

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Aisling Kirby
Main employer name	Central College Limerick
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET provider (Voluntary Secondary School)
Respondent role (e.g. Principle, FE Teacher, ...)	FE Teacher
Responding on behalf of:	ACCS/ JMB
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	No
QQI may not publish my response	Not Applicable

Special validation conditions

Please comment on the special validation conditions.

1.0 Programme Development:

1.1 No comment

1.2 Will learners have to be in possession of a Major Award in ELC at Level 5 on the NFQ in order to undertake the ELC Major Award at NFQ Level 6. How will RPL work for students who wish to undertake the ELC Major Award at Level 6 only.

2.0 Teaching Staff:

2.1 It is very welcome to see the recognition for qualified Staff to teach on ELC programmes but is there a need for specific ELC qualifications? I would suggest that SVR's should be included in the mandatory ELC modules specifying that they are to be taught by Teaching Council recognised tutors who have at least a level 8 qualification in ELC.

2.2 What percentage of teaching staff will be required with ELC experience and will they be expected to teach all the ELC based modules or will other teaching staff be allowed to teach on these programmes?

2.3 The induction programme for new staff members will this be designed nationally similar to those at primary and secondary e.g Droichead? to ensure a National standard? Will this induction programme have to be submitted to QQI as part of the validation process? What will the on-going professional learning opportunities consist of? And who is going to provide these opportunities? Are they going to be ELC specific?

3.0 Professional Practice Placements:

3.1 Good use of the term professional practice placements as it will now have to be a Tusla registered professional practice placements.

3.2 It is great that learners are going to be required to complete work placements with different age groups, as this will prepare them for being able to work with a range of children and settings. However, 150 hours of professional practice placement time may be too much to try and fit in with a full time course particularly where learners are waiting for Garda vetting for a number of weeks at the start of their course.

Also there is now no opportunities for learners who may have an interest in Special needs to work in Special needs schools? How will the requirements of different age

groups match the expectations in the component specifications? E.g Child Development? Early Childhood Education and Play? Etc...

3.3 We welcome this requirement, however if a registered setting is under investigation by Tusla for any reason and that comes to the centres attention are QQI going to issue guidelines for centres and learners?

3.4 Specifying the requirements for learners while on professional practice placements is a very welcome addition. Will QQI issue guidelines that can be passed onto professional practice placements in this regard? As some learners have very different experiences while on placement and some providers have very different expectations of learners while on professional practice placements.

3.5 In my experience Professional placements will not take learners without Garda Vetting however will the centre garda vetting learners be sufficient or will the Professional Practice placement still require their own vetting arrangements like they do now?

3.6 This is a welcome requirement for providers

3.7 This is a welcome requirement for providers but will the requirement for a formal written agreement between professional work practice and providers be off putting for some providers who are already very busy with paper work and the requirements by POBAL, TUSLA etc...

3.8 Professional Practice placement Supervisors will be suitably qualified is a welcome addition to the Award Standard, however on practical terms will QQI be issuing guidelines to providers on what exactly these Supervisors should be looking for? How are Providers expected to fund Supervisors? How often will Supervisors be expected to visit learners while on Professional Practice Placement? How will this be graded for the learner? Will there be expectations for the learner to meet during these visits?

Will the Professional Practice liaison person be able to contribute to the learners grade?

3.9 What is the difference between a Professional Practice Supervisor and a Professional Practice Monitor? Will there be guidelines for Providers for recruiting Placement Monitors? How will Providers fund Placement Monitors? Will there be guidelines on how to grade learners for the Placement Monitors?

3.10 Practice placement assessments are a welcome addition in order to ensure quality standards.

3.11 Will there be training provided by QQI for placement Supervisors and Monitors in providing the appropriate guidance to learners?

3.12 This is a welcome addition to the standards for ELC placements.

4.0 Learner Language Competence:

4.1 This is a welcome addition to the standards of the Awards

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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.

Deactivation

What will happen with the modules that are being shared with other awards if a learner undertakes one of the components that are not being deactivated e.g Child Development 5N1774 can they bring this over to the new ELC Award under exemptions?

School Age Child Childcare 5N1781 is being deactivated, however this is an area that is becoming regulated so will there be a separate award to replace it? Or will it be built into the new ELC Awards? Professional Practice Placement does not allow for hours to be used working with the School Age children so what incentive will there be for learners to engage in this module or for providers to offer School Age Childcare in the future?

Again Special Needs Assisting, Understanding Special Needs etc..

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *"Awards to be deactivated and implications for validation"*

'The shareable curriculum would be developed and maintained on an on-going basis by a single lead provider or a group of providers acting as a coordinating consortium'

- How will QQI decide on who this lead provider or group of providers will be?
- Will it be a fair and transparent approach that allows all sectors including the Community/ Comprehensive and Voluntary Secondary Schools be represented?
- This will have implications for all of our schools who are providing ELC courses and they want to be involved in this process, as we have some very qualified and experienced tutors.

Will there be continuing professional development provided for tutors on the new shared curriculum?

Is it envisaged that the shared curriculum will bring a national standard to ELC Awards? In light of recent documentaries on Creche provision, I feel the shared curriculum provides the opportunity to address ELC standards no matter what type of provision a learner completes their award. We need to try and give more professionalism to the ELC sector. In order to achieve this a number of stakeholders should be involved in the shared curriculum process.

'Providers may propose new minors and/ or special purpose awards' in the case of Special Needs for example would this be something QQI could envisage standardising? Lots of learners currently undertake ECCE Awards in order to become SNA's however with the special validation criteria learners will no longer have the same opportunity to complete work placement in order to gain some experience to apply for SNA positions. Will schools be notified of the changes to the Award structure so that they are aware that learners who complete the new ELC awards may not have the experience in working with Special needs?

Any other comments

Given the move towards all-inclusive education and the AIMS model in Early Childhood Education I feel this should be reflected throughout the Annotations. Learners should be more aware of differentiating for children with additional needs. Outside of minimum English standards being recommended for learners, will there be a national standard that should be set down for minimum entry requirements to participate in an ELC Award at both level 5 and level 6?

Consideration should be given by QQI to create a new School Age Childcare Award as the knowledge and understanding of school age children differs from the understanding needed to work with children under 6.

Guideline for respondents

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Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Cecilia Munro
Main employer name	CDETБ
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET
Respondent role (e.g. Principal , FE Teacher, ...)	Principal, Ballyfermot College of Further Education (BCFE)
Responding on behalf of:	<p>The following CDETБ staff attended the consultation</p> <ol style="list-style-type: none"> 1. Jacqueline Moloney (Deputy Principal BCFE) 2. Patricia Bourke (BCFE) 3. Donal Griffin (BCFE) 4. Orla Ni Bhriain (BCFE) 5. Jason King (BCFE) 6. Mary Clare Fox (BCFE) 7. Bernadette Keegan (BCFE) 8. Anna Gacquin (BCFE) 9. Anne Marie Lyons (BCFE) 10. Helen Webb (Kilester College) 11. Sinead Hickey (Colaiste Dhulaigh) 12. Ann Walsh (Kilester College) 13. Fionnuala Crennan (Colaiste Ide) 14. Bridget Barry (Pearse College) 15. Anna Merrick (Pearse College) 16. Conan Doyle (Whitehall College) 17. Jackie Perris (Liberties College) 18. Michelle Flynn (Liberties College) 19. Jean Fitzgerald (Principal Colaiste Ide) 20. Ann Dunne FET Development Officer (CDETБ) <p>Other Participants Deirdre Hanamy, Chair of QQI’s Standards Review Group</p>
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes
QQI may not publish my response	QQI can publish this response

Special validation conditions

Please comment on the special validation conditions.

1.0 Programme Development:

1.1.A: To enable ETBs to involve a broad range of experience and expertise, DES/SOLAS working in partnership with QQI, will have to adequately resource this programme development. Subject experts and curriculum content experts will have to be hired to complete this task or released from the classroom and replaced with adequate teachers. Arising from this, all aspects of the Special Validation Conditions will need to be properly resourced by DES/SOLAS/ QQI, in partnership with ETBs, to ensure effective delivery.

1.1.B: Learner supports such as ICT, numeracy and literacy, learning supports and guidance need to be developed and improved. These learner supports and resources will need to be put in place for implementation.

1.2.A: The teaching and learning strategies should be broad to include an element of blended learning and continuous assessment. However, there should be a CAP on the % of delivery through blended learning, as this sector is not suitable as of yet to deliver a full blended learning ELC programme. To date, Childcare programmes in the ETB sector are delivered directly through people to people contact which is appropriate for skills and training for this profession.

1.2.B: Full-time delivery is welcomed, however, there needs to be clarification in relation to part-time delivery under various funding streams (such as BTEI) and for Evening Schools delivery.

1.2.C: Various iterations of the programme can be made during the year, for example to avail of the 6 key dates for QQI certification. This should be reflected in the Special Validation Conditions.

2.0 Teaching Staff

2.1: The flexibility should remain in the requirements for the teaching staff as outlined in the Special Validation Conditions. For example, the provider should be able to decide on teaching requirements, such as whether or not to include the Teaching Council element.

2.2: A comprehensive pre-planned Professional Development support plan needs to be put in place for existing and new teachers. DES/SOLAS must resource this.

2.3: Comprehensive induction guidelines should be provided for all new staff induction.

3.0 Professional Practice Placements

3.2.A: The Professional practice placements across the years 0-6 is welcome, and the mandatory requirement to gain 50 hours experience in the 0-2.8 years is welcome, along with 50 hours working with children 2.8 – 6, and the remaining 50 hours across either of these two groups.

3.2.B: The hours requirement is considered excessive at 150 hours, 120 is sufficient. The difference in 30 hours relates to an extra week, which takes from the academic teaching, learning and assessment work.

3.2.C: Consideration should be given to increasing the age of Professional practice from 0-6 years to 0-12 years to allow for education and training with children in after-school care.

- 3.6: Resources required for the governance implementation of the Quality Assurance elements on professional placement need to be considered by the DES/SOLAS in partnership with QQI, to ensure quality and valuable placements.
- 3.7: MOUs and a Code of Practice are welcome. However, the resources for the development of the QA systems to support Professional Practice need to be put in place and national guidelines/common materials to support these resources would be welcome.
- 3.8: The requirement that the person supervising the student in the workplace has to have a qualification a NFQ level above the student being supervised is an area for concern. How can ETBs/Colleges ensure that this is in place without proper resources? It is incumbent on the DES/SOLAS to provide support materials and resources to ETBs in order to ensure that Professional Practice is conducted properly and in accordance with the Professional Award guidelines.
- 4.0: Language:**
- 4.1.A: Welcome this requirement, however there is concern that the minimum competency B2 measure might be too high?
- 4.1.B: There should be commonality and an agreed standardised test for English as part of this Special Validation Condition i.e. use of the same test nationally.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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

Deactivation

Please comment on the deactivation schedule.

- The management of legacy awards need to be addressed and mapped out in order to provide current and prospective 20/21 enrolled students an opportunity to complete certification, both for full-time and part time current ELC programmes.
- Deactivation has implications for CAOs higher links scheme and MOU agreement on access, transfer and progression to Higher Education in Ireland and Europe. When courses migrate that is always a delay in new course codes being listed and recognised by CAO and the HEIs therefore students (and Guidance Counsellors) are often in limbo regarding their progression routes to higher education usually for the first year that they are run. It would be helpful and progressive if this delay could be bypassed.
- The sector will need a national commitment and plan containing national guidelines from QQI on how to address these legacy issues and the RPL process. For example, access for Mature Learners and Leaving Certificate students need to be clarified. There are implications for example, on a Childcare BTEI course at Level 5 being delivered over 2 years.

- Providers will need to have the PATD as soon as possible in order to agree the programme development process across the ETB sector, commence programme development, complete validation and schedule changes to courses so as to prepare and promote these changes.
- The access requirements for Level 6 needs to be clear at a national level. For example, Leaving Certificate students and adults can apply for both Level 5 and Level 6 courses.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *“Awards to be deactivated and implications for validation”*

- The curriculum needs to be broad to facilitate a variety of delivery modes.

Any other comments

Please comment on any other matters here.

- SOLAS/DES need to properly resource or ring fence an innovation/curriculum development fund for ETBs to complete this task to a professional standard. It is noted that QQI should take a partnership approach with ETBs in this regard.
- No mention of the name Child in the title.
- Guidelines should be put in place in order to capture and address concerns raised by students after observing poor practice in Professional Practice Placements in a formal manner.
- How can personal learning be recognised as valid for assessment? For example, experience with own children or working in the community, for example coaching in sport. This needs to be included in the process.
- Advanced entry routes from this new programme should be determined in advance of the award publication i.e. from Level 6 to HEI’s (this is not just for this award, but is indicative of all other awards at Levels 6). This concern is informed by our collective experience with CORU and the specific advanced entry relationships between colleges within CDETb offering the Higher National Diploma and advanced entry to IOT’s for Social Care Programmes.

ELC Consultation 2019

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Respondent details and permissions

Respondent name	Dave Collins/Michael Kelly
Main employer name	Chevron Training & Recruitment
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET/HET provider
Respondent role (e.g. Principal, FE Teacher, ...)	Training & QA managers
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes
QQI may not publish my response	No

General

We welcome the progression pathway (Level 5 through to Level 8) and overall goal of a focus on “professionalism” and the creation of a distinctive ECCE occupational group.

At the meeting on 7 May 2019 it was suggested that a working group would be established to progress the new ELC awards. We would welcome the opportunity to contribute to this group in view of our experience in the creation and delivery of programmes across Level 5 through Level 8.

We would agree with some of the concerns raised at the 7 May 2019 meeting, including:

- Who would own a programme once completed (the proposal is for content, etc. to be developed by a single source)?
- How would access to programme sources be coordinated?
- More detail on the programme development process and related timelines.

The idea of reducing the assessment strategy to eliminate over assessment is a great vision but how this could work in practice needs to be mapped out.

Special Validation Conditions

We acknowledge and welcome a specific role for ELC subject matter experts in programme development. Most progressive organisations in this area currently use expert teams to develop content so this proposal would build on current best practice (1.1).

Balancing Professional and Supportive Approaches

We agree that high quality teaching and learning requires induction of teaching staff into the new framework and supporting a professional mindset, together with ongoing CPD opportunities (2.3)

Managing & Resourcing Practice Placement

Practice placement proposals (3.0) will create a significant extra workload for providers, as the goal is to ensure a broad experience for learners:

0 to 2yr 8m	50 hours
2yr 8m to 6yr	50 hours
Either of the above	50 hours

The main area of increased workload and resourcing will be in:

- Sourcing and selection of placement settings.
- Monitoring supervisor competencies.
- Linking placement activities with assessments and learning outcomes (3.6 to 3.11).

The above will involve providers having to resource or create additional educational research and delivery supports, with a resulting impact on course costs and therefore affordability for learners. Will additional funding be available to help support learners to access and progress within these new programme formats? Existing approvals (e.g. TUSLA inspections) could be considered as a cost-effective measure in meeting any placement and supervisor evaluation criteria.

Defining the key features of placements (3.4) and required completion of Children First (3.5) formally confirms and builds on current best practice. Currently, we require all our ECCE learners to complete the Children First programme. We also welcome the linkage between a successful practice placement and achievement of the award in view of the practical nature of ELC work.

Equality of Access

Equality of access is likely to be an issue for mature learners returning to education in the ELC area. For example, people in rural areas with children looking to reskill on returning to the workplace may have limited access to local placement facilities or opportunities.

English language competency

We welcome the English language competency requirement (4.1) as no provider should enrol learners who cannot properly engage with the course or who lack the capacity to complete the programme. However, completion of the IELTS exam represents a significant cost to potential learners (typically €200) and this makes considerable inroads into the financial supports available to learners, such as the TESSG via the Department of Employment Affairs & Social Protection channel, leaving less resources to support access to an ELC programme. Perhaps QQI might consider developing an English language proficiency award as a more cost-effective alternative to IELTS for learners seeking to access a QQI accredited programme?

Annotations to the PADT for ELC at NFQ Levels 5 and 6

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.

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.

Deactivation

Although we welcome the move towards professionalisation of the ELC sector through the new awards, it is ambitious to launch these from 2021. Given the fundamental nature of the proposed changes and the lead time required to create the new curriculum content, a phased pathway should be used to spread these changes over a longer timescale up to 2025. Also, many of the current modules have a standalone value as CPD so further thought should be given to this scenario.

Shared curriculum concept

As stated above, there is an ambitious timetable to launch the new regime and the proposed move towards a shareable curriculum model represents a radical change from QQI's current approach based on relatively brief module descriptors.

A weakness in the current format is the focus on short Learning Outcome descriptions so the shareable curriculum approach offers the opportunity to improve by developing more comprehensive descriptors (e.g. as used by City & Guilds and NCFE/CACHE for their families of awards). The shareable curriculum model is analogous to the open-source software model, where developers can create content around a core operating structure. More information on the selection of a lead provider (single or consortium) will be required to see how this might work in practice. However, we would prefer to see a community of providers engaged to develop the curriculum rather than a single provider as this will create a sense of collective ownership of the new ECCE framework. We would be willing to contribute an educator to this curriculum development exercise.

The new shared curriculum will also need to recognise the range of learning pathways open to modern learners. These include both full- and part-time learning channels, people returning to work and seeking ELC training as a career change, plus a range of different delivery routes, e.g. classroom, e-learning and blended formats.

Although some consultation with learners has taken place in framing these new proposals, a more robust and representative examination of learner needs is required, e.g. an industrywide online survey to obtain a comprehensive analysis of different learner profiles and pathways (age, gender, nationality, rural/urban, full-time/part-time workers) within ELC training and skills.

Any other comments

There needs to be a balance between the quality goals of professionalism and the costs of delivering this new framework. Areas requiring detailed consideration include:

- Single provider versus community solutions to programme development
- A realistic transition timeline to deliver the proposed changes
- The different urban-rural experiences and resources
- Classroom versus online options

As outlined above, key concerns are the additional work involved in sourcing and monitoring practice placements, together with how equality of learning can operate effectively in this new framework.

Respondent Name	
Main Employer Name	As above
Employer Type (e.g. FET provider, HET provider, ELC service provider etc)	FET provider
Respondent Role (e.g. Principal, FE Teacher ...)	QA Support Service
Responding on behalf of:	ELC Teaching Staff and associated Co-ordinators/Managers
QQI may publish my response with the respondent details	No
QQI may publish my response without the respondent details	Yes
QQI may not publish my response	N/A

Reference Document	For Comment	Responses	Concerns
<p>Proposed New Awards Standards For ELC</p>	<p>Special Validation Conditions (pg 2)</p>	<p>Good idea that learner will complete two work placements (different settings and with different age groups).</p> <p>The formal written agreement will ensure that the learner is supervised on their placement and receive adequate feedback.</p> <p>Learners will have support on placement. This will enable learner to get the most from their placement.</p> <p>The guidelines on the minimum English language and literacy required for a learner to enter a programme will ensure that learners have these competencies before they start the programme. If they wish to study Level 5 they know they require B2 in writing, reading, listening and speaking.</p>	<p>1.2 the structure of part time programmes must be considered in this part of the consultation.</p> <p>2.0 while it is accepted that there have to be standards set for eligible teaching staff, concerns have been raised about the lack of availability of teachers who would meet all these requirements. There is a shortage of teachers in this ETB and co-ordinators are concerned that additional requirements would exacerbate this situation.</p> <p>2.3 who will develop this Induction programme and ongoing PD training?</p> <p>3.2 are we forgetting about an older age cohort? While it is accepted that the award is <i>early</i> learning and care, aimed at 0-6 years, learners with this award may have to work with older children, in an after school setting for example.</p> <p>3.3 does each programme provider have to obtain a list of Tusla registered service providers? Is being listed sufficient or does the programme provider have to carry out their own checks?</p>

			<p>3.8 who will train the PP placement supervisors?</p> <p>3.9 who are the PP placement monitors? Whose responsibility are they?</p> <p>3.10 there is a lot of planning and co-ordination involved here. Is it envisaged that the programme provider will do this?</p> <p>4.1 the setting of an assessment/competency check to assess this standard should be at national level so all programme providers are using the same assessment tool.</p>
	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.	
			Concern about learners who will need to have their modules considered for RPL.

ELC Awards To Be Deactivated And Implications For Validation	Deactivation Schedule (pgs 1 & 2)		<p>Many centres have not become acquainted with the RPL model and are apprehensive about the unknown.</p> <p>Concerns raised for learners on part time programmes over an extended time who may have issues with their previous modules not being validated within the new programme.</p>
	Shared Curriculum Concept (pg3)	<p>Good idea</p> <p>Having a shared curriculum will lend itself to building communities of practice.</p>	<p>Who will develop this shared curriculum? Staff would like to be involved but are concerned with the conditions they may have to work under, the time constraints involved, remuneration, and a big concern relates to working on classroom delivery while also working on programme development.</p>

Any other comments	
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Following a workshop consultation on Proposed Changes to Early Childcare Awards I wish to put forward some concerns that I have for consideration for the consultation responses. Our Quality Assurance Officer is unable to merge these points with the ETB overall feedback so suggested that I submit my feedback directly to QQL.

3.0	Professional Practice Placements:
3.3	<p>Placement should always be integral to the programme however having delivered the Full Award for 16yrs+ both on a fulltime and part-time basis I can foresee problems arising with the new proposed 150 hrs of placement criteria with min 50hrs working directly with children between ages of 0-2yrs 8mths and 50 hrs in 2yrs 8mths to 6yrs.</p> <ul style="list-style-type: none"> • Firstly there are not enough Long Day Placements out there to ensure students can complete their 150hr placement with them for the proposed 50hrs with younger age group or Tipp ETB's suggested 25-50hrs and move within the centre in the allocated time frame i.e. Sept to May. • Secondly Childcare centres do not want students starting short placements with them midyear and then moving on to a centre with the younger age group as there is a lot of additional work to supervising a student and integrating them into the Early Years' Setting. Childcare settings prefer minimum amount of upheaval in order to maintain stability and routine for their children and smooth running of their services. They do not want a lot of different students coming and going during their 'school ' year as it causes disruption and additional work to already overworked childcare personnel therefore I could not see a second short placement for students working in order to satisfy this criteria. • Thirdly Level 5 Students' are not allowed to change Nappies nor administer personal intimate care to young children in Early Years settings. Depending on individual centres policies students may/may not be allowed to observe such tasks. In my experience baby room and wobbler rooms mostly do not allow a student to observe the child being changed thus preserving the dignity of the child and also in line with parents' wishes. I wonder how many parents would be happy with a lot of different students observing such an intimate task on their young child.

Given my above concerns I am wondering have the Stake Holders parents and providers been consulted in this proposal as it has huge implications' for them and their children. I would be afraid that we will end up with an Award that will be impossible to deliver within PLC College Year to its entity and as a result Students will consider doing a higher level Childcare course which has fewer restrictions at the moment. For the integrity of the overall award we need to make sure that the programmes we offer we are able to deliver on.

It was stated at our ETB consultation day that Special Needs and SNA would be an award in its own right separate from Early Years award. We run an integrated Award here at xxx where we run our Children with Additional Needs Module cross curricular throughout the Early Childhood Care and Education Award and I would hope that we would be able to continue to do so once the new professional awards are established. Given that the Government provides supports to ensure that children with disabilities can fully participate in the Early Childhood Care and Education (ECCE) Programme, it would be only logical that we continue to educate our Early Years Workers in the whole area of additional needs so that can help such children in their care reach their full potential and ensure that they too will receive quality early years care and education.

I am concerned that the whole area of Integration and Inclusion of children with additional needs seems missing in the draft especially in this day and age when Early Years Providers are receiving funding through Aims and LINKS for children to attend mainstream centres. There is mention of Care Needs but no mention of children with additional needs and minimum mention of Inclusion.

Know-how and skill:	Engage in practices that consistently promote a democratic, <i>inclusive</i> and anti-bias approach to education and care of children
Competence-Context, Role, Learning to learn:	Engage in ethical, rights based, <i>inclusive</i> and participatory practice.

I look forward to feedback from you on my above concerns and if you have any queries or wish to clarify any of my above points please do not hesitate to contact me.

Regards
xxxxxxx

Coordinator
Level 5 Childcare

PLC Provider	Statutory provider of education & training
Coordinator	
Responding on behalf of	self and fellow tutors.
QQI may publish my response without the respondent details	

Guideline for respondents

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Respondent details and permissions

Respondent name	Kathleen Grimes
Main employer name	Tipperary ETB
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider Part Time
Respondent role (e.g. Principle, FE Teacher, ...)	BTEI Coordinator
Responding on behalf of:	Self
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	
QQI may not publish my response	

Special validation conditions

Please comment on the special validation conditions.

The specification of at least 50 hours across the 2 age groups is considered restrictive to those who are working in a childcare setting with children of a specific age group and who are completing their full award after work hours under a part time programme.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

This is appropriate.

Deactivation

Please comment on the deactivation schedule.

While it may be preferable for learners to accelerate progress and complete their studies before deactivation this may not be possible for part time learners. Due to the nature of part time programmes learners may take up to over 2 years to complete their full award. The proposed mid 2021 deactivation timeline will cause issues for learners who wish to start a part time programme in 2020. To counteract these issues I propose that there is a transition period where the new and old award run concurrently for a period of time.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document "*Awards to be deactivated and implications for validation*"

Any other comments

Please comment on any other matters here.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Pamela Latimer
Main employer name	Longford Women's Link
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	Community Education and Training, FET provider
Respondent role (e.g. Principle, FE Teacher, ...)	Education and Training Business Development Manager.
Responding on behalf of:	Self/employer
QQI may publish my response with the respondent details	Yes/No
QQI may publish my response without the respondent details	Yes/No
QQI may not publish my response	Yes/No

Provider Profile

Longford Women's Link (LWL) is a women's centre based in Longford Town and has been in existence since 1995. We are a long standing provider of Community Education in Longford Town and County with Education and Training delivered according to the principles of Women's Community Education (WCE) at our dedicated WCE Facility. We provide a wide range of services, including Education and Training (QQI Centre), using our Integrated Service Model. LWL is a third level Outreach Centre for IT Carlow and a partner college of the Irish Academy of Public Relations and An Cosán's Virtual Community College (VCC). LWL has previously provided third level outreach via UCD and NUI Maynooth. LWL's purpose is to link women with the resources to change their lives and transform their communities and we have a long history of promoting the transformative nature of WCE.

LWL is a member of AONTAS, the National Adult Learning Organisation, and is represented on the AONTAS Executive Committee by our Deputy CEO, Tara Farrell, who is the AONTAS Chairperson. Pamela Latimer, Education and Training Business Development Manager is a member of Aontas CEN, QQI Reengagement Community of Practice and is Co-convenor of the RPL Practitioners Board.

Introduction

LWL welcomes the opportunity to make a submission in relation to the new-format draft awards standards for Early Learning and Care (ELC). LWL is an organisation that has a strong focus on Early Years both as practitioners and education providers. We provide QQI Level 5 and 6 Early Childhood Care and Education and work with IT Carlow to provide progression onsite to QQI Level 8 Bachelor of Arts Honours Degree in Early Childhood Education and Care. LWL is the lead sponsor of the CE childcare scheme for Co Longford.

Special validation conditions

Please comment on the special validation conditions.

A number of the suggested changes are most welcome to the sector.

1.0 Programme Development:

We suggest that the reference Early Learning and Care (ELC) should include Education as this reflects the role of the practitioner and continues to contribute to a sector that is professional and progressive.

The document references to full time learners only. What is the provision for part time learners? Also, a learner may move between providers, how is this managed?

Have the CE schemes that focus on Childcare been looked at as an option for Childcare Apprenticeship?

We encourage a learner-centred approach that not only qualifies the learners but also encourages confidence and progress within the sector.

2.0 Teaching staff:

We would also recommend that teaching staff have an ECCE qualification at a minimal of QQI Level 7 together with experience of working in the sector. This lends itself to a more relevant learning experience for the learner, bringing experiential, practical and academic together.

3.0 Professional Practice Placement:

There may be an issue for some smaller childcare providers in terms of providing work experience. In addition, this sector is heavily regulated and will the provision of work experience create additional burden for the service, making it less attractive to afford learners the opportunity?

4.0 Learner Language Competence;

We welcome the addition of ensuring that literacy and English language competency is of a good standard. However we suggest that this is decided upon after a meeting with the learner.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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.

Deactivation

Please comment on the deactivation schedule.

While we are not providers of the QQI Level 4 ECCE Award, we recommend that some learners start at Level 4 ECCE to gain confidence and address any barriers which may impact their learning - they can then confidently move to QQI Level 5 ECCE. We would see failure to do this as having a detrimental impact on the sector and would create a barrier for those most distant from the education sphere from gaining a professional qualification.

Many providers offer modules such as QQI SNA at Level 5 and 6 under the major awards of ECCE at Level 5 and 6, therefore we would ask how will service providers such as LWL continue to provide these modules?

We also highlight the fact that QQI providers are going through QQI re-engagement and understood that deactivation or review of existing awards would not take place until re-engagement was complete. Having the two processes running concurrently will prove to be a challenge on already over-stretched resources for training providers.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *“Awards to be deactivated and implications for validation”*

We welcome the introduction of a Single Shared Curriculum for consistency and the smooth transfer from FET to HET. However we do have a number of key questions below:

- How will the Lead Provider or consortium of providers be appointed?
- What are the requirements for availing of the Single Shared Curriculum?
- Will the conditions create barriers for provider to engage i.e. additional QA work, further proof of sector qualification and work practices? Will this process be resource heavy?
- The new proposed grading system is not clear, how will this work? The current system that is in place is fair, based on actual results and calculated by QQI, why is it necessary to change this process?

Any other comments

We welcome the concept of the changes, but encourage a broader representation of sector representatives.

In addition, we also request mindfulness of ongoing sectoral changes e.g. QQI re-engagement and the implementation of the National Childcare Scheme and the impact this will have on the sector as a whole. We encourage a focus on the value of the practitioner and the relevance of their qualifications as early years educators and carers.

We are happy to discuss the above further by phone or in person.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	
Main employer name	
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET provider
Respondent role (e.g. Principle, FE Teacher, ...)	
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	
QQI may publish my response without the respondent details	This option was selected in a follow up email
QQI may not publish my response	

We reviewed this as a team and combined the views of:

- Our learners
- Our Tutors
- The training provider

Special validation conditions

Learner

Its states there is a minimum of two placements for the programme. Depending on where the participants lives, this request will be challenging. What is the placement available does not have/give access to all ages?

If the learner is working full time in the sector, they would only be able to complete the programme through blended learning/online – will this be possible?

If the learner has already completed some of the current major award –can what they have done be used towards the new award or do they have to start from scratch?

Tutor

Will tutors need to be vetted for each placement in order to gain access and to supervise/assess the student on placement?

Learners on placement may not be allowed to do some tasks for assessment (observation only) e.g. nappy changing. Will this be facilitated to complete in a classroom setting?

Provider

Does the assigned workplace supervisor need to attend training? Online? Mandatory as in apprenticeships?

Can assessments be signed off in the workplace by the workplace supervisor, or do they need to be signed off the tutor?

How are the 50 hours per age category monitored and verified? Implications if it needs to be verified by the tutor/provider.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

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

Deactivation

If a learner hasn't completed their major award in timeframe specified, how is the validity of their existing modules measured?

Will there be an agreed RPL process? Who manages and implements the RPL guidelines?

Will tutors be provided with common learner resource packs. PPP's etc or will this again depend on the provider delivering.

Are providers still free to deliver childcare level 5 and 6 modules that are not being deactivated? E.g. Child Development, SNA etc. What major awards can these be used for or do they remain as stand alone modules?

Shared curriculum concept

Serious concerns about this

- How is the lead provider selected? Is it a tendering process?
- Will the selected lead provider have any desire to endorse or give permission to other providers (including private providers) to deliver the awards?
- Why would the lead provider allow any other providers to deliver?

Any other comments

Were private providers notified and made aware of PHASE 1? We were not notified of, or aware of the stakeholder meetings in November 2018.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	DDLETB collated response
Main employer name	DDELETB
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider - ETB
Respondent role (e.g. Principle, FE Teacher, ...)	QA Resource Officer
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes/No
QQI may not publish my response	Yes/No

Special validation conditions

Please comment on the special validation conditions.

Programme Development:

- DDLETB welcomes the involvement of a broad range of expertise and experience in programme development.
- We agree with the expectation that the programmes leading to major awards at NFQ Levels 5 and 6 should be the equivalent of one academic year of full-time.

Teaching staff:

- DDLETB broadly considers the validation conditions in regards to teaching staff qualification and experience as set out here, as a welcome movement towards professionalism in the sector.
- However, there are some concerns about the logistics and practicality of finding/upskilling FET teaching staff with the required background in the short to medium term. We would welcome some consideration of 'grandfathering' for existing FET teaching staff.

Professional Practice Placements:

- DDLETB finds the changes to the placement hours to be very positive. Two issues of concern arose in our consultation process. One concern is that the students may find it difficult to secure two placements, each one focussing on a different age cohort. The second concern is that after-school services and Special Needs Assistants do not seem to be addressed in this placement proposal.

- In relation to the QA requirements for the placement, there is a concern about the additional paperwork/administration for early years centres as they are already very pressured environments.

Assessments while on placement and monitoring:

- In our consultation process, it was noted that there was some confusion as to who carries out the roles of placement supervisor and placement monitor, whether they are workplace staff or teaching staff. It might be useful to have further clarification or explanations on the roles.
- Similar to the above concern about teaching staff qualifications, there is a question about the practicalities of having placement supervisors (childcare service staff) who are qualified to a level above the Level 5 and Level 6 students, as they may be difficult to source in the short term to medium term. For example, a person working in a childcare service who has a Level 6 qualification would not be able to supervise a Level 6 student under the requirement as set out here. It would be helpful to have the phrase 'or will have appropriate experience/alternative qualifications' clarified.
- If teaching staff carry out the role of placement monitors, there are some concerns about the practicalities and logistics of scheduling time for teachers to make mentoring visits and in particular where delivery is part-time in evenings. This could be a challenge in relation to teacher contracts.

Requirement to pass the professional placement element:

- DDLETB welcomes this as a mandatory requirement. This goes towards ensuring that learners are prepared for the responsibilities in practise, to educate and care for young children.

Learner Language Competence:

- DDLETB agrees with the language competency requirement at B2 level.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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.

Deactivation

Please comment on the deactivation schedule.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *“Awards to be deactivated and implications for validation”*

- DDLETB agrees that a single sharable curriculum is effective and efficient for consistency throughout FET.

Any other comments

Please comment on any other matters here.

- DDLETB very much welcomes the move to include programmes at Levels 5 and 6 as part of the progression towards Level 7 and 8 in this way, based on the PATD. We feel it is a positive move forwards in the professionalisation of qualifications in the ELC sector.

Respondent name	Siabhra O'Brien
Main employer name	DDLETB (Greenhills Community College)
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	Further Education College
Respondent role (e.g. Principle, FE Teacher, ...)	Art Teacher
Responding on behalf of: Self	
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes
QQI may not publish my response	No

Response to the deactivation of Creative Arts for Early childhood Module 5N1769:

In my professional opinion the deactivation of the Creative Arts for Early Childhood Module as part of the QQI Childcare course (Level 5 & 6) would be a massive mistake. It is always regarded as a favorite subject among the Childcare students. They are taught the necessary skills to be able to participate in Art activities in a childcare settings such as school as well as it being an enjoyable module for the students to complete.

I believe that without Art as part of the Childcare course it would be seriously lacking creative input. Children enjoy Arts and Crafts and not giving our Childcare workers the skills in this field would be a serious mistake.

If you wish to discuss this with me please feel free to email me with any questions.

Kind Regards,

Siabhra O'Brien



Siabhra O'Brien

Art Teacher

Greenhills Community College

Email: siabhraobrien@greenhillscollege.ie

Phone: (01) 450 7779

Web: www.greenhillscollege.ie



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Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	
Main employer name	CMETB
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider
Respondent role (e.g. Principle, FE Teacher, ...)	
Responding on behalf of:	Self
QQI may publish my response with the respondent details	No
QQI may publish my response without the respondent details	Yes
QQI may not publish my response	No

Special validation conditions

Please comment on the special validation conditions.

- Clarification on what are the implications of delivery over the equivalent of one academic year for part time learners? What is this time scale – 167 days?
- Teaching staff qualifications – what is a relevant major award at Level 7? What type/level of Teaching qualification is required? Is registration with the Teaching Council required?
- How much ELC sector experience is required for teaching staff?
- Professional Practice Placements – what will monitoring and assessment consist of for the work place supervisor and the teaching team?
- Language competency – is min B2 level to access a Level 5 programme not to high?

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

Deactivation

Please comment on the deactivation schedule.

Think that Deactivation should be pushed out to Dec 2021, to allow for completion of programmes post May 2021 assessment.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document "*Awards to be deactivated and implications for validation*"

We are agreeing with the Shared curriculum concept, but acknowledge the need for clear guidelines in developing the curriculum and time allocated for staff engaged in the process.

Any other comments

Please comment on any other matters here.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Tipperary ETB
Main employer name	-
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	Statutory provider of education and training programmes
Respondent role (e.g. Principle, FE Teacher, ...)	Teachers, tutors, trainers, programme co-ordinators, QA staff
Responding on behalf of:	Self/employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	-
QQI may not publish my response	-

Special validation conditions

Please comment on the special validation conditions.

3.2	Suggestion that the programme, as opposed to the specific validation conditions, should specify the requirement for how the 150 hrs should be divided across the 2 age groups. This would suit learners who are employed in a childcare setting with a particular cohort of children (eg 0-2yrs 8mths only) and are completing a part-time programme by night. While it is accepted that all learners should have access to both age groups of children, the specification of at least 50hrs with each group, could be too restrictive. Perhaps, a range eg 25-50 hours, would be more practical
3.3	Not all providers of preschool education are registered with TUSLA. Expand this to include settings beyond TUSLA to include: recognised primary school, or a recognised Montessori school

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

- Clarity and suitability - appropriate

Deactivation

Please comment on the deactivation schedule.

1. The proposed mid 2021 deactivation timeline seems very ambitious. We would suggest an extension to this deadline to facilitate a longer phase-out stage to accommodate continuing learners eg part-time, pregnancy/maternity leave. This could mean that there may be an overlap of 'existing' and 'new' programmes.
2. If the new programmes could be written within the 2 years, then it would be a positive contribution to the sector for the 2021 Sept roll out
3. Can learners with ECCE Level 5 (existing) award progress directly onto ELC major Level 6 (new)?
4. In submitting a differential validation application, must the provider chose their additional elective modules from the shareable curriculum or can the provider develop their own modules?
5. For Special Needs specifically – can we confirm that a provider can propose a special purpose award in for eg Special Needs as part of ELC. If possible, that the DES would endorse this as the industry standard
6. If existing grading conventions do not apply to the new awards, is it possible that this will have a knock on effect to CAO, access requirements to HE, employer understanding of grades etc

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *“Awards to be deactivated and implications for validation”*

While we welcome the concept of a shareable curriculum to promote consistency, we have reservations about the practicalities of every provider being facilitated to have input on the content of the shareable curriculum. It may be challenging for so many providers to reach consensus.

Any other comments

Please comment on any other matters here.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Jo Edgar
Main employer name	Dungarvan College
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider
Respondent role (e.g. Principle, FE Teacher, ...)	Training Coordinator for Early Care and education & Work Placement Tutor
Responding on behalf of:	Dungarvan College Early years Team
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	
QQI may not publish my response	

Special validation conditions

Please comment on the special validation conditions.

- Special validation conditions are reflective of best practice and help provide a consistent approach by providing clear guidance on requirements.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

- 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.

Deactivation

- Training providers need to be kept up to date with changes if the deactivation does not proceed on the specified dates.
- Sufficient time needs to be given to training providers to make the transition from one system to another.
- Providers, given clear guidance on supporting learners with incomplete awards at the time of deactivation to complete their awards.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document “*Awards to be deactivated and implications for validation*”

- The shared curriculum content is an excellent approach in providing consistency across the awards.
- It has not been made clear who the main provider will be.

Any other comments

Professional Practice Placements. The Draft Consultation Propose a minimum of two ELC Placement providers: Age band 0-2yrs 8mths and 2yrs 8mths-6yrs.

While in theory, the new requirements seem fine (i.e. increasing the quantity and variety of experience) there could be a lot of negative, practical implications for those on the ground. The proposal for a minimum two separate placements in a one year ELC programme for childcare is impractical for a number of reasons:

Current experience with ECCE service providers is that each provider has their own systems for Garda Vetting which is not transferable from one setting to another; this will result in a time barrier for both the first and the second vetting for a second placement. Learners cannot afford to lose this time which can be a number of weeks in relation to getting practical tasks completed in placement, such as activities, course work journals and observations. Re-vetting learners for a second placement will increase the volume of paper work for the ECCE placement providers (Not to mention double amount of work for the Garda Vetting Unit)

At present in line with quality practice Dungarvan College provides ‘Placement Provider Agreements’. This again would have to be duplicated for a second placement increasing the administration for both the placements and the College.

Inducting learners into placements takes time in the ECCE services, this will have to be done twice if there are two placements; time which childcare providers cannot afford in their busy schedule; this might give reasonable cause for services to withdraw from taking learners.

It is essential to remember ECCE services arrange Learner Placements as a courtesy to the Colleges. Dungarvan College is a centre of excellence and strives to ensure students gain first-rate experiences by developing and maintaining good working relationships with the ECCE services in which both parties benefit; increasing any workload that is not part of the ECCE daily operations could in effect damage these relationships.

It will be difficult for students to find and secure two placements in a relatively small catchment area. In the catchment area for our College there are insufficient placements for the age range 0-2 as day nurseries are limited and many day-care services no longer take children 0-1. This would either increase the intake of learners into existing facilities which is not an option; or it might increase travel times and expense for learners having to access placements outside the immediate area, which might also infringe on other College's catchment areas and would put undue stress on learners.

The majority of our placements are currently in, preschools and primary schools (Junior/senior infants) for those doing the SNA programmes. These groups do not take babies at all. The College at present meets Lo requirements for observing this age range with parents or childminders; knowledge on development for this age is covered in-depth in College and Skills Demonstrations are facilitated in simulated activities at College. This has been acceptable practice evidenced in EA Reports over the years and it is felt this should continue.

All placement providers must be registered with Tusla which is quality practice but there needs to be a clause to ensure that there are specific exceptions for one off or short term requirements. Example: Part time Students completing one off modules may not be able to secure traditional placement for activities or observations and should be afforded to opportunity to get work in voluntary, statutory or community services that run out of hours such as after schools, evening clubs and respite care etc. (These services will not be registered with Tusla)

Dungarvan College strives for learners get the very best experiences in pre-schools, day-care or schools by allowing three full terms for practical learning. Our learners leave placements with exceptional hands-on knowledge, a network of contacts and on many occasions a good reference, which will help them gain employment. Again two placements will reduce this extended experience.

All childcare programmes are based on best practice removing learners and settling them in a new second placement is not conducive to the welfare of the learners nor is it best practice in childcare.

Current research in Síolta, Aistear and the Early Years Services Regulations, indicates best practice for children is based around continuity of care, building trusting relationships and the child's well-being. If students are asked to move to a second placement as part of their course this consistency will be interrupted and will have an adverse effect on the children.

With the introduction of the Access and Inclusion Model in preschools, many of our learners assist in the care and support of special needs children under supervision. Many children with additional needs find it difficult to settle with new people, it is important for children with special needs that there is not regular disruption with changes of staff (including learners on placement). Again the proposal of two placements effectively means there will be disruption for these children.

The increase in the minimum number hours to 150 effectively works out to an additional working week. This may put students under a lot of pressure to get their hours completed within the academic year and before the Work Experience/Work Practice module is to be submitted for assessment. At present 120hrs in placement is deemed sufficient hours to get all the course work completed, some learners struggle to meet the this requirement it is envisaged that some students will not be able to fulfil the requirement to complete the work placement module and it is felt the hours should remain as they are.

The Early Years Tutors at Dungarvan College contributed to the consultation and we thank you for the opportunity to put our views forward.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Angela Higgins, Ashling Hopper and Fiona Bradshaw
Main employer name	Kildare and Wicklow Education and Training Board
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider
Respondent role (e.g. Principle, FE Teacher, ...)	QA; 2 Teachers; Childcare Practitioners.
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	No
QQI may not publish my response	No

Special validation conditions

Please comment on the special validation conditions.

There are a few issues in this section – It will be a requirement of learners to do 150 hours placement thereby potentially impacting on the available teaching time. This will have an impact on choices made in the Programme Development process – how will participating programme providers come to a mutually acceptable agreement regarding duration of the programme for example, to take account of this requirement?

There is a requirement for the learners to do 50 hours in full day care. In rural towns, this would present a challenge for learners because there tend to be a very small number of full day care settings.

We are concerned that the monitoring of placements might be difficult for early years providers – will a supervisor 1 level above the learner have sufficient experience or knowledge to provide feedback that will contribute to learning? This includes knowledge about how to give feedback and sign off on the learning in a way that maintains the standards, and provides a meaningful experience for learners.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

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

Overall, there is satisfaction with the featured annotations.

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?

Deactivation

This is a very tight timeframe:

2020 Aug- Dec Research

2021 Jan- April Draft

2021 May – Aug evaluation, validation

All current learners will have to complete by August 2021

Special Needs Assisting and Early Education and Play are not being deactivated – ETB providers who provide Healthcare programmes which include these as electives will be required to support the continued delivery of programmes leading to these awards while at the same time introducing the newly developed Early Learning and Care curriculum. Clear understanding of the integrity of the emerging ELC programme as a discrete curriculum for the purpose of educating practitioners will be required, and in this scenario, it is unlikely there would be opportunities for learners to claim credit towards a healthcare award – the distinction of vocational areas will become clearer.

Shared curriculum concept

A shareable curriculum will potentially improve the quality of the sector and of the education/training of staff in the sector. There will be a need for flexibility however – alternatively, time will be required to work out the practical impacts of a shareable curriculum – e.g. come to agreements about how much flexibility there is for localised adaptations.

There needs to be clearer information distinguishing between the shareable curriculum and what is to be delivered at local level/ who approves this delivery?

Level 6: Should training of DLPs be included in the PADT standards, or should this be included in the programme agreed by providers?

6N1942 Child Development currently provides standards for understanding Child Development up to aged 12. In the DATP, at Level 5, there is no reference to standards related to children in afterschool childcare or types of childcare providing for children older than six. We recommend inclusion of curricular elements relevant to school-aged childcare.

It is important that the people that write and develop the shared curriculum have experience of working in the Early Years Service.

Any other comments

We welcome the proposals as positive for the sector. This is a great opportunity to reshape the delivery of Early years courses and will benefit teachers, learners (future childcare practitioners) and children.

This development will provide great opportunities to update and improve education and training in the field. It will lead to improved qualification and standards both in provision of education and training and in the professional context for childcare workers.

We are 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. We are concerned that the curriculum development model proposed may constrain the level of latitude and inventiveness that could be applied at local level – for example, if a provider decided to train an number of practitioners in the skills associated with forest schools, in response to an industry demand, then at what point would the shareable curriculum be changed or adapted, and who would validate this change?

It is clear that the new PATD will link well with progression to levels 7 & 8.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Liz Kerrins
Main employer name	Early Childhood Ireland
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	National charity; QQI-registered provider
Respondent role (e.g. Principle, FE Teacher, ...)	Director of Research and Professional Learning
Responding on behalf of:	Early Childhood Ireland
QQI may publish my response with the respondent details	yes
QQI may publish my response without the respondent details	
QQI may not publish my response	

Special validation conditions

Early Childhood Ireland welcomes that future Early Learning and Care (ELC) programmes will have to show evidence of the involvement of a broad range of expertise and experience in its development, from a broad range of sectors, leveraging a broad range of expertise. This condition has the potential to benefit the quality and relevance to ELC services and practice of QQI ELC programmes, to the quality of graduates, feeding to compliance and quality in settings and in children's experiences and outcomes, specifically:

- Using the considerable existing knowledge and skills of national childcare voluntary organisations that have been delivering accredited ELC training and education for many years;
- Taking what relevant course content and research from these voluntary organisations that can be aligned with the PATDs set out in the QQI's consultation document;
- Providing work-relevant course content and dispositions through involving ELC employers and professionals; and
- Providing coherence with regulatory, curriculum, and quality standards, and supporting the embedding of national frameworks in ELC training and education programmes.

The uneven systemic quality of the Irish ELC training and education system is well-documented (Urban, Robson and Scacchi, 2017). In this context, we welcome the condition that teaching staff must have a relevant Level 7 Major Award and an adult teaching qualification, or five years of teaching on programmes designed to prepare learners for practice in ELC. However, QQI and all statutory actors need to recognise that, in order to be ready for implementation in 2020/21, a

substantial cohort of current ELC teachers will require intensive in-service to upskill to meet these new requirements in terms of their knowledge of current research and developments in the ELC policy and practice landscape. The size of the cohort needs to be understood, and an assessment of education and training needs conducted, to be then addressed through a professional up-skilling strategy and fund.

We also welcome the condition that the teaching team should include people with ELC-specific qualifications and experience of working in the ELC sector to ensure that students receive guidance from people who have on the ground knowledge of daily ELC practice and the relevant issues that go along with that, particularly in relation to ethical and values-based practice. These members of the teaching team are better placed to make relevant links between theory and practice for their students. to ensure the learner has adequate support and supervision from a teaching team that not only possess the academic qualifications but also the practical applications of this theory into practice from years of experience in the sector. These real-life experiences can bring learning to life for many students.

CPD for ELC trainers and educators is vital, as it is for all those working in the wider ELC sector, if they are to remain current and able to effectively support their students to develop the necessary skills and competencies required of an ELC professional. It is crucial that ELC trainers are kept up to date with new policy developments, including changes in the national quality and curriculum frameworks, so that the learner is fully prepared and updated with current and relevant policies. We recommend that validation conditions specify that all those teaching on ELC levels 5 and 6 have access to ongoing CPD, whether employed directly by the education provider and or through short-term teaching contracts.

Early Childhood Ireland welcomes that a 50 hours practice placement must be completed with children from birth to 2 years 8 months and 50 hours with children aged over 2 years 8 months. This may help correct the situation in settings where those with the least skill and lowest level of training are working with the youngest children. It means that all educators will have practice experiences with children in the full birth to six years age range, which they may not have at present. However, we believe that this requirement may present a challenge, or indeed barrier to course participation, for those who may find it difficult to find a setting close to them that cater for children from birth to 2 years, especially if they are part-time learners and already have an existing job in a sessional preschool only.

However, we suggest that insufficient attention has been given in the development the practice placement requirements to part-time ELC students that are already employed as educators, and who use their own setting as their placement. Some will need to undertake placements in other settings. This requires further practical consideration and we must be cognisant of their role and responsibility in their main place of work. It may be possible for services to arrange for reciprocal exchange of staff on a one-day per week basis, etc.

That educational programme validation will require professional practice placement settings meet the education providers' criteria for placement potentially will oblige the providers to develop such criteria, if they have not already done so: and some providers have not. For those that have criteria the descriptors can guide their review and redevelopment.

We support that only Tusla-registered services can be utilised for professional practice placement. The regulatory minimum standards are there to keep staff, children and students safe. Compliance with some of these standards also provide the minimum foundation for the achievement of the

desired student learning outcomes indicated by the descriptors, e.g., level of staff to child ratios that facilitate the formation of secure and positive relationships between children and staff and the co-construction of knowledge with children.

That only Tusla-registered services can participate in professional practice placement also suggests the need to ensure that phase one of the draft childminding action plan is achieved on time as it includes the regulation of all childminding services in three years' time. The plan also actions to develop accredited training for childminders, and work placement will be a vital element of that.

Finally, Early Childhood Ireland's view from the ground is that the learner language competence requirement is vital at this point and will become even more important as the educator supply crisis continues, and educator recruitment from outside of Ireland intensifies. The Teaching Council recently introduced a language competence registration requirement for similar reasons in that sector. As ELC education is not yet a regulated profession this option is not yet open in order to ensure that educators can support children's language acquisition, complete regulatory and pedagogic documentation, and so on. There is a significant job of work associated with bringing some educators whose first language is not English up to the required proficiency. This is particularly relevant for those already working as educators who will undertake part-time ELC training and education.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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 in 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.

Deactivation

Early Childhood Ireland agree with the deactivations proposed by the QQI. The minor awards in the list being proposed are outdated and quite discrete. The new professional award descriptor provides an opportunity for a new programme to be developed that: is current; more cohesive; and makes better links between the different learning strands and content; links theory with practice more effectively and comprehensively

In relation to school-age childcare, a new award is required. The purpose of ELC and SAC differ from each other, the professional role profile will differ, as will the goals and descriptives for professional awards. The Workforce Development Plan is addressing both ELC and SAC workforce development in tandem as settings can include both service types and staff may work across them.

Shared curriculum concept

Early Childhood Ireland supports the shared curriculum concept, providing opportunities for training and education providers to work together. It supports a broad range of delivery partnerships.

Any other comments

Early Childhood Ireland warmly welcomes the national strategy to move from the Common Awards System towards setting standards for major professional awards. This is a milestone in national policy for the ELC sector and for children. That the training and education of ELC professionals are considered and named as professional awards for the first time provides a building block for the professionalisation of the ELC sector.

We welcome that the journeys to the ELC awards are flexible but coherent and explicit across the four levels, providing greater consistency across initial professional preparation programmes to enhance quality practice and pedagogy and services provision and to provide meaningful efficient professional pathways for educators through the NFQ.

We welcome that the awards are cumulative, with students required to achieve the learning outcomes for an award in NQF Level 5, then 6, with the opportunity to progress to higher levels.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Dorset College
Main employer name	Dorset College
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET, HET and English Language
Respondent role (e.g. Principle, FE Teacher, ...)	Mary Gordon, Registrar
Responding on behalf of:	Dorset College
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	N/R
QQI may not publish my response	N/R

Special validation conditions

Please comment on the special validation conditions.

1. Professional Practice Placement(s) – with regards to assessment who will manage the assessment of such placements? Will the provider and the end-user (place of placement) have equal responsibility in this regard?

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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.

Deactivation

Please comment on the deactivation schedule.

Dorset College are mostly satisfied that the deactivation schedule of mid-2021 which will leave providers with sufficient time to engage with the 'Development of Professional Awards in ELC'.

Dorset College would like to raise some queries thereto:

1. **Main-Provider** – the lead programme provider must first apply for validation which may lead to the main provider delaying, for one reason or another, any application by a sub-provider; and
2. **Sub-Provider** – for a sub-provider i.e. a provider other than a main provider, to deliver a programme differential validation will be needed which may lead to delays in student recruitment on a course for which they were heretofore accredited for.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *“Awards to be deactivated and implications for validation”*.

With regards to the shared curriculum concept Dorset College have the following observations:

1. **Permission to use the Curriculum** – a training provider, other than the lead provider, must seek permission to use the curriculum and seek differential validation. The concern is that in seeking permission leading to a differential validation application a sub-provider/training provider who has no statutory link to the main provider will encounter delays. Moreover, in sharing a curriculum with a sub-provider is the main-provider losing out on a cohort of students? Might this lead to hesitancy in giving such permission to use the curriculum. Specifically could a main-provider refuse permission to a sub-provider? If so can a sub-provider appeal such a decision and to whom? Is there a statutory framework for the sharing of curricula, refusal to share, appeals of such decisions?
2. **Shared Curriculum** –
 - a. Dorset College sees a shared curriculum as leading to equality of learning outcomes and communities of learning. We see this as a positive endeavour and would welcome such an approach within the sector. Dorset College sees the ‘shared curriculum’ concept as ensuring best practice, consistency and authentic delivery of learning outcomes and assessment strategies.
 - b. Dorset College sees some risks in such a shared curriculum as the interpretation of a shared curriculum may vary amongst providers. If the sharing of a curriculum is ineffective and/or unworkable can a sub-provider change its main-provider connection?
 - c. How will the connection between main and sub-provider be governed; memorandum of agreement or formal articulation agreement?
 - d. How will a sub-provider view the main-provider’s curricula to ensure they choose an appropriate lead/main-provider?
 - e. How prescriptive will assessment be i.e. will the main-provider prescribe the assessment strategy etc. or will it be similar to Higher Education where a provider includes this detail as part of their validation process (main-provider) or differential validation application (sub-provider).

- f. Can a provider put its own interpretation on a 'shared curriculum' e.g. can it deliver the learning outcomes using Montessori principles/methods or is the main-provider entitled to prescribe the outcomes.

Any other comments

Please comment on any other matters here.

1. Will RPL be determined by each provider? Could this lead to inconsistencies?
2. How will an organisation apply to form part of the proposed consortium of providers?
3. Exemptions – how will providers manage exemptions from old programmes?

Dorset College would like to thank QQI for engaging in a comprehensive consultation period with all providers and would welcome all requests for such engagement going forward.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	John Fitzgibbons
Main employer name	Cork Education and Training Board
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET
Respondent role (e.g. Principle, FE Teacher, ...)	Director of Further education and Training
Responding on behalf of:	Cork Education and Training Board
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes/No
QQI may not publish my response	Yes/No

Cork Education and Training Boards Quality Assurance office consulted with teachers regarding the new award. Below is the the feedback from those who participated in a consultative session. The consultative group included representatives from CETB PLC colleges, BTEI services and Adult Self Financing (night) courses.

Special validation conditions

Special Conditions for Validation Professional Practice Placement:

The group was broadly supportive of the increase in Professional Practice Placement hours to 150. Some concerns were raised about the age brackets involved. It was pointed out that as the ECCE scheme now commences when children are 2 year 8 months, that students could technically complete both placement in a preschool. Perhaps it would be better to lower the age brackets for placements to 0-2 years and 2-6 years to ensure that students have contact with young children. Similarly, not every childcare centre offers provision for babies. As a placement with babies is not specified as part of the hour's students may not work with babies during their award

Some of centres operate in rural areas and expressed concerns that the required amount of placement with very young children may be difficult to source. For example, in West Cork there are currently few centres which offer provision for children of this age.

The group was broadly supportive of the introduction of monitoring for students. However, some felt that experience working in ELC and monitoring of student should be sufficient qualification. It was suggested that clarity be provided as to who will assess students on placement: the workplace supervisor or the tutor?

Cork ETB has a substantial amount of provision delivered the on a part time basis, including adult self-financing evening/night provision. Concerns were raised as to how centres would be able to facilitate monitoring of students who choose to engage in this flexible learning pathway.

It was suggested that students may have difficulty in competing the hours if they attend sessional services, will students be able to complete the hours in the summertime? Or is block placement in addition to one day a week the answer?

Some centres currently allow students to attend placement in primary schools to prepare them for a role as a Special Needs Assistant. These centres are concerned about the loss of this flexibility and felt that in order for students to gain the most benefit from the award, placement hours in a primary school should be allowed. Some providers felt that a single award for ELC and Special needs Assisting should be developed while others welcomed the development of an award specifically for ELC.

Special Consideration for Validation: Contract for Professional Placement:

Cleaning should be specified as a task in the contract between student, placement and providers. While students not there only to clean, this task will have to be down by students as part of the work duties. It should be included in the contract and the rationale explained.

Special Considerations for Validation: Teaching staff:

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".

It was pointed out that this criterion may be difficult in centres with one or two teachers. The smaller centres need to be considered

Annotations to the PADT for ELC at NFQ Levels 5 and 6

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.

Deactivation

There was some initial concern about the proposed dates for deactivation of the CAS awards. Will programmes leading to the new award be ready in time and will staff be adequately trained in the delivery of the new programme?

Adequate time must be ensured for deactivation of the old award and the introduction of new award. An exemption period is necessary to enable students who have commenced to finish the old award, particularly those taking components to accumulate towards the full (existing) award part time (i.e. by night). QQI must ensure enough notice is given to providers to be able to inform students of the change, in particular students standing on a part time basis.

It is suggested that QQI consider removing validation for online programmes leading to an ELC award. It was felt an online award-is not sufficient preparation for ELC and undermines the professional expectations and requirements of the award. Where online delivery is part of a blended programme, minimum periods for online and direct delivery should be outlined and required.

The group welcomed the retention of the Level 4 modules Child Development and Play (4N111) and Child Care and Safety (4N1905) for Youthreach/BTEI/Community provision. This provides a valuable introduction for students.

Finally, the group noted the need to ensure that all the content in the deactivated modules is covered in the annotations.

Shared curriculum concept

The group agrees with this idea, which will standardise the provision and delivery of ELC programmes. Some felt that a consortium may be better for this work as opposed to one provider writing the new programme. Others felt that a single provider would be able to provide the direction and consistency needed. Finally, it was highlighted that delivery staff will need adequate training for implementation of curriculum to ensure consistency.

Any other comments

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Joe Walsh
Main employer name	The Open College, Leopardstown Business Centre, Ballyogan Road, D18.
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider
Respondent role (e.g. Principle, FE Teacher, ...)	Director
Responding on behalf of:	Provider
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	N/A
QQI may not publish my response	N/A

Special validation conditions

Having a lead provider developing programmes to include a proposed sharable curriculum is not an option that would promote fairness and equality in the ELC Sector. If once validated, what guarantee is there that the lead provider **WILL** release the shareable curriculums and make them available to providers in the network?

The lead provider for Private Providers should be a consortium of Private Providers to ensure, a guarantee that there is access by all providers to the newly validated programmes without criteria set. Therefore, it is essential that there are clear, fair and concrete practical arrangements for sharing (including the specification of conditions that must be met) and collaborative maintenance of the New Curriculum.

The Quality Assurance aspects of these arrangements should be approved at validation ensuring that all providers are capable to adhere to the requirements as set to ensure high quality.

For the lead provider's programme to be validated for Private Providers, it would be recommended that there is a consortium of Private Providers as a lead provider so that all providers in this group has a voice of this provider group to be heard. When the shareable curriculum is due to be published it **must** be openly accessible for all training providers freely and without penalty and without any set criteria for access.

Asking permission from the lead provider to use the curriculum would not be a viable or recommended option as the lead provider may not be open to release of the curriculum they have written and designed.

Having “**If permission is given**”, highlights the lack of guaranteed access to the newly created curriculum by all providers. Asking the provider to develop and document the provider-specific parts of the programme i.e. name, contact details, resources, budgeting, staffing, quality assurance, etc. should not be a problem for providers once the main curriculum is designed each provider will always place their own identity stamp on the course being created with the designed curriculum guidelines.

Having a subsequent provider applying to QQI for differential validation seems to elongate the process for validation and may cause incorrect focus on what is being achieved. If a consortium of Private providers is considered as the lead providers, then subsequent validation should not be necessary.

An Evaluation panel can focus on the provider-specific parts of the programme together with any additional elective programme modules specific to that programme to review what each individual provider provides for the new ELC Course but again it would be its own specific individual provider slant on the course.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

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 - Link -

https://www.qqi.ie/sites/docs/AwardsLibraryPdf/6N1944_AwardSpecifications_English.pdf

However, there is a lack of clarity of which annotations clearly relate to which of the current Module.

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.

Deactivation

The decision for deactivating some of the current modules is very disappointing.

- We would ask the question - who decided the minor awards at both level 5 and level 6 which are being recommended to be deactivated and how they came to the conclusion?
- When all the listed minor awards recommended are deactivated, clarity as to how they are being replaced needs to be provided. There should be clear mapping completed as a comparison exercise showing the deactivated Modules beside the new Annotations. This will show clearly where the information from the deactivated Modules is going to be included in the new Annotations.

For example, deactivating School Age Childcare (5N1781) seems an **unusual** decision when Tusla the Children and Family Agency have released Child Care Act 1991 (Early Years Services)(Registration of School Age Services) Regulations 2018 , having individual specific Annotations for what will be legacy modules would again aid the transition to the new Standards for ELC .

- In addition, we have received feedback from one of our lecturers who is trained Montessori Teacher and an advocate for the Montessori Learning Approach, that she **completely disagrees** with the deactivation of the 4 Level 6 Montessori related Modules:

6N1932 - Early Learning Philosophy

6N1933 - Early Learning Environment

6N1935 - Early Childhood Literacy and Numeracy

6N1936 - Early Childhood Arts and Culture.

There **should not be an elimination** of these modules without clear replacement annotations being written for them.

We feel this decision is a process whereby since the introduction of Aistear in 2009, and where Aistear promotes Play, there has been an ongoing attempt to remove these four Montessori Specific Modules for ECCE Practitioners to train as Montessori Teachers. If these four Montessori Specific Modules are removed how does this leave the identity of the many Sessional ECCE Settings calling themselves Montessori Schools going forward?

There will be no opportunity to have staff qualified in the Montessori Method of Education to become Montessori Teachers to educate and care for children in the many Montessori Schools around the country. We feel very strongly that these 4 modules **must remain** and should not be deactivated.

Recognition in the legacy of the Montessori Method of Education within Ireland in the Early Childhood Care and Education Sector where there are many Montessori Schools should not be lost in the Creation of the New ELC Awards.

- The basis of Learning for the ELC sector is also concretely based on the knowledge of how a child develops and therefore again the deactivation of *6N1942 - Child Development* is **also a negative decision**.

Shared curriculum concept

Having a programme based on a single 'shared curriculum' is a good concept in theory and should help to promote consistency , have good transitions from Level 6 to Level 7 and so on, however, there must be fair and equal access to the created Shared Curriculum with criteria set providing allowances for individual providers to have the ability to have their own version of the ELC programme to provide individual providers with the ability to remain as individual stand-alone companies as they currently are.

All Private Providers cannot be expected to fall under the exact same criteria without at least the allowance of instructional design.

Any other comments

It must be noted that the changes recommended are large and in doing so it would be hoped that the core foundations of learning to gain qualifications to work in the Early Childhood Education and Care Sector are not lost in transition.

It would be our hope that the four Montessori Modules would **not be deactivated**, and some provision would be made for these to be facilitated in the new standards for Early Learning Care.

Going forward QQI should make it clearer as to the requirements for Feedback from providers for the new awards standards for Early Learning and Care consultation Process.

Guideline for respondents

This guide is intended to help respondents structure their responses consistently to facilitate analysis.

Responses must be received by QQI by **30 September 2019**. Responses must be sent by email to Consultation@qqi.ie using the subject **ELC**.

Respondent details and permissions

Respondent name	Claire Fannin
Main employer name	College of Management & IT (CMIT)
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET provider
Respondent role (e.g. Principle, FE Teacher, ...)	Quality Director
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes
QQI may not publish my response	Yes/No

Overall comments

Please comment on any other matters here.

This proposal represents a shift from the Common Award FE model to a HE model. Learners will no longer be able to use modules as building blocks across various providers to gain a major award. We believe this is a disadvantage to the learner.

We feel the inclusive nature of our further education system and the way in which it has previously allowed learners a flexible and learner friendly approach to gaining recognised qualifications is totally contradicted by this proposed standard.

Based on the information available about the consultation process to date, learners seem to have been underrepresented considering the impact of this new standard will ultimately be on the learner.

The broad learning outcomes outlined all seem relevant and indicative of a programme in ELC. The means of development and specific validation requirements raise concerns regarding accessibility of this programme to learners. It seems to promote a single stream of learning which focusses on a post-secondary school approach with little regard for the many different avenues learners currently take to completing their qualifications.

The lack of a consistent structured curriculum being offered by all providers would also raise concerns with consistency of assessment, programme outcomes and learner access transfer and progression.

We would also question the potential risk this model has in terms of protection for enrolled learners. Multiple providers delivering different curricula could present an issue in the event of a provider ceasing to be able to deliver a programme.

Special validation conditions

Please comment on the special validation conditions.

3.0 Professional Practice Placements

The conditions outlined in this section seem to be aimed at a learner with no previous experience in the sector who is not currently employed. There are no 'and/or' options for learners who are currently working in the early years sector.

Our primary concern with this structure as it stands is the issue of accessibility for the diverse range of learners wishing to access these programmes and the barriers and disadvantage, they will likely experience as a result of this.

The standard as it stands, at no point refers to a learner currently working in the sector – for example, "...in a minimum of two ELC settings'. A learner in full time employment may find it difficult to gain employer support for the programme if they are required to seek a 50 hour placement which will remove them from the setting staff rota for that period of time. This could represent a potential loss of earnings for the learner which disadvantages a part time learner in full time employment.

There is also a concern with the availability of suitable settings for learners who are in rural locations.

If these proposed conditions remain as per this draft standard it is likely that they will be taken literally to the detriment of learners who are upskilling as opposed to progressing from second level education. This will present a significant barrier to learners currently employed in the sector who are looking to build on existing qualifications and advance their career.

Some of the points in this standard also place responsibility on the provider which could be considered outside of the scope of a provider. For example, the requirement for centres to confirm learners are Garda vetted - in a case where a learner is in full time employment, they will be garda vetted to their setting (this is a legal requirement) – a provider should not be accountable for a settings vetting compliance – this is under the remit of the Child and Family Inspectorate.

In a case where a learner is not working in early years and is completing the minimum 150 hours, of where a learner needs to arrange a new setting placement to meet the requirements, vetting arranged by provider would be appropriate.

4.0 Learner language competence

While language competence is important, the wording in this section is over prescriptive and if taken literally implies learners for whom English is a second language are required to specifically prove B2 English at their own expense. This would present a potential cost barrier to learners. We propose an appropriate alternative to the B2 English could be taken from the existing NFQ, for example, a learner who has completed an award at a similar or maximum one NFQ level below through English.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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.

Deactivation

Please comment on the deactivation schedule.

The current CAS modules that are available individually to learners present valuable CPD options. The new programme does not provide for this. The nature of the industry is one of change and continual growth. It has been our experience that learners often enrol on individual CAS components to update knowledge and expand their qualifications for CPD purposes. We recommend that the existing modules remain available as CAS awards for CPD purposes.

Shared curriculum concept

Please comment on the shared curriculum concept set out in the document *“Awards to be deactivated and implications for validation”*

The current level of information provided on this concept raises more questions than it answers.

It could create a ‘round hole, square peg’ situation where providers are developing programmes based on curricula designed with a different programme delivery / learner profile in mind. Providers could be forced to try and adapt a curriculum which is not a custom fit to their delivery capabilities, or learner profile.

The idea that a lead provider would take responsibility for the providers it shares the curriculum with presents a number of practical challenges both as a lead provider or a provider seeking access to a curriculum.

As a provider who may look for permission to use another providers curriculum, what assurance would they have that they would be granted permission. A lead provider could refuse permission for any number of reasons.

This model lends itself to larger, influential providers who will develop a curriculum with their own programme in mind ultimately limiting availability and accessibility of the programme to the learner.

Unless specifically validated by a lead provider, there are no exit awards for learners who are unable to fully complete their programme. Under this new proposed method of multiple curricula, even if a provider validates individual module certificates / exit awards it does not allow for a learner to easily transfer to another provider at a later date should they wish to return to their studies.



An Ghníomhaireacht um
Leanaí agus an Teaghlach
Child and Family Agency

Tusla Early Years Inspectorate Response to Professional Award –type Descriptors at NQF Level 5 and 6: Annotated for QQI Early Learning and Care (ELC) Awards.

Respondent details and permissions

Respondent name	Rita Melia
Main employer name	Tusla Early Years Inspectorate
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	Inspectorate
Respondent role (e.g. Principle, FE Teacher, ...)	Early Years Specialist representing Tusla Early Years Inspectorate.
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	Yes/No
QQI may not publish my response	Yes/No

Special validation conditions:

Programme Development.

1.2:

The time scale for programmes of one year fulltime or equivalent with an additional year for major level 6 awards is welcomed.

Question: does the early learning and care award level 5 & 6 include a focus on school age childcare?

Teaching Staff:

2.1 -2.2

Teaching staff with a degree and a teaching qualification are essential, it should also be clarified the percentage of staff teaching on the level 5 and 6 programmes who are required to also have, experience in the ELC sector.

2.3:

The induction programme for learners should identify the culture, values and beliefs that underpin the level 5 & 6 programme based on current national and international literature and research.

A specific minimum number of professional learning opportunities or hours should be identified and supported to ensure that all teaching staff have opportunities to keep updated.

Professional Practice Placements:

3.3

ELC services must be registered with Tusla as stated, however the service should also have a high level of compliance with the Child Care Act 1991(Early Years Services) (Amendment) Regulations 2016. The most recent inspection report from the Early Years setting available online should be used to make an informed judgement of the suitability of Early Years settings for professional practice placement.

An generic criteria for placement selection should be agreed, if the programme is to be standardised, resulting in all students having a comparable qualification.

3.10

By ensuring that the learner, the practice placement supervisor and the placement monitor are all aware of the practice placement assessment, marking schemes and criteria, provides an opportunity to support a learning community within the EY setting, which may further enhance quality and be of benefit to the setting and the children accessing.

3.11

A minimum number of 1:1 sessions between the learner and the placement monitor should be identified.

Annotations to the PADT for ELC at NFQ Levels 5 and 6

Purpose: level 5 & 6.

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".

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.

Knowledge Structure:

The section should include a mention of National and international policy and practice Frameworks.

Knowledge Breadth and kind:

Specialist Knowledge:

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.

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.

Deactivation:

N/A

Shared curriculum concept:

Tusla Early Years Inspectorate would welcome inclusion in the development of a shareable curriculum as outlined in the above document.

Any other comments

Tusla Early Years Inspectorate welcomes the opportunity to consult on the Professional Award –type Descriptors at NFQ Levels 5 & 6.

Respondent details and permissions

Respondent name	Ann McNamara
Main employer name	MSLETB
Employer type (e.g. FET provider, HET provider, ELC service provider, ...)	FET Provider
Respondent role (e.g. Principle, FE Teacher, ...)	Assistant Manager
Responding on behalf of:	Employer
QQI may publish my response with the respondent details	Yes
QQI may publish my response without the respondent details	N/A
QQI may not publish my response	N/A

Mayo, Sligo and Leitrim Education and Training Board (MSLETB) welcomes this opportunity to make a formal response to QQI's proposed new awards standards for Early Learning and Care. MSLETB believes the QQI consultation on the draft awards standards for Early Learning and Care (ELC) is timely given the launch of the 'Whole-of-Government Strategy for Babies, Young Children and their Families 2019-2028'. This submission is based on the feedback gathered at a consultation event specially convened to discuss the upcoming changes to awards standards in Early Learning and Care with a cross section of MSLETB staff involved in the delivery of early years childcare awards including teaching staff, coordination staff, quality assurance staff and management.

Special validation conditions

Teaching Staff

MSLETB understand and appreciate the importance of having suitably qualified teachers as part of a teaching team. However, feedback from our consultation event raised concerns in relation to the number of staff on each teaching team to fulfil the requirement for staff to have ELC qualifications and experience. MSLETB is of the view that ETBs will have to conduct qualifications audits and create specific CPD plans for teaching staff. Consequently, we feel that specifics in relation to relevant qualifications will need to be considered by ETBs.

Professional Practice Placements

There are many positive elements which are welcomed by MSLETB but the content raises concerns which will need to be addressed. Figures from the Skills and Labour Market Research Unit (SLMRU) in SOLAS indicate that approximately 30% of people employed as childminders in Ireland (both centre-based and home environments) hold third level qualifications. Therefore, there are concerns that it will be extremely difficult and, in some cases, impossible to source a placement where a staff member with Level 7 qualification is available to be the supervisor.

Turnover and attrition has led to these low figures. If the terms and conditions associated with work in the Early Years sector are not addressed, it is fair to say that these figures will remain unchanged. It is not possible to professionalise a sector without addressing the terms, conditions and status of Early Years workers. Improving the education qualifications alone will not lead to the professionalisation of the sector.

Feedback from our consultation event also raised concerns that there are limited Early Years services within our geographical area with a 0-2.8 years' service and therefore the availability of placements will be restricted. In this same vein, feedback indicated fears that learners on a Level 6 programme who are employed in childcare, would encounter difficulties being released from work to fulfil a work placement with another age group.

MSLETB is in favour of the proposed requirement for learners to pass their professional placement.

Learner Language Competence

MSLETB agrees that it is appropriate to set a minimum English language and literacy competence for entry to the programmes at level 5 & 6 and agree that B2 is an appropriate level for learners to be able to communicate effectively.

MSLETB would like to ask QQI if there are currently any plans to link the ESOL awards offered through the NFQ to the Common European Framework of Reference for Languages (CEFR) as this would aid ETBs in providing a clear progression path for learners wishing to access ELC programmes.

[Annotations to the PADT for ELC at NFQ Levels 5 and 6](#)

Please comment on the clarity and suitability of the annotations at NFQ Levels 5 and 6. You are not required to comment on the annotations at NFQ levels 7 and 8.

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 PADT
- 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

Deactivation

MSLETB is concerned that the deactivation of the current major awards would be problematic for learners and, in particular, part-time learners. Feedback from our consultation event suggested that a longer lead-in time was necessary in order to make a smooth transition. A significant number of learners avail of Level 5 and 6 via part-time provision. And people working as childminders generally can only access classes on a part time basis.

Shared curriculum concept

In September, MSLETB, with partners GRETB and WWETB had programmes approved for validation as part of a sectoral pilot which comprised of three programmes in Agriculture and was the culmination of 18 months of work for the programme development team. The new validation criteria fundamentally change and improve not only the development of FET programmes but also how they are delivered and continuously improved to ensure their relevance.

The development of a shared curriculum with project partners not only spread the workload but a collaboration emerged, and curriculum writers reported that this was the most rewarding part of the project. The coming together of partner ETBs, with a wide geographical spread and differing experiences, led to the development of a well-rounded curriculum. The requirement that each programme have a Programme Steering Group is also a welcome one. This ensures that responsibility is taken for the ongoing management of the curricula and the group also identifies and addresses programme review and updates, all of which leads to a dynamic programme capable of meeting the needs of its learners in a timely manner.

Any other comments

There were several general comments and questions included in feedback from the consultation event including:

- The delivery of part time provision needs to be thought out very carefully under the new validation policy. Will it be modularised given that it is not a CAS award? If there is not a modular approach how would you structure and deliver part-time?

- Can learners exit during programme with a component certificate?
- The timing of 'one-year full time equivalent' will need to be clarified for part time service
- Some retained modules will need to be reviewed and updated

MSLETB looks forward to the publication of the reviewed PATD for ELC following this consultation period.