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Working paper based upon the PLÉ submission to the DCYA (Department of Children and Youth Affairs) consultation on the statement of strategy 2016 - 2018

Introduction

In contributing to the consultation on the DCYA Statement of Strategy 2016- 2018, PLÉ draws upon the following core initiatives:

- *DCYA Statement of Strategy 2015 – 2017*
- *A Programme for a Partnership Government, 2016*
- *Better Outcomes Brighter Futures: The national policy framework for children and young people 2014 – 2020*
- *Report of the Interdepartmental Working Group: Future Investment in Early Years and School Age Care and Education Services (DCYA, 2015)*
- *Report of the Interdepartmental Group: Supporting Access to the Early Childhood Care and Education (ECCE) Programme for Children with a Disability (DCYA/DES, 2015)*
- *Joint Oireachtas Committee on Health and Children (January, 2016) ‘Report on Affordable and Quality Childcare’¹.*

We acknowledge the recognition of the importance of early childhood, and the commitment to prioritising the early years which is evident across all these documents. The importance of early childhood is further enshrined within the vision for children and young people in Ireland, adapted in the previous DCYA Statement of Strategy (2015 – 2017)

Our vision is to make Ireland the best small country in the world in which to grow up and raise a family, and where the rights of all children and young people are respected, protected and fulfilled; where their voices are heard and where they are supported to realise their maximum potential now and in the future (DCYA, 2014, p. 4).

Since its establishment in 2011, the DCYA has endeavoured to make this vision a reality, and PLÉ acknowledges that it has delivered on a number of key commitments including:

- Investing €35 million *Growing Up in Ireland* : the national longitudinal study of children;
- Holding a Referendum on Children’s Rights , 2012;
- Establishing TUSLA: The Child and Family Agency, 2014;
- Publishing the first National Policy Framework for Children and Young People, *Better Outcomes, Brighter Futures*, 2014;
- Publishing the *Childcare Act 1991 (Early Years Services) Regulations*, 2016;
- Expanding the ECCE scheme from September, 2016

¹ This submission also draws upon the PLÉ submission to the consultation on the DES Statement of Strategy 2016 - 2018

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- Introducing a minimum training requirement at Level 5 on the National Framework of Qualifications (NFQ) from December, 2016, and
- Introducing the *Paternity Leave and Benefit Act, 2016*

Better Outcomes Brighter Futures (DCYA, 2014) recognises that investment in children is a collective social and economic imperative, and therefore, it focuses upon ‘investment in early childhood care and education, and implementation measures to support and regulate improvement in the quality of services’ (DCYA/DES, 2015, p. 42). PLÉ acknowledges the increased investment in the ECEC sector in recent years, including:

- €260 million investment in childcare in 2015; primarily invested directly into three State subsidised programmes: the Early Childhood Care and Education (ECCE) Programme; the Community Childcare Subvention (CCS) programme, and the Training and Employment (TEC) programme
- €85 million childcare package introduced in Budget 2016 including a new model of support for children with special needs; expansion of the ECCE programme to allow children to start pre-school at 3 years of age, and to continue until they transition to primary school; expansion and extension of the CCS programme to private providers

A Programme for Partnership Government suggests that the political system in Ireland, continues to focus upon the short-term and ‘does not easily accommodate long-term thinking’ (p.12). However, as proposed in *Better Outcomes Brighter Future* investment in early childhood must ‘be guided by a medium to long-term perspective’ (, 2014, p. 3). With this in mind, and given our particular interest in children aged from birth to six years, the PLÉ submission to the consultation on the DCYA Statement of Strategy 2016 – 2018 focuses specifically upon the Early Years (children aged from birth to six years in both pre-school, early years settings and the infant classes of primary school). It also draws upon our recent submission to the DES consultation on its Statement of Strategy 2016 – 2018. Our submission highlights a number of areas considered by PLÉ as central to the new DCYA Statement of Strategy 2016 – 2018: 1) Vision and Principles, 2) Investment, 3) Harmonising policy and provision across Government, 4) Transition to school, 5) Workforce development, 6) Making better use of educational assets within communities, 7) Special needs education, and 8) Meeting the skills needs of the future.

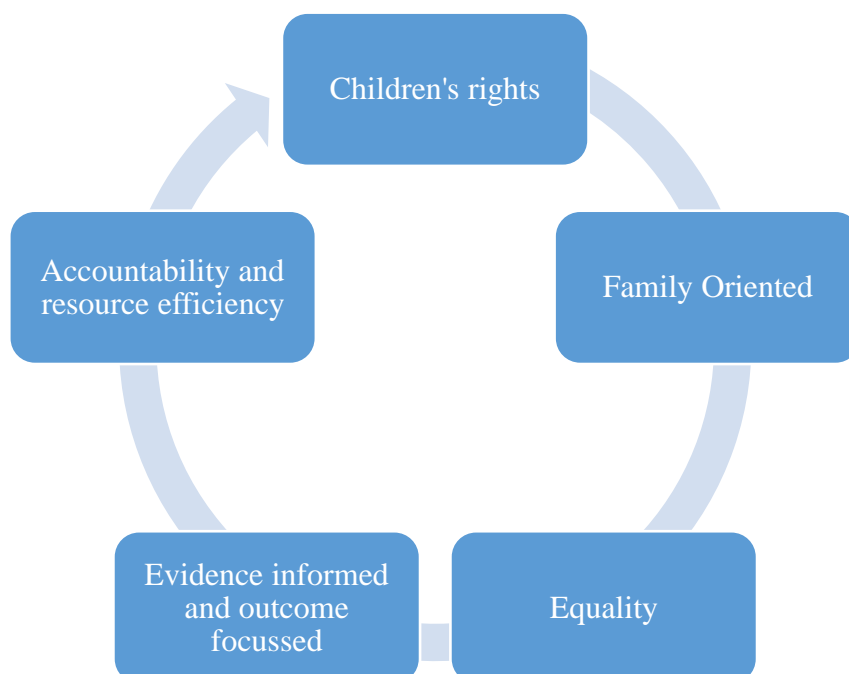
Vision and principles

In its statement of strategy, 2015 – 2017, the DCYA acknowledges that *Better Outcomes Brighter Futures* provides the context for the Department’s work, as well as a single blueprint for both the DCYA and its colleagues across Government in planning and prioritising actions to improve the lives of children and young people in Ireland to 2020. It is clear that the DCYA, and the Government as a whole, have adopted the vision for children and young people in Ireland proposed within *Better Outcomes Brighter Futures* (DCYA, 2014)

Our vision is to make Ireland the best small country in the world in which to grow up and raise a family, and where the rights of all children and young people are respected, protected and fulfilled; where their voices are heard and where they are supported to realise their maximum potential now and in the future (p. 4)

PLÉ recommends that in placing this vision to the forefront of its Statement of Strategy, 2016 -2018, the DCYA should also adopt the guiding principles embedded within *Better Outcomes Brighter Futures* (DCYA, 2014)

Figure 1: Guiding Principles²



² A full definition of each guiding principle is available in *Better Start Brighter Futures* (DCYA, 2014, p.21)

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These guiding principles provide a succinct statement of intent, while also serving as a mechanism against which to benchmark future DCYA actions.

Investment

In 2008, the report of the United Nations Children's Fund (UNICEF) stated:

*Today's rising generation is the first in which a majority are spending a large part of early childhood in some form of out-of-home childcare. At the same time, neuroscientific research is demonstrating that loving, stable, secure, and stimulating relationships with carers in the earliest months and years of life are critical for every aspect of a child's development. Whether the childcare transition will represent an advance or a setback for today's children and tomorrow's world **will depend on the response** (p.1).*

It is noteworthy, that in its previous Statement of Strategy, 2015 – 2016, the DCYA state that budgetary constraints demand 'demonstrable strategies for achieving value for money and working to ensure improved systems of resource allocation'. Although PLÉ accepts the importance of working within budget, and the need to achieve value for money etc., it must be acknowledged that there has been a historic underinvestment in ECEC provision in Ireland. Following the €85 million childcare package introduced in Budget 2016, public investment in Ireland's ECEC services has increased to 0.3% of GDP (not including expenditure for young children in primary school). This investment, albeit increased to 0.3%, falls far short of the 0.8% average across the OECD, and the UNICEF (2008) international benchmark of 1% of GDP. Although the need to enhance the quality of provision permeates ECEC discourse and policy; it must be recognised, that this cannot be achieved on a shoe-string budget.

It is widely acknowledged that educators remain among the most poorly remunerated of all professional groups (Herzenberg, Price, and Bradley 2005; Boyd 2013; Moloney 2014, 2015, 2016; Moloney and Pettersen, 2016). While research evidence links graduate level educators to the development of more effective early years provision, the fact remains, that there is no correlation between educational attainment, professional status, and compensation in Ireland. This poses a significant threat to the professionalisation of the sector, as many educators feel undervalued and underappreciated, with increasing numbers leaving in search of better paid work elsewhere including shops (Madden, 2012, Moloney and Pope, 2013; Moloney, 2014, 2015, 2016; Moloney and Pettersen, 2016). *'A Programme for Partnership Government'*

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commits to ‘tackling the problems caused by the increased casualisation of work that prevents workers from being able to save or have any job security’ (p.40). Yet, remuneration in the sector is leading to ‘in-work poverty’, while the ECCE programme has resulted in the casualisation of the workforce. The issue of casualisation is directly related to the semesterisation of the ECCE programme in line with the school year, whereby, capitation to settings is only paid for 38 weeks of the year. However, many Early Years Services are open all year round to facilitate working parents, and therefore, semesterised payments do not meet the needs of these parents, nor of the educators working in these settings. Based upon primary research with 47 early years managers in Ireland; 33 community, and 24 private, Moloney and Pettersen (2016) conclude that both the quality of provision and the financial viability of services, is considerably compromised by the provisions of the ECCE programme. Because payments under the programme cease at the end of June each year, many parents remove children from services due to their inability to pay, and educators are laid off during the summer months to claim welfare payments (Moloney and Pettersen, 2016). In fact, Pobal (2014) estimate that 3, 370 approx. educators (14% of the overall ECEC workforce) are forced to sign on the live register during the summer months at a cost of €7.2 million to the exchequer.

Increase Investment to 0.8% of GDP

The mission of the DCYA is ‘to lead the steps needed to improve outcomes for children and young people in Ireland’ (DCYA Statement of Strategy, 2015 – 2017). The proposed new Statement of Strategy 2016 – 2018 provides an opportunity for leadership, at the core of which must be a firm commitment to increase investment in ECEC. PLÉ recommends that the DCYA

- **Increase investment from 0.3% to 0.8% of GDP over the lifetime of the strategy and beyond, to 2020.**

We believe that increased investment is essential to:

1. **Alleviate the cost of childcare for parents** in Ireland who are considered to spend more than 40% of Net income approx. on childcare costs, ahead of Switzerland, Canada, the US, and New Zealand (OECD Economic Surveys: Ireland, 2015)
2. **Extend the capitation associated with the ECCE programme** from 38 to 48 weeks of the year to redress ‘the problems caused by the increased casualisation of work that prevents workers from being able to save or have any job security’ (*A Programme for*

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Partnership Government, 2016 p.40). This is not to suggest that those early years services currently operating for 38 weeks of the year, should open all year round. Rather, it is intended to enable ECEC providers to remunerate their staff during holiday periods as happens in other professions such as teaching.

3. **Introduce pay parity** between early years educators and primary school teachers where both hold an honours degree

Harmonising policy and provision across Government

A core aspect of the DCYA's mandate relates specifically to harmonising policy issues that affect children in areas such as early childhood care and education and provision' (www.dcy.gov.ie). Indeed, this is a core strategic objective (1) and a priority activity within the present Statement of Strategy, and it is closely aligned with strategic objective (5) which is directed towards supporting 'children and young people so that they can fully engage in active learning through the provision of high quality early childhood care and education...'. PLÉ recommends:

- **Greater harmonisation between the DCYA, the DES and TUSLA as a political imperative over the lifetime of a long-term statement of strategy**

Such harmonisation is particularly essential to the area of inspection and regulatory enforcement within the early years sector.

The Regulatory Regime

As far back as 1999, the Department of Education and Science proposed that 'early childhood providers in receipt of State funding for developmental places would be subject to inspection', and that 'the purpose of inspection will be to determine whether provision meets the developmental and education standards set by the DES'. It also noted that 'the Child Care Regulations cover matters of health and safety, and standards do not extend to the developmental or educational component of services of the training and qualifications of staff' (DES, 1999). The many developments within the sector since the publication of *Ready to Learn*; such as the practice Frameworks *Síolta* (CECDE, 2006), *Aistear* (NCCA, 2006), the introduction and expansion of the ECCE programme, and the development of the *Access and Inclusion Model* (AIM) have considerably altered the early years landscape and operational environment. Moreover, in stark contrast to the previous Childcare (Pre-School

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Services) Regulations, 1996 and 2006, the newly published *Child Care Act 1991 (Early Years Services) Regulations, 2016* focus upon both the training and qualifications of staff, and place a greater emphasis upon the developmental/educational component of services.

PART V: Care of Child in Pre-School Service, Health, Welfare and Development of Child, section 19. (1) States that a registered provider shall, in providing a pre-school service, ensure that—

- (a) Each child’s learning, development and well-being is facilitated within the daily life of the pre-school service through the provision of the appropriate activities, interaction, materials and equipment, having regard to the age and stage of development of the child, and
- (b) Appropriate and suitable care practices are in place in the pre-school service, having regard to the number of children attending the service and the nature of their needs (Government of Ireland, 2016, p.18).

The establishment of TUSLA: the Child and Family Agency in 2014 has resulted in significant reform of the early years inspection regime. Services must now register with, and be inspected by TUSLA. However, the TUSLA inspection is only one of many inspections to which early years services are subjected, others being POBAL, Health and Safety, the Department of Education and Skills, and the Work Place Relations Commission for example. In relation to the DES, its inspectors now undertake Education Focussed inspections of services participating in the ECCE programme. While these inspections ‘validate the work of early years educators by adopting a strengths- based approach to inspection’ (Moloney, 2015), there is no doubt that they add another layer of bureaucracy to an already burdened sector. Moreover, an unintended consequence of the DES inspections is the re-emergence of a care/education divide. Consequently, while the ECCE programme is clearly associated with education, working with children from birth to three years of age has been reframed as ‘care’, for which little training is required³. Furthermore, investment in the early years is almost exclusively focussed upon the ECCE scheme. In terms of inspection, as it relates to settings catering for the younger age group (birth to three years), the pre-dominant focus remains upon health and safety, rather than education more broadly. PLÉ believes that this twin-track approach to inspection is incongruous, and contradicts strategic objective (5) of the DCYA Statement of Strategy 2015 – 2017, which as mentioned earlier, aspires to support ‘children and young people so that they can fully engage in active learning through the provision of high quality early childhood care and education...’. Accordingly, children under three years

³ The issue of staff qualifications is discussed in detail later in this working paper

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are increasingly disadvantaged in terms of investment, qualified staff, and a holistic approach to their early care and education (Moloney, 2015).

Although the DES have recruited ECEC graduates who must have at least 5 years' experience within early years settings (birth-6 years) to complement the existing DES inspectorate, TUSLA inspections continue to be undertaken “predominantly by public health nurses acting as early years ...” (Jeyes, 2013). Within the sector, there is a belief that the qualifications and role of the inspectorate is ‘too narrow with the primary focus on health and welfare, rather than more broadly’ (Start Strong, 2013, p. 3); as a result, there is a reality disconnect between those working in the sector and those inspecting ECEC settings (Moloney, 2014). The difference in inspectorate qualifications, and approaches to inspection, may be driving an emerging discontent among some early years educators who suggest that they are receiving contradictory advice and recommendations from the DES and the TUSLA Inspectorates. There are indications also of overlap in terms of the documentation required by both inspectorates, as well as conflicting advice and recommendations from DES/TUSLA inspectors and Better Start Specialists.

Based upon the various anomalies outlined, it is apparent that the present inspection regime should be reviewed and reformed. PLÉ recommends that:

- **The DCYA, the DES and TUSLA collaborate** and agree upon a robust unified single inspection regime. This is especially important for children under three years as international experience indicates that the best provision for this age cohort is achieved when policy making is unitary, with a single set of rules, supports and funding arrangements (Kaga, Bennett and Moss, 2010)
- **A common inspection framework** that takes account of both the health and safety aspects of the the *Child Care Act 1991 (Early Years Services) Regulations, 2016*, and the educational aspects of early years provision be developed
- **The common inspection framework be used across the early years sector** (pre-school and infant classes in primary school) to ensure a continuum of provision for children in the birth to six years cohort
- **Appropriately qualified ECEC graduates** with relevant experience working in the early years sector be recruited as an interim measure to enhance TUSLA inspection teams

Transition to school

PLÉ believes that the area of transitions, especially the transition between pre-school and primary school requires greater harmonising of policy between government departments. Strategic objective 5 of the current DCYA Statement of Strategy 2015 – 2017, is concerned with supporting children to fully engage in active learning, including through the provision of high-quality early childhood care and education. The practice frameworks *Síolta* and *Aistear* have the capacity to transform practice within settings when fully implemented. It must be borne in mind however, that these frameworks apply to children in the birth to six age cohort which includes the infant classes of primary school. We acknowledge the willingness, and the efforts of the DES in recent years to ensure that play becomes a core aspect of pedagogical practices in the infant classes of primary school. However, an extant body of research (Murphy, 2004; Hayes, 2004; Moloney, 2011; McGettigan and Gray, 2012) points to the considerable differences in the approach to early childhood education between pre-school and primary school. Although the importance of play for young children is emphasised in the primary school curriculum, research indicates that children are required to sit for long periods of time in infant classrooms, to be quiet, to solve math problems, to write, to know their letters and to complete their homework (McGettigan and Gray, 2012).

In relation to using play as a teaching methodology as envisaged through *Aistear*, infant teachers conceptualise and operationalise play primarily through ‘station teaching’ or through the ‘Aistear hour’. This is a misinterpretation of *Aistear* and a misrepresentation of how this curriculum framework is intended to be used in the infant classes of primary school. On the other hand, to date, there has not been a comprehensive implementation plan for early years educators working with children from birth to school going age. Yet, settings participating in the ECCE programme are now being inspected by the DES upon this curricular framework in the absence of capacity building or resources. PLÉ therefore welcomes the recent appointment of both a *Síolta* and an *Aistear* national coordinator to progress the implementation of these frameworks.

At a minimum, a continuum of educational provision implies progression from one setting to another, and a sharing of information between settings. Although the situation is improving, there is an overall dearth of information sharing between pre-school and primary school settings (Ring, Mhic Mhathúna, Moloney et al, 2016). Research indicates that in many instances, pre-school programmes are underpinned by primary school academic activities

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where children spend much of their time indoors, learning letters and numbers in preparation for primary school (OECD, 2006; Pantazis and Potsi, 2012; Moloney, 2011; Professional Association for Childcare and Early Years (PACEY), 2013; Ring et al, 2016). It is critical that the DCYA and the DES harmonise policy in this regard, in order to create a continuum of educational provision for children as they transition from pre-school to primary school. PLÉ recommends that the DCYA and the DES collaborate to ensure:

- **Síolta and Aistear coordinators work across both sectors** (early years and the infant classes of primary school) to guarantee the appropriate implementation of these frameworks, and to ensure that play based methodologies extend beyond the Aistear hour/play stations in an infant class context.
- **Provision of equitable and accessible Aistear training** to both primary and early years educators, taking account of early childhood development, play as a primary vehicle for children's learning in the early years, pedagogical strategies, observations, documentation of learning and so on. In this way, the much debated and discussed continuum of education proposed within the White Paper on Early Childhood Education: *Ready to Learn* (DES, 1999) and reinforced through a range of OECD reports could be realised
- **Joint training, and continuous professional development of infant class teachers and early years educators** in order to develop a common shared language between the sectors, and a shared understanding of:
 - The importance of play as a pedagogical tool in the early years
 - Curriculum continuity as children transition between settings
 - How each can best support children's learning through this methodology
- **Joint training, and continuous professional development of the Síolta and Aistear coordinators** to ensure consistency in approach, and information to early years educators and to minimise any potential overlap and repetition
- **Fully resourced time for early years educators to engage in cycles of observation, planning and evaluation** as envisaged within the practice frameworks *Síolta* and *Aistear*
- **Consultation on what constitutes school readiness** and the development of clear guidelines detailing the roles and responsibilities of early years educators and infant class teachers in this regard

Workforce Development

The CoRe Report of the European Commission (2011) indicates that the ECEC workforce is one of the most influential determinants of quality in the early years sector, and consequently recommends that at least 60% of educators should be trained to degree level. Others such as Barnett (2003) and IOM & NRC (2015) assert that in settings where educators have at least a bachelor's degree, the quality is more likely to be of higher quality, including richer language environments, enhanced literacy environments, and better teacher–child interactions all of which are highlighted as critical in the early years (see the *National Strategy to Improve Literacy and Numeracy among Children and Young People*, DES, 2011). While the DCYA recognises the relationship between staff qualifications and achieving high quality early years provision and experiences for children (2015, p. 1), it is interesting to note that a minimum qualification requirement, at Level 5 on the National Framework of Qualifications (NFQ) has been established as the standard for all those working, or intending to work in the sector from December, 2016. At present, only 15% of educators hold a Level 7/8 degree (POBAL, 2015) and other than a perfunctory suggestion that the ‘longer term policy could aim for a 60% degree-led (Joint Oireachtas Committee on Health and Children: 2016: Report on Affordable and Quality Childcare. p.25) no targets have been set for the number of degree level graduates for the sector in Ireland.

PLÉ is also concerned that current qualification requirements further reinforce the care/education divide discussed earlier in this submission. Accordingly, we turn our attention to the qualification requirements associated with the ECCE programme where all Pre-School Leaders working with children in the programme, (i.e., children aged three and upwards) must hold a minimum Level 6 or equivalent on the NFQ. In addition, in order to qualify for the higher capitation payment, all Pre-School Leaders are required to hold a Level 7 or Level 8 Bachelor degree in childhood/early education.

Notwithstanding neuroscientific evidence of the critical importance of the first three years of life, when children's long-term capacities to think, to trust, to feel concern for others, to understand and construct ideas are being fundamentally shaped (Nugent, 2015 Opening Statement to the Joint Committee on Health and Children), the present qualification requirements mean that the most highly qualified staff work with children aged three and over in the ECCE programme. As mentioned earlier, the suggestion is that these educators are

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ostensibly educating children, while those working with children from birth to three years are viewed simply as caring for children, i.e., unskilled work for which a minimum basic qualification is considered sufficient.

Taking all of these factors into account PLÉ recommends the:

- **Introduction of a 60% degree led early years workforce**, and the development of clear career pathways for early years educators with salaries commensurate with qualifications and experience.
- **Expansion of the Learner Fund** to support early years educators to upskill to Level 7/8 on the NFQ

PLÉ is concerned about the list of recognised/acceptable qualifications for working with children in the early years. It is interesting to note the integrity of the primary school profession where one qualification only, i.e., A Bachelor of Education is required. Naturally, while we recognise that the diversity of the early years sector requires a number of entry requirements, and that internationally recognised early years qualifications are a necessity, it is disconcerting to find, that as of August, 2016, no less than **479** different qualifications, including nursing and teaching are acceptable for the purposes of meeting the requirements of the *Childcare Act 1991 (Early Years Services) Regulations, 2016* and DCYA Childcare Programmes Contracts (DCYA, 2016). We recommend that:

- **The vast array of acceptable qualifications should be reviewed**, and that clear and comprehensive selection criteria for determining the suitability of qualifications should be developed and published.

Making Better use of Educational Assets within Communities

We note the proposal within the both the interdepartmental group report: *Future Investment in Childcare In Ireland* (2015) and *A Programme for Partnership Government* (2016, p.78) ‘to utilise our primary school buildings for afterschool care provision for school age children to offer more options and flexibility to parents’. Although there is no universal definition of afterschool care, in an Irish context, it is understood as the ‘need to provide a childcare facility to meet the care needs of children whose parents’ work or educational timetables are incompatible with school timetables’ (Department of Justice Equality and Law Reform

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(DJELR), 2005, p. v111). Consequently, services may be required to provide for the care needs of children before school starts in the morning, after school finishes in the afternoon and during school holidays and pre-planned school closures (Ibid, p. viii). This model of provision works well in other jurisdictions such as the Scandinavian countries. Likewise in New Zealand, such programmes known as OSCAR (Out of School Care and Recreation) are located in or near schools. However, given the present configuration of early years provision in Ireland, and the lack of focus to date upon the provision of afterschool care, the proposals contained in the reports outlined give rise to a number of concerns:

- **Quality of provision.** In the absence of regulations for the afterschool sector in Ireland, how would the quality of provision be guaranteed? Who will operate the proposed afterschool settings in school premises? What qualification requirements, if any, will be put in place? Bearing in mind, that children availing of after school care will have spent their day in a highly structured environment, it is vital that careful consideration is given to age-groupings, and to the nature and type of programme/activities that will be facilitated within these settings. PLÉ proposes that after school provision must be underpinned by Article 31 of the United Nation’s Convention on the Rights of the Child, which sets out the child’s right to play: ‘Parties recognise the rights of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts: parties shall respect and promote the rights of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity’. It is noteworthy that public funding will be provided to establish afterschool provision in school premises, and consequently, PLÉ asks in what way funding will be linked to the quality of provision.
- **Competitive advantage.** The establishment of afterschool provision in school premises may create a competitive advantage for new entrants to the sector Vis a Vis cheaper rent and overheads. Rather than a quick fix solution to the provision of afterschool provision, a comprehensive strategy is required. The proposal contained within ‘*A Programme for Partnership Government*’ is to ‘link additional capitation to the provision of buildings for afterschool care, where demand exists’ (p. 78) is of particular concern to PLÉ. Consideration must be given to how this will impact upon existing afterschool providers. It should not be possible for anybody to expedite afterschool provision simply because of the availability of capitation. The quality of children’s experiences must be paramount.

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- **Funding mechanism for cash strapped schools.** Schools may potentially view this as a money making venture and seek commercial rent, thus adding to the cost of afterschool provision for families. PLÉ therefore recommends expanding the proposal to conduct and publish an independent review of the cost of providing quality childcare in private and community settings to include the cost of afterschool provision. This review would provide a blueprint for the development of a comprehensive afterschool infrastructure that is matched by the allocation of appropriate resources, supports and training
- **Suitability of school premises.** By its nature afterschool provision is a year round service that incorporates care before school starts in the morning, after school finishes in the afternoon, and during school holidays and pre-planned school closures as highlighted earlier. Careful consideration must be given to the suitability of primary schools for this purpose, such as flexibility of usage in terms of access, provision of meals, use of equipment and materials, and the risk of prolonging/replicating the school day.
- PLÉ recommends that:
 - **The DES commission a working group to review *Developing School Age Childcare* published by the DJELR in 2005 as a matter of priority, with a view to redrafting and publishing a set of standards, principles and guidelines for the afterschool sector**
 - **The working group scope the development of draft regulations for the afterschool sector.**

Special Needs Education

The publication of the Interdepartmental Group Report: *Supporting Access to the Early Childhood Care and Education (ECCE) Programme for Children with a Disability* (DES/DCYA, 2015) represents a pivotal point on the journey towards creating inclusive early years provision in Ireland. We especially welcome the focus upon developing an inclusive culture, and the need for a qualified and confident workforce ‘that can confidently meet the needs of all children wishing to participate in the ECCE programme’ (DES/DCYA, 2015, p. 7). It is heartening to see that the proposed model of inclusion has not only been costed, but that funding has been set aside to ensure that it becomes reality in practice. We recognise the ambitious targets associated with the LINC⁴ (Leadership for Inclusion) Special Purpose Level

⁴ The Leadership for Inclusion programme (LINC) is a core aspect of the new Access for Inclusion Model (AIM) of supports designed to ensure that children with disabilities can access the ECCE programme.

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6 training programme associated with this model, whereby it is estimated ‘that an average of 20% of ECCE settings might seek to participate in this training each year for the next four years’ (DES/DCYA, 2015, p. 29). Additionally, the DES/DCYA suggest that ‘every pre-school service should be encouraged to appoint an Inclusion Co-Coordinator’ (p.29) who must have a special interest in disability and undertake the LINC programme outlined above. Following completion and award of this training, the early years setting will be ‘recognised for its commitment and capacity to cater for children with a disability through additional capitation’ (Ibid. p.28). As yet the role of the inclusion coordinator is unclear; but it appears that this person will assume a role of significant responsibility within the early years setting. While the development of career pathways within the sector is a positive and progressive step, the continued emphasis upon a Level 6 qualification for a role of responsibility is disappointing. In relation to the LINC programme, PLÉ notes the oversight with regards to validating prior learning of Level 7 and Level 8 ECEC graduates. We are disappointed to note that applicants to the LINC Special Purpose Level 6 programme with qualifications equivalent to, or higher than the programme, may seek exemptions only with regard to two of six modules: Child Development and Curriculum for Inclusion. Having undertaken three or four years of full-time study, where in many instances, they will have studied inclusion and leadership/management in-depth, and will also have developed an understanding and working knowledge of the practice frameworks: Síolta and Aistear; Level 7 and Level 8 graduates may now be disadvantaged in terms of their employability, and career pathways by the LINC programme. Furthermore, these graduates may also find themselves in a position of subordination to an Inclusion Coordinator who has attained a Special Purpose Level 6 award.

PLÉ recommends that:

- **The DCYA/DES undertakes further work on the development of a job description and clear roles and responsibilities for the inclusion coordinator**
- **A comprehensive system of Validation of Prior Learning** with clearly defined criteria must be developed to enable early years educators who hold a Level 7 or Level 8 degree to identify potential gaps in their training Vis a Vis inclusion, and to facilitate their appointment as inclusion coordinators
- **All existing Level 7 and Level 8 ECEC degree programme** must be ‘future proofed’ to ensure that graduates are equipped with the knowledge and skills required

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to be appointed as an inclusion coordinator, and they are not disadvantaged within the sector for which they are trained.

Meeting the Skills Needs of the Future

An important area of change in the ECEC sector in Ireland has been the increased attention to the need for formal qualifications for early years educators, and as mentioned previously, the competences of the ECEC workforce is a predictor of quality early childhood education and care. Throughout this submission, we have highlighted the anomalies in relation to the training and qualification requirements for working in the early years sector. We wish to reiterate our welcome for the establishment of a minimum qualification level for the sector, and the provision of the Learner Fund which has enabled many in the sector to attain the basic minimum Level 5 and Level 6 qualification on the NFQ required through the *Child Care Act 1991 (Early Years Services) Regulations, 2016*, and as a core condition of the ECCE programme. The many recommendations with regards to qualifications and CPD for early years educators earlier in this submission are highly pertinent in terms of meeting the skills needs of the future as it relates to the early years.

The journey to become an early years educator involves the mastery of particular knowledge and skills that form the basis for quality practice (Ryan and Grieshaber, 2005). Traditionally, early childhood educator preparation programmes provide opportunities for pre-service educators to practice new pedagogical skills in the field, as a critical factor for promoting and enhancing their ability to influence children's development and learning in a positive way (Hyson, Tomlinson & Morris, 2009). Moreover, educator preparation cannot be "adequately addressed through standard, content-focused training" but must take place in a real life setting (Manning-Morton, 2006, p. 46). For this reason, it is important to develop learning processes that prepare pre-service educators for interactions with the supervising tutor, the child and the family, that allow knowledge to be jointly constructed and specifically crafted for young children (Recchia and Shin, 2010). The EU (2011) posits that early years educator skills and competencies must be based upon a well-balanced combination of theory and practice (practical experiences in early years settings) which are central to enabling students to translate theory into practice, develop the key competencies required to work in the field of ECEC, and in shaping their personal philosophy of working with young children. While most Universities/Colleges/IoTs offer a professional practice component as part of their degree programmes, concerns about the nature of placements (across the FE and HE sector) have

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been raised at a number of national fora. Currently, there is no available empirical data with regards to the nature, extent and experience of the professional practice component of ECEC degree level programmes across HEIs in Ireland. Against this backdrop PLÉ is currently engaged in a research study, funded by the Teaching and Learning Forum, which seeks to examine the practices and perspectives related to the professional practice (PP) component of undergraduate ECEC degrees (Level 7/8) across the PLÉ membership. In line with the proposal to ‘drive quality throughout the sector by investing in the professionalisation of the workforce, through continuous professional development within programmes of further and higher education’ (*A Programme for Partnership Government*, 2016. P.78). PLÉ members seek to enhance their own knowledge and skills with regards to how to best to organise, deliver, support and assess this aspect of their work with ECEC students. We are open to working collaboratively with the DCYA in terms of sharing the outcomes of this research, and the development of a national framework to guide professional practice placements.

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