

Start Strong welcomes the opportunity to make a submission to the Department of Children and Youth Affairs in relation to the Department's Statement of Strategy 2015-2017. Start Strong is a coalition of organisations and individuals seeking to advance high quality early care and education for young children in Ireland.

Start Strong has six recommendations for the Department's Statement of Strategy:

Summary of recommendations

1. **The Department's role in cross-Government coordination should be enhanced**, to ensure effective implementation and monitoring of national strategies, and to ensure children's interests are systematically considered in Government decisions. Specific actions should include establishing a dedicated cross-departmental **implementation team for the National Early Years Strategy**, and giving DCYA **responsibility for "child-proofing"** Government decisions and legislation.
2. **Policy responsibility for early childhood care and education should be integrated within a single Government Department**, bringing together responsibilities that are currently shared between the Department of Children and Youth Affairs, the Department of Education and Skills, and the HSE.
3. In particular, **the role and composition of the Early Years Inspectorate should be reformed**, with the current Tusla inspectorate integrated with the new Department of Education early childhood education inspectors into a new, integrated, early care and education inspectorate.
4. **The Department's consultation with stakeholders should be enhanced, in particular its consultation with young children**, which was notably absent from the consultation which informed *Better Outcomes Brighter Futures* and still remains absent from preparation of the National Early Years Strategy.
5. DCYA should **develop and apply measurement tools to assess the quality of early years services**, and to measure change as policy changes are implemented.
6. On specific strategies and actions, among the range of existing Government commitments on early care and education, **priority must be given to the improvement of quality in early years services**, in line with the recommendations of the Expert Advisory Group on the National Early Years Strategy.

1. Enhanced role in cross-Government coordination

The mandate of DCYA (the Department of Children and Youth Affairs) includes the harmonisation of policy and provision across Government. DCYA has been carrying out this coordinating role since its inception, and the role was exemplified in DCYA's lead role in the development of *Better Outcomes Brighter Futures*, the new national policy framework for children and young people.

However, Start Strong recommends that DCYA's role in cross-departmental coordination on children's issues should extend beyond strategies that are specific to children. Given the range of policies that impact on children's lives, the Expert Advisory Group on the National Early Years Strategy rightly argued that there is a need for *all* Government decisions and legislation to be systematically "child-proofed",

and that responsibility for this should lie with DCYA. Start Strong supports this recommendation.

In relation to strategies for children, with *Better Outcomes Brighter Futures* now published and other strategies – including the National Early Years Strategy – soon to be published, over the period 2015-2017 the focus of DCYA's coordination role will shift in emphasis from policy development to implementation and monitoring.

In some respects, those coordination roles – implementation and monitoring – are even more demanding, as they will require DCYA to hold other Government Departments to account, particularly if implementation by other Departments is slow. Given the demands this coordination will place on DCYA if it is to be effective, we recommend a strong focus on coordination in DCYA's Statement of Strategy 2015-2017.

For effective cross-departmental implementation and monitoring of the National Early Years Strategy, a dedicated cross-Government implementation team should be established, led by DCYA, and with external stakeholder involvement. The Expert Advisory Group on the National Early Years Strategy specifically recommended (Recommendation 51) that the Government should:

“Establish an implementation team, independently chaired and consisting of an equal number of public servants and people from outside the system, to prepare and publish an annual report outlining the degree of progress being made towards realisation of the goals and specific measures in the strategy.”

While we welcome the decision to include early years representation on the Advisory Council on *Better Outcomes Better Futures*, it is essential that dedicated sub-structures are established for implementation and monitoring of the National Early Years Strategy. Inclusion within overarching structures for *Better Outcomes Brighter Futures* will not be sufficient. Dedicated sub-committees on the Early Years Strategy will be needed within the Children and Young People's Policy Consortium, and within the Advisory Council.

Recommendation: The Department's role in cross-Government coordination should be enhanced, to ensure effective implementation and monitoring of national strategies, and to ensure children's interests are systematically considered in Government decisions. Specific actions should include establishing a dedicated cross-departmental implementation team for the National Early Years Strategy, and giving DCYA responsibility for “child-proofing” Government decisions and legislation.

2. Integration of early years policy in one Department

Policy responsibility for early years services is currently split across Government Departments and agencies. For example:

- DCYA has policy responsibility for childcare funding schemes, the Free Pre-School Year, and the Early Years Inspectorate (through Tusla).
- The Department of Education and Skills has policy responsibility for Síolta, Aistear (through the NCCA), the Workforce Development Plan, and the Early Start programme – as well as the infant classes within primary schools.
- Some early years services and supports are the responsibility of the HSE, including the provision of special needs assistants at pre-school level, supports for some pre-school services in disadvantaged areas, some parenting supports, and the Childminding Advisory Officer service, which has been significantly reduced in size following recent HSE cuts.

In building an integrated approach to policy-making for young children and their families, international research indicates that it is important to draw together ‘childcare’ and ‘early education’ policies into an integrated approach to children's early care and education. Right through early childhood, care and learning are inseparable, and there should be no divide between childcare policy and early education policy – high quality services for young children of all ages support the whole child – their physical, social, behavioural, emotional and cognitive development, as well as their well-being.

According to UNESCO, policy integration requires not just coordination across Government Departments, but integration within a single Department: “Coordination mechanisms ... have proved



less successful in promoting a coherent overall policy and administrative framework across sectors”.¹ While UNESCO’s research suggests that Departments of Education are often supportive locations for policy responsibility, in Ireland DCYA is also a possible location. Whatever location is chosen, UNESCO is clear that the key to effective integration is recognition of the inseparability of care and education through bringing all policy responsibility for early years services into a single Department.

Recommendation: Policy responsibility for early childhood care and education should be integrated within a single Government Department, bringing together responsibilities that are currently shared between the Department of Children and Youth Affairs, the Department of Education and Skills, and the HSE.

3. Merge and reform the Early Years Inspectorate

A major weakness of the existing early years inspection system is its predominant focus on health and safety issues, rather than children’s early learning and development. This focus partly results from the wording of the Pre-School Regulations (in which only Regulations 5 and 9 really address adult-child interactions), and partly from the composition of the Inspectorate, as Public Health Nurses are not adequately qualified or trained to assess services’ contributions to children’s early learning and development.

In this regard, the recent announcement by the Minister for Education and Skills that she will recruit “a new team of early childhood education inspectors”² is in principle very welcome. In particular, we welcome the statement by the Minister for Children and Youth Affairs that the focus of the new inspectors will be “the quality of educational provision”, in particular the “quality of provision for children’s learning and development”, “children’s learning experiences and achievements”, and “management and leadership for learning”.³

This new focus on children’s learning and development is extremely positive. However, a real concern is the Government’s statement that the new education-focused inspectors will look specifically at “settings participating in the Free Pre-School Year programme”. There is a danger that the Government is falling into the trap of assuming that the Free Pre-School Year is “educational” while other early years provision is not. All young children in all settings are learning and developing – early education does not suddenly begin in the Free Pre-School Year. All early years services – for young children of all ages – should provide for integrated care and education, and should be inspected accordingly.

Moreover, the announcement of new education-focused inspectors begs a number of questions:

- How will the Department of Education inspectors work together with the existing Inspectorate in Tusla?
- What regulations or standards will the new inspectors be using? And what sanctions or resources will they have available to them?
- What qualifications will be required of the new inspectors?

Start Strong recommends that the new education-focused inspectors should be merged with the Tusla inspectors into a single, integrated, broad-based inspection system, rather than two parallel systems. However this integrated service is configured, care will be needed to demarcate roles and qualification requirements for different types of inspectors. While Public Health Nurses may be qualified to assess some of the Regulations, many aspects of early years provision – including Regulation 5 – should be assessed by inspectors who are qualified and experienced in early childhood care and education.

Any temporary arrangement by which the education-focused inspectors operate in parallel to the Tusla inspectors and/or are limited to looking at the Free Pre-School Year must be short-term only, pending the expansion and restructuring of the inspectorate.

Recommendation: The role and composition of the Early Years Inspectorate should be reformed, with the current Tusla inspectorate integrated with the new Department of Education early childhood education inspectors into a new, integrated, early care and education inspectorate.

¹ Yoshie Kaga, John Bennett and Peter Moss (2010) *Caring and Learning Together: A Cross-National Study of Integration of Early Childhood Care and Education within Education*, Paris: UNESCO, pp.7-8.

² Department of Education and Skills, press release, 14 October 2014.

³ Minister for Children and Youth Affairs, speech in the Dáil, 15 October 2014.



4. Consult young children

DCYA has put considerable effort into bringing the voices of children and young people into its work, including the large national consultation with children and young people that fed into *Better Outcomes Brighter Futures*. This effort is to be commended. However, *young* children have not been included in any Departmental consultations to date, and we urge the Department to remedy this in its Strategy for 2015-17.

The national consultation with children ('Life as a Child and Young Person in Ireland') only involved consultation with 7-18 year olds. In response, Start Strong urged the Government – as part of *Shaping the Future*,⁴ our submission on the National Early Years Strategy – to carry out a consultation with under-6 year olds as part of the preparation of the National Early Years Strategy. We met with members of DCYA's Citizen Participation Unit specifically to discuss how such a consultation might be carried out. We are disappointed that no such consultation has taken place, even though there has been ample time for such a consultation, and there is a lot of good practice to draw on in designing such a consultation.

We urge the Government to carry out such a consultation before publication of the National Early Years Strategy, to ensure the Strategy is informed by children's own views, and also to incorporate consultation with young children into its planning for 2015-17.

Recommendation: The Department's consultation with stakeholders should be enhanced, in particular its consultation with young children, which was notably absent from the consultation which informed *Better Outcomes Brighter Futures* and still remains absent from preparation of the National Early Years Strategy.

5. Measure quality of early years services using international scales

There is little data on the quality of early years services in Ireland today. The limited official data we have is either indicative (such as the qualification levels of the early years workforce) or based on inspection reports that are prepared by Public Health Nurses, who are not required to be qualified in early care and education. A recent academic study that applied the international standard ECERS scales to a random sample of early years services in Ireland raised serious concerns about the quality of provision and demonstrated the need for systematic analysis of this kind.⁵

The Expert Advisory Group on the National Early Years Strategy recommended that the Government should audit the quality of services, using international rating scales (e.g. ECERS/ITERS) – both to inform policy development and to provide a baseline for assessing the impact of future policies.

Recommendation: DCYA should develop and apply measurement tools to assess the quality of early years services, and to measure change as policy changes are implemented.

6. On early years policy, prioritise the raising of quality

Start Strong welcomed the commitment in *Better Outcomes Brighter Futures* to "increase investment in high-quality early years care and education for all children". In particular we welcomed the wording of this commitment, which specified that a Second Free Pre-School Year would be introduced "once the required quality standards are achieved" (Commitment G8).

This wording reflects the recommendation of the Expert Advisory Group on the National Early Years Strategy, with which Start Strong is in full agreement:

"Ensuring high quality is the foremost policy challenge in early care and education today. While the Expert Advisory Group supports the extension of free pre-school provision, it is essential that

⁴ Start Strong (2013) *Shaping the Future*, Dublin: Start Strong, p.11.

⁵ Gerardine Neylon (2014) 'An Analysis of Irish Pre-School Practice and Pedagogy Using the Early Childhood Environmental Four Curricular Subscales', in *Irish Educational Studies*, vol.33, issue 1.



quality standards are raised first.”⁶

The Government has made a range of policy commitments on early care and education, including the introduction of a Second Free Pre-School Year, and further commitments will be made in the National Early Years Strategy. Among the different commitments, we urge the Government to prioritise the raising of quality levels in early years services.

The Government is currently investing nearly €300m per annum in early years services. While this sum is low by international standards,⁷ it is nevertheless a significant investment, and the Government must ensure that it is invested well.

If quality levels are not improved across the board, the Government investment will not yield the high returns that research shows are possible.⁸ The international evidence shows that early years services can bring significant benefits to children, but that they only benefit children when they are of high quality.⁹ When services are of low quality, children can suffer harm, as was visibly demonstrated in the Prime Time documentary, *A Breach of Trust*.

As the Expert Advisory Group observed, “The quality of early care and education services in Ireland today is very variable and the lack of quality assurance is unacceptable.” (p.16).

Tusla’s recent report on the quality of pre-school services, while limited to a review of inspection reports, demonstrated the variability of quality in early years services.¹⁰ According to Tusla’s review of 3,007 inspection reports, while 24% of services are compliant with all regulations assessed, 6.5% of services are non-compliant with 11 or more of the 27 regulations. There can be no doubt that any service that is non-compliant with 11 or more regulations is failing to meet minimum quality standards. That 6.5% represents around 300 services, which in turn implies up to 10,000 children. The finding is very worrying for those 10,000 children who attend below-standard services every day – and it is a finding that the Government cannot ignore.

To support the prioritisation of quality, we recommend that DCYA’s performance indicators should include the following measures:

- % of services receiving the Higher Capitation Grant for delivery of the free pre-school year.
- % of services engaging with the National Early Years Quality Support Service.
- % of services meeting Level 5 and Level 6 qualification requirements respectively.
- % of services compliant with all regulations.
- % of services non-compliant with 11 or more regulations.

Recommendation: On specific strategies and actions, among the range of existing Government commitments on early care and education, priority must be given to the improvement of quality in early years services, in line with the recommendations of the Expert Advisory Group on the National Early Years Strategy.

Start Strong

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⁶ DCYA (2013) *Right from the Start: Report of the Expert Advisory Group on the National Early Years Strategy*, p.16.

⁷ Ireland’s level of public investment in early years services is among the lowest in Europe. According to the OECD, Ireland spends 0.4% GDP on early care and education services, well below the OECD average of 0.7% GDP and the international benchmark of 1% GDP. Furthermore, the OECD figure for Ireland includes expenditure on 4 and 5 year olds in the infant classes of primary schools. If we look just at expenditure on services prior to school entry, expenditure in Ireland amounts to approx. €300m, or less than 0.2% GDP – a fraction of the OECD average.

⁸ Start Strong (2011) *The Economics of Children’s Early Years – Early Care and Education in Ireland: Costs and Benefits*.

⁹ OECD (2012) *Starting Strong III: A Quality Toolbox for Early Childhood Education and Care*, Paris: OECD, p.9.

¹⁰ Tusla (2014) *Report on the Quality of Pre-School Services: Analysis of Pre-School Inspection Reports*.

