

General

QQI posted a 5-month consultation for the new proposed standards in Early Learning and Care from May 2019 to September 2019, a total of 21 responses were received (ETB's (10), Private Providers (5), Tutor's (2), Community/Voluntary (3), Government agency (1). A number of the responses were consolidated responses submitted by groups of providers. Below is an initial summary of issues raised in the responses for the consideration for the review group.

Special validation conditions – overview

In general, the validation conditions were welcomed, given the complexity of responses the table below indicates some of the areas that raised concerns.

Reference to the Programme - concerns	Occurrence
How will placements be monitored/supervised	9
Problem with Part-time learners – what provision will be made for them	8
Problem with Placements (younger age group 0 – 2.8mths)	7
Problem with placements (geography – rural settings/available settings)	6
Reduce the placement hours	4
What about the older age cohort school age?	3
No mention of learners currently working in Childcare	3
What about integration and children with additional needs	2
Expand placements to include primary schools	2
Completion of programme half done/half to go – what happens here? (RPL)	2
Is B2 language competency too high?	2
150 hours placement will impact on teaching hours	2
Requirement to pass professional placement welcomed	2
Include Education in the title	1
Would apprenticeship be more appropriate	1
Will QQI issue guidelines for centres and learners	1
Reference to Tutors/Teaching staff	Occurrence
Teaching staff with sufficient ELC qualifications welcome	6
What will on-going CPD opportunities be, are they ELC specific	4
Will there be training by QQI for Monitors/Supervisors	2
What is the relevant qualification to teach ELC	2
Will staff members require ELC qualification to teach programme?	2
Will teaching staff require further Garda Vetting for placements	1
How will placement supervisors be qualified who issues guidelines	1
How will supervisors be funded	1
What is the difference between Monitor and Supervisor	1
Lots of planning – who will do this?	1
Will need comprehensive guidelines for all new teaching staff	1
The validation condition that teaching staff on the programme should include some with ELC qualifications is to be welcomed, although some expressed the need for clarity as to the exact meaning of “some”	1
We support that only Tusla registered settings be utilised for placement	1
Welcome grandfathering for existing FET staff	1
Clarity regarding roles for placement Supervisor/placement Monitor	1
Reference to Learners	Occurrence
Language competency welcome	7

May not be allowed to do some tasks e.g. nappy changes	2
Language competency incurs more expense to learners	2
How will RPL work for learners wanting to do Level 6 only?	1
Cleaning duties to be part of contract for placement	1
Should have agreed standardised test for English – same to be use nationally	1
Reference to Providers	Occurrence
Professional placements will create more workload on Providers	4
Smaller Providers would have extra burden to provide W/E	1
Childcare centres don't want short – term placements, settings need stability and routine	1
How will Providers maintain standards with their feedback	1

Annotations to the PATD for ELC at NFQ Levels 5 & 6

In general, the annotations were welcomed and deemed to be very thorough the next table has all original responses with common themes highlighted.

<p>On page 6 of the annotations for Level 5 it states learners will study the “characteristics associated with children with SEN”. It was suggested the word characteristics be changed. Material should be included to “encourage expression of emotions” Examination is suggested for practical skill, i.e. nappy changing, bathing, bottle making etc.</p>
<p>Annotations as set out in the Professional Award – Type Descriptors are written clearly and comparable to the Learning Outcomes from the current Level 5 and 6 as found on the current QQI Website</p> <p>However, there is a lack of clarity of which annotations clearly relate to which of the current Module.</p> <p>If there was a clearer reference made to each of the Current Modules, then the mapping process and transition for the creation of the new curriculum would be an easier process.</p>
<p>The content of the annotations is straight forward.</p> <p>Our concern with this broad form of spec at FE level would be a potential lack of comparability, standardisation and assessment consistency across FE providers.</p>
<p>This is an opportunity to link the learning to theory, so rather than just proposing that the learner should learn to meet the care needs of children, which is a significant and essential learning component for all ELC professionals. Can we suggest that learners should have knowledge of how to meet children’s basic care needs for, food, water, rest, sleep, warmth, safety, and security as outlined in Maslow’s hierarchy of needs. These are essential components of quality ELC provision which are not reflected in “care needs”.</p> <p>In relation to the skill and competencies for professional development this should also include personal wellbeing. ELC professionals need to learn how to look after their own wellbeing as this will significantly impact on their professional practice.</p> <p>Knowledge Structure:</p> <p>The section should include a mention of National and international policy and practice Frameworks.</p> <p>Knowledge Breadth and kind:</p> <p>Specialist Knowledge:</p> <p>This section for both level 5 and 6 should include learning on values beliefs and the culture of ELC. This should include learners reflecting on and making explicit their image of the child as a learner as this will directly influence their pedagogical practice as outlined in a number of studies.</p>

Management:

Under level 6; while leadership is included here, management must also be included to ensure proper governance and oversight.

Evaluation of practice and action planning should also be a requirement at level 6, based on the fact

that currently 78% of people working in the sector have a level 5 or 6 qualification.

Child Development and learning theories:

Motivation is mentioned this should be clarified as intrinsic motivation and a love for learning.

Broad Knowledge of curricular approaches should also include: international best practice.

There is a need to highlight specifically:

- Learning to work in active partnership with parents.
- The need to underpin all professional practice in a rights based approach underpinned by the UNCRC.
- While it is essential that all learners have knowledge of current legislation they should also have knowledge of the European context which guides quality provision, such as the European Quality Framework (European Commission, 2014).

Note:

Tusla Early Years Inspectorate Annual Report 2017 identifies the regulations with the greatest numbers on non-compliance. These are in order;

- Regulation 9: Management and Recruitment.
- Regulation 23: Safeguarding health, safety and welfare of the child.
- Regulation 16: Records in relation to a preschool service.

All training programmes at level 5 & 6 should prepare the ELC professional to meet the requirements

of the Child Care Act 1991 Early Years Services Regulations 2016.

Level 5 Annotations:

The annotation that begins with '**Child development and learning theories, to include contemporary theories**'...

I feel there needs to be an emphasis in this section on inclusion and differentiation for **Special Education Needs (SEN)** within this whole section as well as the child within the 'norm' especially as the future seems to be for the model of inclusion for all, and I don't think learners are necessarily equipped for this with the current QQI award structures.

The annotation '**Support the development and implementation of policies and procedures in early years' settings with others**'

This could be difficult for learners to be able to achieve in practice as generally management do not give that level of autonomy to learners. But it could be done within the classroom environment.

Level 6 Annotations:

The annotation that begins with '**Integration of contemporary child development and learning theories in ELC practice**'

Again, I feel an emphasis needs to be included in here on inclusion and differentiation for **SEN**.

- Consensus that this was comprehensive, clear and fit for purpose.
- It is clear that the requirements of **Síolta and Aistear** are included.

Within Levels 5 and 6, we welcome moves to:

- Teach an ethical and rights-based approach in ELC given the needs of individual children, a professional mindset and wider changes in Irish society.
- Support the development of digital literacy and STEAM skills as these are increasingly relevant in the ELC sector.

- Teach reflective practice skills to learners to foster critical thinking skills.

3

It is also important that descriptors focus on the individual child and avoid a deficit approach which is becoming increasingly outdated. The emerging area of educational play should also be considered to enhance learners' skillsets.

Annotations to the Professional Award Type Descriptor at Level 5 (pgs 3-13)

The requirement of work placement with the two age groups will ensure that all learners get opportunity to work with 2ys 8mths. To-date learners can find it difficult to get work placement with this age group. This will enable learners to carry out observations, play activities with the younger age group.

Annotations to the Professional Award Type Descriptor at Level 6 (pgs 3-13)

No responses offered as the majority of our provision is at L5. We understand that teachers from the one centre who deliver at this level have already responded to QQI.

This is appropriate

We welcome that the new standards are based on the NFQ Professional Award – type Descriptors and aims to help facilitate the development of efficient progress pathways for learners.

While the review group are a strong group, they do not represent all providers of Early Years courses. The community sector is not represented and this is a significant omission and should be addressed in order for the process to be fully inclusive.

Notice on the initial stages of this process came to us via a consultant who shared the information via email. We suggest a wider consultation process to ensure that the full range of experiences and

shared knowledge is available as part of the decision-making process in relation to ELC.

Providers will need to be prepared and organised to complete existing qualification with learners in order to commence with the new format standard in September 2021, as this will have a significant impact on learners and providers.

We welcome the condition that to earn a major award in NFQ Level 6, a person must achieve the learning outcome for a major award in ELC at both NFQ level 5 and 6.

Everyone was happy with the clarity and suitability of the annotations at level 5 and 6 - (11 elements)

- Clarity and suitability – appropriate

As NFQ Levels 5 and 6 were developed in 2014 some of the information is out of date regarding new regulations for childcare. Updated references to quality standards should include Aistear toolkit and **Aistear/Soilta** Practice Guide and the Early Years Services Regulations 2016.

- There is also no reference to after school or the new regulations for this sector; many after schools provide for the under six years age band
- Annotations needs to be broken down further as it is not in a clear structure that is easily understood.
- Training for teaching staff will be required to ensure full understanding before programme delivery.

Development of assessment based on the standards as they are currently phrased may present challenges.

Overall, there is satisfaction with the featured annotations.

2

Is there a plan to include opportunities for learners to avail of DLP (Children First) training and Paediatric First Aid within the PADT, or is it perceived that this could be included as an embedded

programme in the newly developed curriculum?

1. Annotations are clear and comprehensive.
2. Ethics and Law – Dorset College welcomes the reference to ethics and an awareness of legislative requirements which will ensure the sector continues to maintain standards and best practice.

The content of the annotations is straight forward.
Our concern with this broad form of spec at FE level would be a potential lack of comparability, standardisation and assessment consistency across FE providers.

Agreement with the statements of Purpose, Knowledge, Skill and Competence:

- DDLETB broadly agrees with the statements of Purpose, Knowledge, Skill and Competence at. DDLETB's view is that they match what would be expected in ELC settings and what ECCE teachers currently teach. The PATD statement annotations are generally well written and quite straight forward.

Appropriateness for Levels 5 and 6:

- DDLETB considers them to be appropriate for the knowledge and skills that would be needed to support professionals qualified at Level 5 and Level 6 working in the sector. The statements generally reflect a good move from Level 5 with its practical focus to Level 6 with its staff support focus.
- A couple of points, however, came up in our consultation with SME teachers. One concerns the term 'mentoring' (page 8) when referring to Level 6 students as this may be above the competence level required and mentoring in itself is a different programme to the ELC award. Another point concerns the statement on page 9 that Level 5 students are not expected to work outside of "predictable situations" whereas every day working with children is in itself unpredictable. Perhaps asking students to develop their use of initiative, communication and reflective skills in challenging situations may be more suited to the reality of working in the early years service.

Clarity of the statements:

- DDLETB finds the statements to be overall sufficiently clearly written.
- The consultation with the SME teachers pointed to some areas where the language and approach could be future-proofed.
 - The terms ECCE and ELC ('specialised knowledge' in ECCE in the ELC sector, page 4) could usefully be defined or clarified, in particular ECCE as it currently has two distinct uses.
 - Using terms such as "special needs", which some of the respondents considered outdated, could age the annotated PATD. More inclusive language that fits with a human rights model of progressive support was suggested as an alternative.
 - Specific references to terms such as QRF, Children First etc may be counterproductive in also aging the annotated PATD. Using generic terms such as regulation and legislation may be more suitable.
 - In the phrase "principles and practices of physical and mental health", mental health was thought by some to be difficult terminology to use in the childcare environment and that "emotional well-being" would be more age appropriate.

References to community partnership/relationships as well as speaking about family partnership/relationships would be a welcome addition.

It is very welcome that our national ELC quality and curriculum frameworks are embedded in the descriptors.

Early Childhood Ireland understands that the new PATDs are intended to be overarching descriptors, and that programme development teams will use these as a guide to design and develop a more comprehensive programme to meet the required credit level, which will then be validated by QQI before being rolled out. The expertise of the programme development teams in training and educational institutions will become even more significant in influencing the capacity

of students to create a high-quality pedagogic environment that makes the difference for children.

We suggest that a schedule for programme review be developed to ensure that the PATDs remains current as these frameworks change over time and to incorporate any new developments We support the deactivation of level 4 as the skills, knowledge and competencies are covered in the descriptors for level 5. Level 4 also dates from a different stage in the development of the Irish ELC sector and of regulatory requirements.

It is welcome that working with others and building relationships and communicating with other relevant professionals in the best interests of the child is included. *First 5's* emphasis on developing an inter-disciplinary early childhood workforce and system means that that the nature of the ELC role is changing. Educators should be able to work as part of inter-disciplinary teams to meet children's needs, that include learning and care.

We welcome that access arrangements for recognising prior learning are included. The development of a national approach is now required, using set criteria, which would be implemented consistently.

MSLETB's consultation event gathered a range of comments in relation to the suitability of the annotations at NFQ Levels 5 and 6 including:

- Very open to interpretation so therefore difficult to assess the clarity of the PATD
- A clear curriculum is required
- Training on MIMLOs and MIPLOS will be needed to assist teaching staff
- Shared curricula is a good idea
- School-Aged Children are not mentioned- emerging policies in *Early Years has* incorporated School-Aged Children so therefore should PATD reflect that. Similarly, child-minding is omitted from the PATD
- Equality and Diversity needs to be more prominently included in any new programmes
- Creative Arts as a part of curriculum – its inclusion is not very clear in the PATD

One response left this section blank

Deactivation

There was mainly a positive reaction to the deactivation of minors as stated in the consultation, but some concerns were raised, see below

Concerns regarding deactivation of current minors	Occurrence
Sufficient time required to phase out CAS	7
What allowances will be made for part-time learners	5
Sufficient time for Providers to make the transition to new awards	4
Can providers deliver L5&6 modules not being deactivated, what majors can they be used towards	2
2021 Timeline seems ambitious/concern with timing	2
Clarity with legacy modules to new annotated version	2
What will implications be for CAO?	2
What about Special Needs?	2
If a learner has not completed a CAS major, will there be an agreed RPL process	1
Providers need to be informed and kept up to date if deactivation does not proceed on specified date	1

Leave current CAS components available, learners use for CPD	1
Not all centres familiar with RPL	1
Who decided what minors should be deactivated and how they came to the conclusion	1
Deactivation of Creative Arts for Early Childhood would be a mistake – a favourite among students	1
Access requirements need to be clear at national level, adults and LC students can apply for both level 5 & 6	1
SNA & Early Education & Play currently included in Healthcare programmes, how will this continue to be the case?	1
Can learners with CAS L5 progress to new Level 6?	1
School age childcare – what will replace this? (Reference to 1991 Childcare act & 2018 regulations)	1
Placement does not include school age childcare, what incentive for learners to engage in this component?	1

Shared Curriculum Concept

Overall the shared curriculum was welcomed, some concerns were noted as to how a lead provider would be selected and how training and delivery would be implemented.

Responses	Occurrence
Concept of Shared Curriculum welcomed	15
Reservations/Concerns about the practicality of shared curriculum	5
How is the lead provider selected	4
Will it be fair and transparent approach to allow all sectors engage	3
Delivery staff will need adequate training for implementation of curriculum to ensure consistency	3
Will lead Provider have to endorse/give permission to other providers to deliver	2
Who will develop the shared curriculum	2
Perhaps a consortium rather than one provider to write new programme	2
Concept raises more questions than answers	1
Why would lead provider allow others to deliver	1
Challenging for many providers to reach consensus	1
New system (grading) not clear – how will this work	1
Will conditions create barriers – additional QA work, process may be resource heavy	1
A need to recognise range of learning pathways for both full-time & part-time learners	1
More consultation with learners & industry required	1
Current programmes include special needs – new standard may not include this component	1
Transfer for learners between providers – how will this be managed (exit awards & rpl)	1
Implementations for current staff would be challenging	1
How will connection between main and sub provider be governed (MOA or formal articulation agreement)	1
Tusla would welcome inclusion in development of Curriculum	1
L6 Child Development currently includes children up to 2 yrs, no reference to this age group in the new standard, suggest it be included.	1

Previous experience in development led to a well-rounded curriculum with a dynamic programme capable of meeting the needs of learners	1
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Any other comments

The table below is a collection of comments/concerns recorded, no trend presented itself.

Positive responses	Occurrence
As a provider we welcome the opportunity to consult on these new standards	3
A positive move forwards in the professionalisation of qualifications in the ELC sector	2
Welcome the move to include L5&6 as part of progression towards L7 & 8	2
Welcome the concept of the changes but encourage a broader representation of sector reps	1
Consider other things like re-engagement with QQI and the impact of the National Childcare Scheme will have on the sector	1
This is a great opportunity to reshape the delivery of Early years courses and will benefit teachers, learners (future childcare practitioners) and children	1
A milestone in national policy for the ELC sector and for children	1
Negative responses	Occurrence
Were Private Providers notified and made aware of Phase 1. We were not notified or aware of stakeholder meetings in November.	1
Consideration for single providers versus community solutions to programme development	1
Realistic transition timeline to deliver changes	1
The different urban/rural experiences and resources	1
Classroom versus online options	1
Sourcing and Monitoring practice placements	1
Parents and stakeholders not consulted yet	1
Integration and inclusion of children with additional needs missing in the draft	1
Consideration by QQI to create a new School Age Childcare Award as it differs for 0 – 6	1
A national standard in English set down for minimum entry for level 5 & 6	1
Changes recommended are large, it is hoped that the core foundations of learning are not lost in the transition	1
It is hoped that the 4 level 6 Montessori components be retained	1
QQI should make it clearer as to the requirements for feedback from Providers for new award standards for Early Learning and Care Consultation Process	1
Will RPL be determined by each Provider	1
How will an organisation apply to form part of the proposed consortium of Providers	1
Exemptions – how will providers manage exemptions from old programmes	1
Concerned about bureaucracy of lead provider mode indicated. This may lead to many layers of QA and reporting to many ‘masters’, which may not be efficient or effective in the longer run	1