

Start Strong is a coalition of organisations and individuals seeking to advance high quality early care and education for young children in Ireland. A list of Start Strong's 64 Supporter organisations is included at the end of this submission.

This submission is Start Strong's response to the public consultation questionnaire for the Inter-Departmental Group on Future Investment in Early Years and School-Age Care and Education.

The format, subject-matter and length of all sections of this submission follows the format set by the consultation questionnaire.

Section 1 – Objectives of, and core principles for, investment

A. Objectives for investment

Objectives in order of importance, from the objectives specified in the consultation form:

1. Promoting child development and well-being.
2. Reconciling work and family life.
3. Improving incomes of disadvantaged families or reducing their expenditures.
4. Encouraging and/or supporting parenthood.
5. Reducing gender inequities.
6. Removing barriers to female employment.

B. Core principles of investment

Objectives in order of importance, from the objectives specified in the consultation form:

1. Quality (i.e. funding should be linked to quality).
2. Accountability (i.e. funding should be linked to reporting requirements and certain obligations).
3. Evidence-based (i.e. funding should be based on reliable evidence.)
4. Equity (i.e. funding should be based on need).
5. Transparency (i.e. funding should be allocated according to rules that are easy to access and understand).
6. Value for money (i.e. funding should be cost-effective).
7. Stability (i.e. funding should be consistent and predictable).

Section 2 – Review and reform of current investment

A. Direct DCYA investment

Strengths of current DCYA investment programmes

Core strengths of the Free Pre-School Year are that it is both universal and free. These features ensure that there is a very high take-up, which is important as the research evidence shows that children from all social backgrounds benefit from high quality early care and education. The fact that it is universal and free also prevents social stigma attaching to the scheme, and helps to promote a social mix within services, which benefits children.

More broadly, a key strength of all the direct investment programmes (Free Pre-School Year, Community Childcare Subvention, Training and Employment Childcare programmes) is that they subsidise places directly, rather than trying to reduce costs through the tax system. The OECD *Starting Strong* review concluded that direct subsidies have many benefits over tax credits. In particular, with direct subsidies it is possible to improve quality at the same time as affordability. Tax credits, in contrast, do nothing for the quality of services.

A further strength of DCYA investment programmes is the Higher Capitation Grant within the Free Pre-School Year, which is actively incentivising professionalisation of the early years workforce, and which provides a funding model that can be further built on to incentivise higher quality standards.

Weaknesses of current DCYA investment programmes

A major weakness of current programmes is the insufficient link between quality and funding. Firstly, there is no mechanism for withdrawal of funding where quality is low. Even though funding contracts include quality-related clauses, in practice funding continues to go to low-quality services. This is a serious concern as research has demonstrated that low-quality services can harm children and worsen child outcomes.

For example, there is no requirement that services should implement Síolta or Aistear as a condition of funding. The funding contract requires services to ‘adhere to the principles’ of Síolta and Aistear, but even this requirement is not enforced. A wider problem lies behind this limitation: neither Síolta nor Aistear have yet been rolled out nationally. Until there is sufficient training and mentoring for their full roll-out, it will unfortunately not be possible to require their implementation.

Secondly, DCYA has only made limited use of the potential for incentivising higher quality through higher funding. While the Higher Capitation Grant is positive, it could bring further benefits if stronger conditions were attached.

A major weakness of the Community Childcare Subvention is that subsidised places are only available in community services, preventing access for many families eligible for subsidised places.

B. Indirect investment

Strengths of current indirect investment programmes

While the current 6 months of paid leave is too short, a strength of the current entitlement is that those 6 months take the form of paid maternity leave. The extension of paid maternity leave to 26 weeks was a very positive development, and it is important that the first 6 months of leave should remain specifically for mothers. The research evidence shows that children do best when they spend at least the critical first year at home with their parents. And, while leave beyond the first 6 months should be open to either parent (through paid parental leave), the first 6 months should remain for mothers. This is important to ensure that mothers are not put



under pressure to return early to work, and also as a positive support for breastfeeding for the first 6 months, in line with ILO and Department of Health advice.

A major strength of Child Benefit is that it is universal. Child Benefit is an important contribution to helping parents with the cost of raising their children, and also to combating child poverty. Its universality ensures its high take-up and also embodies recognition by society of the importance – and the cost – of raising children.

Weaknesses of current indirect investment programmes

Because of the lack of paid parental leave in Ireland, a large proportion of parents have no choice but to return to work when their children are just 6 months old. The 6 months of paid leave for parents in Ireland is very short by international standards. Adding together maternity leave, parental leave and other childcare-related leave, on average European countries offer 19 months of paid leave for parents after the birth of a child. The 6 months available in Ireland is also much shorter than the 12 months' paid leave recommended by UNICEF as a minimum standard.

A second major weakness of current indirect investment is the absence of any paid paternity leave in Ireland. Paternity leave, which is leave for fathers around the time of the birth of a child (at the same time as the mother is taking maternity leave), is an important support for families in the challenging first few weeks. Most European countries offer paid paternity leave – typically around 2 weeks in duration.

C. Reform of current investment

Given the low level of early years investment, there is little scope for reform within current investment. At a minimum, the National Early Years Strategy must be published, to guide the investment that is needed over the coming years.

One immediate action is reform of the CCS and TEC programmes, including reform of their administration, so that subsidised places can be accessed easily by eligible families. Extension to eligible families in all areas of the country will require some additional investment (see below).

Secondly, the Government should tighten the conditionality of public funding on quality. Actions should include making Level 6 the qualification requirement for leaders of *all* rooms in services (not just the pre-school year), and setting timetables for the raising of qualification levels and introduction of salary scales.

Thirdly, the new DES inspectors and the Tusla inspectorate should be merged into a reformed inspectorate, including an education focus in all inspections (not just the pre-school year), and broadening inspection teams to include early years expertise.

To support children with additional needs, the Government should introduce a national inclusion policy, to ensure equity in access to additional supports and to give guidance on the delivery of supports.



Section 3 – Priorities for future investment

A. Three options the Government should prioritise to improve early years care and education

In the immediate term:

1. National roll-out of quality supports to all services – and to all age-groups (not just the pre-school year) – including full roll-out of Síolta and Aistear, funding of non-core hours, and a requirement that early years educators engage in CPD on Síolta and Aistear.
2. Regulation of childminding, along with development of childminding supports, and opening up of funding schemes to childminders who meet quality standards.
3. Extension of CCS to private services, and ending its annual basis of administration, so that all eligible families can access subsidised places wherever they are in the country and at any time of year.

Over the next 5 years:

1. Professionalisation of the early years workforce, including extension of the Learner Fund to support existing workers to progress to Level 7 and 8 qualifications, and sufficient funding for the introduction of salary scales.
2. A Second Free Pre-School Year. A specific timeframe should be set soon for its introduction, including a timetable of actions to be completed in advance, including the raising of quality standards.
3. Paid parental leave (available to either parent), to be taken at the end of maternity leave, so that total paid leave lasts at least 12 months.

B. Three options the Government should prioritise to improve school-age care and education

Start Strong focuses on the care and education of young children, aged 0-6, so we are not in a position to answer this question.

C. Three options the Government should prioritise to improve early years care and education for children with additional needs

In the immediate term:

1. Introduce a national inclusion policy on (a) how additional supports are allocated, removing local variation; and (b) standardised job descriptions and training for pre-school special needs assistants, to ensure their role is primarily to support the whole service to be inclusive.
2. Gather and publish data on access to the Pre-School Year for disadvantaged groups, including children with special needs, Traveller and Roma children, and migrant children who do not speak English or Irish at home.
3. Increase the practice of therapeutic supports (such as Speech and Language Therapy) being provided on-site in services, rather than in clinical settings.



Over the next 5 years:

1. Respond to data on groups with lower access rates, supporting children with additional needs to access places in the Free Pre-School Year.
2. Increase the level of funding for early years services with children with additional needs.
3. Improve adult-child ratios, particularly in the Free Pre-School Year, moving the ratio (currently 1:11) towards the ratios for part-time and full-time day-care for 3-6 year olds (1:8). Given the importance of interactions between adults and children, all children would benefit from this change, and it would enable services to support children with additional needs more effectively.

D. Lessons to be learned from international examples

Following an in-depth study of 20 countries' systems for early care and education (*Starting Strong I and II*), the OECD concluded that the most effective way to make early care and education services more affordable – while at the same time raising the quality of services – is through 'supply-side' subsidies. That means directly subsidising places in services so that fees are lower or fully covered (as already happens in schools and in the Free Pre-School Year).

The OECD concluded that tax credits – or other 'consumer subsidies' – are less effective. The reason is that supply-side subsidies give governments more 'steering capacity' over what happens in services than is offered by tax credits.

There are related findings in Penn & Lloyd's recent review (in *Start Strong, Childcare: Business or Profession?*), which concluded that market approaches to 'childcare' are damaging, and that instead we need to see 'childcare' as a public service, and invest in it to achieve high quality provision, with a professionalised workforce and a robust inspection system. As in Norway, delivery may be through private or community providers, but they must be delivering a public service, with public funding as their mainstay.



Start Strong supporters

Start Strong is a coalition of organisations and individuals committed to advancing high quality care and education for all young children in Ireland. Start Strong has a growing number of Supporters. We value their support as we work to advance high quality care and education as a right for all young children in Ireland.

Organisations. We currently have 64 organisational supporters:

ABC Childcare	Early Childhood Ireland	Preparing for Life
An Gairdín Scoil	Early Childhood Studies	Prevention and Early
Montessori	& Practice (BA prog.),	Intervention Network
Association of Childhood	Adult & Continuing	Puddleducks Pre-school
Professionals	Education, NUI Galway	Holy Child Pre-School
Ballymun Whitehall Area	Equality and Diversity	(Rutland Street Project)
Partnership	Early Childhood	Sligo County Childcare
Barnardos	National Network	Committee
Bonnybrook Early	(EDENN)	Society of Saint Vincent
Education Centre	Fingal County Childcare	de Paul
Brigit's Hearth Children's	Committee	South Dublin County
Centre	Finglas Childcare Limited	Childcare Committee
Bright Horizons Family	Forbairt Naíonraí Teo	Southside Partnership
Solutions	Grovelands Childcare	SpunOut.ie
Canal Communities	Institute of Community	Step-by-Step Montessori
Partnership	Health Nursing	Pre-school
Childcare Network Loch	Irish Penal Reform	Strategic Innovation in
Garman	JAGGO Pre-school	Education, Limerick
Childminding Ireland	Kildare County Childcare	Univ.
Children in Northern	Committee	Tallaght West Childhood
Ireland	Lifestart	Development Initiative
Children's Rights Alliance	Little Stars Pre-school,	Úlla Beag Pre &
Cork County Childcare	Montessori &	Afterschool Care
Committee	Afterschool, Donegal	UNESCO Child & Family
Cork Early Years Network	Meath County Childcare	Research Centre, NUI
Centre for Research in	Committee	Galway
Early Childhood (CREC)	Montessori Alliance	Waterford Area
Deansrath Family Centre	National Childhood	Partnership
Disability Equality	Network (formerly	Waterford Childcare
Specialist Support	BCCN)	Committee
Agency (DESSA)	National Women's	Western Area Childcare
Donegal County	Council of Ireland	Partnership
Childcare Committee	North Tipperary Childcare	Westmeath County
Dublin City Childcare	Committee	Childcare Committee
Committee	OMEP Ireland	Wicklow County
Dublin West Childcare	One Family	Childcare Committee
and Learning Services	OPEN	youngballymun
Early Learning Initiative,	The PlayDen Montessori	
NCI	Pre-School, Westmeath	

We also have a growing number of individual supporters (available on our website).

If you would like to become a supporter of Start Strong, please contact us on info@startstrong.ie or through our website www.startstrong.ie

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