The draft Early Learning Childcare Strategy is divided into three parts or "themes", each of which is broken into parts or "objectives". We encourage the public to look at the draft Strategy themselves and to draw their own conclusions, however we are providing a guide here that outlines our major concerns within each theme and objective, followed by some overall concerns.

This is followed by an outline of the Childcare for All model that we are proposing as an alternative.

THEME 1: Giving children the best start in life through early learning and childcare

Objective 1.1 – Deliver universal, full-time pre-school provision (22.5 hours)

We fully support the ostensible purpose of objective as per the headline. However, we are gravely concerned that the actions outlined in this document will not and cannot achieve universal provision of early years education.

We take it as accepted that the evidence is undisputed; early years education is significant for the prospects of children in terms of educational attainment and long-term health. As such, reducing access for any children is a development that we cannot support.

However, the draft Strategy proposes to change the current approach to admission to early years education, and to legislate to remove social disadvantage criteria from pre-school admissions.

Quite obviously, this would have a significant impact on lower-income children and families. The purpose of the current social disadvantage criteria is to identify and assist those children most in need of early educational intervention. Without it, many of these children will fall behind their more socially advantaged peers.

The Minister has indicated that it his view that the social disadvantage criteria will not be needed as a result of universal, full-time provision. However, in the current challenging financial circumstances it is not at all certain that provision will be truly universal before the social disadvantage criteria will removed, and as such we remain as concerned as before hearing the Minister's view.

More broadly, it will have an impact on the sharp class divide that already pervades our society and leads to a situation that leads to a 14-year life expectancy gap between two girls born in the same hospital on the same day, but raised in homes a mile apart into different social circumstances. Society should be laser focused on alleviating that gap. This proposal will widen it.

Objective 1.2 – Deliver targeted early learning and childcare services for children facing disadvantage and additional needs

At a glance, this section appears to offer alternatives for children who will no longer be eligible for the social disadvantage criteria and to close the gap that may be created in future. However, despite appearances and despite the fact that the programmes listed – Sure Start, Pathway, and ToyBox – are excellent and commendable programmes which deserve expansion on their own merits, they are not sufficient to the needs of those groups disadvantaged by the other parts of this Strategy.

Access to Sure Start is, at present, very much based on location and postcode, rather than the socio-economic circumstances of the family. Even if expanded that would likely remain an issue, and there is no plan outlined here to address the gaps that this would create.

It also is not a substitute for full-time early learning places or for childcare; they operate in such a way that they often do not provide full time spaces and they are therefore not the necessary key to facilitate parents accessing education, training or the workplace. Nor would they provide the same range of educational opportunities to children as their peers in full time early years provision.

Objective 1.3 – Expand developmental provision for children aged 2–3

Ostensibly, this could fill the gap created by the loss of the social disadvantage criteria for early years education, and as such this aspiration is admirable.

However, the Strategy lays out a plan that describes a roll-out of this provision on a phased, targeted and geographically limited basis in the short to medium term, with universal access only envisaged in the longer term. Combined with the proposals at 1.1 above, this will lead to a lottery for children while provision is not universal.

As a result, the gap will remain for a period of some length, meaning that while the department works towards universal provision a generation – or more – of children will miss out on this opportunity and be disadvantaged in comparison to their peers.

Objective 1.4 – Promote high-quality provision across all early learning and childcare providers

This is welcome in principle, the best possible standards of provision should be standardised and expected everywhere.

However we are concerned that, as standards improve for those children with access to this kind of provision, those children who will miss out will fall further behind.

THEME 2: Making childcare more affordable and supporting families

Objective 2.1 – Make childcare more affordable

We welcome a focus on affordability where childcare is concerned, however we are concerned that the means chosen to tackle it will not yield the results intended.

The Northern Ireland Childcare Subsidy Scheme (NICSS) was designed to reduce the cost of childcare, but the impact has not been what was hoped. This is because there were no caps placed on costs, and as such many providers have raised costs to match, and even to exceed, the value of the subsidy, leaving parents in a similar position or even worse off than before. As a result, continuing to invest in this scheme without additional guardrails is counter-productive and will not lead to reduced costs for parents currently eligible for NICSS. The Strategy includes a paragraph that outlines a consideration of the possibility of capping fees, but ultimately it has not been pursued at this stage.

Additionally, the NICSS itself is not available to all families; specifically parents in receipt of Childcare Vouchers or Universal Credit do not benefit from this scheme. Those more likely to be in financial precarity; those with low incomes, working part time or in precarious roles, student parents and more, are excluded from the scheme. This means that, as NICSS investment increases, there is a very real risk that the investment itself will lead to continual and escalating price rises in private childcare, further reducing the accessibility of childcare for families who already have less financial means.

In terms of public finances, we are concerned that an approach that focuses on investment in the NICSS but does not place caps on cost will represent a poor choice of scarce resources that could be strategically invested in such a way as to genuinely reduce cost and increase access to childcare.

Objective 2.2 – Improve the information and support available for families

While more information is always helpful, we are concerned that the Strategy radically overstates the degree to which those who do not use childcare do so because they lack information or advice, as opposed to the simple calculation that they cannot afford it.

THEME 3: Supporting a sustainable, high-quality early learning and childcare sector

Objective 3.1 – Build the sustainability and capacity of the ELC sector

The capacity of the ELC sector is clearly vital to the success of any Strategy. In particular, we have stressed that the childcare workforce is insufficiently supported, both in terms of pay and in terms of career development and working conditions. As such, we welcome that the Strategy intends to centre these issues.

However the Strategy fails to differentiate between the issues that present in different parts of the sector and to tailor its interventions appropriately. As we make clear below, we believe that investment in community-based childcare models that meet the needs of those with the lowest income and operate to utilise every penny of investment to the best effect, as opposed to models based on generating considerable profit. The latter have opportunities to invest in their workforce, and there are no interventions in this Strategy to encourage this, while community models such as the Women's Centre Childcare Fund could and should be seen as an ideal site for strategic investment.

Finally, there is a need to consider the research used to outline the plans for the sector. They assume a similar pattern that currently holds, namely that many families will continue to rely on family connections to provide childcare at a similar level to what is currently established. Given demographic shifts and a higher level of inward migration from people who may not have local family connections, this should be examined with great care.

Objective 3.2 – Enhance accessible early learning and childcare for children with additional needs

We support this goal unequivocally, however without specific actions and an outline of how this will be supported financially, it is difficult to assess how successful this will or can be. Supporting children with additional needs comes with additional costs, including in staffing numbers, specialist training and in many cases additional equipment for settings. As such it is important that the investment follows this commitment in order to be certain that the objective amounts to more than warm words.

Objective 3.3 – Enhance early years infrastructure through a skilled and valued workforce

As we outlined in response to objective 3.1, we have long asked for proper, long-term and thorough investment in the childcare workforce. These workers carry out vital work with the utmost professionalism, and they deserve recognition and appropriate remuneration for this work.

However, this Strategy outlines no measures to avoid the risk that better pay and conditions results immediately in rising childcare costs. Again, we stress that this kind of pitfall can be avoided by removing the reliance on the private sector and moving towards the approach we have outlined below and elsewhere; a community-based model of childcare that sees strategic investment that goes directly to the site most needed; provision of appropriate spaces, and investment in the childcare workforce.

Overall Concerns

A lack of detailed costings: The cost of this Strategy is considerable, and the text of the document is clear that many of the proposals are subject to the Department's financial position, which is widely understood to be very challenging. As such, the lack of detailed costs is especially concerning; no exercise is shared that allows us to assess what will be prioritised in the event that the Department does not get the amount of money that it wants and needs for this work. It is not clear, because of the lack of even estimated costings, whether inflation has been considered or how that may impact on the delivery of these actions.

A lack of specifics: Too often, plans are mentioned without enough detail to tell for certain if they will have the impact that we hope that they might. A clear example of this is in section 3.1 ; proposing to develop a Strategic Childcare Accessibility Fund sounds positive, but details are extremely sparse, to the extent that it is not clear if this is money that will be strategically invested or if it is intended to be a grant accessible to individual families who are eligible.

A lack of co-ordinated timings: A number of proposals rely on other parts of the Strategy being completed and in place in order to work as intended; for example the proposal to remove the social disadvantage criteria relies on universal early years provision of 22.5 hours being available to all parents. Without the certainty of adequate funding, this cannot be guaranteed and creates a significant crack through which the most disadvantaged may fall.

An Alternative Childcare Model

While we have welcomed the focus on childcare and early years education from the current Executive, the draft Strategy confirms to us that there is not a serious attempt to reform the current childcare model to meet the needs of children, parents and childcare workers in the sector.

Childcare for All sets out an alternative approach to addressing the issues.

Childcare for All

For Children:

• All children have access to high quality childcare that meets their educational and developmental needs in a safe, nurturing environment supporting them to achieve their full potential, including children with additional needs including SEN, language barriers, etc.

• No child is living in poverty as a result of a parent's inability to access or stay in paid work or due to the high cost of childcare.

For Childcare Providers:

• All types of childcare settings are enabled to deliver high quality, sustainable, accessible childcare across a range of settings through strategic investment by Government.

• Specific support through the Women's Centre Childcare Fund to be increased and expanded as this model best meets the needs of low-income women and especially those who live in areas of increased deprivation.

• The childcare workforce is valued and supported through investment in skills development, workplace progression, and decent pay and terms and conditions.

For Parents

• All parents are able to access, stay in and progress in paid work, or education and training facilitated by affordable, accessible and flexible childcare.

• All parents are supported to undertake the amount of paid work that suits the needs of their family with adequate financial support to live free from poverty.

For Society:

• Significant reduction in the gender pay gap and social inequality through ensuring that no-one's employment options are constrained by lack of access to affordable, flexible childcare.

• Economic growth is stimulated through employers having access to a wider pool of skilled, experienced potential employees for recruitment.

A Community Childcare Model

Our Childcare Strategy should be ambitious in scope and should seek to prioritise and invest the most money into building a new community-based childcare model that is designed to meet the needs of all those in the childcare equation. This model would be best placed to recognise childcare as an essential part of our public infrastructure worthy of proper, strategic investment.

The Women's Centre Childcare Fund (WCCF) as a model

The Women's Centre Childcare Fund (WCCF), established in April 2008 and funded by the Department for Communities, enables Women's Centres to provide childcare places that are 100% supported for the most disadvantaged children in our communities. These childcare places ensure that disadvantaged children have an opportunity to experience a childcare setting, to socialise, interact, play and learn in a supported environment. These supported places also give women the opportunity to access a wide range of programmes available in their local Women's Centre including training and education, back to work programmes, counselling, health and wellbeing programmes and a range of advice services.

For some women (including ethnic minorities and lone parents) the prospect of increased economic participation can depend on the availability of appropriate integrated childcare and access to education/training opportunities at community level. A lack of appropriate integrated childcare and community education acts as a fundamental barrier to the engagement of socioeconomically disadvantaged women in education, training and in employment. This is the kind of integrated provision that is provided by WCCF and which is so vital to these women.

Despite the importance of this childcare model in tackling disadvantage and promoting equality WCCF continues to be administered on an annual basis and has been subject to Departmental cuts/austerity measures since 2012 which resulted in the overall original allocation being reduced by just over 20% up until 2022. Over the last three years the Department has increased this funding slightly to those Women's Centres in receipt of it to help them to meet 'Cost of Living' increases. While this is positive there is insufficient investment in WCCF to address existing levels of need.

The Women's Regional Consortium believes that this is a hugely important area of funding for women and children in disadvantaged areas. We argue that any progress on childcare provision in Northern Ireland must invest in low cost/no cost childcare provision for marginalised women in disadvantaged and rural areas.

Yet, the draft Early Learning and Childcare Strategy only mentions WCCF **once** and that singular mention is as part of a list of Existing Programmes in Appendix Two. The Women's Regional Consortium are disappointed that it has not been given greater focus within the draft Strategy as an important model for the delivery of childcare for children facing the most disadvantage.

WCCF should be specifically included in the final Early Learning and Childcare Strategy as a funding and delivery model, taken forward on a multi-year basis, to provide for a planned, longer-term response to the need for childcare provision for children facing disadvantage.

What this means for financial investment priorities

It is vital that childcare is seen as an investment providing benefits to our society and to our economy and as a critical piece of our infrastructure not simply a cost to the Executive.

We are calling for the earmarked investment in childcare to be invested directly with childcare providers of all types provided that they meet certain criteria with regards to price regulation as well as the pay and terms and conditions of the childcare workforce.

These measures should include capping prices for parents and families, and any public funding of providers should be conditional on the payment of the Real Living Wage as determined by the RWL Foundation. The Childcare strategy should also consider other recommendations in relation to the childcare workforce put forward by the Irish Congress of Trade Unions, the collective voice for trade unions across NI, in their childcare policy paper, ensuring that providers can pay their staff a Real Living Wage to help reduce staff turnover in the sector, and stabilise the numbers of available places.

This funding should also be provided on the condition that a certain number of childcare places are reserved for low-income families ideally using the model of the Women's Centre Childcare Fund and should take care to cover rural and underserved areas and provide the necessary support for children with Special Educational Needs and who face other barriers to their education.