



PlayBoard NI Response Draft Draft Executive Early Learning and Childcare Strategy

Introduction

PlayBoard welcomes the publication of the draft Early Learning and Childcare Strategy and recognise it as an important milestone following many years of discussion and sector engagement. The ambition is to create a system that is more affordable, accessible and high-quality for children and families is strongly supported.

PlayBoard has supported and advocated for the School-Age Childcare (SAC) sector for over 30 years and holds a unique position in representing the views and experiences of the sector. Through sustained engagement with providers, key stakeholders and Government officials across Northern Ireland, including the Regional Coordinator for School-Age Childcare role and the provision of Secretariat support to the SAC Forum, PlayBoard has developed extensive insight into the operational, workforce and policy challenges affecting SAC provision. In addition, as the delivery agent for the Bright Start Childcare Grant Scheme, PlayBoard has direct experience of supporting the development and sustainability of SAC services across the region.

Drawing on this long-standing engagement and sector knowledge, PlayBoard has facilitated a series of consultation events across Northern Ireland to gather the views of providers and key stakeholders. This engagement has ensured that the response to the draft Early Learning and Childcare Strategy is informed by frontline experience, sector expertise and the lived realities of those delivering School-Age Childcare services.

Feedback from the SAC sector highlights significant concerns regarding the lack of sectoral visibility within the draft Strategy, leading to a sense of exclusion and concern that the long-term sustainability of SAC provision for children aged 4–11 has not been acknowledged. While the Strategy outlines important reforms for early years provision, there is a strong perception that School-Age Childcare has not been sufficiently integrated within the strategic framework.

This response reflects the views of SAC providers and stakeholders and aims to support the development of a strategy that recognises the full continuum of childcare from early years through to the end of primary school.

General Comments

- Whilst it is helpful that the Strategy has categorised actions by timeline, the 'lack of agreed funding post March 2026' is referenced throughout the Strategy, and we note the ongoing consultation on a multi-year budget. We also note the Education Minister's response to the draft budget, suggesting it would make the Northern Ireland Childcare Subsidy Scheme (NICSS) 'unsustainable'. The draft Strategy outlines that delivering all of the proposed Category 2 actions to March 2030 would cost approximately £500 million. The costs of Category 3 actions are not clear. Given the current financial context, it is not clear how the Strategy will be funded. Nevertheless, it is important to ensure funding and resources are allocated to allow for effective delivery of the Strategy.

Currently, it is unclear to what extent the Strategy as drafted can be delivered, and whether the proposed timeline is likely to be met. The final Strategy should set out further information on costings and how actions will be prioritised, in the context that it is unlikely there will be available funding for all of the proposals. When prioritising actions, Departments should take account of the needs of Department of Finance (2025) Draft Budget 2026-2029/30 | Department of Finance. Department of Education (2025) Written Statement-Response to publication of the Draft Multi-Year Budget for Consultation. particular equality groups, and where there are resources constraints, low and no cost actions should be considered.

- The evidence base and resulting objectives are overwhelmingly centred on the 0–4 age group, resulting in limited visibility of School-Age Childcare and a lack of meaningful support for this provision throughout the Strategy. It appears that thought has not been given to evidencing the need for school-age support. Furthermore, the sector has highlighted that they do not feel children are at the heart of the Strategy.
- Several broader objectives where School-Age Childcare may be included reference "Early Years" and "Early Years and Childcare" interchangeably, at times referring solely to the 0–4 age range and at other points suggesting coverage of children aged 0–11. This inconsistent terminology creates ambiguity and makes it difficult to determine the intended age.

- Where SAC is specifically mentioned it is in relation to unregistered, school-based provision (only two specific mentions of school-age provision 3.1 & 3.2). The sector has raised queries around why Education is being funded through the Early Learning and CHILDCARE Strategy with a budget which has glaring financial constraints.
- Teachers are overwhelmed as it is, they are reporting increased levels of work pressure – this raises concern as to how they can they provide quality SAC provision when they are already struggling.
- The sector reports concerns on the safeguarding of children, particularly when classroom assistants who do not require appropriate CHILDCARE qualifications, experience and appropriate vetting under ‘temporary engagement contracts’ could potentially be looking after 30/40 plus children, relying on educational regulation, not childcare regulation.

Recommendations

- Clarify how the Strategy will be resourced; how actions will be prioritised; and what actions will be taken forward by other Departments, taking account of the needs of equality groups.
- Consider learning and evidence from existing childcare schemes, such as Bright Start and Women’s Centre Childcare Fund. Develop and fund support for children age 4-11.
- Specifically outline age ranges for each objective.
- Terminology needs to be consistent either by use of a glossary of terms or separating Early Years (0-4), School Age (4-11) or all ages (0-11).

Theme 1: Supporting Children in their Early Years

While these ambitions are welcomed, the Strategy places a predominant emphasis on children aged 0–4, with limited reference to children aged 4–11 who have the right to structured childcare, play-based developmental support and inclusive play opportunities. Many SAC providers told us they feel unrecognised within the draft Strategy, undervalued and unsupported.

The evidence base referenced throughout the Strategy is disproportionately centred on early years need, outcomes and the impact of early years focused initiatives. This creates a narrow policy framing that does not adequately reflect the broader childcare landscape or the continuum of need across childhood.

There was confusion around the use of the term “Early Years”, which is used inconsistently throughout the document. Providers told us this makes it difficult to understand whether actions genuinely include school-age children. There is real concern that the draft reinforces a structural divide between early years and school-age provision, despite the clear and growing evidence that children aged 4–11 face equally complex needs as the 0-4 age.

Objective 1.1 - Provide 22.5 hours of pre-school education per week for children in their target pre-school years.

Consideration should be given to the impact on settings with shared registered childcare spaces, i.e. those running pre-school provision in the morning and afterschool in the afternoon, impacting on operational challenges in providing afterschool provision. Furthermore, from sector feedback, trends are emerging that providers are making difficult business decisions to follow higher levels of funding input leading to the closure of afterschool departments in favour of opening pre-school provision in order to maintain viable business models. This has the potential to further limit parental choice of school-age provision.

Objective 1.2 - Expand services for children facing disadvantage

This objective solely focuses on children 0-4 and early years (0-4) initiatives, completely neglecting those of school age. The sector is increasingly reporting the need for support for children with SEN, with private providers reporting that there is no funding available to support them in implementing 1:1 workers nor to effectively resource inclusive environments.

There are increasing reports of newcomer families and children from ethnic minority backgrounds with English as a second language. It is reported in the Northern Ireland Assembly, Research and Information Service, Newcomer Pupils in Northern Ireland, 2022 paper that 5.2% of school age pupils (which mitigates those not in education) are from newcomer families. According to Trussell (2025) approximately 110,000 children are living in poverty, if we look at the NISRA statistics it can be deemed that

approximately 45-50% of children are of school age and therefore there is a stark number of children living in poverty that are being mitigated from this objective, despite a clear need for intervention.

Whilst some key officials have argued that children are getting support from education there is clear evidence on school-based anxiety, school avoidance and school absenteeism. It is these children that are in critical need of play-based regulated childcare provision, yet the draft Strategy omits any reference or support for those children and families under this theme.

The Strategy makes little reference to the substantial evidence gathered during the development of the Bright Start Childcare Grant Scheme, nor does it acknowledge the implementation of the Bright Start programme itself, which was originally introduced in response to clearly identified gaps in provision for school-age children facing disadvantage.

The omission of this policy history and associated data risks overlooking established learning, sector experience and demonstrated need, and ultimately weakens the strategic foundation for supporting School-Age Childcare within a balanced, whole-system approach.

Under this theme, there are critical opportunities that have been missed to utilise the school-age sector to support children of school age, instead opting to fund support on school estates and further expand services for those in their early years. It is integral that there is balance and equity for ALL children.

Objective 1.3 - Extend developmental provision for children aged 2-3 (pre pre school year)

- Not relevant for School-Age Childcare.

Objective 1.4 - Promote high-quality provision across all EL&C providers

Investment in early years without parallel investment in School-Age Childcare creates a cliff edge for working families when children start school.

School-Age Childcare is a key enabler of parental employment, child well-being and community resilience. However, it remains under-recognised and under-resourced within current policy frameworks. Without explicit recognition in the final Strategy, there is a real risk that the needs of school-age children aged 4–11 will continue to be overlooked.

Policy has increased wraparound care in school provision which continues to displace SAC provision and limit parental choice. The SAC Sector's concerns began when the Department issued guidance that schools can operate SAC services outside of the Minimum Standards under certain criteria (Permanent Secretary 2023). More recently the Minister stated, through written correspondence to the School-Age Childcare Forum, that "*The Department aims to support a mixed model of provision to meet the needs of families, recognising the vital role of both registered School-Age Childcare (SAC) providers and school-based services. The forthcoming Early Learning and Childcare (ELC) Strategy will set out a long-term vision that supports quality, accessibility, and sustainability across all forms of provision.*"

Furthermore, the amendment to Tax Free Childcare eligibility was changed in 2025 shortly after the extension of NICSS to families with children of school age with a letter sent to all schools in NI stating that they were now eligible for NICSS alongside information on how to register. We now see school provision being supported through the draft CHILDCARE Strategy. The draft Strategy's only reference to SAC is in two instances and only references this when related to school provision (3.1 & 3.2), during written correspondence [children's order stipulates anyone providing childcare provision is legal bound to register with HSCT.]

Concerns have been highlighted that by implementing and increasing unregulated provision (to a childcare standard) we introduce a less flexible and less fit for purpose model that is variable in both availability and consistency. School-based services do not operate during school holidays, are limited to short after-school periods that do not align with standard working patterns and are subject to being withdrawn at short notice. As provision is determined at individual school level, there is significant regional variation in access and reliability. Schools are already operating within complex constraints relating to funding, workforce capacity and core educational priorities; positioning them as primary childcare providers for school-age children risks placing additional pressure on systems that are not designed or resourced for this purpose. While education and childcare are complementary, they represent distinct policy areas with different objectives and outcomes. School-based provision is not subject to the same regulatory framework as registered SAC, and it is therefore important that policy maintains a clear distinction between educational provision and regulated, quality play-based childcare services.

A play-based school-age childcare model offers a distinct environment that supports autonomy, social development and emotional well-being in ways that differ fundamentally from formal education settings. Positioning extended school provision as a primary solution risks overlooking the importance of diverse environments in supporting holistic development. In practice, children may spend prolonged periods, potentially from early morning until early evening, within the same institutional setting, which raises legitimate concerns regarding balance, well-being and healthy development. Dr Roz Savage MP highlights, "*Children are not wired to sit still for hours a day at age five... The UK remains the only home nation without a statutory expectation that play-based*

learning continues beyond age five.” This perspective underscores growing professional concern that rigid educational structures and outcome-driven regulation can contribute not only to poorer child outcomes but also to wider pressures across the education workforce.

The sector has raised potential safeguarding and quality concerns. Whilst schools are regulated to an educational standard and should be undertaking ETI inspections, it is unclear if wraparound provision is inspected and if so, what standards are being implemented in terms of the childcare function. Furthermore, DE’s recent consultation to strengthen inspection legislation was alarming with the Minister *stating, “The absence of inspection during the past decade, means many schools may not have been identified to receive the support they need to improve. This impacts on all learners but impacts most on those children and young people who are disadvantaged and vulnerable”*. The consultation document states, *“Northern Ireland is the only system within the United Kingdom and Ireland that has been without functioning systems of inspection for almost a decade. We lack even basic data on school and system performance.”*

The current focus of the Strategy is heavily weighted towards early years provision, with limited recognition of the evidence base relating to the needs of older children or the requirements of quality childcare provision. As a result, the play-based experiences and developmental requirements of children aged 4–11 (and up to 14 for those with SEND) are insufficiently reflected. This emphasis has shaped a strategic direction that aligns predominantly with early years initiatives and early intervention, while overlooking the distinct role, challenges and contribution of SAC. A more balanced, whole child approach is required, one that recognises childcare as a continuum and ensures policy, investment and workforce planning meaningfully support provision for school-age children alongside early learning priorities.

Recommendations:

- Expand targeted developmental and inclusion supports to ensure children aged 4–11 within SAC settings is included. For example, having a dedicated pathway funding stream for School-Age Childcare, building and re-designing the Bright Start Childcare Grant Scheme and develop a project dedicated to support families with school-age children from ethnic minority backgrounds and newcomer families.
- Introduce childcare standard regulation within school estates, or require schools to register any provision over 2 hours in duration with HSCT to ensure quality of provision and parity with the registered SAC sector.

Theme 2: Supporting Families with their Children’s Childcare Costs

Objective 2.1 - Make Childcare more Affordable

Initiatives designed to improve affordability are welcomed, however providers report that administrative processes are complex and resource intensive for both providers and families.

From a parental perspective, the coexistence of Tax-Free Childcare (TFC) administered by HMRC, alongside NICSS delivered through the Department of Education, has created a fragmented system that is difficult to navigate. The requirement to engage with separate portals, eligibility processes and administrative bodies introduces complexity and, in some cases, acts as a deterrent to participation. Feedback from the sector indicates that the administrative burden associated with navigating two parallel schemes has led some not engaging with the schemes. This raises a fundamental question for the Strategy: if affordability measures are not accessible or easily understood by those, they are intended to support, can the scheme be considered effective in practice?

In order to reduce childcare costs by half there needs to be the introduction of sectoral regulation. The aim of this is to promote competition, manage monopolies, ensure service quality and address market failures. Currently childcare is provided by a diverse range of legally recognized structures including companies, charities, partnerships, and sole proprietorships. These entities possess their own legal personality, allowing them to enter contracts, own property and set their own fee structures.

With inflation rates and rising fee structures, there are significant concerns regarding whether this objective is genuinely achievable in its current form let alone with objectives to increase the subsidy to 50%. The Department’s decision to extend NICSS into school settings has substantially increased the number and diversity of eligible providers, despite the scheme being designed as a childcare intervention rather than an education-based initiative.

The inclusion of schools as eligible ‘childcare’ providers for NICSS and TFC under the definition of “approved childcare” raises important questions about the distinction between the education system and the childcare sector. While both are essential and valued in their own right, they operate within fundamentally different regulatory, policy and practice frameworks, with differing approaches to safeguarding, workforce requirements and intended outcomes for children. Greater scrutiny is required to fully consider the implications of this policy direction. Registration with HSCTs exists to ensure appropriate standards, oversight and accountability within a childcare context, however implementation of the Minimum Standards carries significant financial implications for registered childcare providers, creating a disparity where schools, operating under a different regulatory framework, can deliver low-cost wraparound provision without equivalent regulatory burden. This risks distorting the market and

creating further sustainability challenges for HSCT registered childcare settings. Extending childcare schemes into settings that are not subject to the same regulatory framework therefore raises significant ethical, financial and practical considerations that must be addressed.

Expanding NICSS into schools raises important questions about policy coherence, regulatory alignment and ethical implementation. Schools are already operating under considerable pressure in relation to staffing, funding and administrative capacity, and early indications of low uptake suggest that many settings may simply not have the infrastructure or resource to implement an additional subsidy scheme effectively.

Lack of recognition of SAC within affordability policies - While schemes designed to reduce childcare costs are welcomed, it is not clear how these will support the sustainability of registered and regulated SAC providers.

Recommendations:

- Simplify administrative processes associated with NICSS for providers.
- Ensure affordability schemes strengthen and support registered SAC provision rather than unintentionally displacing it. Eligibility requirements for NICSS must make it mandatory that providers are registered with HSCT.
- Establish and implement a combined CRM system that will centralize, manage and track all childcare transactions with varying levels of authority, to be accessed by all concerned in the processes and also act as a single source of truth.
- Create a regulatory framework/ body to ensure market integrity by introducing a structured framework of guidelines and oversight mechanisms to manage risk and enforce standards.

Objective 2.2 - Improve the information available on childcare

Generally sectoral feedback agrees with this objective however, it needs to be made clear that SAC is included in the data collection and monitoring element.

The sector felt that that this objective needed to be expanded to include enhanced information for parents on the difference between HSCT registered provision and non-HSCT registered provision, inclusive of information on the critical benefits of play. School-Age Childcare is a key enabler of parental employment, child well-being and community resilience. However, it remains under-recognised and under-resourced within current policy frameworks. Without explicit recognition in the final Strategy, there is

a real risk that the needs of school-age children aged 4–11 will continue to be overlooked. Investment in early years without parallel investment in School-Age Childcare creates a cliff edge for working families when children start school.

Concerns have been highlighted as by implementing and increasing unregulated provision (to a childcare standard) we introduce a less flexible and fit for purpose model that remains variable in both availability and consistency. School-based services do not operate during school holidays, are limited to short after-school periods that do not align with standard working patterns and may be withdrawn at short notice. As provision is determined at individual school level, there is significant regional variation in access and reliability. Schools are already operating within complex constraints relating to funding, workforce capacity and core educational priorities; alongside the requirement to open SEN units and positioning them as primary childcare providers for school-age children risks placing additional pressure on systems that are not designed or resourced for this purpose. While education and childcare are complementary, they represent distinct policy areas with different objectives and outcomes. School-based provision is not subject to the same regulatory framework as registered SAC, and it is therefore important that policy maintains a clear distinction between educational provision and regulated childcare services.

Concerns have been raised regarding the parental support programme for parents with children who have SEN/D (aged 0-4). With 1 in 5 children now having an additional need, school-age children and their families need equitable support.

Recommendations:

- Development and implementation of a campaign raising awareness of HSCT registered services, including raising parental awareness of the benefits of play and play-based provision.
- Extend the parent support for parents with children who have SEN/D programme to be inclusive of school-age children.

Theme 3: Supporting the Early Years Support and Workforce

The sector strongly supports measures designed to improve workforce development, sustainability and professional recognition. Providers have however raised concerns and fears that the measures as outlined may not adequately include the School-Age Childcare workforce.

Workforce delivery must be treated as an immediate and foundational priority, yet the draft Strategy presents vague, non-committal objectives that are contingent on unidentified future funding and largely deferred to the 2030–2036 period. This timeline is fundamentally misaligned with the scale and urgency of the workforce crisis currently facing childcare across Northern Ireland. Without clear, time-bound investment in recruitment, retention, pay and professional pathways and qualifications, there will simply be insufficient provision to deliver any of the wider strategic ambitions.

Objective 3.1 - Build the sustainability capacity of the Early Learning & Childcare sector

Providers reported significant sustainability pressures with several stating that they may not be operational by the time category 3 options are implemented due to:

- Rising operational costs
- Staffing challenges
- Increasing complexity of children’s needs
- Competition from unregulated provision, particularly within schools

The sector overwhelmingly reported sustainability challenges arising from the expansion of unregistered wraparound provision on school estates, resulting in several settings having to close their doors siting unregistered provision on school estates being the main cause. Many providers stated that they simply cannot compete with the significantly lower costs associated with provision that is not required to comply with the Childcare Minimum Standards. Registered SAC settings must absorb substantial regulatory costs, including maintaining prescribed staffing ratios, employing appropriately qualified staff, and meeting rigorous safeguarding and vetting requirements. Staff in registered childcare settings must undergo a comprehensive recruitment process including references, an AccessNI check, a countersigned health declaration, and must hold — or be working towards — recognised childcare qualifications such as Level 2 CCLD or Playwork, with increasing expectations for Level 5 qualifications and relevant experience for senior roles. These requirements carry direct financial implications for providers.

By contrast, unregistered wraparound provision on school estates is not subject to the same regulatory framework. Schools can absorb core operational costs within existing budgets and are not required to meet childcare staffing ratios or employ staff with specific childcare qualifications or experience. Furthermore, under Temporary Engagement Contracts, classroom assistants may commence employment before an AccessNI certificate is issued, significantly reducing the lead-in time for recruitment. Combined with more attractive employment conditions, including shorter working hours and extended school holiday periods, these roles are often more appealing to potential employees than positions within the childcare sector.

This disparity creates an uneven operating environment where registered providers must meet higher regulatory and safeguarding standards while competing against provision that carries fewer compliance costs. Operationally, childcare and education also serve different purposes. School-Age Childcare settings provide a play-based environment where children can unwind, socialise and engage in self-directed play after the structure of the school day. The regulatory framework ensures this environment is safe, appropriately staffed and developmentally focused; however, the additional compliance requirements significantly increase operating costs, further widening the gap between registered childcare services and unregistered school-based provision. Whilst generally the sector agreed that a 'Childcare Business Advisory Service' (CBAS) would be beneficial for supporting sustainability, the lack of details on the service creates uncertainty regarding efficacy of implementation and the sector is calling on the Department to clarify CBAS's structure, mandate and relationship to existing supports. As it stands, the Strategy risks overlooking the expertise that already exist within sector-specific organisations. The Strategy should prioritise partnership with established bodies that understand the operational realities of childcare delivery, rather than utilising generic business interventions that may not address the root causes of workforce instability.

The sector has identified that the following must be taken into consideration to ensure effective support and sustained change:

- Advisers must be experts in childcare, not generic business consultants. They should understand Early Years Regulation (Min. Standards), SEN/inclusion, workforce issues etc. Providers want CBAS advisors who understand the childcare context and ideally should draw from trusted sector bodies (e.g. PlayBoard NI, Childcare Partnerships, youth services or universities with playwork expertise). This will ensure that advice is practical, credible and sectorally relevant.
- The service should cover financial and operational advice (budgeting, bookkeeping, fee-setting, and funding sources) as well as HR, Governance and Strategic planning. With 80% of the childcare sector being private providers (*Review of Childcare Services in Northern Ireland – Executive office*), it is important to note that they would be seeking business support to scale and grow, support in company law and sole trader advice. Providers specifically mentioned help with grant applications,

business plans and strategic plans alongside guidance on inclusion policies (e.g. disability/SEN policy), safeguarding and workforce management. One provider also highlighted the need for financial support to run concurrent with the scheme.

- In addition to business basics, respondents want CBAS to link them to other support outlets. This includes guidance on running programmes for EAL families, behaviour support strategies and expanding activities (sports clubs, field trips, etc.) by identifying available grants or partnership funding. Several noted that older primary pupils often prefer separate spaces (P6–7 separate from P1–2), and CBAS could advise how to plan and fund such changes. Continuity of SEN support was another gap: for example, how to secure 1:1 support for SEN children in SAC, just as in-school support ends.
- Crucially CBAS must be free at the point of use. Settings stressed the service should be offered at no cost to them, since they already operate on tight budgets. It should be widely publicised and easy to access (e.g. via a helpline, online portal or local clinics). Providers also require further information on who will deliver the service highlighting the need to ensure that advisers truly understand childcare. Several said they *"did not want someone from a business background, with no idea what's what"*.
- Advice should be delivered by organisations experienced in the SAC sector. (One group explicitly rejected outsourcing to generic business services like NICVA, which might not grasp the nuances of play-based childcare.) Instead, established children's sector bodies or consortia should run it. Providers also highlighted the need for ongoing monitoring and evaluation of the service, data on outcomes and satisfaction should guide continuous improvement.
- While labelled "business advisory," many providers pointed out that advisory input must be matched by actual financial aid. They reported struggling businesses and reported that some operations are unsustainable without help and financial assistance. They urged that CBAS be linked with concrete funding streams (e.g. start-up grants, inclusion funds, capacity building grants, capital or equipment upgrades) so that the advice can be turned into real change.

By considering these points the Department can ensure the Business Advisory service is not a generic service with limited scope, but a meaningful, tailored resource for the SAC sector. As one provider noted, CBAS must be free and meaningful – giving centres the practical help they urgently need to stay afloat and thrive.

Due to the limited detail currently available on the proposed Strategic Childcare Accessibility Fund, participants indicated that it was difficult to meaningfully assess the potential benefits or impact of the fund for the sector.

However, providers did question why wraparound provision on school estates has been identified as a specific area of focus. There was a strong view that the existing registered School-Age Childcare sector should be better utilised to deliver support, particularly given that this objective is intended to target the most vulnerable children and families.

Several providers further emphasised the importance of drawing on the learning and evidence generated through the implementation of the Bright Start Childcare Grant Scheme, of which the eligibility criteria directly correlate with the outlined key focuses of the fund. Bright Start has supported services and children living in disadvantage across Northern Ireland for more than a decade. They highlighted that this programme offers valuable insight into effective mechanisms for targeting need and strengthening community-based provision.

Recommendations:

- Introduce childcare standard regulation within school estates, or require schools to register any provision over 2 hours in duration with HSCT to ensure quality of provision and parity with the registered SAC sector.
- Partner with organisations experienced in playwork or out-of-school care (e.g. play/ youth work charities, Children's Services agencies) to deliver CBAS. Ensure advisers are versed in Minimum Standards, EAL, inclusion, etc., so advice is sector specific.
- Draw learning from existing business support programmes who allocate mentoring hours and small grants. Exploring existing models (e.g. <https://econx.enterpriseni.com/>) and create a childcare specific version.
- Launch a communications campaign (via PlayBoard, EA, local councils) so all SAC providers know and trust the service.
- Beyond one-off advice, provide tools (template policies, plan outlines), workshops on topics like HR and inclusion, and follow-up coaching. Integrate CBAS with existing schemes (e.g. signpost Early Years SEN/ EAL advisors to SAC providers).
- Connect CBAS to financial supports (micro-grants, capital access, staff bursaries). For example, if a provider's business plan needs investment to be viable, CBAS should guide them to appropriate grants or loans.

- Regularly survey users of CBAS and include sector representatives on oversight committees. Use this data to adapt services (e.g. focus areas, outreach).
- Identify and commission experienced childcare organisations to run CBAS. Clarify the service model (e.g. helpline hours, advisory visits, training modules). Avoid outsourcing to generic business services with no childcare knowledge.
- Transparency and sector and key stakeholder engagement and influence during the development of the Strategy's implementation plan, particularly with regards to the development and implementation of the Childcare Business Advisory Service and the Strategic Childcare Accessibility Fund.

By considering these points the Department can ensure the Business Advisory service is not a generic service with limited scope, but a meaningful, tailored resource for the SAC sector. As one provider noted, costs associated with CBAS must be absorbed through the Strategy to ensure no cost is applied to the provider and support must be meaningful – giving centres the practical help they urgently need to stay afloat and thrive.

Objective 3.2 - Enhance accessible EL&C with SEN

The sector reports a systemic failure to support children with Special Educational Needs and Disabilities (SEN/D) within School-Age Childcare (SAC).

While the draft Strategy acknowledges the importance of inclusion within early learning provision, there is no equivalent operational framework, funding mechanism or workforce support for registered SAC providers, despite increasing numbers of children aged 4–12 presenting with complex needs.

Providers report that children who receive 1:1 support, specialist equipment and structured support during the school day often lose this support when transitioning into afterschool provision. This creates a discontinuity of care and places significant pressure on childcare staff who are expected to meet complex needs without additional staffing ratios, specialist training or financial support.

At the same time, the complexity of need among school-aged children is increasing, including autism, behavioural needs, additional learning needs and social or emotional challenges. Policy changes within special school eligibility criteria are also likely to increase the number of children with SEN placed within mainstream environments, which will inevitably increase demand for inclusive SAC provision.

Despite this, registered SAC settings have limited equivalent SEN funding model, unlike schools and pre-school provision. As a result, providers are often forced to absorb additional costs or limit placements for children who require higher levels of support. This situation represents a structural policy gap where government policy promotes inclusion while failing to resource the settings expected to deliver it.

Without intervention, this gap risks:

- Limiting access to childcare for children with SEN/D
- Increasing pressure on families already facing significant barriers
- Undermining the sustainability of registered SAC provision
- Creating inequality between early years provision and School-Age Childcare

There is also limited integration between childcare providers and health or education services, with no clear pathway for SAC providers to access professional advice, referral mechanisms or coordinated support.

If the Strategy is to deliver genuinely inclusive childcare, school age provision must be explicitly recognised and resourced within the policy framework.

Recommendations:

- Consult with the sector to ensure the effective combination of the Fairplay and Bright Start holiday grant schemes. Expansion of Fair Play and Bright Start Holiday Grant Scheme to ensure all registered SAC providers are able to access the funding they need.
- Expand funding to ensure that private providers are eligible to apply for SEN support including financial support to make reasonable adjustments to create inclusive environments and staff to avail of training.

- Provide further detail and consult with the sector prior to the implementation of the 'Test and Trial school-based childcare/afterschool provision for children in special schools and specialist provision'. Provide clarification on whether the special schools and specialist provision are required to register with HSCT in order to provide after school childcare.

Objective 3.3 - Enhance the EARLY YEARS infrastructure through skilled and valued workforce

SAC providers are reporting a workforce crisis, staff are overworked, underpaid and feel undervalued. The draft Strategy itself promises a *"more sustainable childcare sector with staff valued and rewarded"*, yet on the ground SAC professionals often earn near minimum wage for highly responsible roles. PlayBoard NI's *'State of the Sector'* research confirms *"workforce shortages are limiting provider capacity"*, reflecting both recruitment and retention failures. Years of under-investment and increasing parental fees have left providers struggling financially, undermining staff morale. In this context, SAC staff must be explicitly recognised and supported if the Strategy's goals of quality and access are to be achieved.

Providers highlight several key barriers such as lacking the funds to raise pay to the National Living Wage or beyond *"Providers can't afford to pay staff what they are worth"* causing acute recruitment problems when compared to roles such as classroom assistants who on average earn higher salaries, do not require the same level of qualification or vetting and who are not required to work during non-term time.

Training pathways are weak, playwork qualifications, which are essential for quality SAC provision, have been *"severely limited across Northern Ireland, impacting negatively on the SAC sector"* requiring a higher level of support requests from PlayBoard NI. Meanwhile onerous administrative requirements (minimum standards requirements & HSCT inspections) that are not faced by non-HSCT registered wraparound provision within schools, leaves managers facing constant operational challenges to meet required ratios, significantly increasing pressure to the full staff compliment. Sector analysis warns that many providers feel "overwhelmed by the administrative burden of compliance, particularly when preparing for inspections. Above all, SAC providers need parity with both their Early Years and Education peers - they deserve the same respect, career support and pay uplifts that their counterparts have been promised.

Recommendations:

- Wage support – Introduce target subsidies or grant funding so SAC employers can pay staff at least the real living wage to move towards parity against peers in Early Years and Education. For example, the Strategy could introduce a workforce

stabilisation fund to co-fund pay increases; as PlayBoard has previously called for a dedicated workforce strategy to professionalise and reward childcare staff.

- Development of a SAC workforce strategy: Explicitly include school-age providers in any regional workforce plan. This should promote SAC as a career of choice, with clear progression pathways (e.g. from playworker to leader), mentoring and recognition schemes. It should also address flexible/reduced hours and career breaks, given many SAC workers balance jobs with family responsibilities.
- Expand training access - Ensure Playwork and related qualifications are readily available and funded. -The Strategy should commission new training providers (as PlayBoard is pursuing) and offer paid release time or grants so staff can attend courses without losing income. Targeted bursaries for SAC workers to gain L2/L3/L4/L5 playwork and leadership certifications would professionalise the sector and improve practice.
- Provide administrative support - Integrate SAC workforce needs into all childcare initiatives. For example, any expansion of the Childcare Subsidy Scheme, capital funding or target bonuses should explicitly cover out-of-school and holiday programmes. Publicly acknowledge the role of playworkers in child development to improve the sector's status. Equalise grant and taxation support between early years and SAC staff (e.g. pension contributions, training support) to signal that SAC professionals are equally valued.
- An Accredited Prior Learning framework for those staff who may have many years' experience but hold only Level 3 to endorse them as deputy and full leaders.

By taking these steps, the Strategy will begin to reverse the "*inequity of treatment*" towards SAC staff. A sustainable, high-quality SAC sector requires properly funded, motivated and well training people. Addressing wages, training and administrative stress head-on will lay the foundation for attracting and retaining the workforce the strategy relies on.

Conclusion

The draft Strategy represents an important opportunity to transform childcare provision in Northern Ireland. However, to achieve its ambition of supporting children, families and the sector, it must reflect the needs of the entire childcare system. School-Age Childcare plays a vital role in:

- supporting children’s development through play
- enabling parents to participate in the workforce
- strengthening community infrastructure.

Ensuring the Strategy clearly recognises and supports this sector will be essential to delivering a balanced and sustainable childcare system for the future.

Appendix

Overview of Recommendations

General

- Clarify how the Strategy will be resourced; how actions will be prioritised; and what actions will be taken forward by other Departments, taking account of the needs of equality groups.
- Consider learning and evidence from existing childcare schemes, such as Bright Start and Women’s Centre Childcare Fund. Develop and fund support for children age 4-11.
- Specifically outline age ranges for each objective.
- Terminology needs to be consistent either by use of a glossary of terms or separating Early Years (0-4), School Age (4-11) or all ages (0-11).

Theme 1: Supporting Children in their Early Years

- Expand targeted developmental and inclusion supports to ensure children aged 4–11 within SAC settings is included. For example, having a dedicated pathway funding stream for School-Age Childcare, building and re-designing the Bright Start Childcare Grant Scheme and develop a project dedicated to support families with school-age children from ethnic minority backgrounds and newcomer families.
- Introduce childcare standard regulation within school estates, or require schools to register any provision over 2 hours in duration with HSCT to ensure quality of provision and parity with the registered SAC sector.

Theme 2: Supporting Families with their Children's Childcare Costs

2.1 - Make Childcare more Affordable

- Simplify administrative processes associated with NICSS for providers.
- Ensure affordability schemes strengthen and support registered SAC provision rather than unintentionally displacing it. Eligibility requirements for NICSS must make it mandatory that providers are registered with HSCT.
- Establish and implement a combined CRM system that will centralize, manage and track all childcare transactions with varying levels of authority, to be accessed by all concerned in the processes and also act as a single source of truth.
- Create a regulatory framework/ body to ensure market integrity by introducing a structured framework of guidelines and oversight mechanisms to manage risk and enforce standards.

2.2 - Improve the Information and support available for families

- Development and implementation of a campaign raising awareness of HSCT registered services, including raising parental awareness of the benefits of play and play-based provision.
- Extend the parent support for parents with children who have SEN/D programme to be inclusive of school-age children.

Theme 3: Supporting the Early Years Sector and Workforce

3.1 - Build the Sustainability and capacity of the ELC sector

- Introduce childcare standard regulation within school estates, or require schools to register any provision over 2 hours in duration with HSCT to ensure quality of provision and parity with the registered SAC sector.
- Partner with organisations experienced in playwork or out-of-school care (e.g. play/ youth work charities, Children's Services agencies) to deliver CBAS. Ensure advisers are versed in Minimum Standards, EAL, inclusion, etc., so advice is sector specific.

- Draw learning from existing business support programmes who allocate mentoring hours and small grants. Exploring existing models (e.g. <https://econx.enterpriseni.com/>) and create a childcare specific version.
- Launch a communications campaign (via PlayBoard, EA, local councils) so all SAC providers know and trust the service.
- Beyond one-off advice, provide tools (template policies, plan outlines), workshops on topics like HR and inclusion, and follow-up coaching. Integrate CBAS with existing schemes (e.g. signpost Early Years SEN/ EAL advisors to SAC providers).
- Connect CBAS to financial supports (micro-grants, capital access, staff bursaries). For example, if a provider's business plan needs investment to be viable, CBAS should guide them to appropriate grants or loans.
- Regularly survey users of CBAS and include sector representatives on oversight committees. Use this data to adapt services (e.g. focus areas, outreach).
- Identify and commission experienced childcare organisations to run CBAS. Clarify the service model (e.g. helpline hours, advisory visits, training modules). Avoid outsourcing to generic business services with no childcare knowledge.
- Transparency and sector and key stakeholder engagement and influence during the development of the Strategy's implementation plan, particularly with regards to the development and implementation of the Childcare Business Advisory Service and the Strategic Childcare Accessibility Fund

3.2 - Enhance Accessible ELC for Children with Additional Needs

- Consult with the sector to ensure the effective combination of the Fairplay and Bright Start holiday grant schemes. Expansion of Fair Play and Bright Start Holiday Grant Scheme to ensure all registered SAC providers are able to access the funding they need.
- Expand funding to ensure that private providers are eligible to apply for SEN support including financial support to make reasonable adjustments to create inclusive environments and staff to avail of training.

- Provide further detail and consult with the sector prior to the implementation of the 'Test and Trial school-based childcare/afterschool provision for children in special schools and specialist provision'. Provide clarification on whether the special schools and specialist provision are required to register with HSCT in order to provide after school childcare.

3.3 - Enhance the Early Years Infrastructure through a Skilled and Valued Workforce

- Wage support – Introduce target subsidies or grant funding so SAC employers can pay staff at least the real living wage to move towards parity against peers in Early Years and Education. For example, the Strategy could introduce a workforce stabilisation fund to co-fund pay increases; as PlayBoard has previously called for a dedicated workforce strategy to professionalise and reward childcare staff.
- Development of a SAC workforce strategy: Explicitly include school-age providers in any regional workforce plan. This should promote SAC as a career of choice, with clear progression pathways (e.g. from playworker to leader), mentoring and recognition schemes. It should also address flexible/reduced hours and career breaks, given many SAC workers balance jobs with family responsibilities.
- Expand training access - Ensure Playwork and related qualifications are readily available and funded. The strategy should commission new training providers (as PlayBoard is pursuing) and offer paid release time or grants so staff can attend courses without losing income. Targeted bursaries for SAC workers to gain L2/L3/L4/L5 playwork and leadership certifications would professionalise the sector and improve practice.
- Provide administrative support - Integrate SAC workforce needs into all childcare initiatives. For example, any expansion of the Childcare Subsidy Scheme, capital funding or target bonuses should explicitly cover out-of-school and holiday programmes. Publicly acknowledge the role of playworkers in child development to improve the sector's status. Equalise grant and taxation support between early years and SAC staff (e.g. pension contributions, training support) to signal that SAC professionals are equally valued.
- An Accredited Prior Learning framework for those staff who may have many years' experience but hold only level 3 to endorse them as deputy and full leaders.