

**Early Years Education-focused Inspections
in
Early Years Settings participating in the Early Childhood, Care and Education (ECCE) Scheme**

CONSULTATION AND FEEDBACK FORM

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On 26 May 2015 the Department of Education and Skills (DES) and the Department of Children and Youth Affairs launched a public consultation with the early years sector regarding Education-focused Inspections in early years settings participating in the ECCE scheme. The proposed inspections will be carried out by the Early Years Inspectors of the Department of Education and Skills. The inspections will monitor and quality assure the quality of the educational experiences provided for children.

The attached briefing paper, *Early Years Education-focused Inspections in Early Years Settings participating in the ECCE scheme*, sets out the details of the proposed inspections and the quality framework to be used by the Early Years Inspectors when conducting the education-focused Inspections in early years settings. The DES Inspectorate is committed to working in partnership with the early years sector and, as part of our consultation process, we would like your views on the proposed Early Years Education-focused Inspections.

You are invited to provide written feedback on the proposed Early Years Education-focused Inspections in Early Years Settings participating in the ECCE scheme. The form is structured as follows:

- **Section A:** Your general observations on the proposed Early Years Education-focused Inspections
- **Section B:** Your views on specific aspects of the proposed inspections
- **Section C:** Areas/ questions you would like clarified

- Please return this feedback form to eyei@education.gov.ie by (30 June 2015 at the latest)

Name of Organisation:	 <p>Early Years Leading Education in Ireland National Association of Higher Education Institutions Offering Degree Level Training in Early Childhood Care and Education</p>
Name of representative completing this feedback form:	<p>Dr. Mary Moloney, Chairperson</p>
Email:	<p>mary.moloney@mic.ul.ie</p>
Phone:	<p>061 204316</p>

Section A: General observations on the proposed Early Years Education-focused Inspections in Early Years Settings participating in the ECCE scheme

PLÉ welcomes the DES acknowledgment of the importance of early years education, and its engagement with the early years sector with regards to the quality improvement agenda. PLE also welcomes the opportunity to provide feedback on the DES consultation paper which we see as an initial step in consultative processes relating to Early Years Education-focuses Inspections.

In terms of the present consultation paper PLÉ particularly welcomes the shift in emphasis from a predominant focus on health and safety to:

- An exploration of the processes within settings in relation to children's experiences
- A focus upon Aistear, and
- The recognition of play as the main pathway to children's learning in the early years.

PLÉ believes that the proposed strengths based approach to inspection has the potential to validate the work of early childhood educators. We also view the recruitment of early years inspectors, who must hold an honours primary degree (Level 8, NFQ) in Early Childhood Education and Care, and who must hold at least five years' experience within early years settings (birth to six years) as a positive step, which signifies that the DES has listened to, and taken the concerns of the sector into account with regards to the composition of the inspection teams. The inclusion of early years' graduates is a critical first step towards ensuring that those with the appropriate knowledge and skills of early childhood education and care undertake early years inspections. PLÉ also welcomes this feedback opportunity as an initial step of consultative processes in relation to the education-focussed inspections.

While we understand that the education focussed inspections are at the request of the DCYA (DES consultation paper, p.2) and will focus exclusively upon settings participating in the ECCE scheme, we are concerned that the rights of children (birth to three years) to quality education and care experiences is being overlooked. It is widely accepted that the ECCE sector in Ireland has developed in a piece meal manner, and that it is characterised by fragmentation, and multiple layers of governance and inspection. PLÉ is concerned that the exclusion of children in the birth to three years age cohort from the DES education focussed inspections will lead to further fragmentation and the emergence of a new split between children in the ECCE scheme and younger children. Worryingly, children under three years are increasingly disadvantaged in terms of investment, qualified staff, and a holistic approach to their early care and education (Moloney, 2015). There is a now a considerable risk that the ECCE scheme will become synonymous with 'education' while 'care work' which is at the heart of working with younger children will be denigrated. Furthermore, the 'seamless provision of care and education' for *all* children in the birth to six age group which was endorsed so strongly in *Ready to Learn- White Paper on Early Years Education*, will be undermined (DES, 1999 p. 44).

Although we appreciate the constraints and limitations associated with the DES involvement at this time, we would ideally like to see a single unified inspection process led by the DES. In relation to younger children, Kaga, Bennett and Moss (2010) hold that the best provision for children under three years is achieved when policy making is 'unitary' with a single set of rules, supports and funding arrangements. It is regrettable that the parallel system of inspection between the DES and Tusla will add to the pressures upon a disparate sector that for far too long has been subjected to multiple layers of governance and inspection. In calling for a unitary inspection process, PLÉ would like to see a continuum of quality assurance from birth right through the infant classes in primary school.

Overall, while PLÉ welcomes the DES involvement, we consider that the proposed inspection framework is highly ambitious in a context where only 12.5% of early years educators are qualified to Level 7 (4.9%) and Level 8 (7.6%) (Pobal, 2013). At EU level, it is recognised that the “pre-school period is the most important time in a child’s emotional and social development... staff working with pre-school children should therefore have appropriate qualifications” (2011, p. 7-8). In addition although ‘the education-focused inspections will explore the extent to which early years practitioners participating in the ECCE scheme are engaging with existing national frameworks: *Aistear*: the Early Childhood Curriculum Framework, and *Síolta*: the National Quality Framework for Early Childhood Education’ (DES consultation paper, 2015, p. 2), these frameworks have not been implemented nationally. In fact the report of the pilot inspection report undertaken by the DES and the HSE inspectorates in 2011 noted “...that key requirements underpinning quality assurance of the sector include knowledge and understanding of the *Aistear* and *Síolta* frameworks, play based methodologies and the principles of child development, learning and well-being” (p.10). Moreover, the DCYA (2013) highlighted the need to ‘develop a national plan for the phased, supported and simultaneous implementation of the *Síolta* and *Aistear* frameworks, to achieve their rollout at all levels of the early care and education system, including in all services and at the levels of inspectors and trainers themselves’ (p. 19). Very little has changed since 2013 in relation to the national implementation of *Síolta* and *Aistear*, and yet, the proposed education focused inspections seek to determine how services are engaging with these frameworks. Consequently, PLÉ is concerned that many early years educators are ill prepared for the proposed inspection process. While we acknowledge the supportive nature of the ‘Better Start’ initiative, the overall absence of a comprehensive mechanism to support the sector to engage in the kinds of critical reflection required is problematic, and undermines the model of inspection proposed. Notwithstanding the proposal to engage in ‘co-professional dialogue’ (DES consultation paper, p. 4) those working in the sector may lack the capacity to engage meaningfully in this process.

We note the references to the following documents: *Code of Practice for the Inspectorate* (DES, 2015); *Publication of School Inspection Reports: Guidelines* (DES, 2015); *Procedures for Review of Inspections on Schools and Teachers under Section 13 (9) of the Education Act (1998)* (Revised 2015). (www.education.ie). However these documents repeatedly refer to ‘teachers, schools, boards of management, and learners’. PLÉ therefore recommends that a ‘**Code of Practice**’, and ‘**Procedures for Review of Early Years Inspections**’ should be developed so that they relate specifically to the early years services for which the education focussed inspections are intended. After all, the DES does not have a statutory remit in this regard, and therefore the Education Act, 1998 which ‘provide(s) generally for primary, post-primary, Adult and Continuing Education and Vocational Education and Training’ holds no relevance for the early years sector. PLÉ is very willing to engage in dialogue with the DES and to collaborate on the development of early years specific documentation.

Section B: Your views on specific aspects of the proposed Early Years Education-focused Inspections

Briefing Paper Section	Comment/ Feedback	
1.2	Rationale and purpose	<p>PLÉ welcomes the positive rationale and purpose outlined in the consultation paper. However, we wish to reiterate our concerns in relation to the stated intention “to complement other measures undertaken nationally to support ongoing improvement in the quality of early education provision; in particular the implementation of the national frameworks through engagement with the <i>Aistear/ Síolta Practice Guide</i>” (DES consultation paper, p.2). In the first instance, neither framework has been implemented universally; the majority of those working in the sector have not received training in their implementation. This fact, coupled with the low qualification levels generally within the sector, and the absence of a national support programme, undermines early years educators’ capacity to engage in any meaningful way with these initiatives.</p>
2.1	Focus and principles	<p>In general PLÉ welcomes the focus and principles as outlined in the consultation paper. However, we suggest that:</p> <ul style="list-style-type: none"> • The language overall should be aligned more consistently with the language used in <i>Aistear</i> with a particular focus placed upon ‘learning dispositions’. • The term ‘practitioner’ should be changed to ‘early years educator’ both in the focus and principles, and throughout the entire consultation paper • The emphasis on childrens’ ‘needs’ should be redirected towards dispositions for learning, abilities and so on • Inspections should take cognizance of the overall socio-cultural context of an early years setting (not specify ‘socio-economic circumstances’ (DES consultation paper, p.4) <p>PLÉ also notes the importance of ensuring that inspectors have a broad focus (not a primary school perspective) when undertaking inspections, and as previously mentioned, we suggest that the ‘Code of Practice’ must be revised/rewritten</p>
2.2	Inspection framework	<p>PLÉ welcomes the inclusion of the following broad areas within the inspection framework, and consider that they are highly relevant to children’s experiences in the early years:</p> <ul style="list-style-type: none"> • Quality of context to support children’s learning and development • Quality of processes to support children’s learning and development • Quality of children’s learning experiences...

		<p>We have purposely omitted reference to the quality of children’s ‘achievements’ which we view as problematic. Our concern is that it may lead to negative outcome driven practices that are inappropriate for young children. There is ample evidence nationally (e.g., MIC/DIT, 2015) and internationally (e.g., PACEY, 2013) which points to the schoolification of pre-school. Indeed, the emerging international ‘too much too soon’ discourse questions the introduction of formal learning at too early an age, suggesting that it leads to the erosion of childhood (e.g., Dennis, 2013; House, 2012), and that the focus should be on play and social and emotional development in the early years (Bertram and Pascal, 2014).</p> <p>Rather than focusing upon children’s achievements, PLÉ suggests aligning the language in the inspection framework with <i>Aistear</i> which focusses upon learning dispositions. An emphasis on the ‘process’ of learning for young children rather than a learning ‘product’ or achievement is universally accepted as a more effective approach within early years settings.</p> <p>There are particular issues associated with the fourth area: management and leadership for learning within the inspection framework. This area will be evaluated under the following four outcomes:</p> <ul style="list-style-type: none">• Planning, review and inspection are informed by <i>Síolta; the National Quality Framework for Early Childhood Education</i>• Management within the setting provide for a high quality learning and development experience for children• Clear two-way channels of communication are fostered between the early years setting, parents, families and children• Transitions into, from and within the setting are managed effectively to support children’s learning and development (DES consultation paper, p. 5). <p>Our concerns relating to educators’ capacity to engage in a meaningful way with <i>Síolta</i> has been mentioned previously. In addition to issues about qualification levels in the sector, PLÉ is also mindful that educators do not have ‘non contact’ time during the day where they can engage in planning and review. There is also a presumption that setting management knows and understands how to provide for a high quality learning and development experience for children. This may not be the case, and it is not possible to compare the role of the early years manager with that of a primary school principal for example. It is essential that the inspectorate is attuned to the basic qualification levels among setting staff including the manager which may not lend itself to this particular</p>
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		<p>focus.</p> <p>We are disappointed to note that children have been overlooked in relation to two way communication processes. Given that children are at the core of <i>Aistear</i>, they must be included in the evaluation criteria concerning communication channels.</p> <p>Finally, PLÉ suggests that it would be prudent to change the language of ‘professional dialogue’ (DES consultation paper, p. 5) to mutual respect and collaboration.</p>
2.3	Inspection focus	<p>There is a lack of clarity and support in the sector in relation to documentation of children’s learning. The question arises, how is a judgment going to be made about children’s ‘educational progression’? There is significant concern that the principle of holistic learning and development is lost (although acknowledged in the principles) and the result will be an outcome driven approach to learning and development in the sector.</p>
2.4	Quality continuum	<p>Again the language about the ‘needs’ of children, not their holistic development or indeed their rights, proliferates.</p> <p>The quality continuum is not appropriate as it allows for subjectivity. The terms used are not clear. For example, what is meant by ‘evidence gathered’? The outcome of this process could potentially undermine and indeed terrify the sector.</p> <p>Again, we will reiterate that PLÉ is very willing to engage in dialogue with the DES and to collaborate on the development of early years specific documentation and assessment.</p>
2.5	Child protection	<p>It appears as though the ‘best interests of children’ is ignored in the approach taken here which is ultimately to pass on concerns to Tusla. Whilst the lack of statutory power of the DES in this process is acknowledged, firmer action is recommended.</p>
3.1	Before the inspection	<p>The unannounced inspection creates a problem for early years settings in relation to preparing documentation and having sufficient staff to support the visit in line with the provisions of the the <i>Child Care (Pre-school Services) (No 2) Regulations 2006</i>. In accordance with these Regulations, adult/child ratios must be maintained at all times. As a result, early years educators cannot leave their posts to speak to or engage with</p>

		inspectors during the course of an inspection.
3.2	The inspection	<p>In consideration of the pragmatics of the setting, PLÉ queries the timeline involved in relation to when the inspectors will speak to early years educators, bearing in mind that not all settings are sessional, and that many are private businesses. For example, should the setting open at 8:00am or even 9:00am, when is it envisaged that the inspectors will speak to educators? Likewise, in the event that an educator finishes his/her 3 hours of work in the ECCE scheme, and is required to work in another area of the setting (crèche) for the remainder of the day, when will the proposed ‘professional dialogue’ and ‘review/discussion of available documentation’ occur?</p> <p>The logistical elements as outlined here must be revisited, and cognizance of the realities of the working day for early years educators and managers must be taken into account. It is not appropriate to copy the systems used in the primary sector.</p>
3.3	After the inspection	<p>PLÉ welcomes the transparency of the report publication as long as it is a true reflection, and not a subjective view of practice. Again we wish to reiterate our concerns about the capacity of the sector to engage in the process, and we highlight the need for immediate upskilling of those working in the sector to prepare them for these inspections.</p> <p>We welcome the right of reply, but recommend that the setting’s view be incorporated as part of the report not a separate response.</p>
3.4	Review of an Early Years Education-focused Inspection	<p>PLÉ also welcomes the early years educator’s or manager’s right to seek a review of the inspection. However, we note that this review is based upon the procedures outlined in <i>Procedures for Review of Inspections on Schools and Teachers under Section 13 (9) of the Education Act (1998) (Revised 2015)</i>. (www.education.ie). We consider that the use of these procedures which were developed for the primary school system are inappropriate for the early years sector, and as previously outlined, we suggest the development of early years specific procedures.</p>
Appendix 1 Appendix 2	Quality framework	<p>We welcome that provision will be informed by <i>Aistear</i>. However, it must be acknowledged that <i>Aistear</i> has not been supported or implemented in the majority of settings (with the exception of primary schools).</p> <p>In relation to Area 2, while the focus on language, literacy and numeracy reflects the emphasis of <i>Literacy and Numeracy for Learning and Life</i> (DES, 2011) there is concern</p>

		<p>that the full range of holistic learning experiences/dispositions outlined within the four themes of <i>Aistear</i> is being overlooked.</p> <p>Both Appendices are ambitious generally and would be appropriate if the sector had the capacity to grasp the concepts inherent in this document e.g. broad-based curriculum; emergent curriculum. The sector needs upskilling to meaningfully understand the concepts in the documents and engage in these processes</p>
Appendix 3	Draft report template	

Section C: Areas/ questions for clarification
<p>The concept of integrated learning and learning themes upon which <i>Aistear</i> is premised is ignored in the consultation paper. There is a clear need to align the language of the consultation paper with the language of <i>Aistear</i>.</p> <p>In the event of contradictory advice from the DES, Tusla and Better Start, for example, how does a setting respond and who has the ultimate decision making authority?</p> <p>Clarity in relation to the terms used is required. The term ‘Inspections’ itself seems inappropriate, perhaps use ‘Evaluation’, Appraisal or Review? The use of the alternative terminology suggested here, may be less threatening for those working within ECCE, and a more accurate reflection of the process envisaged within the DES consultation paper.</p> <p>Clarity in relation to some processes is required, for example, if a setting is deemed poor or fair what happens in that event?</p> <p>How many inspections are proposed?</p> <p>We believe that this process should also be included in the Infant Classes in order to achieve continuity in the early years,</p>

We would be grateful if this form could be returned by e-mail to eyei@education.gov.ie by 30 June 2015.

Inspectorate

Early Years Education

Department of Education and Skills

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