

## **Submission to the Department of Education's consultation on the draft Early Years (0-6) Strategy.**

Northern Ireland Commissioner for Children and Young People  
1 December 2010

### **1.0 Introduction**

The Office of Commissioner for Children and Young People (NICCY) was created in accordance with 'The Commissioner for Children and Young People (Northern Ireland) Order' (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland.

Under Articles 7(2)(3) of this legislation, NICCY has a mandate to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. The remit of our Office is children and young people from birth up to 18 years, or 21 years of age if the young person is disabled or in the care of Social Services.

In determining how to carry out her functions, the Commissioner's paramount consideration is the rights of the child and NICCY is required to base all its work on the United Nations Convention on the Rights of the Child (UNCRC).

NICCY welcomes the opportunity to respond to this consultation.

### **2.0 International Law**

#### **2.1 Children's Rights**

The United Nations Convention on the Rights of the Child (UNCRC) provides the overarching framework which guides the work of NICCY. The UK Government, including Northern Ireland, is a signatory to the Convention and has agreed to uphold the rights of children and young people based on the Convention.

NICCY appreciates that there are often complexities when reconciling the rights of children and young people with their welfare and best interests. NICCY commends the Department of Education for conducting an analysis of how the draft Strategy meets relevant articles of the UNCRC. The table in Annex 3 is a positive step in reviewing the compliance of the draft proposals against the UNCRC articles.

In addition to the articles listed, NICCY would point out that Article 2, which states that children shall not be discriminated against and shall have equal access to all articles in the UNCRC is also relevant. With respect to the Early Years Strategy, the application of this article means that all children, irrespective of their background should have equal access to services in their early years. It also means that young children should



not be discriminated against because of their age, and that appropriate services should be as accessible to them as to older children.

The UN Committee on the Rights of the Child has also produced a General Comment on Implementing Child Rights in Early Childhood which provides useful guidance for the Early Years Strategy, and is referenced throughout this response.

### **3.0 Consultation with Children and Young People**

NICCY has regularly expressed through a broad range of policy and consultation work our concern that Section 75 is not being adequately enforced in respect of the age criterion and that public authorities are consistently failing in their duty to meaningfully consult with children and young people on issues that have direct relevance to their lives. Article 12 of the UNCRC also provides that children have the right to express their opinion in matters directly impacting upon them and have those views given due weight in accordance with the age and maturity of the child. NICCY strongly advocates that this article be upheld in the implementation of all government policies, practices and services.

In addition to this Action 4.1 of Our Children and Young People- Our Pledge Action Plan 2007-2008 states that all Departments should 'consider the views of children and young people in the development of new policy that impact on their age group'. This action places an emphasis on all Ministers to ensure that their department is actively seeking the views and opinions of children and young people.

NICCY would like further information on how the Department has sought out the views of children at this stage of the consultation. Due to the vulnerability attached to this age group, as young children and as primary stakeholders of the Early Years Strategy, NICCY is concerned that children aged up to six are consulted and their views given genuine consideration, in a manner that is age appropriate. We note that the consultation document confirmed the intention that consultation would be carried out with children during the public consultation stage.

Furthermore, at this point in the consultation, NICCY is concerned that a child friendly version of the draft strategy does not appear to have been produced. This is despite the fact that Departmental representatives confirmed in September that there would be a child-friendly version released once the DE had sourced the most appropriate agency to collaborate with.

### **4.0 Comments on the Proposal**

NICCY welcomes the DE's Draft proposal of an Early Years Strategy, and the commitment to improving service provision for 0-6 year olds proposed by the DE. However, NICCY is concerned by a number of issues which may result in negative implications for policy and practice in Early Years Provision.



## **4.1 General comments**

### **4.1.1 Scope of Strategy**

NICCY is deeply disappointed at the limited scope of the Early Years Strategy, as it focuses almost entirely on early years education. We had understood that this was to take a more holistic approach and draw together delivery on early years from across a range of departments.

General Comment 7 outlines this approach as a common problem: 'In many countries and regions, early childhood has received low priority in the development of quality services. These services have often been fragmented. They have frequently been the responsibility of several government departments at central and local levels and their planning has often been piecemeal and uncoordinated.'<sup>i</sup>

The Early Years Strategy should not be limited to education, but take a more holistic approach, addressing all areas of development and care relating to this age range in an integrated strategy. This should include family support, childcare, health-care provision and play. The importance of adopting a holistic approach is highlighted in the Department's supporting evidence paper which argues that '*development or non-development in one area will affect outcomes in other areas*'<sup>ii</sup>. NICCY recognizes that the Strategy does seek to promote integrated working through seeking '*to provide services built around the needs of the children, along with those of their families, rather than around professional boundaries*'. However, given the limited scope of the Strategy the degree of integration of services is likely to be extremely limited, with services delivered according to governmental structures rather than the needs of the child.

We note that a childcare strategy is also to be developed, either by OFMDFM or another lead Department, as an action to deliver on the Executive's commitment to tackle child poverty. The provision of accessible, affordable, high quality childcare in Northern Ireland remains a critical issue, and one which should be addressed as part of a comprehensive early years strategy.

NICCY recognizes that it is not possible for one Department to deliver a holistic early years strategy on its own, and that the responsibility must be shared among a number of government departments.

**Recommendation: The Early Years Strategy should be rewritten to comprehensively address the needs of children in their early years. In addition to education this should include childcare, family support, healthcare and play. While one Department should coordinate development and implementation of the Strategy, a number of Departments should be responsible for its delivery.**



#### **4.1.2 Age range for the Strategy**

The Draft Strategy outlines a vision **for all children** who fall within the age group of 0-6 year olds. However, whilst we appreciate that the draft strategy refers to the Department seeking to 'expand the reach of Sure Start and the Programme for Two Year Olds' (p24), beyond this reference, the majority of the document refers solely to the 3-6 age band.

NICCY is concerned at this disparity and believes that this does not reflect the significance of the earliest childhood development and experiences. International evidence demonstrates that, in its first years a child's brain develops to incorporate *'their later outlook on the world, their subsequent ability to learn, interpretation and adaptation of relationships and behaviour'*<sup>iii</sup>. That the period of 0-3 is a critical period in a child's development cannot be disputed. This makes the limited provision of services to this age group difficult to understand.

Indeed, this runs contrary to Article 28 of the UNCRC which advocates that *'a child's right to education should begin at birth, and remain closely linked to a young person's right to maximum development'*<sup>iv</sup>.

The Committee on the Rights of the Child, in its General Comment No 7, has reflected on different definitions of early childhood, and came to the conclusion that it must be inclusive of 'birth and throughout infancy; during the preschool years; as well as the transition to school.' For this reason the Committee proposed a working definition of early childhood as the period below the age of 8.

**Recommendation: The Early Years Strategy should deliver equally for children aged 0-3 as for children aged 3-6. Moreover, the Department should consider extending the age range of the Strategy to reflect the UN Committee on the Rights of the Child's working definition of early childhood as children below the age of 8.**

#### **4.1.3 Funding of Early Years Strategy**

Improving the quality of service delivery in the early years is critical to the Strategy's aim of ensuring *'that all the needs of children lie at its heart so that all of our children have the best possible start in life'*. However, the Strategy also states *'no assumption of new resources becoming available ....it may be a case of making better use of existing resources so the Department will need to ensure that all interventions are effective and appropriate'*. NICCY has real concerns about potential implications for service delivery if new funding is not allocated to Early Years services.

NICCY acknowledges that the current economic climate is extremely difficult for the Executive and Department, with competing priorities both within, and between departments, for crucial resources. Nonetheless, NICCY would remind the Department and wider Executive of the historic underfunding of early years services in Northern Ireland, in comparison with Great Britain.



A report jointly published by NICCY, DFP and OFMdfM in 2007 on public expenditure on children raised alarm about the disproportionate level of provision in NI compared with counterparts in the UK. It highlighted that: *“Regional funding deviations... appear to have stifled the development of Sure Start in NI, particularly in relation to Children’s Centres and this might well hinder progress with regard to tackling child poverty.”*<sup>v</sup> A second comparative analysis (2009) by Save the Children confirmed that current spending per child is much lower in NI than in England, Scotland and Wales.<sup>vi</sup>

The Save the Children report found that Early Years expenditure per child in Northern Ireland is currently set at £80 per child, compared with England who receive £600 per child, Scotland who receive £380 per child, whilst Wales receives a more modest allocation between £270-350 per child.<sup>vii</sup> This difference may reflect the more limited roll out of Sure Start in NI compared to England, with less integrated ‘wrap-around’ services. NICCY is aware that the Department has challenged the figures contained in the Save the Children report, and would welcome the opportunity to review the expenditure on early years in Northern Ireland with the Department.

What is clear is that the Department must address the under-spend in early years services, as well as Foundation Stage primary school education in Northern Ireland, if educational attainment is to be improved and the resulting inequalities reduced. Subsequently, this may help promote equity of access and quality service delivery, in line with the Strategy’s objectives.

Indeed, there are several robust pieces of analysis highlighting of the economic benefits of investing in service deliver in the early years, such as Heckman (2006), who notes: *“At current levels of resources, society over invests in remedial skill investments at later ages and under invests in the early years”*<sup>viii</sup>. Accordingly, NICCY calls for expenditure to the maximum extent of available resources in line with Article 4 of the UNCRC to be allocated to Early Years Services in promoting better quality of service provision. This should include an increased investment in Sure Start Programmes, to both broaden their reach and the range of services they provide.

**Recommendation: The Executive must address the historic underfunding of early years services in Northern Ireland to provide extra resources to ensure better quality, and more widely accessible services.**

## **4.2 Objective 1: Promoting quality early years provision**

### **4.2.1 Early Intervention**

Early intervention is widely recognised as one of the key means of alleviating and eliminating developmental delays in the Early Years. NICCY acknowledges that the draft Strategy appropriately focuses on early intervention, matching policy prescription to ‘best practice’ in proposals of ‘seeking to expand the ‘Two Year Old Programme



and the reach of the Sure Start Programmes (SSPs)'. However, the lack of emphasis placed upon on the earliest childhood experiences (0-3 years) provokes concern over how the practice and delivery of early intervention will be achieved. If the rationale behind early intervention is to detect developmental problems early on in children's lives, then delivering a strategy which focuses disproportionately on the later age group of 3-6 years will most likely fail. Where there is little reference and inclusion of the youngest children and their experiences within the Strategy, there will be little opportunity to intervene early and remedy developmental delays on the ground.

Effective early intervention requires a comprehensive Strategy that establishes the infrastructure essential to the practice and delivery of Early Years Services from 0-6.

**Recommendation: The Strategy must contain sufficient actions for the 0-3 age group to ensure that developmental delays and particular needs are recognised and addressed as early in a child's life as possible.**

#### **4.2.2 Integration**

The draft Early Years Strategy recognises that *'environments which foster the concept of the 'whole child' are more likely to be provided through the delivery of integrated services, where there are strong collaborative and communication links established between parents and a network of other partners'*. Children are not easily divided into different areas – nor is child development easily compartmentalized into different areas. Indeed, all areas of child development are closely related, and there is widespread evidence that an integrated approach with joined-up policies may help ensure and promote better outcomes for children. Indeed, as outlined in UNICEF Report Card 8 on The Child Care Transition,<sup>ix</sup> *'if properly linked to other services, the benefits can be fully realised by the individual, families and societies alike, including: enhanced maternal employment; less family poverty; better parenting skills; and greater family and community cohesion'*.

Early intervention through an integrated approach is essential to an effective Early Years Strategy. NICCY supports the Department of Education's commitment to work closely alongside the DHSSPS in delivering on the Early Years Strategy. However, NICCY is concerned at the split between education and care, reflecting departmental boundaries. Moreover, the Strategy does not adequately address the procedures required to ensure integration in service delivery.

**Recommendation: The Strategy must ensure that early years services are integrated and child-centred, rather than uncoordinated and piecemeal. This will require the remit of the Strategy to be broadened to include a wider range of services for children. Moreover, procedures must be established to ensure integration in service delivery. A statutory duty for agencies to cooperate when planning services for children is essential in ensuring a coordinated approach.**



### **4.2.3 Age Appropriate Care for Two Year olds**

The draft Strategy outlines that the Pre-School Education Expansion Programme 'was aimed at providing a free, quality pre-school place for children in their pre-school year and was, therefore, focused on three year olds'. Over the 10 years, enrolments in pre-school education have witnessed a steady increase, with the latest figures reflecting an overall provision of around 93%. NICCY welcomes the increase in pre-school places outlined in the document, which demonstrates the Department's commitment to maximizing the number of children able to access pre-school places.

However, there appears to be a problem of two year olds being allocated pre-school places that should be allocated to three year olds, although there is some confusion about this issue. The draft Strategy appears to recognize this as a problem and commits to addressing this issue by ensuring provision for two year olds is focused only on most disadvantaged children. However, in response to a recent Assembly question, the Minister for Education, Caitriona Ruane, has said that this is not the case, but rather the two year olds who are enrolled in pre-school have availed of surplus places, within the time and process of application. NICCY requests clarify from the Department in relation to this issue: how many three year olds have not been allocated pre-school places in areas where one or more two year olds have been allocated places?

While it is clearly important that three year olds are able to access pre-school places, it is equally important that two year olds are not inappropriately put into pre-school services that are designed for three year olds. The Department has stated that provision for two year olds is focused only on the most disadvantaged children. It is vital that this provision is designed specifically to meet the needs of two year olds, and not merely be the remaining pre-school places left after three year olds have been allocated places.

**Recommendation: Pre-school places should be allocated only to children in their pre-school year. Where there is need for services for two year old children, for example where they are particularly disadvantaged, services should be designed specifically for this age group.**

### **4.2.4 School starting age**

Currently most European countries start formal education at age six, focusing up to that point on the 'child's readiness to learn'. Northern Ireland has an extremely early starting age, as children can start formal education as early as 4 years and 2 months. NICCY welcomes the Department's commitment to 'begin a consideration of the implications of any potential change to the school starting age'.

This issue is not a simple one, as there is evidence to support different school starting ages. However, arguably, the issue is less the age children start as whether the provision is appropriate to their age, and whether the individual child is ready for school. Research by McEwan & Sharpio (2008), suggests that parents should be given



more autonomy to evaluate their child's readiness for school, in line with obligations of the state to facilitate capacity building for parents. This would allow parents – particularly those with children who are particularly young for their year – to determine whether their child starts school aged four or five.

**Recommendation: When reviewing the school starting age the Department should engage widely with key stakeholders including parents and children to ensure that all views are taken into account.**

### **4.3. Objective 2: Promoting engagement with parents / carers.**

#### **4.3.1 Respecting the Role of Parent/Carers**

The role of parent/primary care-giver is crucial to the development of children in their early years<sup>xi</sup>. As an advocate for children's rights, NICCY welcomes the promotion of engagement with parent/primary care-giver, as early childhood rights are realised during these vital years. This is the time when *'young children form strong emotional attachments to their parents or other caregivers, from whom they seek and require nurturance, care, guidance and protection, in ways that are respectful of their individuality and growing capacities'* (Article 6 (b)<sup>xii</sup>. Further evidence suggests that parents and primary caregivers are *"active ingredients"* in early years – thereby parents as nurturers are central in helping children develop in all areas.<sup>xiii</sup>

The limited scope of the strategy is problematic in relation to supporting parents and carers. A holistic early years strategy would make reference to policy and legislation around maternity and paternity leave. NICCY understands that the Executive has little influence over these policies, but it is important that they are at least referenced in the Strategy.

**Recommendation: The scope of the Strategy should be broadened to include family support.**

### **4.4 Objective 3: Promoting Equity of Access**

NICCY is pleased that the Department and the Executive have recognised the importance of ensuring equality of access to all parents and carers wishing to avail of pre-school education places for their children. Nevertheless, NICCY is concerned that the needs of some groups of children may not be adequately addressed in the draft Early Years Strategy, including:

- Children enrolled in Irish-Medium Education (IME);
- Traveller Children; and
- Children with Special Educational Needs (SENs).

#### **4.4.1 Children enrolled in Irish-Medium Education (IME)**

NICCY acknowledges the proposals contained in the draft Early Years Strategy to take forward issues highlighted in the IME Review and that the Department is supporting best practice in acknowledging potential benefits of quality provision for IME in early



years settings. However, more clarity is required over how the IME will be taken forward under this Strategy.

**Recommendation: The Strategy should outline in more detail how Irish Medium Education will be taken forward in early years settings.**

#### **4.4.2 Traveller Children**

Children of families in the Traveller Community in Northern Ireland are more at risk of experiencing educational disadvantage and/or low educational attainment, compared with settled children<sup>xiv</sup>. Indeed, in its 2008 Concluding Observations on the UK report, the UN Committee on The Rights of the Child noted that children and young people from the Traveller community were one group experiencing significant inequalities in educational achievement and were unable to fully enjoy their right to education. Moreover, the DE evidence paper acknowledged that children from the Traveller Community were in need of additional support in relation to early years education.

However, despite the weight of evidence of the particular needs of Traveller Children and the Department's acknowledgment that 'disadvantaged' children should be supported within the Early Years Strategy, the draft Strategy contains no references to children from the Traveller Community. This omission must be addressed in the final version of the Strategy.

**Recommendation: The Strategy must address the particular situation facing Traveller children to ensure that early years services are appropriate and accessible for this particularly disadvantaged group of children.**

#### **4.4.3 Children with Special Educational Needs (SENs)**

NICCY is concerned over whether the Early Years Strategy will ensure appropriate support for Children with Special Educational Needs (SENs). The lack of detail on how provision for children with SENs will be integrated into the strategy is a matter of concern and must be addressed in the final strategy. For children with SENs, early detection and early intervention is crucial to dealing with developmental problems. This reinforces the significance attached to joined-up policies, and integrated services.

**Recommendation: The Department should work closely with DHSSPS to establish mechanisms that will detect developmental problems early on, so as to offer children with SENs an equal opportunity to avail of quality preschool care. Further guidance in relation to working with children with SENs appropriate to early years settings should also be made accessible to the general workforce involved in service delivery.**

#### **4.4.4 Targeted Provision for Disadvantaged Children and Families.**

The draft strategy and supporting evidence paper has revealed that *'too many young children are beginning their pre-school year demonstrating delay and difficulties with aspects of their development and learning'*. A growing body of empirical research



has documented that gaps in ability appear early, long before formal education begins<sup>xv</sup>. Early education promotes long lasting effects, proving (amongst many benefits), that early education does have the potential to play a part in breaking the cycle of poverty and/or disadvantage<sup>xvi</sup>. Accordingly, NICCY is pleased that the Department is seeking to expand the delivery of Sure Start, and the 'Two Year Old Programme', allocating priority to disadvantaged children and families, in line with article of the UNCRC.

Whilst it is acknowledged that early years education alone will not end disadvantage for children and their families, international and national evidence confirm that early intervention can mitigate the effects of disadvantage<sup>xvii</sup>. However, NICCY is concerned about the current limited reach of Sure Start and the 'Two Year Old Programme' rolled out across the province. Sure Start projects are geographically limited, covering only 20-25% of the most deprived areas. Moreover, not everyone in deprived areas is necessarily disadvantaged, just as not everyone in more privileged areas is necessarily privileged. Often victims of disadvantage are situated outside the parameters of measurement, and consequently fall through the net of geographically targeted provision.<sup>xviii</sup>

**Recommendation: The Strategy must use a range of ways of targeting early years services to disadvantaged young children. Where area-based approaches are to be used, the geographical areas must be expanded to ensure that more disadvantaged children are reached.**

#### **4.4.5 Workforce advancements**

At the heart of improving early years service delivery manifests the issue of improving qualifications of the workforce. The draft Strategy proposes that *'DE, with DEL, ESA, and other relevant bodies, will work towards raising the minimum level of qualifications for those working in all DE funded early years settings, including Sure Start, to an NVQ level 3; the minimum level of qualification for the leader-in-charge will be raised to NVQ level 4 or above. ESA will secure or procure an "early years leadership programme" and provide access to it for those currently in leadership in funded pre-school provision.* NICCY welcomes these proposed changes to enhance training and qualifications of the early years workforce in line with Article 14 (c) of the UNCRC.

NICCY acknowledges however that this issue remains highly controversial. Many academics and policy makers differ over the extent to which enhanced skills and qualifications lead to an enhanced quality of service delivery<sup>xix</sup>. Some advocate raising skills in line with teacher qualifications,<sup>xx</sup> while others argue that this level of qualification is unnecessary and would prove extremely expensive.<sup>xxi</sup>

While NICCY is supportive of the proposal to promote higher levels of qualifications for those working early years services, we have concerns that merely raising the



required level of qualification required to work in DE funded early years settings will not necessarily deliver the proposed changes.

Currently there is a significant disparity between salaries of those working in statutory pre-school settings and voluntary pre-school settings, due to the different funding arrangements for these sectors, and the different requirements with regard to staff:child ratio. NICCY understands that this is linked to the fact that staff in statutory settings are qualified teachers. However, given that the pre-school year focuses on play and the development of a wide range of skill as opposed to formal education, it is not clear that a teachers qualification is necessary. Indeed, the Degree in Early Years may be a more appropriate qualification.

In any case, working within the Early Years sector in many cases remains a low paid, low status occupation with many workers receiving only minimum wage or slightly above. This results in many women (as it is women who predominantly work in early years services) and their children trapped in 'in work poverty'.<sup>xxii</sup> The Department must address this issue by improving funding of services at the same time as providing funding for early years staff to access professional development opportunities.

**Recommendation: The Department must provide funding to promote higher levels of qualifications for those who deliver early years services. In addition, the Department must work towards raising the status of early years work by improving funding for the services, thus tackling the issue of low pay for many providing services to young children.**

#### **4.4.6 Criteria for pre-school places**

NICCY is aware that there is a great deal of variation in the criteria used to allocate pre-school places. Although not addressed in this Strategy we understand that there are only two criteria that are required, one relating to whether parents are in receipt of benefits, which is a proxy measure for disadvantage, and the other in relation to the child's birth month. Children born in July and August are given priority over other children. We are also aware that many pre-schools also use Birth Date as an additional criteria, as it allows differentiation between children who would otherwise equally meet other criteria.

NICCY believes that prioritising older children in allocating pre-school places unfairly disadvantages younger children – who are already disadvantaged because they are younger than other children in the year. Criteria based on birth date may lead to children who are young for their year missing out on a pre-school place, and starting school doubly disadvantaged by being young, and not being prepared for school.

**Recommendation: The Department should remove the requirement for children with July and August birthdays to be allocated pre-school places before children born later in the year. Moreover it should inform**



**pre-school providers that they must not use birth date as a criteria as this disadvantages younger children.**

#### **4.5 Objective 4: Promoting Collaboration among key partners**

NICCY supports the Department's recognition of the importance of promoting partnership between key stakeholders in the delivery of early years services, and welcomes the articulation of this in the Strategy as a key objective. A recent NFER report concludes that promoting partnership between key stakeholders can enhance the quality of service delivery in the early years.<sup>xxiii</sup>

However, as we have previously stated, the limited scope of the strategy limits the potential for holistic, child-centred services. Moreover the variations between sector, including funding and qualifications may result in early years services being delivered to differing standards and directly impact on the ability of young children's outcomes. We believe that such large variations, as reported in the draft Strategy and accompanying evidence paper, must be urgently addressed.

NICCY supports the following proposed actions outlined in the draft Strategy included: *'DE will commission ETI to inspect and report on the quality of the learning provision in all early years settings; DE will consult with DHSSPS, on how the HSCT regulatory function should align with the quality improvement role of ETI to ensure the highest possible standards of provision set out in the proposed quality framework'*. However, other actions including addressing the funding disparities must also be taken forward.

**Recommendation: The Department should review the different delivery methods, staffing, and funding between sectors to ensure that children are receiving universally high quality services. Structures must be put in place to support partnership working.**

#### **5.0 Conclusion**

NICCY welcomes the opportunity to provide advice on the draft Early Years Strategy. While there are a number of aspects we would support, there are a number of significant problems with the approach taken in the draft Strategy. Most importantly, the Strategy is too narrowly focussed and should be rewritten to more holistically address the needs of children in their early years.

While recognising the current economic climate, NICCY would also highlight the need to address the historic underfunding of early years services.

In total NICCY has made fifteen recommendations in relation to this draft Strategy. We hope that they will be carefully considered, and would be pleased to meet to discuss further or to clarify. As decisions are made to take the Strategy forward NICCY would be grateful if the Department would provide a response to these recommendations, detailing which have and which have not been taken forward.



## **Recommendations**

**1: The Early Years Strategy should be rewritten to comprehensively address the needs of children in their early years. In addition to education this should include childcare, family support, healthcare and play. While one Department should coordinate development and implementation of the Strategy, a number of Departments should be responsible for its delivery.**

**2: The Early Years Strategy should deliver equally for children aged 0-3 as for children aged 3-6. Moreover, the Department should consider extending the age range of the Strategy to reflect the UN Committee on the Rights of the Child's working definition of early childhood as children below the age of 8.**

**3: The Executive must address the historic underfunding of early years services in Northern Ireland to provide extra resources to ensure better quality, and more widely accessible services.**

**4: The Strategy must contain sufficient actions for the 0-3 age group to ensure that developmental delays and particular needs are recognised and addressed as early in a child's life as possible.**

**5: The Strategy must ensure that early years services are integrated and child-centred, rather than uncoordinated and piecemeal. This will require the remit of the Strategy to be broadened to include a wider range of services for children. Moreover, procedures must be established to ensure integration in service delivery. A statutory duty for agencies to cooperate when planning services for children is essential in ensuring a coordinated approach.**

**6: Pre-school places should be allocated only to children in their pre-school year. Where there is need for services for two year old children, for example where they are particularly disadvantaged, services should be designed specifically for this age group.**

**7: When reviewing the school starting age the Department should engage widely with key stakeholders including parents and children to ensure that all views are taken into account.**

**8: The scope of the Strategy should be broadened to include family support.**

**9: The Strategy should outline in more detail how Irish Medium Education will be taken forward in early years settings.**



**10: The Strategy must address the particular situation facing Traveller children to ensure that early years services are appropriate and accessible for this particularly disadvantaged group of children.**

**11: The Department should work closely with DHSSPS to establish mechanisms that will detect developmental problems early on, so as to offer children with SENs an equal opportunity to avail of quality preschool care. Further guidance in relation to working with children with SENs appropriate to early years settings should also be made accessible to the general workforce involved in service delivery.**

**12: The Strategy must use a range of ways of targeting early years services to disadvantaged young children. Where area-based approaches are to be used, the geographical areas must be expanded to ensure that more disadvantaged children are reached.**

**13: The Department must provide funding to promote higher levels of qualifications for those who deliver early years services. In addition, the Department must work towards raising the status of early years work by improving funding for the services, thus tackling the issue of low pay for many providing services to young children.**

**14: The Department should remove the requirement for children with July and August birthdays to be allocated pre-school places before children born later in the year. Moreover it should inform pre-school providers that they must not use birth date as a criteria as this disadvantages younger children.**

**15: The Department should review the different delivery methods, staffing, and funding between sectors to ensure that children are receiving universally high quality services. Structures must be put in place to support partnership working.**

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<sup>i</sup> CRC (2005) General Comment No.7 Implementing Child Rights in Early Childhood CRC/C/GC/7/para 22.

<sup>ii</sup> (Lillian Katz 1995): Cited in Early Years Strategy Evidence Book. (DENI2010)

<sup>iii</sup> Early Brain Development (2010). Family and Parenting Institute. Early Home Learning Matters. <http://www.earlyhomelearning.org.uk/brainDevelopment>

<sup>iv</sup> CRC (2005) General Comment No.7 Implementing Child Rights in Early Childhood CRC/C/GC/7

<sup>v</sup> Economic Research Institute for NI (2007) An Analysis of Public Expenditure on Children in NI, (Belfast: NICCY, Department for Finance and Personnel, OFMdFM).

<sup>vi</sup> Save the Children (2009) A Child's Portion: An Analysis of Public Expenditure on Children in the UK. NI Briefing, (Belfast: Save the Children).



- <sup>vii</sup> The amount allocated is reflective of the level of deprivation, with more deprived areas receiving the larger scale of expenditure. Save the Children (2009) A Child's Portion: An Analysis of Public Expenditure on Children in NI.
- <sup>viii</sup> Cited in: UNICEF(2008) Report Card 8: The Child Care Transition, p.9).
- <sup>ix</sup> Prof of Child Development at Columbia University, New York (UNICEF Report Card 8: The Child Care Transition).
- <sup>x</sup> McEwan, PJ & Sharpio, JS (2007). Discontinuity Estimates Using Exact Birth Dates. THE JOURNAL OF HUMAN RESOURCES d XLIII d 1. University of Wisconsin System
- <sup>xi</sup> <sup>xi</sup> Pepper, D & May, T (2009). Thematic Probe. Early Years International Themes. Final Report, Slough, NFER.
- <sup>xii</sup> CRC (2005) General Comment No.7 Implementing Child Rights in Early Childhood CRC/C/GC/7/p.3
- <sup>xiii</sup> NRCIM = National Research Council and Institute of Medicine. (From Neurons to Neighbourhoods: the science of Early Childhood Development): cited in Evidence paper.
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