leave, Ireland now offers a total of only 28 weeks paid leave (7 months),<sup>1</sup> compared to the average of 76 weeks (19 months) paid leave for parents across Europe.<sup>2</sup> Mindful that UNICEF recommends 12 months' paid leave as a minimum, ECI welcomes the Programme for Partnership Government commitment to "significantly increase parental leave in the first year of a child's life" and "prioritise paid parental leave in the first year".

In addition to these initiatives, Government needs to:

- Initiate a new '**Early Education and Care Workforce and Professionalisation Plan**'. Government should conduct research and engage with the sector to develop a Workforce Plan that sets out a

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<sup>1</sup> In most cases, this amounts to only 6 months of paid leave with the child since mothers are required to take a minimum of 2 weeks leave prior to the birth of the child and most fathers/partners will take their 2 weeks paid leave immediately after the birth of the child.

<sup>2</sup> Public Affairs Ireland (April, 2015) 'Current Developments in Family Leave'.

realistic assessment of the number of early childhood professionals that are needed, and where, over the next 5-10 years, including their levels of qualification and how we recruit and retain them.

- Work with the sector to **agree recognised salary scales** for early years educators. Government must recognise and address the impact of inadequate state subsidies in sustaining the low pay in the sector. In order to ensure that Government can meet its own policy objectives to expand the childcare sector, it is critical that the sector is able to retain staff and attract new staff into the sector. The additional investment in the sector needs to take account of the need to increase salaries, where Government works closely with the sector to develop agreed salary scales in the medium term.

### Childminders

We also strongly support the inclusion of childminding in the new Single Affordable Childcare Scheme announced in Budget 2017. We have long been concerned about the numbers of children being minded in the informal and unregistered childminding sector where the cost of care is lower but where there is no regulation, oversight or inspection of quality for children. We hope that the new scheme will lead to a much greater engagement by childminders and we are encouraged by the current work of Childminding Ireland and the Department to advance this. We would like to offer our support these efforts over the coming months, and beyond.

### Access and Inclusion Model (AIM)

ECI welcomes the introduction of the Access and Inclusion Model (AIM), a model of supports designed to ensure that children with disabilities can access the ECCE programme. AIM commenced in September 2016 and we are monitoring its implementation within the sector. We are anxious to see AIM extended throughout the early education and care sector to ensure that children with additional needs in all childcare settings can avail of appropriate supports. We are committed to working constructively with DCYA, Better Start and the sector to this end.

## 2. Sustainability: Viability and sustainability for early childhood providers and staff

Some elements of the 'quality agenda' also have a bearing on the sustainability of childcare providers and their staff. It is critical that in addressing the short and long-term challenges to sustainability, Government needs to base subsidies on a **realistic assessment of the cost of providing childcare**. The financial viability and sustainability of childcare providers needs to be a key concern of policy makers, and not just the providers themselves. Government must address the structural deficiencies in the current funding model, whereby low state subsidies lead to low margins and keep the sector from fulfilling its mission. The levels of subsidy underlying the design of the Single Affordable Childcare Scheme, as well as the existing ECCE programme, must be based on a realistic assessment of the cost of providing childcare with adequate margins.

Our recent report "Doing the Sums: The Real Cost of Providing Childcare in Ireland" provides useful insights into the sustainability challenge for the sector right now. Among the key findings of the report are that:

- The average childcare service in Ireland, whether private or community run, urban or rural, operates on a breakeven basis. Even when a surplus is generated by a childcare facility, it is often too little to meet the cost of re-investment
- There is a clear trend for providers towards an ECCE-only model, alongside Out of School Care, in an effort to remain viable. This has led to a reduction in the provision of non-ECCE childcare, such as year-round full daycare, and care for the under 3's.

We know that this report, and the analysis and recommendations that are built on its research, are being studied carefully by the Department of Children and Youth Affairs and will contribute to the design of the Single Affordable Childcare Scheme. It is likely to serve as a useful starting point for the Minister's own study on the cost of childcare, as committed in the Programme for Government. The recent review of community early years services in Cork and Dublin "Breaking Point" will further contribute to the discourse.<sup>3</sup> We look forward to working closely with the Department to ensure that we can add value to the Government's own efforts to address the sustainability challenge.

In order to advance this agenda, Government also needs to:

- Develop a **Capacity Plan** for the sector based on evidence of need, setting out the numbers and locations for provision, and measures to address the most effective and efficient setting size mix needed, subject to geographic and other factors.
- Develop a new model of **Out of School Care** that is regulated, subsidised and avoids displacement. The Department of Children and Youth Affairs and the Department of Education and Skills need to be cognisant of the important role Out of School Care plays, and the danger of displacement, to the viability and sustainability of many childcare services in the planning and development of an Out of School Care model. ECI has made a number of contributions to this process and you will find a briefing note setting out ECI's position on the development of an Out of School Care model in Appendix 1.
- **Eliminate disincentives** so that providers can offer a full suite of childcare. Government needs to carefully construct its supports for early education and care so that it does not inadvertently create disincentives and barriers to services providing a full suite of childcare for children up to the age of six, and for out of school provision.
- Make all early education and care provision **exempt from Commercial Rates**, as education settings. The current inducement to providers to move to an ECCE-only model needs to be addressed immediately, where all community and private childcare providers offering ECCE-only services are exempt from commercial rates.

### 3. Affordability: Access and affordability for parents to childcare facilities and services.

In Budget 2017, Government made provision for the introduction of the new 'Single Affordable Childcare Scheme' from September 2017, including both targeted and universal elements. We strongly agree with the approach that underlies the Budget announcements, which include a new Childcare Subsidy of €0.50 per hour for under 3s (equivalent to €20 per week for full-time care) that is universally applied, as well as the development of a new consolidated and enhanced targeted scheme so that families on low incomes can avail of greater supports on a graduated basis, thus directly addressing the needs of children at risk of poverty. We also agree with the approach where the State pays the provider or registered childminder directly to subsidise the real cost of childcare, in keeping with international research showing that it leads to better outcomes in increasing the availability and quality of childcare provision. The initial €19 million investment in 2017 needs to be increased consistently year on year. We envisage that the universal scheme should achieve a

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<sup>3</sup> Breaking Point (July 2016): *The challenge of securing sustainable Early Years Services to support children and families most at risk of poverty. A review of Community Early Years Services in Cork City and South County Dublin.*

minimum subsidy of €1.50 (equivalent to €60 per week for full time care) by 2021. We also believe that the targeted element can also be further developed to ensure its efficacy in the coming period.

It is critical that we get the Single Affordable Childcare Scheme right from the start. The new Scheme must be planned and developed to ensure it provides a comprehensive and coherent system of supports for all children availing of childcare, including ECCE and Out of School Care, and provides a flexible and robust platform for all future investment in childcare. The design of the Scheme needs to:

- ☐ Be informed by the knowledge and expertise that the sector has to offer. Preparations for the Scheme need to include a comprehensive consultation and engagement process that ensures that the voices of providers and parents are heard;
- ☐ Recognise that a 'one size fits all' approach will not suffice and that one level of capitation will not work everywhere. For example, where the needs in particular communities must be addressed or where there are geographic factors at play, it may cost more to deliver a service. The universal level of capitation needs to be supplemented, where required, as part of the overall scheme;
- ☐ Be based on year-round supports, and incorporate non-contact time and CPD for all staff;
- ☐ Allows parents and providers to interface with a single, accessible and coherent system of supports.

We look forward to working with this Committee, the Department and the Minister in developing this critical element of Ireland's childcare infrastructure.

## Appendix 1

### Afterschool / Out of School Care: Briefing Note

#### Early Childhood Ireland

26<sup>th</sup> May 2016

The use of school buildings to develop an afterschool service in Ireland, envisaged as part of the new Minister for Education Richard Bruton's recently announced strategy for Education and Skills 2016-2018, may be the easy place to start the conversation but it's not the right place to start.

Rather than talking solely about afterschool care, the focus needs to shift to 'out of school care' by which we mean the wraparound services of breakfast clubs, afterschool clubs and what happens in between during midterm and school holidays. Alarming, especially since children using these services can be as young as four and five years old, after school and out of school services are currently completely unregulated despite years of advocacy from Early Childhood Ireland for this to be addressed.

At first glance, parents of school age children might see the move toward the increased use of school premises for afterschool care provision as a godsend. We are living in an increasingly demanding and fast paced world where the pressures of work and financial responsibilities on parents is immense and a quick fix can look appealing, on the surface. But we've got to look deeper.

First and foremost, we must focus on the out of school experience for the child and get the child's voice into this debate, as set out in Article 12 of the UN Convention on the Rights of the Child. So what is it that children want to do after school? Of course this might not tally with what adults want them to do. Is it to kick off their shoes, relax, have a snack, get their homework done, play with their friends, get away from the school desk? We need to hear from children themselves. That's why the research currently being spearheaded by the Citizen Participation Unit in the Department of Children and Youth Affairs on what children want on afterschool is so important, and needs to be fed into any decision-making on what happens next.

If we locate afterschool care in schools – there is a real danger that, for the child, it feels like an extended school day. School buildings bring with them a culture – a culture of work and discipline and large group activity. The culture is linked to the building and doesn't suddenly end when the bell goes at 2.30 pm. Maybe we can change this by introducing soft areas, different play spaces and an emphasis on relaxation - but at present Irish primary schools don't have the facilities.

We know that children need time and space to relax after a school day. Time to chill out and play. Like adults, they need a space that is different to the work space. We have to be fair to children. We know that children are becoming more and more stressed, driven by school exam pressure, by competition in the sports field, etc. We need to consider how their time spent when school ends impacts on their wellbeing.

Then we have to ask parents what they want and need because they are under pressure too. We need to be careful that our parenting doesn't focus on managing children so that we can cope with our busy lives. Parenting is about giving children a childhood – helping them to build a store of memories and experiences that will sustain them throughout life. Parents need choice, and maybe

there's a role for schools – but we must put children and their rights to a childhood at the centre of our decision making. Parents are relying on us to ensure that the system we develop is good for their children. Children are definitely relying on us to make good decisions for their life chances.

We must also ask the people delivering the service. It's reasonable to assume that we would build on the good service models already available out there in Irish communities. That means analysing the best afterschool / out of school models and using that bank of experience and consulting, and partnering (because they are not the same thing), with the people who are already doing it. What supports and investment do they need to build and possibly expand their service?

We need to plan smartly, setting realistic and achievable targets, by using the Pobal figures that are readily available to estimate the number of places required in afterschool / out of school, to build a scalable model that meets demand. We've got to plan based on population demographics and demand in each area, otherwise this won't be a sustainable model. We cannot have duplication of services and displacement and we must not use our limited resources in the wrong locations. We can't afford bad education economics.

Today, there is a patchwork of school age childcare facilities around the country, some school-based but many in private and community childcare settings, which employ excellent practices and have invaluable expertise. It is important that we don't lose this expertise. Rather, it needs to be harnessed and included in the development of a national model with a variety of options for parents underpinned by quality standards, state subsidies and regulation similar, for example, to New Zealand's Out of School Care and Recreation (OSCAR) model.

The Australian 'My Time, Our Place' model provides a comprehensive framework from which educators can extend and enrich children's wellbeing and development in school aged care settings. Closer to home, Síolta, Ireland's National Quality Framework for Early Childhood Education, has numerous standards already developed to enrich children's wellbeing and development that can be extended to school aged care settings.

We can learn from other countries in this analysis of what Ireland needs, with evidence of successful afterschool care provision in locally based and school settings from other jurisdictions like Northern Ireland, Scotland and Scandinavia. However, the success is linked to approach and facilities, for example afternoon clubs in Helsinki where the emphasis is on unstructured play, pursuing interests with friends, partaking in art and playing instruments, where the facilities in question have canteens and food storage, leisure rooms for children and wonderful outdoor spaces. Currently, many schools in Ireland simply don't have the facilities to ensure a focus on care, recreation and play over containment.

And we've been here before. The inter-departmental consultation process and the report produced by the Department of Children 'Future Investment in Early Years and School Age Care and Education' will also inform this debate and analysis. As will the core principles from the quality standards framework for youth work outlined in 2010 by the Office of the Minister for Children and Youth Affairs.

We can't build a quality, sustainable, afterschool model that prioritises a quality experience for children without the people delivering the service being qualified and experienced, and recognised and rewarded by a fair salary and an inspection process that inspects and respects their work. However, to date, successive governments have failed to recognise and reward the skills and dedication of the people delivering afterschool provision for children. The capitation and support on offer just isn't enough. Insufficient capitation has meant that the ambitious target of 6,000

subsidised places targeting low-income families announced in 2012, and launched two years ago, has so far only resulted in some 100 children availing of the scheme.

Minister Bruton's strategy around the use of school buildings is not the panacea for afterschool care provision. There is a danger, in the absence of a carefully developed care and recreation model, that afterschool and homework clubs on school premises will simply merge into an extension of the school day where children are managed, instructed and curtailed from 7.30 or 8.00 am to 6.30 pm.

In designing the right afterschool / out of school system for Ireland, we are making very big decisions about children's lives and our future as a society. Realistically no single model can meet the needs and best interests of all children, which will differ depending on their age, maturity and personality. Parents need affordable and flexible options within a high quality and sustainable system. Fragmenting settings and separating them into daycare, preschool and aftercare neither lends to quality nor sustainability and is unlikely to meet families' needs.

The experience of children must remain front and centre of our planning, and the views of providers must be listened to. As the people who shape that experience for children, theirs are the shoulders on which the after school / out of school model will be built.

## Recommended Actions

### 1. Audit

**Undertake an audit of afterschool / out of school provision in Ireland.** This should ascertain: the extent of existing provision across all the different provision models; the numbers and ages of the children availing of the various services; capacity and demand; where current gaps in provision exist; good practices (with a view to replication); and all other data necessary to ensure against the displacement of existing school and locally based provision in the future.

At present, afterschool / out of school provision falls into three broad categories. Firstly, early years educators operating out of their own premises or rented spaces in schools. Secondly, services provided by a school within the school. Thirdly, private childminders. We know that the City/County Childcare Committees are currently assisting Pobal with demand versus supply data in the context of additional ECCE places in 2016/2017, but they may not have access to data to establish capacity in the second and third categories mentioned. In order to overcome this barrier, and to include relevant provision in the Youth Work sector, the audit would best be undertaken independently.

The voice and experience of the child must inform all stages of planning and development in this area, including the audit. As the consultation with children committed to in Budget 2016 nears completion, it is essential that the findings be published and inform the audit as soon as possible.

### 2. Current Expenditure and Capital Funding

**Develop systems to channel both current and capital funding for afterschool / out of school provision.** The provision of afterschool / out of school services must be about ensuring the best interests of children and families, and not a mechanism by which additional capitation is provided for schools. Any additional expenditure in this area needs to be developed and integrated within the Single Affordable Childcare Programme, with responsibility for its rollout clearly vested with the Minister for Children and Youth Affairs and her Department.



We must learn from the failure of the After-School Childcare (ASCC) Programme to increase the provision of funded after school places, due to unsustainable capitation levels. The success of an afterschool / out of school system will require increased State investment throughout the childcare sector.

Additional capital funding for afterschool / out of school provision should also be provided, and compliment capital funding for other early childhood education, to ensure coherence and consistency.

### 3. Regulations

**Develop regulations and guidelines for afterschool / out of school provision.** The development of a formal afterschool / out of school system throughout Ireland must be accompanied by specific regulations and guidelines, which could be fashioned from the existing *Child Care Act 1991 (Early Years Services) Regulations 2016*. While these regulations and guidelines are being developed, Tusla's oversight function could be established through a contractual condition of funding.

### 4. Training

**Provide relevant training to practitioners.** School age care is distinct from early years care and requires a different set of skills from those for working in early years services. A new policy directive to expand afterschool / out of school provision should see specific and relevant training made available to providers, such as the former QQI Level 5 training in School Age Childcare, which was discontinued by FETAC in December 2012.

### 5. Stakeholder Consultation

**Involve stakeholders in guiding the development of afterschool / out of school provision.** The experience of children must remain front and centre of our planning, and the consultations with children themselves are essential to any further developments. The views of providers, as the people who shape that experience for children, must also be listened to. In this regard, a process of consultation needs to be undertaken with early years educators and other stakeholders in afterschool / out of school provision on the development of a new system.

## Appendix 2

### Other Improvements

In addition to the above investment priorities, Early Childhood Ireland suggests that there are improvements that could be made that do not require investment or significant resources.

These include:

#### 1. Improving Communications with providers

There are a number of communications issues that need to be addressed, including:

- Poor communications regarding the ECCE contract and the PIP Portal.
- Delays in Communication of Information.
- Lack of clear information and at times conflicting information, particularly in navigating the PIP portal.

#### 2. Streamlining the paperwork, getting PIP working properly and paying people on time.

There are other changes that can be made to the administrative system, including:

- Speeding up the 'Top-Up Payments'.
- Paying Services on Time, through addressing procedures for dealing with technical errors.
- Improving the Fees Policy template.

#### 3. Inspections

Currently, the early years sector can be subject to seven different inspections at any given time:

1. Regulatory inspection by the Tusla Early Years (Pre School) Inspectorate;
2. Early-Years Education-focused Inspection (EYEI) by the Department of Education and Skills (DES);
3. Compliance visits by Pobal's Compliance, Audit & Risk (CAR) directorate of services operating DCYA funded programmes i.e. ECCE, TEC and CCS;
4. Health and Safety Authority inspection of health and safety in the workplace;
5. Workplace Relations Commission (WRC) inspection of compliance with employment rights legislation;
6. Food Safety Authority;
7. Fire Safety Inspection.

Being constantly prepared for possibly multiple inspection visits is inherently stressful, resource intensive and bureaucratically demanding. Difficulties can arise for services due to the lack of consistency and complementarity, particularly between the Tusla and DES inspections, or when the framework guiding the inspection is not consistently applied or fully understood in advance (Pobal compliance inspection).

Services providers and stakeholders need to feed into the work of the Operations and Systems Alignment Group, currently being chaired by DCYA and comprised of the Tusla Early Years (Pre School) Inspectorate, DES Early-Years Education-focused Inspectorate, Pobal and Better Start, which is tasked with:

- ☐ Supporting alignment and collaboration in the work of agencies across the sector;
- ☐ Minimising disruption to service providers by ensuring two agencies do not call to a service at the same time;
- ☐ Working on joint protocols.