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Department of Children, Equality,
Disability, Integration and Youth

National Action Plan for Childminding (2021 – 2028)



National Action Plan
for Childminding
2021-2028



“Children, families and communities of Ireland can experience the benefits of quality childminding”

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Foreword



It gives me great pleasure to introduce the National Action Plan for Childminding 2021-2028. It is a milestone not just in the development of childminding in Ireland, but in the wider development of our provision of early learning and care and school-age childcare.

Childminders have been a hugely important part of our provision for many years, and they continue to be the option of choice for many families and a central figure in the lives of many children, offering nurture, lifelong learning, and a home from home.

Until now, however, there has been very little support for childminding or public recognition of the important role that childminders play. Childminders have been excluded from regulation as a result of exemptions in the Child Care Act 1991, and there has been no access to subsidies for parents who choose childminders for their children's care and early learning.

I would like to acknowledge the contribution of all those who have inputted into the development of this plan over the last 5 years and more. Work began in 2016 on developing the proposals that lie behind this Action Plan, with the establishment by my predecessor in office of the Working Group on Reforms and Supports for the Childminding Sector, chaired by Bernadette Orbinski Burke of Childminding Ireland. The Working Group's recommendations published in 2018, which formed the blueprint for this Action Plan, built on recommendations made by a range of stakeholders over the years. A firm commitment to reform was then made in *First 5, the Whole-of-Government Strategy for Babies, Young Children and their Families*.

Since coming into office I have been committed to seeing this process through – not just to publish the Action Plan but to go on to implement it. A great deal of work still lies ahead, and it is important that we take the time to get this right, as it will involve a major process of change.

During Phase 1 of the Plan we will still be involved in preparatory work, putting in place the building blocks of this major reform. Phase 1, which will take 2-3 years to complete, will include developing new regulations and training that are specific to childminding, amending legislation, rolling out training, further research on costs and on ways to support childminders most effectively, and re-examining the funding and financial supports available for childminders.

This National Action Plan for Childminding sets out an incremental and supportive pathway to Government support and regulation. This phased approach provides a significant lead-in time for new requirements that will be introduced, while access to the National Childcare Scheme will be opened to childminders at the earliest possible opportunity.

I would like to stress the commitment in the Action Plan to respecting what is different about childminding, by developing new regulations and a new inspection model that are proportionate and appropriate to the home setting in which childminders work, and by ensuring that training and other supports are tailored to childminders' needs and working hours.

The Action Plan is underpinned by a vision “that the children, families and communities of Ireland can experience the benefits of quality childminding in a relationship-based, home-from-home, family life environment”. It is a plan for all childminders, and for all families that use a childminder. I look forward to supporting childminders and parents through the Action Plan over the coming years.



Roderic O'Gorman TD

MINISTER FOR CHILDREN, EQUALITY, DISABILITY, INTEGRATION AND YOUTH

Acknowledgements

Sincere gratitude is extended to all who contributed to the development of this National Action Plan for Childminding. In particular, the Department of Children, Equality, Disability, Integration and Youth would like to thank:

- The Working Group on Reforms and Supports for the Childminding Sector, and in particular Childminding Ireland who coordinated the Working Group and Bernadette Orbinski Burke who was its chair.
- The many childminders, parents and agencies who took part in the public consultations on the Draft Childminding Action Plan and, before that, in the consultations carried out by the Working Group.
- The Steering Group and Stakeholder Group for the Workforce Development Plan.



A **childminder** can be a cherished and constant figure in a child's life.

Executive Summary

Childminding offers many benefits to children and parents but currently receives little formal recognition by the State. Whereas centre-based early learning and care services have evolved rapidly in the last 20 years in policy terms, childminding has remained at the margins of funding, support and regulation, in spite of its many advantages and its continued popularity among parents. This National Action Plan for Childminding sets out a plan for extending State support and regulation to childminding on a phased basis by 2028, with accelerated access to subsidies for childminders through the National Childcare Scheme.

Benefits of childminding

Childminders play a central role in provision of both early learning and care and school-age childcare in Ireland. For many children in Ireland, a childminder is their main carer other than their parents, often starting in their early childhood and continuing into their school years. A childminder can be a cherished and constant figure in a child's life – almost a second family.

The research evidence points to positive outcomes for children of quality childminding, which may be linked to consistency of carer and a low child-adult ratio. The evidence on outcomes for children makes a strong case for giving parents choice of provider-type, while continuing to raise quality standards.

Childminders are highly valued by many parents because of the home-from-home setting, their strong and lasting relationships, and the flexibility they can offer. They cater for both pre-school and school-age children, including siblings. Many families prefer to use childminders, while for some families, in areas where centre-based care is either not available or its opening hours do not match the family's childcare needs, childminding is the only option.

Increasing the options for parents in terms of accessible, affordable and high quality early learning and care and school-age childcare can support increased labour market participation. In particular, childminders may offer flexibility and responsiveness for parents, fitting around parents' working hours. As childminding has a significant role in the provision of childcare throughout the country, it may be an effective means of helping to address issues of supply and access.

In spite of its many benefits, however, childminding in Ireland is almost entirely unregulated. The number of childminders can only be estimated. Few are registered with Tusla, the Child and Family Agency – most are exempt, preventing them from registering. It is assumed that some childminders work in the informal economy. The lack of regulation means a lack of quality assurance and potential risk, without a requirement for Garda vetting checks. It means that parents who want to use a

childminder have no access to public subsidy, and may find it difficult to locate a local childminder. The lack of regulation also limits childminders' opportunities to access funded training and supports for quality.

Vision aims and objectives

The vision statements, which underpins the National Action Plan for Childminding, draws on the views expressed by childminders, parents and other stakeholders during the consultation process:

- *That the children, families and communities of Ireland can experience the benefits of quality childminding in a relationship-based, home-from-home, family life environment.*
- *That the life-learning, continuity of care and flexibility that quality childminding provides is acknowledged, supported by the development of an appropriate quality assurance system that protects and enhances this long-established and respected model of childcare.*

The overall objective of this National Action Plan for Childminding is to improve access to high quality and affordable early learning and care and school-age childcare through childminding. To do this, the Action Plan sets out an incremental and supportive pathway to regulation. This will enable more childminders to access Government subsidies, making their services more affordable to parents. It will also enable them to access a variety of supports to assist them in meeting regulatory and quality requirements.

In achieving this overall objective, the Action Plan will contribute to the aims of supporting parental choice, and increasing access to affordable early learning and care and school-age childcare places. It will help support labour market participation for parents, and offer more flexibility for parents who work irregular hours. It will help improve the quality of provision, supporting child outcomes, and provide greater recognition and support for childminders.

The Action Plan has a number of specific objectives:

1. Enable a far greater number of parents who use childminders to benefit from subsidies under the National Childcare Scheme.
2. Support quality assurance of childminders and safeguarding of children through extending the scope of regulation and inspection to all paid, non-relative childminders.
3. Provide greater recognition of childminders and develop appropriate childminder regulations and inspection processes to reflect the home environment in which childminders work.
4. Develop bespoke resources to support the quality of childminding provision, including through the development of staffed local childminding networks.

5. Allow access to financial supports and training opportunities for childminders including an expanded Learner Fund to assist childminders to meet training requirements.
6. Provide a supportive, phased transition process, to facilitate the largest possible number of childminders to enter the regulated sector, the sphere of quality assurance, and access to Government subsidies, while recognising the time and supports required for this reform.
7. Support retention and recruitment of childminders.

Development of the Action Plan

The National Action Plan for Childminding sets out a pathway to achieving Government commitments:

- The Programme for Government commits to examine options to accelerate access to subsidies for non-relative childminders.
- *First 5*, the Whole-of-Government Strategy for Babies, Young Children and Families, commits to:
 - Promote and support the registration of paid, non-relative childminders currently eligible to register with Tusla.
 - Extend regulation to all other paid, non-relative childminders on a phased basis over the lifetime of the Strategy, building on the 2018 Working Group report. This will make National Childcare Scheme subsidies available to more parents who use childminding services.
 - All regulated childminders by 2028 to hold a minimum qualification.
 - Undertake research on the early learning and care (and school-age childcare) needs of parents who work atypical hours or live in rural communities and develop recommendations for future action.
- Publication of a National Action Plan for Childminding is also a commitment in *Future Jobs Ireland*.

This Action Plan draws heavily on the report of the Working Group on Reforms and Supports for the Childminding Sector, which was established by the Minister for Children and Youth Affairs in 2016 and which published its recommendations in 2018 (called the 'Working Group report' here).¹ The Group's work is gratefully acknowledged.

¹ Working Group on Reforms and Supports for the Childminding Sector (2018) *Pathway to a Quality Support and Assurance System for Childminding: Volume 1*.

In scope, the Action Plan mainly addresses self-employed childminders who work in their own homes. The Action Plan is not primarily concerned with childminders or nannies who work in the child's home, and who are employees of the child's parents, nor is the Action Plan primarily concerned with au pairs. The Action Plan does, however, include an action to develop information and training resources in relation to the use of nannies and au pairs.

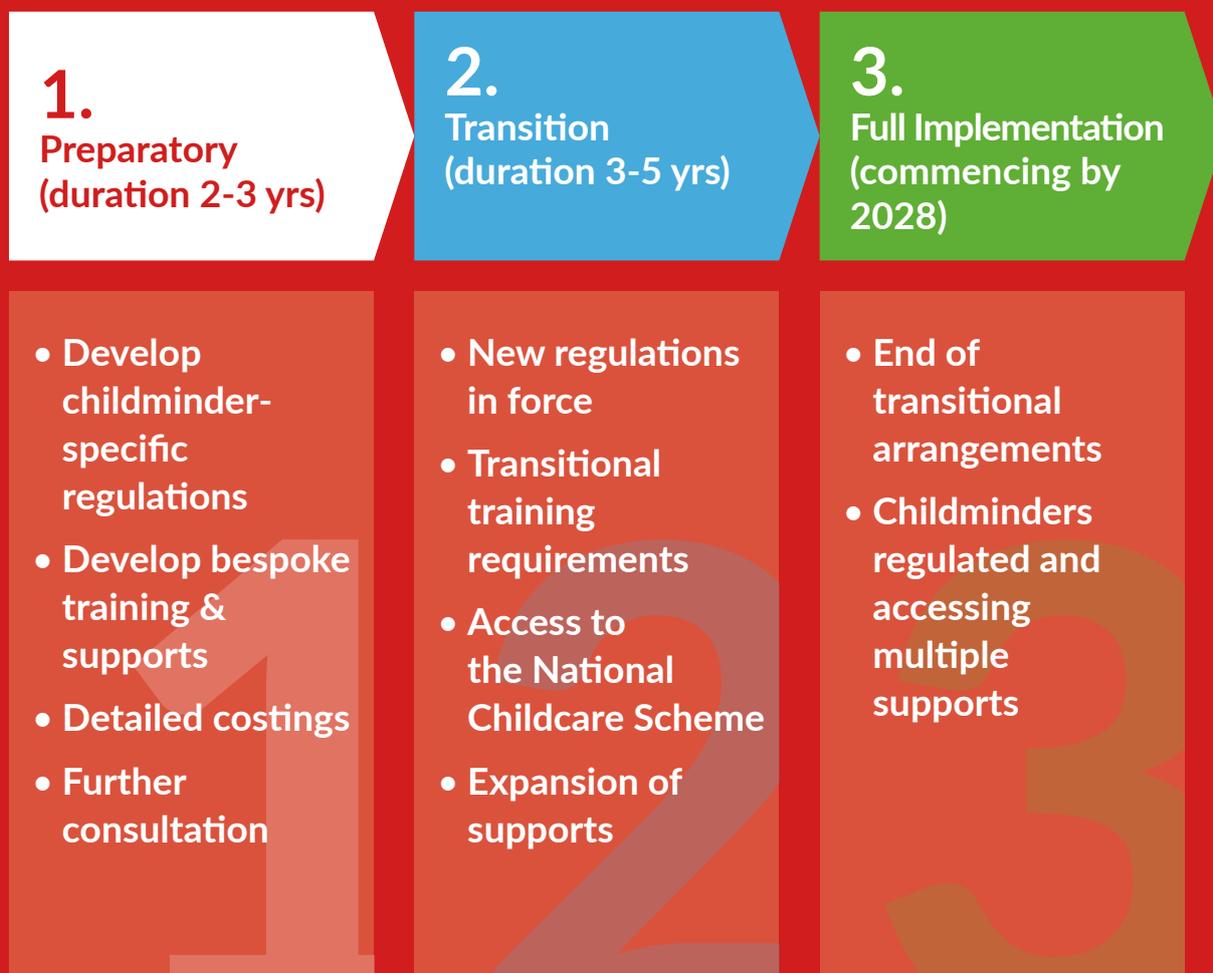
A phased transition

While there has long been a need for an Action Plan for childminding, the introduction of the National Childcare Scheme has created both an opportunity and an urgency to act now. The National Childcare Scheme provides Government subsidies towards the cost of Tusla-registered early learning and care and school-age childcare for families on low incomes and to those with net incomes up to a maximum family threshold of €60,000, as well as a universal subsidy for those with children under 3 years old.

The prospect of being able to take part in the National Childcare Scheme creates a positive incentive for childminders to register with Tusla, giving them – and the parents who choose to use them – an opportunity that has not previously existed to access subsidies. Furthermore, if action is not taken now to extend the possibility of registration to childminders then some families who will be eligible for significant subsidies under the National Childcare Scheme (up to €225 per week per child) may switch to centre-based childcare, creating a risk to childminders' viability. This could significantly reduce parental choice and limit access to affordable options.

However, there is also a need for caution. The Action Plan involves significant change for childminders. It is critical that as many childminders as possible are supported to make the transition and to access subsidies for families using their services. Given the scale of reforms involved, with thousands of childminders expected to move into the scope of regulation and support, and the need to build the infrastructure to support the reforms, the Action Plan necessarily involves a phased approach over the lifetime of *First 5* (to 2028), described below and summarised in the figure.

Phases in the Action Plan



Phase 1: Preparatory – Consultation, research and development (Duration 2-3 years)

Phase 1 will involve detailed planning and putting in place the building blocks for the transition. This will include consultation and further research on many aspects of the plan, as well as development of the infrastructure required. In particular, Phase 1 will involve developing regulations specific and appropriate to childminders, which will come into effect in Phase 2. As the new regulations will not yet be in effect, the current regulations – and legal exemptions from regulation of most childminders – will remain in place during Phase 1.

Phase 1 may take up to 2-3 years, but significant efforts will be made to complete it within 2 years. The duration will also depend on more detailed costing and budget availability. Phase 1 will include:

- Research into the number of childminders expected to be legally required to register with Tusla in Phase 2 and who will remain in the sector. Research into the cost for childminders to deliver their services. Cost estimates of Phase 2 reforms.
- Consultation on new regulations and inspection processes to ensure that regulations are proportionate and appropriate to the home and family setting.
- Amendment of the Child Care Act 1991 (with the amendment to come into force at the beginning of Phase 2) to remove legal exemptions.
- Development and roll-out of a bespoke Foundation Training Programme for childminders, and development of a Quality Development Programme.
- Identification and costing of reforms to quality and financial supports for childminders, including research into staffed local childminding networks.
- Development of a consultation and communication strategy, to ensure childminders and parents are aware of the benefits of the reforms and the changes involved.
- Actions by regional Childminding Development Officers, City / County Childcare Committees and Voluntary Childcare Organisations to support childminders who can already register with Tusla to do so and to access National Childcare Scheme subsidies.

Phase 2: Transition phase (Duration 3-5 years)

Phase 2 will be a transition phase in which childminders will be able to register with Tusla and take part in funding schemes, while benefiting from training and supports to progressively meet regulatory requirements and strengthen quality assurance. Childminders will be able to register with Tusla following completion of a Foundation Training Programme, and will be supported to complete a Quality Development Programme over a period of years.

Phase 2, which is expected to last between 3 and 5 years, will begin when current legal exemptions from regulation (limiting registration only to childminders who care for a minimum number of children) are ended and childminder-specific regulations come into force. The timing of this change will be budget-dependent and subject to agreement with the Department of Public Expenditure and Reform, given the likely increase in the cost of the National Childcare Scheme due to a significant number of additional families benefiting. Phase 2 will include:

- Ending of the legal exclusion from regulation for childminders, and the coming into force of childminder-specific regulations.
- Eligibility to take part in the National Childcare Scheme, for any childminder who meets the registration requirements, including the Foundation Training Programme.
- Roll-out of a Quality Development Programme for childminders, for completion over a period of years in order for a childminder to remain registered with Tusla.
- Expansion of inspection services, with an appropriate inspection model bespoke to childminders.
- Development of quality supports and training for childminders, including piloting and introduction of staffed local childminding networks led by trained network leaders.
- Reform of financial supports for childminders.
- Communications actions to inform childminders and parents about new regulations and available supports.

Phase 3: Full implementation phase (commencing by 2028)

In Phase 3, childminders will have full access to quality and funding infrastructure, and childminders currently working in the sector will have completed the Quality Development Programme. Phase 3 will begin by 2028 at latest, with the timing to be considered in Phase 1 during development of the Quality Development Programme. Phase 3 will include:

- Completion of all regulatory requirements for the initial cohort of childminders, with completion of the Quality Development Programme.
- Full implementation phase in which childminders are included across the full range of quality and funding supports, with completion of infrastructure reforms.
- Progressive roll-out of staffed local childminding networks.
- New entrants to a career as a childminder may continue to have access to phased training requirements, with post-2028 timelines for completion of the Quality Development Programme to be determined by 2028.

Costs

Costing this Action Plan is challenging given considerable uncertainty about the number of childminders working in the country, and even less certainty about the number of childminders who would choose to work in the sector following the introduction of regulations. This uncertainty impacts on estimates of the number of additional children and families who will be able to access National Childcare Scheme subsidies. The cost estimates presented here are therefore purely indicative and will be refined during Phase 1.

Based on available data and comparison with numbers of registered childminders in other jurisdictions that have already regulated childminders, a lower cost scenario is based on an assumption that 5,000 childminders would register with Tusla and become eligible for participation in the National Childcare Scheme in Phase 2. A higher cost scenario is presented in which it is assumed that the number of regulated childminders would rise to 10,000.

It is estimated that Phase 1 costs, including the roll out of Foundation Training Programme, could be in the region of €1.8m per annum in the lower scenario, or €2.8m per annum in the higher scenario. It is estimated that the additional cost in Phase 3 would be €23m per annum in the lower cost scenario, which would represent a 4% increase in annual public spending on early learning and care and school-age childcare. In the higher cost scenario, the net cost would be €51m per annum. *First 5* commits to at least doubling investment in Early Learning and Care and School Age Childcare by 2028, and it is envisaged that the cost of the Action Plan would be met from this increase.

Implementation

A Steering Group will oversee implementation of the Action Plan. The Steering Group will be chaired by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) and will include representation of childminders, parents and other key stakeholders.

During Phase 1, four Advisory Groups (membership of which will also include representation of childminders) will support the Steering Group in relation to:

- A. *Regulation and Inspection* – content of childminder specific regulations, including implications of the home environment.
- B. *Training and Support* – development of a Foundation Training Programme, a Quality Development Programme, and the design of staffed local childminding networks.
- C. *Funding and Financial Supports* – including review of the Learner Fund and the Childminding Development Grant.
- D. *Consultation and Communications* – to develop a consultation and communications strategy for the Action Plan, including communication of reform measures.

DCEDIY appointed a National Childminding Coordinator in 2019, who will support implementation during Phase 1 of the Action Plan. Implementation structures in Phases 2 and 3 will depend on the outcome of the Review of Systems and Structures pertaining to the Operating Model for ELC and SAC, which is scheduled to report by the end of 2021.

Before 2028, a review will be carried out of the initial implementation of the childminder-specific regulations. The review will include consideration of the future timeline within which registered childminders will be required to complete the Quality Development Programme during full implementation (Phase 3), following ending of the transition period.

Communications and consultation

Extensive consultation has already informed development of this Action Plan, including consultations that underpinned the 2018 Working Group report, and a public consultation in 2019 on the Draft Childminding Action Plan. The scale of reform involved in this Action Plan will require further consultation, especially during Phase 1 when developing regulations specific to childminders.

Positive engagement with childminders at local level will be critical to success. A significant communications effort will be required to ensure that childminders and parents are well informed about the changes being made and the benefits that will accrue.

An Advisory Group on Consultation and Communications will be formed in Phase 1 to support the Steering Group in the development and implementation of a consultation and communications strategy.

Summary of actions

	Phase 1 Preparatory Duration 2-3 years	Phase 2 Transition Duration 3-5 years	Phase 3 Full implementation commencing by 2028
Cost analysis	<ul style="list-style-type: none"> • Further research and analyse numbers of childminders likely to come within the scope of regulation. • Analyse likely increase in National Childcare Scheme costs due to higher number of children and families benefiting. • Further cost estimates on Phase 2 and 3 actions. • Regulatory Impact Analysis. 		
Legislation and regulations	<ul style="list-style-type: none"> • Establish Advisory Group on Regulation and Inspection. • Draft childminder-specific regulations, with consultation. • Develop a proportionate and appropriate inspection system. • Amend the Child Care Act 1991. • CMDOs, CCCs and NVCOs will support childminders already eligible to register with Tusla. 	<ul style="list-style-type: none"> • End current legal exclusion from regulation of non-relative childminders. • Childminder-specific regulations come into force. • Communication actions to raise awareness of the new regulations. 	<ul style="list-style-type: none"> • Review the childminder-specific regulations following initial implementation.

Summary of actions

	Phase 1 Preparatory Duration 2-3 years	Phase 2 Transition Duration 3-5 years	Phase 3 Full implementation commencing by 2028
Qualification and training requirements	<ul style="list-style-type: none"> Establish Advisory Group on Training and Supports. Develop Foundation Training Programme and Quality Development Programme. Roll out Foundation Training. Roll out child safeguarding and first aid training to childminders. 	<ul style="list-style-type: none"> Roll out Quality Development Programme for childminders who have completed Foundation Training. Continue roll-out of Foundation Training Programme for new childminders. Continue roll-out of child safeguarding and first aid training. 	<ul style="list-style-type: none"> Quality Development Programme complete for current childminders. Review timeline for registered childminders to complete the Quality Development Programme.
Quality supports	<ul style="list-style-type: none"> Examine options for delivery of childminding supports through existing structures and new options, linked to Review of the Operating System. Research options for roll out of staffed local childminding networks. Begin expansion of inspection services bespoke to childminders. 	<ul style="list-style-type: none"> Expand inspection services to accommodate childminders. Extend and reform quality supports for childminders. Pilot and phased introduction of staffed local childminding networks, depending on outcome of Phase 1 research. 	<ul style="list-style-type: none"> Provide quality supports on an equitable footing to childminders and centre-based providers. Roll out staffed local childminding networks.

Summary of actions

	Phase 1 Preparatory Duration 2-3 years	Phase 2 Transition Duration 3-5 years	Phase 3 Full implementation commencing by 2028
Funding and financial supports	<ul style="list-style-type: none"> Establish Advisory Group on Funding and Financial Supports. Support childminders who meet current regulatory requirements to participate in the National Childcare Scheme. Review other financial supports. 	<ul style="list-style-type: none"> Open National Childcare Scheme to all childminders who meet regulatory requirements, including foundation training. Phased reform of other financial supports. 	<ul style="list-style-type: none"> National Childcare Scheme open to all childminders who continue to meet regulatory requirements, including the Quality Development Programme. Complete reform of other financial supports.
Consultation and communications	<ul style="list-style-type: none"> Establish Advisory Group on Consultation and Communications. Consultation and communications strategy. Develop information and training resources on use of nannies and au pairs. 	<ul style="list-style-type: none"> Implement consultation and communications strategy. Roll out information and training resources on use of nannies and au pairs. 	<ul style="list-style-type: none"> Continue implementation of consultation and communications strategy. Disseminate information and training resources on use of nannies and au pairs.



1. Context

Childminders play a central role in provision of both early learning and care and school-age childcare in Ireland. For many children in Ireland, a childminder is their main carer other than their parents, often starting in their early childhood and continuing into their school years. A childminder can be a cherished and constant figure in a child's life – almost a second family.

The research evidence points to positive outcomes for children of quality childminding, which may be linked to consistency of carer and a low child-adult ratio. The evidence on outcomes for children makes a strong case for giving parents choice of provider-type, with flexibility in subsidies available through the National Childcare Scheme, while continuing to raise standards across the board.

Childminders are highly valued by many parents because of the home-from-home setting, their strong and lasting relationships, and the flexibility they can offer, including catering for both pre-school and school-age children, including siblings. Many families prefer to use childminders, while for some families, in areas where centre-based care is either not available or its opening hours do not match the family's childcare needs, childminding is the only option.

Extending regulation enables childminders to have greater access to Government supports – for example, subsidies that can reduce parents' fees and supports to assist childminders to offer on-going quality care to children. Increasing the options for parents in terms of accessible, affordable and high quality early learning and care and school-age childcare can support increased labour market participation. In particular, childminders may offer greater flexibility and responsiveness for parents, fitting around parents' working hours. As childminding has a significant role in the provision of childcare throughout the country, it may be an effective means of helping to address issues of supply and access.

In spite of its many benefits, however, childminding in Ireland is almost entirely unregulated and in some ways invisible. The number of childminders is unknown and can only be estimated. Few are registered with Tusla, the Child and Family Agency – most are exempt, preventing them from registering as the current regulations allow only those minding seven or more children (or four or more pre-school children) in the childminder's home to register with Tusla. It is assumed that some childminders work in the informal economy. The lack of regulation means a lack of quality assurance for children or parents and potential risk, without a requirement for Garda vetting checks. It means that parents who want to use a childminder have no access to public subsidy, and may find it difficult to locate a local childminder. The lack of regulation also limits childminders' opportunities to train, preventing their access to funded training and supports for quality.

1.1 Definition of childminding

Childminding is defined in this Action Plan to mean paid, non-relative care of children aged from birth to 14 (including both early learning and care and school-age childcare) in which children are cared for singlehandedly within the childminder's family setting.

Childminding is also described as '**home-based**' care, as distinguished from 'centre-based' care. Centre-based care – especially sessional care such as the ECCE programme – sometimes takes place within a service provider's home, for example in a purpose-built extension to the home. Such provision, however, differs from childminding both in scale (the number of children), the degree of integration within the childminder's family life, and the likelihood of a mix of age groups:

- **Scale** – Childminders generally work on their own, though they may receive the support of family members. However, many providers of sessional centre-based care in Ireland also operate their service single-handed.² The scale of childminding is typically smaller, though, and is constrained by both planning rules and insurance. The Planning and Development Regulations 2001, S.I.600, provide an exemption from planning permission for 'the activity of minding no more than 6 children, including the children, if any, of the person minding, in the house of that person for profit or gain'.
- **Family life** – Childminders typically integrate the care of children into their own family life, and may give children the opportunity to experience daily activities that they would experience in their own family home. Internationally, the term 'family day-care' is often used to describe childminding.
- **A mix of age-groups** – Childminders typically accommodate a mix of age groups,³ including both pre-school and school-age children, and may care for siblings of different ages at the same time.

Childminders are distinguished from relative carers through their care of **non-relatives** and through being **paid**. However, childminders may care for family members (both their own children and the children of relatives) in addition to non-family members (as is also the case for centre-based provision), and some relative carers may receive compensation for their caring from a child's parents. Nevertheless, a defining feature of childminding is that it is a business and not exclusively a family arrangement, and for this reason it may appropriately be subject to regulation. (It should be noted that the concept of 'pay' here is understood broadly and is not limited to cash payments.)

For regulatory purposes, childminding is typically limited to more than a minimal **number of hours per day** or per week, and is thereby distinguished from 'babysitting'. In Northern Ireland, for example, registration as a childminder is required where the care of a child is for more than two hours per day.

² The Early Years Regulations 2016 require both (regulated) childminders and single-handed operators of sessional pre-school services to have a second person who is familiar with the operation of the service to be at all times within close distance and available to attend in the event of an emergency.

³ Some centre-based providers also operate mixed age groups.

Childminding, which involves care in the childminder's home, is also to be distinguished from care that takes place in the child's home, which may be carried out by a nanny, an au pair or a 'babysitter'. Care in a child's own home may also be by someone called a 'childminder' in common usage. However, the employment relationship and the legal and regulatory context are different. Whereas a childminder working from the childminder's own home is typically self-employed and offers a service that may be accessed on a public basis, someone caring for a child in the child's own home is regarded as an employee of the child's parents.⁴ In addition, the employment of someone in the child's home may involve a combination of caring with other roles, e.g. cleaning or other domestic duties. Furthermore, because they work in the parents'/child's home rather than their own home, au pairs and nannies cannot be held responsible for the safety or suitability of that home for the purpose of early learning or childcare.

For the purpose of clarity, this Action Plan defines 'childminder' as someone who cares for children in the childminder's home, and uses the term 'nanny' or 'au pair' for someone who cares for children in the child's home.

1.2 Benefits of childminding

Childminding, as defined in 1.1, offers a wide range of benefits for children and families. The benefits of childminding, which include continuity of care and a low adult/child ratio, are sufficiently large that there is a strong case for giving parents choice of setting-type through placing childminding on an equitable footing to centre-based in terms of the regulatory framework and availability of subsidies, supports and information.

Evidence on outcomes for children

Despite growing interest at a policy level, it is recognised that the contribution to outcomes made by childminding is an under-developed area of research.⁵ Existing research points to a range of potential benefits of childminding, though objective data does not provide clear evidence for either childminding or centre-based provision achieving better outcomes, particularly in a context in which childminders are regulated and receive training and quality supports.

Differences in children's outcomes may reflect the differences between setting-types in adult-child interactions as well as in the level of support available to practitioners. For example, interactions between childminders and children may benefit from greater consistency and continuity of care, lower adult-child ratios and an on-going partnership with parents, whereas practitioners in centre-based care may be more likely to benefit from supervision and team-work. Childminding by definition involves continuity of care, whereas this is not always a feature of centre-based care, and

4 In the case of au pairs, the Irish Workplace Commission has ruled that au pairs are domestic employees with an entitlement to the minimum wage.

5 Ang, L., Brooker, E., & Stephen, C. (2017). A Review of the Research on Childminding: Understanding Children's Experiences in Home-Based Childcare Settings. *Early Childhood Education Journal*, 45(2), 261-270.

typically involves a low ratio of staff to children, which is recognised as an important element of structural quality,⁶ with evidence that lower ratios can be predictive of positive caregiving and children's early socio-emotional development^{7,8}, with a stronger effect for younger children.⁹

The Growing up in Ireland (GUI) study has found positive effects of childminding¹⁰ on children's vocabulary,¹¹ In the UK Study of Early Education and Development (SEED) higher verbal ability has also been associated with the use of both formal and informal individual¹² early learning and care.¹³

There is also evidence of a positive impact of childminding on emotional outcomes for children.¹⁴ Children who are cared for by a childminder are found to be less likely to experience internalising behaviour problems and may be more socially competent.¹⁵ Childminders have been associated with fewer emotional symptoms and more behavioural self-regulation.¹⁶ It has also been found that home-based environments may reduce anxiety in early childhood.¹⁷ In general, babies and toddlers in non-parental early learning and care settings are more likely to avoid anxiety and stress if they develop a lasting secondary attachment bond with one caregiver who is consistently available to them, one which is more likely when care is provided by an individual carer such as a childminder.¹⁸

There is some evidence that childminding may play a supportive role in children's transitions and connections from home to school environments.¹⁹ It has also been found that childminding can provide a form of family support,²⁰ especially for vulnerable families.

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- 6 European Commission Working Group. (2014). *Proposal for Key Principles of a Quality Framework for Early Childhood Education and Care*. Report of the Working Group on Early Childhood Education and Care under the Auspices of the European Commission. Brussels: European Commission.
- 7 Leach, P., Barnes, J., Malmberg, L.-E., Sylva, K., & Stein, A. (2008). The Quality of Different Types of Child Care at 10 and 18 months: A Comparison Between Types and Factors Related to Quality. *Early Child Development and Care*, 178, 177-209.
- 8 Dalli, C., White, E. J., Rockel, J., Duhn, I., Buchanan, E., Davidson, S., Ganly, S., Kus, L. & Wang, B. (2011). *Quality Early Childhood Education for Under-Two-Year-Olds: What Should It Look Like? A Literature Review*. Report to the Ministry of Education. New Zealand: Ministry of Education.
- 9 Melhuish, E. (2016). *Discussion Paper: Provision of Quality Early Childcare Services*. Prepared for the Peer Review in Social Protection and Social Inclusion Programme. Brussels: European Commission.
- 10 The GUI study distinguishes between 'relative care' (usually by a grandparent), 'non-relative care' (typically a childminder) and 'centre-based care' (e.g. crèche) as the main types of non-parental care.
- 11 McGinnity, F., Russell, H., & Murray, A. (2015). *Non-Parental Childcare and Child Cognitive Outcomes at Age 5*. Dublin: The Economic and Social Research Institute (ESRI).
- 12 In the Study of Early Education and Development (SEED), settings are divided into formal group (e.g. nurseries), formal individual (e.g. childminders), and informal individual (e.g. friends and relatives).
- 13 Morris, S. P., Melhuish, E., & Gardiner, J. (2017). *Study of Early Education and Development (SEED): Impact Study on Early Education Use and Child Outcomes up to Age Three*. London: Department for Education.
- 14 French G. (2007). *Children's Early Learning and Development: A Research Paper*. Dublin: National Council for Curriculum and Assessment (NCCA).
- 15 Russell, H., Kenny, O. & McGinnity, F. (2016). *Childcare, Early Education and Socio-Emotional Outcomes at Age 5: Evidence from the Growing Up in Ireland (GUI) Study*. Dublin: The Economic and Social Research Institute.
- 16 Morris, S. P., Melhuish, E., & Gardiner, J. (2017). *Study of Early Education and Development (SEED): Impact Study on Early Education Use and Child Outcomes up to Age Three*. London: Department for Education.
- 17 Coplan, R., Findlay, L. C., & Schneider, B. H. (2010). Where do Anxious Children 'Fit' Best? Childcare and the Emergence of Anxiety in Early Childhood. *Canadian Journal of Behavioural Science*, 42(3), 185.
- 18 Bowlby, R. (2007). Babies and Toddlers in Non-Parental Daycare can Avoid Stress and Anxiety if They Develop a Lasting Secondary Attachment Bond with One Carer Who is Consistently Accessible to Them. *Attachment & Human Development*, 9(4), 307-319.
- 19 Ang, L., Brooker, E., & Stephen, C. (2017) A Review of the Research on Childminding: Understanding Children's Experiences in Home-Based Childcare Settings. *Early Childhood Education Journal*, 45(2), 261-270.
- 20 Garrity, S., & McGrath, B. (2011). 'It's Not Like a Job Now; It's Part of Me': Exploring African Women's Experiences in the Irish Childcare Sector. *Child Care in Practice*, 17(1), 69-86.

Children's preferences

There is limited evidence on children's preferences for childminding as opposed to centre-based care. However, the evidence available indicates that the home environment and 'family' setting of childminding may appeal to many children of both pre-school and school age.

The *First 5* report on the national consultation with young children aged 3-5 (including both pre-school and school-age children)²¹ found that home and family were very important to young children, though some young children also spoke favourably about centre-based services. Young children enjoyed 'the experience of being at home', and disliked being away from family. Similarly, a Start Strong consultation with young children found the importance to children of having their families around them.²² While childminding does not involve care by a child's own family, it offers a family setting, a 'home-from-home' environment, and siblings often together.

A survey of school-age children undertaken for the Action Plan on School Age Childcare found that 'a home-like environment was preferred'.²³ In the survey, children described positive relationships with childminders and the opportunity to play and socialise with friends. Children mentioned food cooked in the home as a favourable feature of after-school settings. Older children also acknowledged the trust placed in childminders by their parents.

Parental preferences

Many parents prefer to use childminders, liking its integration in family life and 'home-from-home' environment.²⁴ However, while continued extensive use of childminders by parents is an indication that many parents prefer childminding to centre-based care, all parental decisions relating to choice of childcare reflect a range of factors, including availability, cost, location, flexibility, and perceptions of quality.

Surveys of parents may provide clearer evidence of preferences. A survey of parents undertaken by the Working Group on Reforms and Supports for the Childminding Sector, to which more than 3,600 parents responded, indicated a high level of parental satisfaction with childminders (with 72% of respondents stating they were 'very satisfied' with their childminder). However, such a survey cannot indicate what proportion of parents (whether currently using centre-based care, a childminder, or another form of care) would choose a childminder if all forms of provision were equally accessible.²⁵ A CSO survey in 2016 asked parents what *alternative* childcare arrangement they would like to use that they do not currently use, and the category

21 Coyne, I., Mallon, D., & Chubb, E. (2018). *First 5: A National Consultation with Young Children on A Whole-of-Government Strategy for Babies, Young Children and their Families*. Dublin: Government of Ireland.

22 Start Strong (2011). *If I Had a Magic Wand: Young Children's Visions and Ideas for Early Care and Education Services*. Dublin: Start Strong.

23 Department of Children and Youth Affairs (2017) *Action Plan on School Age Childcare*. Dublin: Government Publications, p.62.

24 Fauth, R., Owen, S., & Jelacic, H. (2012). *The Next Best Thing to Being at Home: Parents' View of Quality in Home-Based Childcare Settings*. Research Summary. London: NCB Research Centre.

25 Working Group on Reforms and Supports for the Childminding Sector (2018) *Pathway to a Quality Support and Assurance System for Childminding: Volume 2*.

of 'paid childminder / au pair / nanny' was selected by 18% of parents of pre-school children and 14% of parents of school-age children.²⁶

The survey of parents carried out by the Working Group also provides insight into the factors considered important by parents in choosing childminding services over centre-based care. Factors considered important also included flexible hours, support with drop-offs and pick-ups, and proximity to the family home. There is also evidence that some parents perceive childminding as supporting a return to work. Other research has similarly pointed to a range of factors taken into account by parents who choose to use a childminder; parents may see the quality of service provided by childminders as higher, with lower ratios and greater potential for personalised care and understanding of children's individual needs.²⁷ Parents may also perceive the home-based environment as preferable.²⁸ In addition, the mix of activities and outings offered by childminders has been identified by some parents as a reason for selecting a childminder over centre-based care.²⁹

Related evidence suggests that parents may desire a sense of 'getting on' with childminders, working in partnership, and perceiving childminding as an extension of their own parenting.³⁰ Trustworthiness has also been identified as an important consideration in choosing a childminder.³¹

The figure overleaf shows the characteristics of a childminder seen as important by parents in a survey carried out by the Working Group, with more 1,300 parents responding to this question. The characteristics most frequently seen as 'very important' were the personal qualities of the childminder, the physical environment, personal references, the home-from setting, flexible hours, and continuity of care.

26 CSO (2017) QNHS Module on Childcare, 2016.

27 Fauth, R., Owen, S., & Jelcic, H. (2012). *The Next Best Thing to Being at Home: Parents' View of Quality in Home-Based Childcare Settings: Research Summary*. London: NCB Research Centre.

28 Shannon, R., Geraghty, T., & Molyneaux, F. (2014). *Childminding in Northern Ireland: An Exploration of Practice, Quality and the Impact of Vertical Placements on Children*. London: National Children's Bureau

29 Fauth, R., Jelcic, H., Lea, J., Willnott, N. & Owen, S. (2011). *Childminding Practice in England: Final Report*. London: National Children's Bureau.

30 Fauth, R., Owen, S., & Jelcic, H. (2012). *The Next Best Thing to Being at Home: Parents' View of Quality in Home-Based Childcare Settings: Research Summary*. London: NCB Research Centre.

31 Huskindon, T., Pye, J., Medien, K., Dobie, S., Ferguson, C., Gardner, C., Gilby, N., Littlewood, M. & D'Souza, J. (2013). *Childcare and Early Years Survey of Parents 2011*. London: Department for Education.

% respondents awarding “Very important” ranking to statements (n=1308, *n=1428)

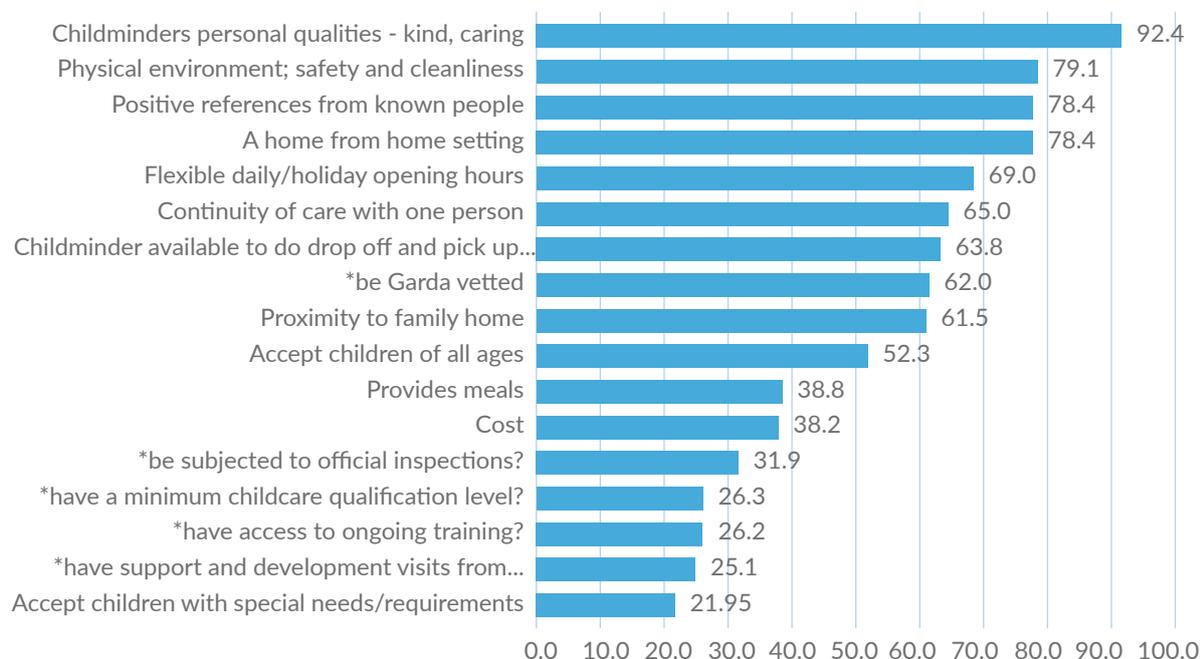


Figure: Relative importance of childminder’s personal and professional attributes

Access and economic benefits

While the lack of regulation of childminding means there is little concrete evidence on the geographic location or operating hours provided by childminders, childminders may be likely to deliver a larger share of services in rural and remote settings,³² and may be more likely to offer flexible hours of attendance, of particular benefit to parents engaged in shift work or working irregular hours.

Childminders can deliver services without incurring significant capital costs or additional overheads,³³ through caring for children within their existing homes. As a result, childminders can operate on a smaller scale, and are more likely to be able to maintain viable businesses in areas with low demand.

Childminders operating out of their homes may also be conveniently located for families, closer to parents’ homes. This is acknowledged as positive by many parents, with childminders sometimes perceived as part of the community.³⁴

32 *ibid*

33 Department for Education (2018) *Survey of Childcare and Early Years Providers: Main Summary*. London: Department for Education.

34 Fauth, R., Owen, S., & Jelacic, H. (2012). The next best thing to being at home: Parents’ view of quality in home-based childcare settings. *Research summary*. London: NCB Research Centre.

For all these reasons, widespread access to regulated childminding can facilitate parents' labour market participation, particularly female labour market participation, and can increase supply of childcare places. Increased supply of places may not only improve access, but also increase pressure for quality provision and reduce the risk of excessive fee increases across both home-based and centre-based provision.

Wider economic benefits also arise from the raising of quality standards in early learning and care, given the impact of high-quality provision on child development and learning outcomes. Where childminders who previously operated in the informal economy are incentivised to enter the formal economy, there may also be an increase in tax revenues.

1.3 The childminding sector in Ireland

Legal status

Many childminders are exempt from regulation currently as a result of exemptions set out in Section 58L of the Child Care Act 1991. Prior to February 2019, only childminders who cared for more than three pre-school children of different families³⁵ were subject to regulation and therefore required to register with Tusla (or, prior to the establishment of Tusla, notify the HSE).

As from February 2019, when Section 22 of the Childcare Support Act 2018 came into force, the scope of regulation has been broadened also to include a service that involves the care of more than six children of any age at one time, in addition to those who care for more than three pre-school children. However, as noted in section 1.1 above, childminding is generally understood to imply the care of six or fewer children.

As of September 2020, the number of childminders registered with Tusla was 77, all registered in relation to their care of pre-school children. While efforts are under way to encourage and support more childminders to register with Tusla, no major change in numbers registered is expected in the absence of regulatory reform, including the introduction of childminder-specific regulations and the removal of legal exemptions.

While it is assumed that a large number of childminders are exempt from regulation, it is also assumed that there are some childminders who fall within the scope of the current regulations but have not registered with Tusla even though they are legally required to do so.

³⁵ Where the children cared for by a childminder are all from one family (other than the childminder's own family), the childminder is exempt from regulation,

For childminders who are exempt from regulation, a 'voluntary notification' process was introduced in 2006 under the National Childcare Strategy 2006 - 2010, which involved childminders choosing to notify City and County Childcare Committees. However, voluntary notification is not a legal status, and the numbers involved have fallen in recent years as the level of support available for the process has reduced. As of September 2020, there were 308 childminders who were voluntarily notified to their local City / County Childcare Committee.

A further 750 childminders are currently engaging with the City/County Childcare Committees for support and information who are neither registered nor voluntary notified. DCEDIY also provides annual funding to Childminding Ireland, which has approximately 700 members, who benefit from supports provided by Childminding Ireland and are required to be Garda vetted. An additional 1,300 childminders are currently engaging with Childminding Ireland for support and information.

Estimates of numbers

There is considerable uncertainty about the number of children cared for by childminders, and the total number of childminders working in Ireland today. This uncertainty reflects both the lack of administrative data on childminders not registered with Tusla, and the fact that the term 'childminder' in surveys may be used either of someone working in the childminder's home or of someone working in the child's home (i.e. a nanny or au pair).

A variety of data sources indicate that whereas a much larger proportion of 3-5 year olds attend centre-based providers than attend childminders (most clearly in the ECCE pre-school programme), the proportion of under-3s and school-age children using childminders is broadly similar to the proportion using centre-based care:

The Growing Up in Ireland study indicated that 12% of both 9 month olds and 3 year olds were cared for by a childminder, with three-quarters of these (9% of the total) cared for in the childminder's home at 9 months, and two-thirds (8% of the total) at 3 years.³⁶ In comparison, 11% of 9 month olds and 27% of 3 year olds were in centre-based care.

- A CSO survey of parents in 2016 indicated that 13% of pre-school children and 8% of primary school children in Ireland are cared for by a childminder, an au pair or a nanny.³⁷ In comparison, 19% of pre-school children and 8% of primary school children were reported to be in centre-based care.
- A DCEDIY-commissioned IPSOS-MRBI survey of parents in May 2020 (on their childcare use pre-March 2020) indicated that 15% of children (aged 0-14) were cared for by a childminder in the childminder's home, and 6% an au pair or nanny in the child's home. In comparison, 27% were in centre-based care.

³⁶ ESRI (2018) *Maternal Employment and the Cost of Childcare in Ireland*, p.30.

³⁷ Central Statistics Office (2016) Quarterly National Household Survey Childcare Quarter 1, 2016.

Given current population estimates, the CSO data indicates that approximately 82,000 children are cared for by a childminder, nanny or au pair. The various data sources suggest 70-75% of these children are cared for in the childminder's home. Surveys of Childminding Ireland members indicate that on average childminders care for 4 children, when both pre-school and school-age children are counted. On this basis, it is estimated that there are approximately 15,000 childminders caring for children in the childminder's home.³⁸

History of supports

Access to the main State funding schemes for early learning and care has been limited to service providers who are regulated. In practice this has meant that very few childminders have taken part in these schemes. For example, 47 childminders currently deliver the ECCE programme.

As most childminders have fallen outside the scope of regulation, a number of initiatives and schemes have aimed to provide supports to unregulated childminders, to raise quality standards and incentivise childminders to move out of the informal economy.

The National Childminding Initiative, which began in 2002, contained a number of strands:

- Publication of National Guidelines for Childminders.
- The voluntary notification system, through which childminders who were not required to notify the HSE (or, more recently, register with Tusla) could voluntarily notify their local City / County Childcare Committee and thereby benefit from a range of supports.
- An introductory training course – the Quality Awareness Programme (QAP).
- The Childminding Development Grant, which was established in 2004 and is designed to help childminders with the cost of safety items, equipment, play resources or minor household adaptations. Childminders are able to access up to €1,000 in funding to cover 90% of the costs.
- Childcare Services Tax Relief, through which childminders may avail of an exemption from tax on up to €15,000 of income earned from childminding. (This tax relief is only available to childminders who are not eligible to register with Tusla currently, e.g. those minding three or fewer pre-school children)
- The appointment of Childminding Advisory Officers, some employed by the HSE

³⁸ On the basis of the CSO survey data, and an assumption that childminders on average mind 2.5 pre-school children (which drew on a 2009 survey of Childminding Ireland members), in 2011 Goodbody's Economic Consultants estimated there were approx. 19,000 childminders caring for pre-school children. (Goodbody Economic Consultants (2011) Children 2020: Cost-Benefit Analysis.) The Goodbody's report did not look at school-age children. Subsequent estimates applied the 2.5 figure to the total number of children cared for by childminders (est. more than 80,000) the Working Group estimated that there could be 35,000 childminders in working in Ireland. However, this estimate does not take into account the fact that many childminders care for both pre-school and school-age children, with a more recent (2012) survey of Childminding Ireland members indicates that on average childminders may care for approx. 4 children, when both pre-school and school-age children are counted. Childminding Ireland (2013) *Report on Survey of Registered Members in 2012*.

and some by City and County Childcare Committees, to offer information, support and training to childminders, to maintain the voluntary notification system and administer the other supports aimed at childminders.

The Childminding Advisory Officer posts were largely discontinued in 2012-2013 as a result of budget cuts, and there has since then been a gradual decline in the take-up of other supports. For example, the table below shows the gradual decline between 2014 and 2019 in the number of childminders applying for and receiving the Childminding Development Grant (CMDG), dropping from 298 to 143. The number of recipients rose in 2020 for the first time since 2014, to 204.

	CMDG applications received	CMDG applications approved
2012	383	273
2013	295	280
2014	314	298
2015	224	215
2016	247	237
2017	201	189
2018	189	173
2019	162	143
2020	208	204

State-funded supports to childminders have been delivered through Childminding Ireland (funded as one of the National Voluntary Childcare Organisations) and the City / County Childcare Committees (CCCs). In 2019, a National Childminding Coordinator and a team of six regional Childminding Development Officers within the CCCs were appointed. These additional supports are intended to supplement the supports for childminders already provided by Childminding Ireland and the CCCs.

1.4 Childminding in other jurisdictions

While the legal status and usage of childminding varies considerably, there are many jurisdictions in which childminding is fully regulated, and several in which it forms a significant part of 'formal' provision. Where it is regulated, there is also significant variation in the minimum requirements, which range from safety and health checks to staff and curriculum standards and pedagogical supervision by an accredited body. According to a 2017 OECD review of provision for pre-school children across OECD countries, 'family day care... is most prevalent for children under the age of 3'.³⁹

39 OECD (2017) Starting Strong 2017: Key Indicators on Early Childhood Education and Care. Paris: OECD, p.60.

A 2019 EU (Eurydice) report on provision across Europe finds that:

- ‘Three quarters of European education systems provide for regulated home-based ECEC [early childhood education and care] services, which must follow certain pre-defined rules and quality standards. In 12 education systems, childminders offering this type of provision are required to undergo specific training. The duration of this type of training ranges from less than 50 hours in some German *Länder*, Latvia and some Swiss Cantons to 1,053 hours in the French Community of Belgium. It most often lies between 100 and 300 hours.... In one third of the education systems where regulated home-based provision exists, the top-level authority requires no minimum qualifications and no specific training to become a childminder.’⁴⁰

In comparison, in Ireland the current qualification requirement for Tusla registration is a major award in Early Childhood Care and Education at Level 5 on the National Framework of Qualifications.

The table below indicate the range of requirements on childminders in a number of jurisdictions. As indicated, there are now many jurisdictions – including England, Scotland, Wales and Northern Ireland – in which all childminders are required to register with a regulatory body, and are subject to a range of requirements in relation to police vetting, inspection, and training. While qualification requirements for childminders are limited to introductory training courses, it should be noted that in many such jurisdictions (unlike in Ireland) there is also no requirement on all staff in centre-based settings to have a relevant qualification.

Requirements for childminders in selected jurisdictions

England	Requirements
Registration	Must register with Ofsted or a Childminding Agency if looking after children under the age of 8.
Vetting	Disclosure and Barring Service checks for childminder and all residing adults over the age of 16 in the home.
Inspection	Yes, from one or both of the agencies that the childminder is registered with.
Qualification	Required to attend a Local Authority approved course e.g. an Introduction to Childminding course.
Additional Training	Paediatric First Aid Certificate.

40 European Commission, EACEA, Eurydice (2019) *Key Data on Early Childhood Education and Care in Europe, 2019 Edition*. Luxembourg: P.79.

N. Ireland	Requirements
Registration	Must register with the Health & Social Care Trust.
Vetting	The police check everyone aged over 10 living in the childminder's home.
Inspection	Yes, by the Health and Social Care Trust.
Qualification	Pre-Registration Training.
Additional Training	Minimum Standards for Childminding and Day Care require a childminder to attend relevant training in order to gain knowledge and information about Health & Safety, Safeguarding Children and an Introduction to Paediatric First Aid.

Wales	Requirements
Registration	Must register with the Care and Social Services Inspectorate Wales .
Vetting	Disclosure and Barring Service checks for childminder and all residing adults over the age of 16 in the home.
Inspection	Yes, by the Care and Social Services Inspectorate Wales .
Qualification	Pre-Registration Training.
Additional Training	Minimum Standards for Childminding and Day Care require a childminder to attend relevant training in order to gain knowledge and information about Health & Safety, Safeguarding Children and an Introduction to Paediatric First Aid.

Scotland	Requirements
Registration	Must register with the Care Inspectorate and all the adults living or working at the home where childminder is based must also register.
Vetting	The Care Inspectorate will carry out Protection of Vulnerable Groups Scheme checks and Disclosure Scotland criminal records checks on the childminder and also check anyone else who is living or working at the home over 16 years old.
Inspection	Inspected by the Care Inspectorate.
Qualification	The Care Inspectorate recommend the childminder to complete a Childminding Induction Learning Course.

France	Requirements
Registration	Registration is linked to specific approval from La Protection Maternelle et Infantile (PMI) and local authorities, which recognise their professional status and fix the number and the ages of the children they can look after.
Vetting	No vetting requirement.
Inspection	Inspected by the PMI Inspectors.
Qualification	The childminder must complete 60 hours of training before taking on the first child, and a further 60 hours over the following two years. (Those already holding certain childcare qualifications may be exempt.)

Denmark	Requirements
Registration	Must be approved and registered by the municipality, and childminders are employed by the local authority.
Vetting	The childminder requires a child certificate, which includes information on convictions and violation of the Penal Code's rules on sexual offences in relation to minors or to child pornography.
Inspection	Inspected by municipality Inspectors.
Qualification	No training requirement.

Netherlands	Requirements
Registration	Childminders must be registered with a childminding agency that is registered in the Dutch National Childcare and Playgroup Register (<i>Landelijk Register Kinderopvang en Peuterspeelzalen, LRKP</i>).
Vetting	Childminders must have a certificate of good conduct. All adults over 18 and all individuals present in the home over the age of 12 when children are present also require vetting.
Inspection	Annual inspection of the Childminding Agencies and random inspection of the childminders.
Qualification	Childminders must have relevant qualification at least at ISCED level 3 (equivalent to Level 4/5 on Ireland's NFQ).
Additional Training	Childminders must have a registered and valid first aid certificate that focuses on children.

1.5 Development of the Action Plan

A number of reports in recent years have called for development of a national plan or strategy to widen the scope of regulation to childminding:

- In 2013, the Expert Advisory Group on the National Early Years Strategy recommended ‘the regulation and support of all paid, non-relative childminders’, with amendment of the Child Care Act 1991, a transition phase prior to regulatory change, and the development of regulations that are proportionate and appropriate to childminders’ home environment.⁴¹
- In 2015, the Inter-Departmental Working Group on Future Investment in Childcare recommended ‘a stepped programme of reforms [for childminders] migrating from voluntary through to mandatory requirements’, which ‘might also include the re-introduction of a childminding advisory service’.⁴²
- In 2017, the Action Plan on School-Age Childcare called for establishment of an expert working group to develop ‘a robust quality assurance system for childminders’.⁴³

Working Group report

Building on these recommendations, in 2016 the then Minister for Children and Youth Affairs established a Working Group on Reforms and Supports for the Childminding Sector to:

- Provide a description of the childminding sector in Ireland, including all the different categories of childminders and, where possible, the estimated number in each category.
- Make recommendations in respect of which categories should be included in plans for reform and support of the sector, and (if necessary) provide a rationale for excluding others.
- In the short term, identify the reforms and supports that are required to have a robust system of quality assurance for childminders.
- Make proposals for, and cost where appropriate, a model of reforms and supports for the childminding sector in the short (1-3 years) term, medium (3-5 years) and long (5-10 years) term.
- Examine the feasibility and implications of the migration from voluntary to mandatory regulation for the childminding sector.

The Working Group’s report was published in March 2018. In line with its terms of reference, the report set out a series of short, medium and longer-term

41 Department of Children and Youth Affairs (2013). *Right from the Start: Report of the Expert Advisory Group on the National Early Years Strategy*. Government Publications.

42 Department of Children and Youth Affairs (2015). *Report of Inter-Departmental Working Group: Future Investment in Childcare in Ireland*. Government Publications.

43 Department of Children and Youth Affairs (2017) *Action Plan on School Age Childcare*. Dublin: Government Publications.

recommendations that aim to move towards the regulation and support of all paid, non-relative childminders over a 5-10 year timeframe. **Annex 1** contains a summary of its proposals. This National Action Plan for Childminding draws heavily on the Working Group's report, and the Working Group's efforts are gratefully acknowledged.

First 5 and National Action Plan for Childminding

The National Action Plan for Childminding also follows through on commitments made in *First 5*, the Whole-of-Government Strategy for Babies, Young Children and Families, which was published in November 2018. *First 5* commits to:

- Promote and support the registration of paid, non-relative childminders currently eligible to register with Tusla in preparation for the introduction of the [National] Childcare Scheme.
- Extend regulation to all other paid, non-relative childminders on a phased basis over the lifetime of the Strategy [2019-2028], building on the 2018 Working Group report. This will make [National Childcare Scheme] subsidies available to more parents who use childminding services.
- All regulated childminders by 2028 to hold a minimum qualification.
- Undertake research on the ELC (and school-age childcare) needs of parents who work atypical hours or live in rural communities and develop recommendations for future action.

A Draft Childminding Action Plan was published in 2019, for the purpose of public consultation.

Findings of public consultation

As part of its work, the **Working Group** carried out a consultation with parents through a parents' survey in May 2017, and consulted childminders through a survey of Childminding Ireland members and a discussion day that allowed more in-depth discussions with 22 childminders from around the country. It also drew on the findings of the consultation with 177 children aged 5-12 that was undertaken in 2016 to inform the Action Plan on School-Age Childcare. The parent's survey had 3,630 responses, and asked questions about use of childminding and attitudes towards childminding. The survey of childminders had 357 responses.

The consultation on the **Draft Childminding Action Plan** took place in the second half of 2019. The consultation process consisted of four strands:

- *Invitation to make written submissions.* This strand of the consultation was open from 29th August to 10th October 2019. 14 submissions were received.
- *Online survey.* An online survey was live from 29th August to 10th October 2019. In total, 467 respondents completed the survey. Respondents represented a range of stakeholders including childminders (57% of respondents), parents (36% of respondents) and others.

- *Focus groups with childminders.* An expression of interest to take part in a focus group on the Draft Childminding Action Plan was issued to childminders through the City and County Childcare Committees. Thirty-two focus groups were held between 21st October and 28th November 2019. A total of 205 childminders took part in the focus groups.
- *Open Policy Debate.* On 16th October 2019, DCEDIY hosted an open policy debate on the Draft Childminding Action Plan to which key stakeholders, including childminders, childcare organisations, and groups representing children, parents and childminders were invited, with 55 participants.

Annex 2 contains the conclusions of the report on the 2019 consultation process on the Draft Childminding Action Plan. The full report is published on the DCEDIY website.⁴⁴ The findings of the consultation process informed the revision of the National Action Plan for Childminding.

While views on some questions were mixed, overall the consultation process indicated support for central aspects of the Draft Plan. In addition to welcoming the proposed move to regulate childminders, respondents supported a phased approach with a preparatory phase followed by an extended transition phase, to allow childminders a lead-in time for any requirements. Other findings of the consultation process included:

Regulatory change. The importance of future regulations being proportionate, appropriate and specific to the home-based setting of childminding emerged as a strong finding of the consultation process. Responses suggest that any new inspection model should also be proportionate, appropriate and specific to the home-based setting. The majority of respondents to the online survey agreed that childminders should be required to register with Tusla and be subject to regulation and inspection.

Retention of current childminders was raised as a concern. Responses suggest that the potential cost and workload that may come with registration and inspection may lead some childminders to leave the sector.

Qualifications and training. Responses to the consultation process demonstrate a lack of consensus in relation to qualification and training requirements for the childminding sector both for a transition phase and at the stage of full implementation of regulations.

Quality supports. The majority of responses to the consultation process agreed with the proposal to open up to childminders the full range of quality supports that are available for early learning and care and school-age childcare services.

The majority of respondents agreed with the proposal to develop local support networks that are led by qualified childminding network leaders. However, the majority of responses suggested that centre-based settings should not play any role in supporting childminders or local childminding networks.

44 Brien, R. (2020) *Draft Childminding Action Plan: Report on the Findings of the Consultation Process*, Department of Children and Youth Affairs.

Funding and financial supports. The majority of respondents agreed with the proposal to open up the National Childcare Scheme to all childminders who meet transitional requirements, as soon as childminder-specific regulations are in place. Responses to the consultation process suggest that respondents agreed with the proposal to review and reform other financial supports for childminders, including the Childminder Learner Fund and the Childminding Development Grant. Responses showed no clear consensus regarding the proposal to develop a range of resources on the use of nannies and au pairs, including information for parents.

Alignment with the Workforce Development Plan

Both the 2018 Working Group report and the Draft Childminding Action Plan left open the question of what the minimum qualification requirement for childminders should be, given lack of agreement across the sector on the issue. The public consultation on the Draft Childminding Action Plan similarly indicated mixed views, with some calling for the same qualification requirement that centre-based practitioners face, while others said there should be no qualification requirement for childminders.

To ensure that any qualification requirement for childminders makes sense in the context of proposals for qualifications and training for centre-based practitioners, the task of developing a recommendation on minimum qualification / training requirements for childminders was given to the Steering Group of the Workforce Development Plan (WDP) for the early learning and care and school-age childcare workforce. Work on the WDP began in 2019 and will be completed in 2021.

The WDP Steering Group examined the issue of training / qualification requirements for childminders on a number of occasions during 2019 and 2020. It considered the views set out in the Working Group report and the Draft Childminding Action Plan as well as the recommendations of the WDP Stakeholder Group and a focus group of childminders specially convened for a meeting of the WDP Steering Group.

The WDP Steering Group recommended a balanced approach, reflecting both the opportunity created by the National Childcare Scheme to incentivise childminders to register with Tusla and the need for a phased, supportive approach that encourages and supports childminders to remain working in the sector. The WDP Steering Group proposed the introduction of a minimum training requirement for childminders to register with Tusla, but proposed that the requirement should be less onerous than the full Level 5 NFQ requirement for centre-based practitioners and should be introduced over time. The WDP Steering Group recommended an initial pre-registration requirement of completing a Foundation Training Programme, with the full training requirement to be met over a period of years following registration.



2. Vision, aims and objectives

Childminding offers many benefits to children and parents but currently receives little formal recognition from the State. Whereas centre-based early learning and care services have evolved rapidly in the last 20 years in policy terms, childminding has remained at the margins of funding, support and regulation, despite its many advantages and its continued popularity among parents. This Action Plan sets out a plan for extending State supports and regulation to childminding on a phased basis by 2028, with accelerated access to subsidies for childminders through the National Childcare Scheme.

The National Action Plan for Childminding follows through on the Programme for Government commitment to examine options to accelerate access to subsidies for non-relative childminders, and the commitment in *First 5* to 'extend regulation to all other paid, non-relative childminders. A National Action Plan for Childminding will set out a plan for moving progressively towards wider regulation and support for childminders over the lifetime of the Strategy [2019-2028] building on the 2018 Working Group report'.⁴⁵

2.1 Vision

The vision statement below, which underpins the whole National Action Plan for Childminding, draws on the views expressed by childminders, parents and other stakeholders during the consultation process:

- *That the children, families and communities of Ireland can experience the benefits of quality childminding in a relationship-based, home-from-home, family life environment.*
- *That the life-learning, continuity of care and flexibility that quality childminding provides is acknowledged, supported by the development of an appropriate quality assurance system that protects and enhances this long-established and respected model of childcare.*

2.2 Aims

The overall objective of this Action Plan is to improve access to high quality and affordable early learning and care and school-age childcare through childminding. To do this, the action plan sets out an incremental and supportive pathway to regulation. This will enable more childminders to access Government subsidies, making their services more affordable to parents. It will also enable them to access a variety of supports to assist them in meeting regulatory and quality requirements.

⁴⁵ Government of Ireland (2018) *First 5: A Whole-of-Government Strategy for Babies, Young Children and their Families 2019-2028*. Government Publications.

In achieving this overall objective, the Action Plan will contribute to the following aims:

- Support parental choice.
- Increase access to affordable early learning and care and school-age childcare.
- Increase the availability of childcare places, for early learning and care and for school-age childcare.
- Offer more flexibility for parents who work irregular hours.
- Support labour market participation for parents, including those who live in areas with low population density.
- Improve the quality of provision of early learning and care and school-age childcare, thus supporting child development and educational outcomes.
- Provide greater recognition for childminders and support childminders in their work.

2.3 Objectives

Within the overall objective of extending State supports and regulation to childminders, the Action Plan has a number of specific objectives:

1. Enable a far greater number of parents who use childminders to benefit from subsidies under the National Childcare Scheme.
2. Support quality assurance of childminders and safeguarding of children through extending the scope of regulation and inspection to all paid, non-relative childminders.
3. Provide greater recognition of childminders and develop appropriate childminder regulations and inspection processes to reflect the home environment in which childminders work.
4. Develop bespoke resources to support the quality of childminding provision, including through the development of staffed local childminding networks.
5. Allow access to financial supports and training opportunities for childminders including an expanded Learner Fund to assist childminders to meet training requirements.
6. Provide a supportive, phased transition process, to facilitate the largest possible number of childminders to enter the regulated sector, the sphere of quality assurance, and access to Government subsidies, while recognising the time and supports required for this reform.
7. Support retention and recruitment of childminders.

2.4 Timing: urgency and caution

This Action Plan is long overdue. Childminders play a central role in the provision of both early learning and care and school-age childcare in Ireland, but they are almost entirely unregulated as most childminders are exempt from registration with Tusla, the Child and Family Agency. Calls for greater recognition and support for childminders have been made for many years, and there is an ongoing need for regulation to protect children and provide quality assurance of childminding provision.

While there has long been a need for an action plan for childminding, the introduction of the National Childcare Scheme has created both an opportunity and an urgency to act now. The National Childcare Scheme makes subsidies available to an increased number of parents using a diverse range of types of provision, as long as the providers are registered with Tusla. The National Childcare Scheme provides Government subsidies towards the cost of Tusla-registered early learning and care and school-age childcare for families on low incomes and to those with net incomes up to a maximum family threshold of €60,000, as well as a universal subsidy for those with children under 3 years old. The new scheme aims to make early learning and care and school-age childcare more affordable and accessible.

The prospect of being able to take part in the National Childcare Scheme creates a positive incentive for childminders to register, giving them – and the parents who choose to use childminders – an opportunity to access subsidies that has not previously existed. Furthermore, if action is not taken now to extend the possibility of registration to childminders then some families who are eligible for significant subsidies under the National Childcare Scheme (up to €225 per week per child) may switch to centre-based childcare, creating a risk to childminders' viability. This could significantly reduce parental choice and limit access to affordable options for early learning and care and school-age childcare.

While the introduction of the National Childcare Scheme has created some urgency, there is also a need for caution. The proposed Action Plan includes significant change for childminders. It is critical that as many childminders as possible are supported to make the transition to the new era of regulation and to be able to access subsidies for families using their services. Given the large scale of reforms involved, with thousands of childminders expected to move into the scope of regulation and supports and the need to build the infrastructure to support the reforms, the Action Plan necessarily involves a phased approach that will extend over the lifetime of *First 5* (through to 2028):

- Phase 1 will allow for consultation, research and development actions, to ensure that the regulations that apply to childminders are appropriate to the home environment, to build the quality support infrastructure required (including expansion of inspectorates and provision of training), and to ensure reforms are based on consultation and research evidence.

- Phase 2 will allow for a supportive transition process in which the National Childcare Scheme is opened to childminders at the earliest possible opportunity, while giving childminders adequate time to meet all regulatory requirements. A transition phase lasting several years is considered reasonable given the scale of change involved, and the fact that practitioners in centre-based services similarly had transition phases during the extension of regulations.⁴⁶
- While the end-point is clear, the Action Plan leaves open the precise timing of movement between Phases 1, 2 and 3. Given the potential cost to the Exchequer of opening the National Childcare Scheme to childminders, the timing of the transition from Phase 1 to 2 will be Budget-dependent and will depend on agreement with the Department for Public Expenditure and Reform.

⁴⁶ The introduction of a minimum qualification requirement for centre-based practitioners was first announced in mid-2013, regulations were signed in mid-2016, and the requirement into force at the beginning of 2017.



3. Areas of action

This chapter presents actions, and the rationale for those actions, within four areas:

1. Regulatory change
2. Training
3. On-going quality supports
4. Funding and financial supports

Within each area, short (Phase 1), medium (Phase 2) and longer-term (Phase 3) actions are identified.

3.1 Regulatory change

Legislation

A core requirement for receiving a State subsidy under the National Childcare Scheme is registration with Tusla. However, at the time of publication just 77 childminders (out of an estimated 15,000) are registered. According to the Working Group report, one of the main reasons that childminders cite for the low number of registered childminders is dissatisfaction with current regulations.

To bring childminders within the scope of registration and therefore subsidisation will require amendment of Section 58L of the Child Care Act 1991 (as amended by the Childcare Support Act 2018), which currently exempts and excludes from regulation three categories of person:

- A.** The care of one or more children undertaken by a relative of the child or children or the spouse of such relative,
- B.** A person taking care of one or more children of the same family and no other such children (other than that person's own such children) in that person's home,
- C.** A person taking care of not more than 6 children, of which not more than 3 are pre-school children, of different families (other than that person's own such children) at the same time in that person's home, except where that person has been continuously registered as an early years service for a period of one year, wishes to remain on the register, and continues to satisfy such conditions as may be prescribed.

In order to bring all paid, non-relative childminders within the scope of regulation, it is proposed to amend the legislation by removing exemptions (b) and (c). It is proposed to retain exemption (a), as it is not intended to regulate the care of relatives (except in cases where a childminder also provides a pre-school or school-age service for non-relative children).

This proposal is in line with the recommendations of the Working Group, which argued that care of children by a relative in the relative's home should continue to be exempt from the definition given that relatives tend to care for children to help family members, providing kinship care rather than operating as a business that may be accessed on a public basis.

While drafting of the legislative amendment will begin early in Phase 1 of the Action Plan, the amendment – subject to agreement by the Oireachtas – will not be commenced until there is full readiness to move to Phase 2 of the Action Plan. As commencement of such an amendment will immediately bring all paid, non-relative childminders within the scope of regulation, the amendment will only be commenced when:

- Childminder-specific regulations have been developed that are proportionate and appropriate to the family and home setting in which childminders work;
- Tusla's Early Years Inspectorate is ready to register and inspect a potentially large number of childminders; and
- The budget is available to allow for the expansion of the National Childcare Scheme as a result of childminders beginning to register with Tusla.

Regulations and inspections

The limited number of childminders who are currently required to register with Tusla's Children's Services Regulation division (those who care for more than six children at any one time or more than three pre-school children) are subject to two sets of Regulations: the Early Years Services Regulations 2016 in relation to pre-school children and the Registration of School-Age Services Regulations 2018 in relation to school-age children. The Regulations set out requirements that a service must meet at the time that it registers and also requirements that it must meet on an on-going basis and which may be subject to inspection by Tusla.

These Regulations are the same for (non-exempt) childminders and for centre-based services. However, in the course of carrying out inspections Tusla interprets the Regulations differently according to the context. This tailored approach to inspections was laid out in Tusla's Quality and Regulatory Framework (QRF) published in 2018, which sets out explicitly the ways in which Tusla interprets the Early Years Services Regulations in practice when carrying out inspections in relation to pre-school children. A separate QRF document was published that is specific to childminders.⁴⁷

⁴⁷ Tusla (2018) *Quality and Regulatory Framework: Childminding*, Dublin: Early Years Inspectorate, Tusla.

While the QRF has been widely welcomed, childminders have argued that the current Regulations and inspection process are not proportionate or appropriate to the childminding context. The Working Group report states (vol.1, p.26) that:

- *'Elements of the regulations – for example those relating to the premises and space, and to changing and sleeping requirements – are not suitable to a home-based environment as they were designed with centre-based childcare services in mind. Childminders consulted by the Working Group cited the inappropriateness of the regulations as a disincentive to register, and expressed a wish for specific childminding standards regulations tailored to the home-based childcare context.'*

To address these concerns, during Phase 1 of the Action Plan separate, childminder specific Regulations will be developed, encompassing both early learning and care and school-age childcare carried out by childminders.

During Phase 1 there will also be a review of registration and inspection processes for childminders, as well as the number of inspectors required to implement a new inspection model that is specific to childminders. To provide a proportionate and appropriate inspection regime for childminders, it is likely that a significant increase in number of registration officers and inspectors will be required.

Regulatory requirements

Pre-requirements for Tusla-registration by childminders will include Garda vetting, insurance, first aid training, and child protection training. Other training requirements are set out in section 3.2 below.

It will be a requirement of registration with Tusla that any childminder is Garda vetted, and that any adult living in the childminder's home is also Garda vetted. During Phase 1 of the Action Plan, legislation and regulations will be reviewed in conjunction with the Department of Justice to ensure that there is an adequate legal basis for all such vetting. Consultation will also take place with the Department of Justice in relation to resourcing of the National Vetting Bureau to accommodate increased applications for vetting from childminders.

Actions (Legislation and regulations)

Phase 1 – Consultation, research and development	<ul style="list-style-type: none"> • Establish Advisory Group on Regulation and Inspection. • Draft childminder-specific regulations, with consultation. • Develop a proportionate and appropriate inspection regime. • Amend the Child Care Act 1991. • CMDOs, CCCs and NVCOs will support childminders who are already eligible to register with Tusla.
Phase 2 – Transition	<ul style="list-style-type: none"> • End current legal exclusion from regulation of childminders minding 6 or fewer children (and fewer than 4 pre-school children). • Childminder-specific regulations come into force. • Communication actions to raise awareness of the new regulations.
Phase 3 – Full implementation	<ul style="list-style-type: none"> • Review the childminder-specific regulations following initial implementation.

3.2 Training

This section first considers the question of training requirements for registered childminders. It then considers the training requirements for the leaders of the staffed local childminding networks discussed in section 3.3 below. The final two sections consider other training requirements, and delivery options for training. To assist childminders to meet training requirements, the Action Plan will involve provision of financial supports through an expanded Learner Fund, discussed in section 3.4.

Training for childminders – a phased approach

The minimum qualification requirements for Tusla-registered childminders under current regulations are identical to those for practitioners in centre-based services:

- For those working with pre-school children: a major award in Early Childhood Care and Education at Level 5 on the National Qualifications Framework or a qualification deemed by the Minister to be equivalent.
- A higher (Level 6) contractual requirement for ‘room leaders’ providing the ECCE programme. In the case of childminders, the room-leader requirement applies to a childminder who wishes to offer the ECCE programme.

- For those working with school-age children, there is currently no qualification requirement (either in centre-based services or for childminders).⁴⁸ As part of the comprehensive regulation of school-age childcare, a qualification requirement in relation to school-age childcare will be introduced by 2028, as part of the Workforce Development Plan.

However, because of the legal exemptions from regulation currently in place, a large proportion of childminders are not subject to these requirements.

Both the 2018 independent Working Group report and the Draft Childminding Action Plan left open the question of what the minimum training requirement for childminders should be, given lack of agreement across the sector on the issue. The public consultation on the Draft Childminding Action Plan similarly indicated mixed views, with some calling for the same qualification requirement that centre-based practitioners face, while others said there should be no qualification requirement for childminders.

The Steering Group of the Workforce Development Plan recommended a balanced approach, reflecting both the opportunity created by the National Childcare Scheme to incentivise childminders to register with Tusla and the need for a phased, supportive approach that encourages and supports childminders to remain working in the sector. The balanced approach recognises that both access to, and quality of, childminding services are in the best interests of children and families. It is important to set requirements that are achievable and that will encourage childminders to join a regulated sector rather than result in childminders leaving the sector or entering the informal economy.

Training requirements for childminders

It is important that an incremental approach is taken to ensure that childminders are supported to engage in quality development and are not driven out of the sector. Such an approach has been adopted in other countries. There are only 12 European countries in which there are training requirements for childminders; in other EU countries either childminding is unregulated or there are no training requirements. In 1/3 of European countries where childminding is regulated, there are no requirements related to training or qualifications. Where there are training requirements for childminders, they are typically at a foundation level.

An initial action in Phase 1 of the Action Plan will be to identify a role profile for a childminder, to form the basis for development of training programmes. This work will be carried out by the Training and Support Advisory Group as an initial step in the development of bespoke training programmes for childminders.

⁴⁸ If a childminder cares for more than six children including both pre-school and school-age children and if four or more are of pre-school age then the Level 5 minimum qualification applies.

On the basis of the role profile, a Foundation Training Programme will be developed. The Foundation Training Programme will be rolled out during Phase 1, with completion of this Foundation Training Programme being a pre-requirement for registration with Tusla. Introducing foundation level training as a condition of registration with Tusla is important for child safeguarding, for a child-centred approach to quality, and to ensure accountability for public funding (e.g. the National Childcare Scheme).

The Foundation Training Programme will be specific to childminders. Other initial training for childminders will be considered during the design phase, including the previous Quality Awareness Programme for childminders, as well as the EU-funded (Erasmus+) project 'Child in Mind' that has developed free online learning resources for childminders.⁴⁹

A Quality Development Programme of training and mentoring that is specific to childminding will also be developed, offering childminders a local, supported pathway to quality development and recognition of their skills and experience. The Quality Development Programme will result in a special purpose award at Level 5 on the NFQ, significantly smaller in scale than a major Level 5 award. Tusla-registered childminders will be required to complete this Quality Development Programme over a period of years. In order to remain registered, a childminder will have to demonstrate progression through the training and mentoring programme. The number of years for completion of the programme will be determined during Phase 1 when the programme is being developed, but completion of the programme for the initial cohort of registered childminders will be by 2028.

Participation in the Quality Development Programme will be supported through the progressive rollout of staffed local childminding networks across the country (see section 3.3), which will provide peer support and will support continuing professional development for childminders.

Before 2028, a review will be carried out of the initial implementation of the childminder-specific regulations. The review will include consideration of the future timeline within which registered childminders will be required to complete the Quality Development Programme during full implementation (Phase 3), following ending of the transition period.

Content, delivery and funding of training for childminders

Training will be delivered in formats that are suited to childminders, e.g. evenings and weekends, remote and face-to-face. Childminders work on their own as sole traders, with little support, no relief staff, and limited opportunity to engage in formal education or in training during the working day. Training and continuing professional development (e.g. local childminder networks) will reflect and value what is distinctive about the service offered by childminders. Both the development and the roll-out of

⁴⁹ www.childinmind-project.eu. Early Childhood Ireland was a partner in this cross-national project, along with partner organisations from Greece, Italy, Spain and Slovakia.

training and continuing professional development will be informed by childminders themselves.

Recognition of prior learning will be built into the assessment of both the Foundation Training Programme and the Quality Development Programmes. Assessment will be competency-based, and will involve a strong emphasis on portfolios.

While training will be developed for the purpose of supporting childminders working in a home environment, it will be modular and structured in such a way as also to facilitate:

- Childminders who have completed part or all of the Quality Development Programme to have their learning recognised if they choose to progress to a full Level 5 award, either as part of their own development as a childminder or in order to move to work in a centre-based service. (A major Level 5 award in early learning and care is required to work with children of pre-school age in centre-based settings. As the Quality Development Programme will not be equivalent to a full Level 5 qualification, further training would be required.)
- Those who have qualifications relevant to centre-based services (e.g. a Level 5 or higher qualification in early learning and care) to register with Tusla as a childminder (provided they meet other regulatory requirements) and have their prior learning recognised and therefore be able to complete the Quality Development Programme in a short period of time.

To facilitate this two-way transferability of training, and to provide recognition to childminders for their skills and experience, the Quality Development Programme will include within it some elements that also form part of the minimum qualification requirement for centre-based practitioners, e.g. a module on child development. The appropriate elements will be specified by the Training and Support Advisory Group.

Participation in the Foundation Training Programme and the Quality Development Programme will be either part or wholly funded by DCEDIY.

Training for local network coordinators

As discussed in section 3.3, over the course of this Action Plan a quality development structure for childminders will be developed, which will include staffed local networks of childminders. While unsupported local networks, e.g. peer support groups, have value in reducing isolation and providing a forum for sharing experiences, networks that are led by trained practitioners are more likely to serve as means of supporting participation in training, reflective practice, self-evaluation and teamwork.

Given their planned roles in supporting training and the understanding of childminding that will be required of them, the leaders of local childminding networks will have a relevant qualification as well as training that is specific to their role. For this purpose, it is proposed that a specific training programme should be developed for Childminding Network Leaders. The design of such a programme could build on the success of the LINC programme for training of Inclusion Coordinators as part of the AIM programme.

The tasks of the Training and Support Advisory Group will therefore also include specifying the components, level and delivery model for a specific training programme for the role of Childminding Network Leader. Consideration will be given as to what supports would be required to enable experienced childminders to become network coordinators.

Other training

Other training will also be made available to childminders, including child protection training and first aid training. The content and the delivery mechanisms will reflect the fact that childminders work singlehandedly in a home setting.

In addition to training that is specific to early learning and care and school-age childcare practitioners, Tusla worked with DCEDIY and the HSE to develop a universal e-learning training programme called 'Introduction to Children First', which is a useful starting point for all those working with children, including childminders. The National Early Years Children First Committee devised and oversees child safeguarding training, which includes childminding-specific scenarios. As the number of registered childminders increases over the course of the Action Plan, the Committee will be asked to develop a plan for the wider delivery of child safeguarding training to childminders.

First aid training for childminders will be extended more widely over the course of the Action Plan. Since 2019 DCEDIY has funded a wide range of service providers, including childminders, to meet the PHECC First Aid Responder (FAR) Education and Training Standard, which is the national standard for occupational first aid in all workplaces and which will be required by the Tusla Early Years Inspectorate from 2021. First aid requirements for childminders will be further considered during development of childminder-specific regulations.

Actions (Training and supports)

Phase 1 – Consultation, research and development	<ul style="list-style-type: none"> • Establish Advisory Group on Training and Supports. • Develop Foundation Training Programme and Quality Development Programme. • Roll out Foundation Training. • Roll out child safeguarding and first aid training to childminders.
Phase 2 – Transition	<ul style="list-style-type: none"> • Roll out Quality Development Programme for childminders who have completed Foundation Training. • Continue roll-out of Foundation Training Programme for new childminders. • Continue roll-out of child safeguarding and first aid training.
Phase 3 – Full implementation	<ul style="list-style-type: none"> • Quality Development Programme complete for current childminders. • Review completed of timeline for registered childminders to complete the Quality Development Programme.

3.3 Quality supports

All children, including those cared for by childminders, should be equally protected and supported. In addition to minimum training requirements for each childminder (considered in section 3.2 above), over the course of the Action Plan a range of quality supports will be extended to childminders, including:

- Information and advice
- Mentoring
- CPD opportunities
- Peer support.

Over the past decade, there has been a significant growth in investment in centre-based services delivering early learning and care and in school-age childcare. This investment has included initiatives to improve quality and ensure children’s safety and welfare through regulation, mentoring, training and wider supports for the quality of provision. In contrast, the quality supports currently available to childminders are limited in scale (see below), and largely consist of support provided by Childminding Ireland (funded as one of the National Voluntary Childcare Organisations) and by the City / County Childcare Committees.

During Phase 1 of the Action Plan, research and costings will be carried out into a range of options for delivery of on-going quality supports for childminders, and piloting will begin in Phase 2. The central aim will be to ensure that childminders are fully integrated into and able to benefit from quality supports. Over the next decade, as part of *First 5*, the supports available to childminders will evolve as the national quality development infrastructure itself evolves.

In addition to possible extension of the current supports for childminders and possible adaptation of the supports provided by the Better Start Quality Development Service, the National Voluntary Childcare Organisations, and the City and County Childcare Committees, consideration will be given to introducing staffed local childminding networks (see below), to reduce the isolation of childminders and help them to benefit from mentoring, training and peer support.

The final decision as to which type of on-going quality support to provide to childminders will depend both on the research and costings in Phase 1 and on the outcome of the Review of Systems and Structures for early learning and care and school-age childcare that commenced in late 2020.

Even in advance of regulatory change, there is an immediate need for information, advice and guidance to be made available to childminders, particularly information about current and changing regulatory requirements and funding opportunities. For this purpose, a National Childminding Coordinator and a team of six Childminding Development Officers were appointed in 2019, to help prepare the childminding sector for the move towards wider regulation and in the immediate term to support childminders who are subject to the current regulations but are not yet registered with Tusla to meet Tusla registration requirements, thus enabling more childminders to take part in the National Childcare Scheme. These additional supports are intended to supplement the supports for childminders already provided by Childminding Ireland and the City / County Childcare Committees, which were significantly reduced in scale following the loss of Childminding Advisory Officer posts in 2012/13.

Childminding Ireland is the national associative body for childminders and is primarily funded by DCEDIY. Childminding Ireland provides information, advice, guidance and training to childminders, both members and non-members. It supports research into childminding, and helps childminders to inform policy development that relates to them. Its work continues to be a significant part of the range of supports available specifically to childminders.

Staffed local networks

Isolation can be a challenge for childminders, who work singlehandedly in their homes. To overcome this isolation, some jurisdictions have introduced a range of mechanisms by which childminders may link into local networks (see box). Such mechanisms may provide not only for peer exchange and an alternative location at which children may play and interact with other children as well as the opportunity to share resources (e.g. toys and equipment), but also for information, mentoring and training supports. It is this concept that is expressed by the term 'staffed local network', which was a recommendation of the Working Group. Research on the impact of such approaches shows significant potential benefits in improving the quality of childminding provision.

In exploring the development of staffed local networks for childminders across the country, it will be important to ensure that the support within these networks is carried out by practitioners who are appropriately trained and supported, with a good understanding of practical aspects of childminding, the ability to offer support in line with evidence-based strategies, and an agreed national approach. (The development of training for the network leader roles is discussed in section 3.2 above.)

Local childminding networks in selected jurisdictions

In England, local authorities run Quality Assurance Schemes, in which childminders who join the scheme benefit from a range of quality supports, including mentoring, training and advice, as well as opportunities for interaction with other childminders. The network coordinators may be based in Children's Centres, which were introduced in the early 2000s, and which deliver a range of services, including parenting support, 'stay and play' sessions for parents and young children, health services, and early learning and care services. Some Centres run childminding networks, or coordinate with other agencies which deliver such networks, in order to provide a more joined-up service for parents.

In France, childminders supply a significant proportion of childcare for under-threes. In an effort to improve the quality of care delivered by childminders, the French government encouraged local authorities to set up *Relais Assistances Maternelles* (RAMs), or childminding support centres. They offer childminders the opportunity to meet other childminders, receive advice and support on child development and practical matters, and take part in joint activities for the children they care for. RAMs also provide advice to parents, e.g. on finding childcare. There are around 500 RAMs in France (roughly one per 130,000 people).

Sources: Wheaton B., Harding C. (2017). International childcare comparisons. London: Coram Family and Childcare Trust; Joy, S., La Valle, I., Smith, T., Sylva, K., Mathers, S., Dearden, L., Goodman, A., Kaplan, G. (2004). Wraparound care: a model of integrated provision, final report for the Department for Education and Skills. U.K.: National Centre for Social Research, University of Oxford, Institute for Fiscal Studies.

Actions (On-going quality supports)

Phase 1 – Preparatory	<ul style="list-style-type: none"> • Examine options for delivery of childminding supports through existing structures and new options, linked to Review of the Systems and Structures for ELC and SAC. • Research options for roll out of staffed local childminding networks. • Begin expansion of inspection services bespoke to childminders.
Phase 2 – Transition	<ul style="list-style-type: none"> • Expand inspection services to accommodate childminders. • Extend and reform quality supports for childminders. • Pilot and phased introduction of staffed local childminding networks, depending on outcome of Phase 1 research.
Phase 3 – Full implementation	<ul style="list-style-type: none"> • Provide quality supports on an equitable footing to childminders and centre-based providers. • Roll out staffed local childminding networks.

3.4 Funding and financial supports

A number of financial supports are already available for childminders, including the Childminder Development Grant, the Childminder Learner Fund Bursary, and the Childcare Services Tax Relief. While the National Childcare Scheme and the ECCE pre-school programme are in principle open to childminders, in practice the very limited number of registered childminders and the scheme rules mean that very few childminders yet take part in the schemes.

The Action Plan will involve opening up funding schemes to childminders, as well as providing dedicated funding to support childminders to meet regulatory requirements.

National Childcare Scheme

The National Childcare Scheme, has replaced all existing targeted subsidy schemes for early learning and care and school-age childcare, as well as the universal subsidy available for children under 3 years old.

The Childcare Support Act 2018, which provides a statutory basis for the National Childcare Scheme, specifies that only Tusla-registered providers are eligible to participate in the Scheme. This requirement is a key impetus lying behind this Action Plan, given the need to extend Tusla-registration to a much wider cohort of childminders if the policy intention of supporting parental choice and allowing a choice

of registered provider is to be achieved. It also creates a unique opportunity, given the financial incentive for childminders of participation in the National Childcare Scheme.

Given the current legal exclusions from registration for many childminders, the number of childminders expected to take part in the National Childcare Scheme during Phase 1 of the Action Plan is low. However, actions will be undertaken in Phase 1 through the regional Childminding Development Officers, the City and County Childcare Committees and the National Voluntary Childcare Organisations to support childminders who can already register with Tusla to do so and to access National Childcare Scheme subsidies.

A larger increase in the number of childminders taking part in the National Childcare Scheme is only likely to take place during Phase 2 of the Action Plan, after the scope of regulation is extended. The consequent increase in the cost of delivering the National Childcare Scheme due to the higher number of children and families benefiting from subsidies (considered further in Section 4 below) will be a significant factor in determining the timing of the start of Phase 2.

Research to be carried out in Phase 1 on the number of childminders likely to remain in the sector will include further research on the cost of delivery of childminding services, to determine whether any adjustment is required to subsidy rates under the National Childcare Scheme in relation to childminders. Preparatory actions in Phase 1 will also include review of the contractual and compliance requirements for participation in the National Childcare Scheme to ensure they are appropriate for the extension of regulation to all paid, non-relative childminders.

ECCE universal pre-school programme

The ECCE universal pre-school programme is in principle already open to childminders. However, programme rules require that:

- A provider must be registered with Tusla.
- A child-minder must have five ECCE-eligible children.
- As a childminder is acting as 'room leader', the childminder must, at a minimum, hold a qualification that meets the ECCE Room Leader requirements, e.g. a relevant qualification at Level 6 on the National Framework of Qualifications.

In practice, very few childminders qualify to offer ECCE. Currently, only 47 childminders are in contract to provide ECCE. It is difficult to determine the numbers of children on the ECCE programme with childminders as in some instances childminders have dual Tusla registration, e.g. operating a centre-based service for a morning session and working as a childminder at other times.

Unlike the National Childcare Scheme, ECCE has an explicit educational objective, which limits the scale and character of services that can provide the programme. This concern has underpinned the limits currently set. However, further research is required to determine whether these limits will remain appropriate in the context of the widening of regulation to more childminders over the course of the Action Plan.

Phase 1 of the Action Plan will therefore include research on what limits should be in place in relation to the participation of childminders within the ECCE programme.

Learner Fund

In 2019, DCEDIY introduced a Learner Fund for childminders who achieve a level 5/6 major award in early childhood care and education recognised on the National Framework of Qualifications and who are registered with Tusla. This measure is intended both to incentivise childminders who already have a Level 5/6 qualification to register with Tusla, and also to incentivise other childminders to complete Level 5/6 training. (Tusla-registered childminders can also avail of the Learner Fund Graduate Bursary for level 7/8/9 major awards in early learning and care.)

The Childminder Learner Fund may continue in its present form during Phase 1 of this Action Plan, as childminders operate within the existing regulatory framework, supplemented by support for the new Foundation Training Programme for childminders. It will then be extended to support childminders to undertake the Quality Development Programme set out in section 3.2.

Childminding Development Grant

The Childminding Development Grant was introduced in 2009 to support childminders through providing small grants for equipment, complementing a significant capital investment going into centre-based services at the time. The scheme, which is administered by City and County Childcare Committees, provides grants to childminders of up to €1,000 per childminder who fully meets the criteria of the scheme. The grant may provide up to 90% of total receipted eligible expenditure.

The Childminding Development Grant is open to Tusla-registered childminders, childminders who have voluntarily notified their City/County Childcare Committee, childminders proposing a new childminding service, and childminders who have completed the childminding Quality Awareness Programme. The childminder or potential childminder must mind at least 3 children on a part-time basis or one child on a full-time basis and one part-time. In order to receive the maximum grant available, a childminder must have appropriate insurance and undertake to stay in operation for two years after the date of the grant. If a childminder only gives a shorter time-commitment, the grant is reduced accordingly.

In Phase 1 of the Action Plan, the Advisory Group on Funding and Financial Supports will review the effectiveness of this grant and recommend adjustments to improve its effectiveness and impact.

Re-opening funding package for childcare services during Covid-19 pandemic

As part of the Re-opening Funding Package for Childcare Services, the Covid-19 Capital Grant and the Re-opening Support Payment were made available to

childminders that were in contract for DCEDIY programmes and closed their childminding business on 25 March 2020 due to the Covid-19 pandemic. 66 childminders received the Covid-19 Capital Grant to the value of €137,000 and 61 Childminders received the Re-opening Support Payment to the value of €157,000. As part of the Funding Package a Childminding Re-opening Grant was also available for childminders who were not in contract for DCEDIY programmes and were ineligible for the Covid-19 Capital Grant or the Re-opening Grant. 308 Childminders received the Childminding Re-opening Grant to the value of €308,000. This funding package facilitated the reopening of childminding services from 29 June onwards, supporting parents to resume work and children to benefit from quality early learning and care and school-age childcare.

Tax relief

While taxation policy is a matter for the Minister for Finance, during Phase 1 of the National Action Plan for Childminding the Advisory Group on Funding and Financial Supports for Childminders will take the tax relief into account when making its recommendations on the reform of the range of financial supports available for childminders.

The Childcare Services Relief, introduced in 2006, was created to incentivise childminders who fall outside the scope of regulation to enter the formal economy. It allows childminders who care for a maximum of three children at any one time (of any age, and excluding the childminder's own children) to receive up to €15,000 in childminding income tax-free, provided the childminder declares this income to Revenue. (The €15,000 limit relates to revenue from childminding, not to profits. If the childminding income exceeds €15,000 in a year, the full amount is taxable, subject to the childminder's tax credits and other allowances.)

The Childcare Services Tax Relief was intended to support childminders who could not register with Tusla (or, previously, notify the HSE) and who might otherwise have had limited incentive to enter the formal economy. The context will change in Phase 2 of the Action Plan when many more childminders will be able to register with Tusla. However, there is no direct financial benefit of registration for childminders as, while Tusla-registration will allow a childminder to participate in the National Childcare Scheme, National Childcare Scheme subsidies must be fully passed on to parents in reduced fees. While the context will change, the tax relief could therefore continue to provide a positive incentive to childminders to enter the formal economy.

The most recent data available from Revenue indicates that 690 exemptions were granted under the Childcare Services Relief in 2018. The cost of the tax relief to the Exchequer in foregone tax revenues was €1.6 million in 2018.

Although the number of childminders benefiting from the tax relief is low in comparison with the total number of childminders thought to be operating, it is an increase on the 230 beneficiaries in 2006 when the tax relief was first introduced.

The total number of tax exemptions provided under the relief since it was introduced is 7,070, at a total cost to the Exchequer of €13.7 million.

Actions (Funding and financial supports)

<p>Phase 1 – Consultation, research & development</p>	<ul style="list-style-type: none"> • Establish Advisory Group on Funding and Financial Supports. • Support childminders who can meet current regulatory requirements to participate in the National Childcare Scheme, including through the Learner Fund. • Review other financial supports.
<p>Phase 2 – Transition</p>	<ul style="list-style-type: none"> • Open National Childcare Scheme to all childminders who meet regulatory requirements, including foundation training. • Phased reform of other financial supports.
<p>Phase 3 – Full implementation</p>	<ul style="list-style-type: none"> • National Childcare Scheme open to all childminders who continue to meet regulatory requirements, including the Quality Development Programme. • Complete reform of other financial supports.



4. Costs

Costs arising from the Action Plan comprise:

- Direct costs (discussed in section 4.1) of measures identified to support childminders to achieve regulatory requirements and to extend quality supports to childminders, including an increase in the size of registration and inspection services, training supports through the Learner Fund, and expansion of the quality support infrastructure.
- Indirect costs (discussed in section 4.2) of opening up funding schemes, in particular the National Childcare Scheme, to a wider cohort of childminders.

While the direct costs are significant, the largest share of costs is indirect, especially associated with more families benefiting from the National Childcare Scheme. While the direct costs will begin to arise during the course of Phase 1, the indirect costs will only arise during the course of Phase 2 as they will only begin after the changes to primary legislation and regulations. For this reason, the timing of the transition to Phase 2 will be budget-dependent and will be agreed with the Minister for Public Expenditure and Reform prior to any decision being made.

Costs arising from the Action Plan will be offset by increased labour market participation resulting from wider access to National Childcare Scheme subsidies, by increased tax revenues resulting from an increase in the number of childminders entering the formal economy and, in the longer term, by improved child outcomes resulting from increases in the quality of provision.

Assumptions and scenarios

All cost estimates in this section are indicative and provisional and will be subject to further examination during Phase 1 of the Action Plan.

As discussed in section 1.3, it is estimated that there are currently 15,000 childminders working in Ireland, though there is considerable uncertainty about the number. It is also not known what proportion of childminders are likely to remain working in the sector in the event of a move to wider regulation. It is possible that a significant proportion of childminders may choose not to take up the opportunities presented through the Action Plan, and would stop working as childminders. The balanced approach adopted for training requirements (see section 3.2) is intended to support childminders to remain working in the sector.

To judge the likely number of regulated childminders, comparison is made here with other jurisdictions that regulate childminders and in which the nature of childcare provision (its extent, the role of the private sector, and the balance between home and centre-based care) is broadly similar to that in Ireland. The table below presents the number of childminders in England, Scotland, Wales and Northern Ireland, the total number of 0-15 year olds in each jurisdiction, and the implied number of 0-15 year olds per registered childminder.

	Number of registered childminders	Population aged 0-15	0-15 year olds per registered childminder
England	39,157	10.048 million	257
Scotland	4,961	864,000	174
Wales	1,890	527,000	279
Northern Ireland	2,720	368,000	135

Sources: The Care Inspectorate Register, Scotland; The Care Inspectorate Register, Wales; Ofsted; Family Support NI; Population Statistics – Office of National Statistics [GB]

Given Ireland's current estimated population of 1.1 million 0-15 year olds,⁵⁰ the experience of these four jurisdictions suggests Ireland might expect to see between 3,608 (i.e. 1 per 279 0-15 year olds) and 7,456 (i.e. 1 per 135) regulated childminders following the move to full regulation, i.e. between 19% and 39% of the number currently working as childminders, au pairs and nannies.

On this basis, the lower scenario adopted in each of the costings below is 5,000 regulated childminders, i.e. approx. 33% of current number of childminders. A higher scenario is also considered in each of the costings below, in which the number of regulated childminders is double the lower scenario, i.e. 10,000 childminders (or approx. 67% of the number currently working as childminders).

4.1 Direct costs

Registration and inspection of childminders

The legal exemptions from regulation will be ended in Phase 2 of the Action Plan and childminder-specific regulations will then come into force. At that point the registration of childminders will begin, and a new, proportionate and appropriate inspection regime for childminders will be introduced.

While an appropriate inspection regime for childminders has not yet been determined and will be considered during Phase 1, for the purpose of an indicative cost estimate

⁵⁰ CSO population estimate for 2018.

it is assumed that an inspection of a childminder would take 0.5 days (compared to the average 1 day per centre-based service) and that the frequency of inspections would be the same as Tusla inspections for centre-based services (i.e. on average each childminder would be inspected once every 3 years). On this basis, in the lower scenario the additional cost of registration and an inspection system for childminders would be €2.5m per annum, while the additional cost in the higher scenario would be €5m per annum.

Learner Fund

The costings below represent a range of estimates of the once-off costs of providing subsidised training to support childminders to meet training requirements pre- and post-registration. This cost would be spread over the period through to 2028, commencing during the course of Phase 1 and continuing through Phase 2.

While the delivery model for the training is yet to be developed, a preliminary cost estimate has been estimated based on existing training programmes. It is indicatively estimated that the cost of the Foundation Training Programme would be €250 per person, and the cost of the Quality Development Programme would be €1,400 per person, with this cost spread initially over 5 years. It is assumed that, in addition to training for current childminders, recruitment of new childminders over time would see an additional 10% training requirement per year. The cost estimate assumes that the 315 childminders known to Childminding Ireland who already have a full Level 5 or Level 6 award in Early Childhood Care and Education would not need any further training.

On the basis of these assumptions, it is estimated that the cost of training would in Phase 1 be €0.6m per annum in the lower cost scenario and €1.3m in the higher cost scenario. The cost of training in Phase 2 would be €1.5m per annum in the lower cost scenario, and €3.1m per annum in the higher cost scenario. In Phase 3, when current childminders have completed the Quality Development Programme and training costs will arise only in relation to new childminders, it is estimated that the costs would fall to €0.3m per annum in the lower cost scenario and €0.5m in the higher cost scenario.

First Aid for Childminders

As with the Learner Fund, the costings below represent once-off costs of providing first aid training to all childminders who fall within the scope of regulation, in order to meet regulatory requirements. As first aid is likely to be a regulatory requirement from the outset, i.e. from the beginning of Phase 2 of the Action Plan, this cost would be spread over a shorter time period of up to 3 years. The €225 subsidy per childminder is the same level of subsidy as is currently being provided for Occupational First Aid training for centre-based practitioners. As a financial commitment has already been made to provide Occupational First Aid training to 250 childminders in 2019-20, this cost is deducted from the total cost. In the lower scenario the cost of first aid training would amount to €1.1m, or €560,000 per annum if spread over 2 years. In the higher cost scenario, the total cost would amount to €2.2m.

Quality supports

As discussed in section 3.3 above, Phase 1 of the Action Plan will involve research, exploration and costings of options in relation to the future delivery of on-going quality supports, including mentoring, advice, pedagogical leadership and peer support. Consideration of the options will take into account the outcome of the forthcoming Review of Systems and Structures.

In advance of this research taking place, it is not possible to provide detailed cost estimates. To provide a broad indication of the order of magnitude of costs, comparison may be made with the cost of on-going quality supports for centre-based services. (While the small size of each childminding service may reduce the support-cost per childminder relative to that per centre-based service, the lack of historic supports for childminders and the need to create new opportunities for peer support and mentoring may increase the support-cost per childminder relative to that per centre-based service.)

Current on-going quality supports for centre-based services include annual funding for Better Start's Quality Development Service and a proportion of public funding provided to the National Voluntary Childcare Organisations and City / County Childcare Committees, which in addition to quality supports carry out administrative, information and advisory functions, including provision of information to parents. Taking into account a proportion of the public funding provided to each of these organisations,⁵¹ a cost per service may be estimated. A preliminary estimate is that the annual additional cost in the lower scenario would – from Phase 2 onwards – be €6.2m per annum in the lower cost scenario, while the annual cost in the higher cost scenario would be €12.4m.

It should be noted that the quality development infrastructure for centre-based services is being incrementally expanded in scale and scope, in order to raise the quality of provision for all children. Further reform and/or expansion of the range of quality supports provided would impact on the cost of fully opening up such quality supports to childminders.

Childminding Development Grant

The Childminding Development Grant is part of the capital budget, and operates within a fixed annual budget, rather than being demand-led. It is currently limited to €250,000 in total per annum, with a cap of €1,000 per childminder, though actual expenditure has been less than this in recent years. Assuming the grant scheme were doubled in capacity to a maximum €500,000, retaining a cap of €1,000 per childminder, thus allowing approx. 500 childminders to benefit each year, the additional cost would be €250,000 per annum.

⁵¹ A preliminary and very approximate estimate of the cost of quality supports is derived by assuming that the cost of supports per childminder would be 1/3 of the cost of supports per centre-based service (recognising the smaller scale but the need for more individualised supports). This figure is applied to the cost of supports provided by the combination of the Better Start Quality Development Service, the National Síolta Aistear Initiative, the National Voluntary Childcare Organisations, and the City/County Childcare Committees.

4.2 Indirect costs

National Childcare Scheme

Estimates of the impact of the opening of regulation – and therefore the National Childcare Scheme – to all paid, non-relative childminders come from two sources:

- The DCDEIY cost model for the National Childcare Scheme, which draws on administrative (Pobal) data on current usage of centre-based services as well as CSO survey data on childcare usage, population by age, and income-levels. The DCDEIY cost model includes an estimate of the ‘dynamic’ effect of the Scheme on parents’ childcare choices.
- The ESRI’s SWITCH model, which allows for ‘static’ cost estimates of the National Childcare Scheme, based on the CSO’s SILC dataset, which includes questions to parents on use of childminders.

Additional costs for the National Childcare Scheme would primarily arise during Phase 2 of the Action Plan, after Tusla-registration has been opened to a wider cohort of childminders.

Taking into account both the DCDEIY and the SWITCH cost models, it is estimated that the additional cost (over and above the estimated annual full-year cost of the National Childcare Scheme of €206m) of widening the scope of regulation to allow childminders to take part in the National Childcare Scheme would be €14m per annum in the lower cost scenario, with the parents of an estimated 8,000 children benefiting from subsidies who would not otherwise benefit.⁵² It is estimated that the additional cost in the higher scenario would be approx. €33m per annum, with the parents of an estimated 16,000 children benefiting from subsidies who would not otherwise benefit.

ECCE

It is assumed that the wider regulation of childminders would not impact on the overall costs of the ECCE programme, as there is nearly full coverage of the ECCE programme and the shortfall in numbers does not appear to reflect lack of involvement of childminders in the programme. It is likely, therefore, that any increase in the number of children taking part in ECCE through a childminder would see an equivalent reduction in the number of children taking part in ECCE in a centre-based service.

⁵² While the lower scenario involves an assumption that one third of current childminders would remain in the sector, it is estimated that approx. 10% of children cared for by childminders would benefit from subsidies under the National Childcare Scheme, given the children’s ages and the income-profile of parents who use childminders.

4.3 Offsetting savings

Increased labour market participation as a result of wider access to the National Childcare Scheme is expected to increase tax returns. In addition, tax returns will also rise with an expected increase in the number of childminders declaring taxable income to Revenue, as it will be a requirement of participation in public funding schemes – including the National Childcare Scheme – that childminders are tax-compliant, and it is assumed that a proportion of childminders are currently in the informal economy and would move into the formal economy.

Given the high level of uncertainty about the potential additional returns to the Exchequer, no estimate of offsetting savings is included in the overall cost estimates for the Action Plan. Further research and analysis during Phase 1 may allow inclusion of offsetting savings during future costings exercises.

4.4 Total net costs

Taking into account the preliminary estimates of direct and indirect costs (sections 4.1 and 4.2), it is estimated the total cost of the proposals set out in this Action Plan would be €23m per annum during Phase 3 in the lower cost scenario, which would represent a 4% increase in annual public spending on early learning and care and school-age childcare. In the higher cost scenario, which assumes double the number of registered childminders, the net cost would be €51m per annum.

First 5 commits to at least doubling investment in Early Learning and Care and School Age Childcare by 2028, from the 2018 baseline of €487m, reflecting the historically low level of investment in the sector by international standards. It is envisaged that the cost of regulating childminders would be met from this increase.

During **Phase 1**, there will be limited preparatory costs. Subject to agreement in the Estimates process, these may include: extension of the Childminder Learner Fund; child safeguarding training; first aid training; expansion of a reformed Childminding Development Grant; costs associated with research and consultation on the adjustment to regulations; and costs of research into new models of quality supports for childminders (including staffed local networks). Assuming costs of research and consultation of approx. €125,000 per annum (to be further refined during initial planning actions), it is estimated that Phase 1 costs could be in the region of €1.6m per annum in the lower scenario, or €2.8m per annum in the higher scenario.

During Phase 2, the transition phase, when costs may be higher than in Phase 3 as a result of additional Learner Fund costs arising from the once-off cost of training the current cohort of unregulated childminders, it is estimated that the net cost of the proposals would be €25m per annum in the lower scenario and €54m in the higher scenario.

Actions (Cost analysis)

Phase 1 - Preparatory

- Further research and analyse numbers of childminders likely to come within the scope of regulation.
- Analyse likely increase in National Childcare Scheme costs due to higher number of children and families benefiting.
- Carry out further cost estimates on Phase 2 and 3 actions (regulation, training, supports).
- Regulatory Impact Analysis.



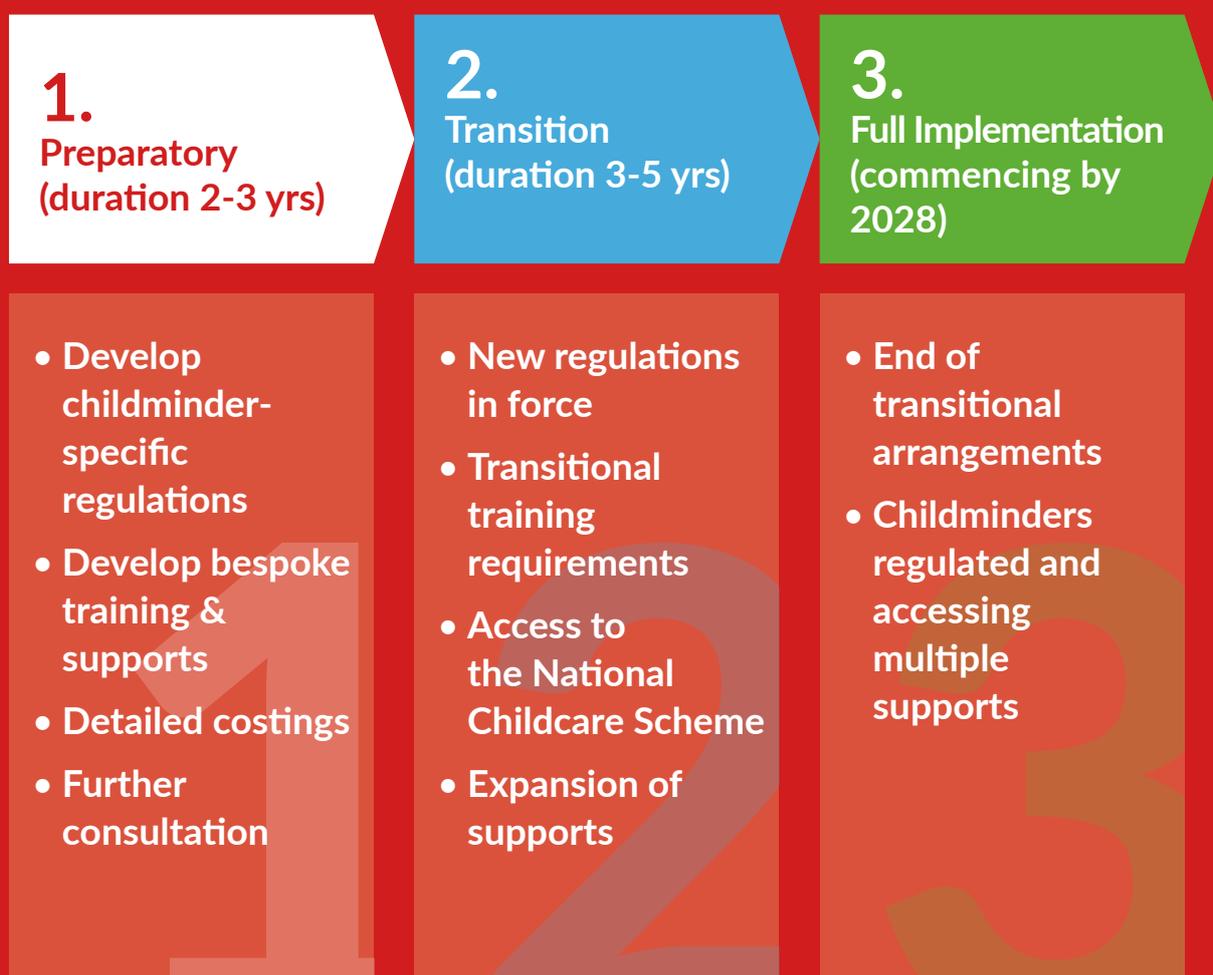
5. Implementation

5.1 Timeline

Given the scale of change involved, and the challenge of transitioning thousands of childminders into a system of support and regulation, with potentially large financial implications for public funding schemes, the Action Plan necessarily involves a phased approach, as described under each of the action areas in section 3.

Given the uncertainty about the number of childminders likely to fall within the scope of regulation and consequent uncertainty about the costs of Phase 2 and Phase 3 measures, the duration of each Phase will only be determined during the course of Phase 1, when initial decisions have been taken on regulatory requirements and when there is greater clarity on costs. In summary:

Phases in the Action Plan



Phase 1: Preparatory – Consultation, research and development

Phase 1 will involve detailed planning and putting in place the building blocks for the transition. This will include consultation and further research on many aspects of the plan, as well as development of the infrastructure required. In particular, Phase 1 will involve developing regulations specific and appropriate to childminders, which will come into effect in Phase 2. As the new regulations will not yet be in effect, the current regulations – and legal exemptions from regulation of most childminders – will remain in place during Phase 1.

Phase 1 may take up to 2-3 years, but significant efforts will be made to complete it within 2 years. The duration will also depend on more detailed costing and budget availability.

Phase 1 will involve research and more detailed planning of actions to commence in Phases 2 and 3 (including, for example, development of childminder specific training and reforms to the quality development infrastructure for childminders), as well as further research and analysis to inform more detailed cost estimates of actions in Phases 2 and 3.

Phase 2: Transition phase

Phase 2 will be a transition phase in which a significantly increased number of childminders will be able to register with Tusla and take part in State funding schemes, while benefiting from training and supports to progressively meet regulatory requirements and strengthen quality assurance. Childminders will be able to register with Tusla following completion of a Foundation Training Programme, and will be supported to complete a Quality Development Programme over a period of years.

Phase 2, which is expected to last between 3 and 5 years, will commence when the current legal exemptions from regulation (limiting registration only to childminders who care for a minimum number of children) are ended and new childminder specific regulations come into force. The timing of this change will be budget dependent and subject to agreement with the Department of Public Expenditure and Reform, given the likely increase in the cost of the National Childcare Scheme due to a significant number of additional families benefiting, and the cost of additional registration / inspection and professional development resources.

Phase 3: Full implementation phase

In Phase 3, childminding will have full access to quality and funding infrastructure for early learning and care and for school-age childcare, and childminders currently working in the sector will have completed the Quality Development Programme. Phase 3 will begin by 2028, with the precise date to be estimated in Phase 1 during development of the Quality Development Programme.

5.2 Consultation and communications

A significant amount of consultation has already been carried out to inform development of this Action Plan, both through the Working Group – which drew on consultations with children, parents and childminders (see section 1.5 above) – and through wider consultation processes that informed overall policy direction towards childminding, e.g. the consultations that underpinned *First 5*, and a public consultation in 2019 on the Draft Childminding Action Plan. However, the scale of reform involved in this Action Plan will require further consultation, especially during Phase 1 when developing regulations specific to childminders.

Positive engagement with childminders at local level will be critical to the success of this Action Plan. A significant communications effort will also be required to ensure that childminders, parents and other relevant stakeholders are well informed about the changes being made and the benefits that will accrue.

An Advisory Group on Consultation and Communications will be formed during Phase 1 to support the Steering Group in the development and implementation of a consultation and communications strategy. This Advisory Group and the strategy will help develop will both support overall communications in relation to the Action Plan, and support other Advisory Groups to ensure that proposals they make (e.g. on regulations and on reform of financial supports) are underpinned by public consultation.

Communication activities will also include the promotion of childminding as a career, to support recruitment of new childminders into the sector, particularly in the context of the increasing support for childminding as a profession during the course of the Action Plan. The promotion of childminding as a career will form part of the wider effort to raise the profile of careers in early learning and care and in school-age childcare, which is a *First 5* commitment and will form part of the Workforce Development Plan.

While nannies and au pairs will not be included within the scope of regulation or of financial supports, the consultation and communications strategy will include development of a range of information and training resources in relation to the use nannies or au pairs. These information supports will address both legal requirements under employment law and advice for parents on what to look for in terms of quality of care and learning experiences that nannies and au pairs may offer.

In this regard, the consultation and communications strategy will contribute to the *First 5* commitment to ‘Develop guidance and information for parents and families on ELC [early learning and care] (and school-age childcare), including information on ELC (and school-age childcare) options and entitlements and guidance on key indicators of high-quality provision’.

5.3 Oversight and delivery

A Steering Group will be appointed to oversee implementation of the Action Plan. The Steering Group will be chaired by DCEDIY, and will include representation of childminders, parents and other key stakeholders within the early learning and care and school-age childcare sectors.

During Phase 1, four Advisory Groups will support the Steering Group in relation to:

- A.** *Regulation and Inspection* – content of childminder specific regulations, including implications of the home environment.
- B.** *Training and Support* – development of Foundation Training Programme, a Quality Development Programme, and the design of staffed local childminding networks.
- C.** *Funding and Financial Supports* – including review of the Learner Fund and the Childminding Development Grant.
- D.** *Consultation and Communications* – to develop a consultation and communications strategy for the Action Plan, including consultation during development of specific actions in Phase 1, communication of reform measures, and information / training resources on the use of nannies and au pairs.

DCEDIY appointed a National Childminding Coordinator in 2019, who will support the implementation during Phase 1 of the Action Plan. The Coordinator will have two main roles: to manage the team of regional Childminding Development Officers within the City/County Childcare Committees (each working with a cluster of CCCs), and to support implementation of Phase 1 of the Action Plan at national level.

Further research and analysis will be carried out during the course of Phase 1 on the number of childminders likely to fall within the scope of regulation and take part in funding schemes from Phase 2 onwards, to inform cost estimates of the transition to Phase 2 and a Regulatory Impact Analysis. As noted in section 5.1, the timing of the move to Phase 2 (marked by the commencement of changes to the Child Care Act 1991 and commencement of new childminder specific regulations) will be dependent on further cost analysis and approval by the Department of Public Expenditure and Reform.

Before 2028, a review will be carried out of the initial implementation of the childminder-specific regulations. The review will include consideration of the future timeline within which registered childminders will be required to complete the Quality Development Programme during full implementation (Phase 3), following ending of the transition period.

Annex 1: Working Group report – Summary of Proposals

Legislation

1. Amend the Child Care Act, 1991, S.58 to allow for the inclusion of the following more comprehensive definition of childminding services in the Early Years regulations (2016). ‘Childminding service’ means a childcare service, which may include an overnight service, offered by a person who single-handedly takes care of children aged from 0-15 years old, which may include the person’s own children, in the person’s home for payment for a total of more than 2 hours per day.
2. Amend the extended definition of early years services in the Child and Family Agency Act 2013, S.92, (which amended the Child Care Act, 1991, part VII) in order to include school aged childcare up to age 15, raising the age limit to align with the upper child age threshold for eligibility for the [National] Childcare Scheme.
3. Start the development of the legislative amendment in year one of the strategy as the legislative process can take some time.
4. Review the various definitions of childminding services and eligibility criteria underpinning national policy and programmes to ensure consistency and their support for national policy goals for children and families.
5. Review how best to support in-home childcare by au pairs and nannies to ensure children’s protection, health and development, and possible parental access to subsidies.

Regulation, Registration and Inspection

6. Develop the required amendments to the 1991 Child Care Act. The Working Group was aware that the DCEDIY is reviewing the Child Care Act 1991 over the next three years with a view to reform. There is a case for amending the Act separately from this review and reform process to support childminders’ migration to become regulated providers of childcare.
7. Establish an expert group on Registration, Regulation and Inspection that would develop minimum regulatory standards for childminding services for children from birth to 15 years. This expert group could start by developing the minimum regulatory standards required for initial registration, covering, but not necessarily limited, to:
 - The suitability of the childminder
 - Up-to-date Certification in First Aid for children
 - Two written references

- Insurance for the childminding service
 - Certification in Always Children First training
 - Certification in at least the QQI level 5 minor award in childminding, or other recognised qualifications for early years on the DCEDIY list
 - Copy of the vetting disclosure received from the National Vetting Bureau of the Garda Síochána in accordance with the National Vetting Bureau Children & Vulnerable Persons Act, 2012.
 - The suitability of other people in the home
 - A copy of the vetting disclosure for all members of the household aged over 18 received from the National Vetting Bureau of the Garda Síochána in accordance with the National Vetting Bureau Children & Vulnerable Persons Act, 2012.
 - The suitability of the home; the childminder should be required to present:
 - Copy of health and safety risk assessment
 - Copy of a Fire Safety Plan
8. Create a Communications Strategy, to communicate the benefits of registration, to childminders and parents.

Quality Standards and Supports

9. Establish an expert group on Quality Standards, Mentoring and Network Development to recommend appropriate quality standards for childminding in line with the Síolta Framework.
10. As part of the national childminding office, create a system of staffed childminding networks, facilitated by childcare professionals with experience in childminding.
11. Once regulatory and quality standards have been agreed, establish an expert group to develop education and professional training for childminders:
- Redevelop the QQI Level 5 minor award in Childminding, alongside basic training in paediatric first aid and Always Children First.
 - Review other QQI Level 5 components with view to including mixed age childcare and business practice for childminders.
 - Consider educational development for childminders in the longer term: continuous professional development, special purpose awards and major awards at different levels.
12. Provide childminders with access to a learner fund or equivalent so they can achieve further childcare qualifications should they wish to.
13. Introduce a Grandfathering Declaration Clause for those close to retirement from childminding.

Funding and Financial Supports

14. Establish a funding and financial support expert group to review the effectiveness and efficiency of the funding and financial supports to childminding services
15. All registered and regulated childminding services should be eligible to apply to deliver the ACS [National Childcare Scheme] and other government funded schemes

Strategy and Implementation

16. Establish a National Childminding Strategy informed by the proposals of this Working Group to coordinate the regulatory and quality support aspects within one coherent framework. The National Childminding Strategy should be included in the National Early Years Strategy
17. Establish the following expert groups to further develop the pathway to quality supports and assurance for childminding:
 - Minimum standards, registration, regulation and inspection
 - Quality standards, mentoring and network development
 - Education and professional development
 - Communication strategy
 - Funding and financial supports
 - Monitoring and review of strategy implementation.
18. Establish an appropriately resourced National Childminding Office to ensure the delivery of the National Childminding Strategy. Suggested functions of the Office would be:
 - Developing, in partnership with the DCEDIY and relevant stakeholders, an implementation plan for the National Childminding Strategy, and annual work plans
 - Managing the regional and local support staffed networks for childminding services
 - Providing strategic operational direction
 - Monitoring and adjusting the implementation of the National Childminding Strategy
 - Implementing a national childminding communications strategy.
19. Commission a specialist to produce a feasibility study on the proposed reforms for a childminding regulatory and support system.
20. Support the development of a model for estimating and planning for the supply and demand of childminding services within the context of the wider ECEC and SAC sectors.

Annex 2: Conclusions of the public consultation on the Draft Childminding Action Plan

The results of the consultation process suggest that the introduction of regulation for the childminding sector is a welcome development. It is clear that the childminding sector is complex and the consultation process demonstrates the importance of a clear communication strategy to support regulatory change. Consultation with childminders, parents and other key stakeholders is an essential element in the development of regulation for the childminding sector.

While some concerns and challenges have been identified for childminders and to a lesser extent, parents, through the consultation process, identification is key to ensure that progress in these areas is supported by providing a phased approach to the regulation of the home based sector.

The main findings of the consultation process are summarised below.

Response to the Draft Childminding Action Plan

While many respondents said they disagreed with the overall approach set out in the Draft Childminding Action Plan, answers to specific questions suggested support for central aspects of the Draft Plan. In addition to welcoming the proposed move to regulate childminders, respondents supported a phased approach with a preparatory phase followed by an extended transition phase, to allow childminders a lead-in time for any requirements.

Regulatory Change

Responses to the consultation process suggest that the proposed introduction of regulation and inspection that are specific to childminders and that are proportionate and appropriate to the home setting is a welcome development for the childminding sector.

The importance of future regulations being proportionate, appropriate and specific to the home based setting of childminding emerged as a strong finding of the consultation process.

Responses suggest that any new inspection model should also be proportionate, appropriate and specific to the home based setting.

The majority of respondents to the online survey agree that childminders should be required to register with Tusla and be subject to regulation and inspection.

Retention of current childminders was raised as a concern by a minority of respondents. Responses suggest that the potential cost and workload that may come with regulation, registration and inspection may lead to some childminders leaving the sector.

Parental views on the introduction of regulation for the childminding sector were mixed, with some parents expressing a view that regulation of the sector is unnecessary.

Qualifications and Training

Responses to the consultation process demonstrate a lack of a clear consensus in relation to qualification and training requirements for the childminding sector during the transition phase and at the stage of full implementation of regulation.

Quality Supports

The majority of responses to the consultation process agree with the proposal to open up to childminders the full range of quality supports that are available for early learning and care and school-age childcare.

A minority of responses suggest that assistance in relation to supporting children with additional needs should be available to childminders and also that the current definition of childminding excludes children with disabilities who are minded in their own homes for practical reasons.

The majority of respondents to the consultation process agree with the proposal in the Draft Childminding Action Plan to develop local networks that are led by qualified childminding network leaders. However, the majority of responses suggest that centre-based settings should not play any role in supporting childminders or local childminding networks.

Funding and Financial Supports

The majority of respondents agree with the proposal to open up the NCS to all childminders who meet transitional requirements, as soon as childminder specific regulations are in place.

Responses to the consultation process suggest that respondents agree with the proposal to review and reform other financial supports for childminders, including the Childminder Learner Fund and the Childminding Development Grant.

Responses suggest that some respondents agree with the proposal to extend the Learner Fund for childminders as set out in the Draft Childminding Action Plan.

Responses demonstrate that there is no clear consensus regarding the proposal to develop a range of resources on the use of nannies and au pairs, including information for parents.





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