

# Equality Commission

## Northern Ireland

**Consultation Response:**

**Department for Education**

**Draft Early Learning and Childcare Strategy**

March 2026

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## **Introduction**

The Equality Commission for Northern Ireland ('the Commission') is an independent public body established under the Northern Ireland Act 1998<sup>1</sup>. We welcome the publication of the draft Executive Early Learning and Childcare (ELC) Strategy, and the opportunity to respond to the Department for Education's (DE) consultation on the Strategy.

We have had significant and long-term engagement with DE and other Departments in relation to childcare, including through recent representation on DE's Stakeholder Engagement Forum. We have called for appropriate, accessible and affordable childcare and early learning provisions that is flexible and promotes equality of opportunity for both children and parents from all equality groups. Within this response, we are using the term parents as an inclusive term that encompasses all individuals who may hold responsibility for the care of children and young people, across a range of diverse family types.

We welcome that the Minister confirmed that our priority recommendations were key considerations as the Strategy was developed<sup>2</sup>, and that the Education Committee supported these recommendations<sup>3</sup>.

We welcome the Executive's focus on childcare, and proposed actions in the draft Strategy which would further equality. This response sets out a range of recommendations from the Commission, including to clarify the Strategy, and to better enable equality of opportunity, which are summarised in Annex 2. We also note that much of the Strategy will depend on available resources.

We look forward to further engagement with the Executive Departments in relation to the design and delivery of a Strategy that progresses equality of opportunity.

## **Strategic Context**

It is not currently clear what actions will be taken forward by wider Departments in the Strategy. For the Strategy to be successful, action

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<sup>1</sup> See Annex 1 for further detail

<sup>2</sup> Letter from Minister of Education to ECNI – 22<sup>nd</sup> April 2024

<sup>3</sup> NI Assembly: Committee for Education (24<sup>th</sup> April 2024) [Minutes of Proceedings](#)

will be required across Departments, including the Department of Education, Department of Health, Department of Communities and the Department for the Economy.

Several relevant existing childcare schemes, such as the DfC Women's Centre Childcare Fund and the Bright Start School Age Childcare Scheme are not substantively referred to in the draft Strategy.

Consideration should be given to learnings from these programmes, and clarity provided as to what their intended future is.

We welcome reference to other related cross-Departmental Strategies and policies, including Good Jobs, Anti-Poverty and DE's Transformation Agenda. Other relevant work includes the wider Social Inclusion Strategies, the Racial Equality Strategy, and the Disability and Work Strategy.

### **Financial Context and Prioritisation**

Whilst it is helpful that 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<sup>4</sup> on a multi-year budget.

We also note the Education Minister's response<sup>5</sup> 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

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<sup>4</sup> Department of Finance (2025) [Draft Budget 2026-2029/30 | Department of Finance](#)

<sup>5</sup> 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.

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 from existing childcare schemes, such as Bright Start and Women's Centre Childcare Fund, and clarify future plans.

## **THEME 1: Supporting children in their early years**

As below, we welcome many of the actions within this theme. However, support for children should include high-quality school-aged childcare, particularly for those with additional needs. This should include addressing the needs of disabled teenagers and their families.

### **Objective 1.1: Provide 22.5 hours per week through the pre-school education programme for children in their target pre-school year.**

We welcome the standardisation of the length of pre-school provision. However, we would highlight that many families will continue to require wrap-around and holiday childcare. As referred to in Objective 1.2, it is proposed that there will only be a feasibility study of the potential to provide standardisation of special school pre-school provision in 2027. It is not clear why this work is taking place later than mainstream provision.

We note that non-statutory preschools will receive an uplift to reflect the additional pupil-related factors that are included in funding to statutory pre-school settings. It is important that such payments are used across settings to support the needs of children with additional needs, such as disabled children, newcomers<sup>6</sup> and Travellers. These funds should be monitored to assess how they address educational inequalities across the equality groups.

Recommendations:

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<sup>6</sup> Although we note concerns with the term 'newcomer', we have used this term in our response as it is the term used by DE in relation to English-language proficiency. It may not relate to the length of time a family or student has been settled in Northern Ireland.

- Progress the standardisation of special school pre-school provision at an earlier stage;
- Ensure funds to address additional pupil-related factors are used to support the needs of children with additional needs across the equality groups.

### **Objective 1.2: Expand services for children facing disadvantage and children with additional needs.**

We welcome the expansion of services for children facing disadvantage and additional needs. We recommend that provision should meet the specific needs of children from across the full range of equality groups, including disabled children, those from minority ethnic communities and new residents (who may not have English as a first language). The intersectional needs of children should also be considered, for instance disabled children from minority ethnic communities.

The programmes mentioned under this Objective are all aimed at young children. It is not clear how services for older children facing disadvantage and children with additional needs will be supported. Such children may include young carers, and disabled teenagers.

#### **Children from minority ethnic communities and newcomers**

We welcome the ongoing work to stabilise the Toybox scheme. Toybox has been identified<sup>7</sup> as a ‘*good initiative for the purposes of encouraging participation and improving long-term outcomes for Traveller children*’.

A Department commissioned review<sup>8</sup> found Toybox is important for the Traveller community as it provides<sup>9</sup> “*services for children that are more likely outside of all other services*” within early learning and childcare.

We note the proposed action to expand Toybox beyond Traveller and Roma children to include newcomer children. Consideration should be given to how Toybox will meet the needs of all children, who will have particular needs and barriers. In any expanded Toybox programme, it will be key to ensure that the specific needs of Traveller and Roma children continue to be met and resourced. Their needs should not become

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<sup>7</sup> Economic and Social Research Institute (2023) [Early Education and Care in Ireland and Northern Ireland](#). p.63-65.

<sup>8</sup> Ipsos UK (2023) [Review of Department of Education Targeted Early Years Interventions](#). p. 2,54

<sup>9</sup> Ipsos UK (2023) [Review of Department of Education Targeted Early Years Interventions](#). p. 60

invisible. It is also key to recognise the diversity that exists within newcomer children.

Newcomer children can face a number of barriers to educational achievement, including limited English language ability, lack of knowledge of the education system, racist bullying and social exclusion. Many of these issues are shared with the wider minority ethnic community. In England, research suggests there is a lower take-up of early education entitlements for those who speak English as an additional language, and for children from minority ethnic communities<sup>10</sup>.

Other research<sup>11</sup> has found that policy and programmes appear to be less well established for children and families from migrant and minority ethnic backgrounds in Northern Ireland. It highlighted that one concern is awareness of available entitlements, supports and services.

It will be important to ensure that these varied needs are met, including for those children from minority ethnic communities who may not meet the Department's definition of newcomer, and for older children.

### **Children with SEN/D**

Throughout the draft Strategy, there are proposals relating to children with SEN/D, which we have addressed in the relevant sections below.

We note the reference to the potential to provide special school pre-school provision on a full-time basis; it would be helpful to clarify the likely timeline for this.

The UN Committee on the Rights of Persons with Disabilities have noted<sup>12</sup> that *'If identified and supported early, young children with disabilities are more likely to transition smoothly into pre-primary and primary inclusive education settings'*.

It is key that SEN provision is tailored to meet the specific needs of different equality groups. Specific and appropriate support (e.g. support materials and translation services) is required for children with SEN who speak English as an additional language, and targeted support may be required for groups such as Travellers and children from the most

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<sup>10</sup> JRF and Coram Family and Childcare (2023) [Tackling Disadvantage Through Childcare](#). p. 15

<sup>11</sup> Economic and Social Research Institute (2023) [Early Education and Care in Ireland and Northern Ireland](#). p. 63-65.

<sup>12</sup> Committee on the Rights of Persons with Disabilities (2016) [General comment No. 4 on the right to inclusive education](#). para 67.

deprived areas. Likewise, children attending Irish-medium provision should receive language-appropriate SEN resources and support.

The intersectional needs of SEN/D children should be considered in each of the specified programmes under this objective (Toybox, the Pathway Fund and Sure Start). For instance, Toybox provision should meet the needs of Traveller children with disabilities.

### **Wider Disadvantage**

The expansion of programmes addressing wider disadvantage is welcome. Whilst socio-economic disadvantage is not a specified ground under the equality legislation in Northern Ireland, the barriers and inequalities experienced by equality groups can be exacerbated by poverty and social exclusion.

It would be helpful to clarify how a Sure Start outreach model will identify additional children and families with need, and outline whether groups such as disabled children and newcomer children will be eligible.

Recommendations:

- Ensure that if the Toybox programme is expanded, the specific needs of Traveller and Roma children continue to be addressed, alongside meeting the needs of children from other minority ethnic communities;
- Clarify how children facing disadvantage and those with additional needs will be identified and supported, particularly in relation to Sure Start;
- Progress the standardisation of special school pre-school provision at an earlier stage, and clarify the timeline;
- Ensure programmes meet the intersectional needs of children.

### **Objective 1.3: Extend developmental provision for children aged 2-3 (in their pre-pre-school year).**

We welcome the expansion of developmental provision for children aged 2-3, with a prioritisation for children facing disadvantage and with additional needs. Early and effective provision can have a significant

impact on children from particular equality groups – including children from minority ethnic communities<sup>13</sup> and disabled children<sup>14</sup>.

As above, it would be helpful to clarify how children facing disadvantage and those with additional needs will be identified and supported. There may be particular barriers for families who have recently arrived in Northern Ireland.

Consideration should be given to how to ensure that children, across settings, have suitable access to provision and support, such as from Educational Psychologists.

Recommendation:

- Clarify how children facing disadvantage and those with additional needs will be identified and supported when prioritising developmental provision for children aged 2-3

**Objective 1.4: Promote high-quality provision across all early learning and childcare providers.**

Although this Objective refers to ‘all early learning and childcare providers’, actions are primarily focused on provision for young children, rather than school-aged childcare. It is important to ensure school-aged children can also access high-quality and appropriate provision.

The UN Committee on the Rights of the Child<sup>15</sup>, in its 2023 Concluding Observations on the UK, were concerned at the inequalities in educational attainment and outcomes for children in disadvantaged situations and recommended that all children have access to adequate and affordable early childhood education.

Whilst we welcome actions to support parents in their role, it is important such actions take account of parents’ needs, who may face specific barriers, including disabled parents and those from minority ethnic communities. Consideration should be given to how best to ensure that both mothers and fathers are supported to be ‘first educators’, mindful of diverse family types.

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<sup>13</sup> DE (2017) [A compendium of evidence on ethnic minority resilience to the effects of deprivation on attainment](#)

<sup>14</sup> DE (2015) [Study of Early Education and Development: meeting the needs of children with special educational needs and disabilities in the early years](#), p. 11.

<sup>15</sup> Committee of the Rights of the Child (2023) Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland, para 47.

We note the intention to design and introduce an integrated Early Years Framework. The Framework should go beyond academic attainment to promote equality and good relations, and tackle prejudice<sup>16</sup>. It is important<sup>17</sup> to ensure access to education and learning across and between all stages of life for all equality groups, including disabled children, and children from minority ethnic communities or for whom English is an additional language.

Early learning and high-quality childcare provision can encourage development in understanding and experiences of the value and range of diverse cultures, identities and backgrounds in Northern Ireland.

As below, we consider the Strategy should take actions to combat gender stereotypes. The Framework is an opportunity to tackle such stereotypes at a young age, including in relation to caring roles.

Recommendations:

- Ensure appropriate, accessible, flexible and affordable childcare and early-years provision that meets the diverse and intersectional needs of all children, including school-aged children;
- Consider the needs of all parents when supporting them as primary educators;
- Promote equality and good relations and tackle prejudice through the development of the Early Years Framework.

## **THEME 2: Supporting families with their children's learning and childcare costs**

### **Tackling Gender Stereotypes**

Actions in relation to Theme 2 and the wider draft Strategy do not sufficiently address the need to tackle gender stereotypes concerning childcare and early learning roles.

Particularly in the absence of an Executive Gender Equality Strategy, the Early Learning and Childcare Strategy represents a key opportunity to progress actions to combat gender-based stereotypes. The Commission recommends coordinated, comprehensive and coherent measures to tackle gender-based stereotypes and prejudicial attitudes

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<sup>16</sup> ECNI (2022) [Equality in Education Position Paper](#)

<sup>17</sup> ECNI (2025) [ECNI Response to the DfE's Call for Evidence as part of the Curriculum Review for Northern Ireland](#)

from an early age and across all areas of life, mindful of diverse family types.

Action should include challenging gender stereotypes in relation to women's and men's caring roles – both in the home and in employment. Evidence<sup>18</sup> suggests that the involvement of fathers in childcare assists with children's development, including school readiness.

The CEDAW Committee recommended<sup>19</sup> action to provide further incentives to encourage men to take parental leave, such as non-transferrable leave, and to encourage men to participate equally in childcare responsibilities.

While at a societal level attitudes and roles with respect to caring responsibilities are changing, caring remains an issue that is disproportionately undertaken by women. There is need for acceptance and recognition of a greater emphasis on both women and men taking childcare responsibility (including parental leave) and building appropriate, accessible, flexible and affordable childcare and early-years provision around this.

Though we welcome that the draft Strategy refers briefly to labour market participation and gender inequality, there is no reference to actions to tackle the underlying stereotypes that lead to mothers facing employment penalties after childbirth.

The CEDAW Committee concluded in 2018 that there was a failure in Northern Ireland to combat stereotypes depicting women primarily as mothers, exacerbating discrimination against women, and in violation of CEDAW<sup>20</sup>. Subsequent legislation<sup>21</sup> has placed a duty on the Secretary of State for Northern Ireland to adopt a strategy to combat gender-based stereotypes regarding women's primary role as mothers, but to date this remains undelivered.

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<sup>18</sup> ESRI (2023) [Early childhood education and care in Ireland and Northern Ireland](#). p. 19.

<sup>19</sup> CEDAW (2019) [Concluding observations on the eighth periodic report of the United Kingdom of Great Britain and Northern Ireland](#), CEDAW/C/GBR/CO/8, para 46.

<sup>20</sup> CEDAW (2018) [Inquiry Report](#), CEDAW/C/OP.8/GBR/1, paras 73-74.

<sup>21</sup> [Section 9](#) of the Northern Ireland (Executive Formation etc) Act 2019.

Tackling gender stereotypes could also help attract men to the early learning and childcare workforce. In 2024-2025 all nursery teachers in grant-aided schools were female<sup>22</sup>.

Recommendation:

- Tackle gender-based stereotypes and prejudicial attitudes.

### **Overcoming barriers to parental employment**

The Strategy should take account of how to help parents overcome barriers to employment.

The current model of provision, largely from 8am to 5 or 6pm does not fit well with many people's working lives, for instance, those with shift patterns<sup>23</sup>, whether fixed or flexible. Parents may also struggle to access childcare during the school holiday period.

Additionally, the current funded pre-school education provision of 2.5 or 4.5 hours per day in term-time does not facilitate a parent to return to substantial or full-time employment if they have no other support.

Access to childcare support beyond early years is also important, not only for working parents, but also for those with caring responsibilities for older children with SEN/D.

The Commission continues to recommend that further action is taken to address the shortfalls in provision for children<sup>24</sup> including before and after school and preschool, during holiday periods, and within special schools that could support wider economic participation of parents.

The Strategy does not currently substantively refer to DfC's Women's Centre Childcare Fund, which enables access to affordable or free childcare sessions to help parents access employment and training opportunities. It would be helpful to clarify this Fund's role within the Strategy.

Recommendation:

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<sup>22</sup> NISRA (20205) [Teacher workforce statistics in grant-aided schools in Northern Ireland, 2024/25](#)

<sup>23</sup> RSM (2023) [Review of Childcare Services in Northern Ireland](#), p. 37-38.

<sup>24</sup> McQuaid, R. Graham, H. and Shapira, M (2013) Child care: Maximising the economic participation of women.

- Help parents overcome barriers to employment and training, including in relation to school-aged childcare, and wraparound and holiday childcare;
- Clarify the role of DfC's Women's Centre Childcare Fund within the Strategy.

### **The role of employers**

The draft Strategy does not sufficiently recognise the role of employers in reducing the challenges that parents can experience in reconciling employment or training and childcare.

Actions should take account of the conditions that would facilitate parents to enter, remain in, progress in and return to work or training.

Employers and training providers should be supported and encouraged to develop carer friendly policy and practices. Actions should also include the promotion of flexible working practices, shared parental leave and the equal sharing of family roles and responsibilities between women and men. For larger employers, the provision of crèches may be an option.

There is a need to maximise the flexibility offered by employers and to improve understanding of the position of parents, particularly mothers in the labour market and the role of childcare in this (including parents who are in work, seeking work and not-seeking work).

Employers should be supportive, not just of the ongoing need for flexibility in trying to reconcile work and childcare, but also of the unpredictable absences that children may necessitate. This is particularly the case with lone parents, who are predominantly women, as the need for flexibility and emergency time off for the lone parent cannot be shared with a partner, and thus between two employers.

Recommendation:

- Support employers to develop take forward carer-friendly policies

### **Objective 2.1: Make childcare more affordable.**

The Commission recommends appropriate, accessible, flexible and affordable childcare and early-years provision to meet the diverse needs of all children.

We note that concerns have been raised that, for many people, the proposals in the draft Strategy will not result in more affordable childcare<sup>25</sup>. In developing a model, consideration should be given to the needs of parents and children from across the equality grounds, the sustainability for the workforce, and lessons from other jurisdictions.

The CEDAW Committee has highlighted<sup>26</sup> their concern '*that childcare costs remain excessive, in particular in Northern Ireland, which constitutes an obstacle for women in entering into and progressing in the workplace*'.

There are particular challenges for key groups of parents in accessing financial support for childcare - including low-income families, those in receipt of benefits, one parent families and those with disabilities<sup>27</sup>.

Research conducted by the Joseph Roundtree Foundation<sup>28</sup> highlighted the complexities in engaging with government support schemes parents can experience.

Recommendations:

- When considering actions to improve affordability, take account of the needs of parents and children from across the equality grounds, the sustainability for the workforce, and lessons from other jurisdictions;
- Consider the impact of navigating different systems of financial support for parents, especially for parents with disabilities or whose first language is not English.

### **Objective 2.2: Improve the information available on childcare.**

The Commission welcomes the collection of data relating to early learning and childcare and the publication of the first NI Childcare Survey in 2024. However, there were gaps in the Survey, such as the needs of families with disabled teenagers. We understand concerns have also been raised regarding how childcare provided by close family members was taken into account in relation to the cost of childcare. These issues should be addressed in future surveys.

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<sup>25</sup> For example Childcare for All (2026) [Guide: Draft Early Learning & Childcare Strategy](#)

<sup>26</sup> CEDAW (2019) [Concluding observations on the eighth periodic report of the United Kingdom of Great Britain and Northern Ireland](#), CEDAW/C/GBR/CO/8, para 45.

<sup>27</sup> ECNI (2024) [Childcare and Early Learning Policy Position Paper](#). p. 11,12,16.

<sup>28</sup> Joseph Roundtree Foundation (2025) [Poverty in Northern Ireland](#). p. 81.

The Department should consider how to improve collection of disaggregated equality data, to provide insights into key equality groups. Whilst we recognise the difficulties with small sample sizes for some groups, the Department should consider other methods to gather information about the specific needs of, for example, particular minority ethnic communities, or diverse family types.

We welcome efforts to increase awareness of childcare generally, and for provision suitable for SEN/D children. This should include information on school-aged childcare.

Information on childcare and early-years provision and availability should be easily accessible, including for those who do not speak English as a first language, and disabled people.

Department supported research suggested<sup>29</sup> parents can struggle to find information regarding childcare, particularly those who speak English as an additional language. Migrant parents, without established networks, may also find it difficult to find out what financial support is available for childcare.

Consideration should be given to ensuring that the proposed digital platform of resources is accessible for key equality groups.

Recommendations:

- Improve the collection and sharing of disaggregated equality data in relation to childcare, including for older children, to inform actions and track impact;
- Make information on childcare and early-years provision accessible.

### **THEME 3: Supporting the early years sector and workforce**

#### **Objective 3.1: Build the sustainability and capacity of the Early Learning and Childcare sector.**

The Commission has recommended action to ensure the sustainability of provision, including childcare services in disadvantaged and rural areas. We therefore welcome actions to support the sector, which should be informed by significant engagement with providers, including

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<sup>29</sup> RSM (2023) [Review of Childcare Services in Northern Ireland](#). p. 21, 56-58.

daycares, childminders, school-aged childcare, statutory and non-statutory pre-schools, etc.

We welcome that the Strategy recognises the need to ensure provision is accessible to children and families which might not be well served without government intervention, including children with SEN/D and those for whom English is not a first language.

We welcome the proposals for a Strategic Childcare Accessibility Fund, and the initial focus on groups including areas of disadvantage, provision for children with additional needs, and families working atypical hours. However, further details on how this Accessibility Fund will work, and how eligibility will be determined would be helpful.

While we welcome funding for these key groups and provisions, consideration should also be given to how the Childcare Accessibility Fund or other actions could also support newcomer children. Likewise, although Irish-medium childcare is referred to in the narrative for this Objective, it is not referenced in the actions.

The Commission welcomes that this Objective includes reference to an aim to promote equity and inclusion through a diverse and culturally competent workforce. However, there is only one reference to gender and cultural diversity under objective 3.3. Further clarity would be helpful to outline what actions will be taken.

Recommendations:

- Ensure the sustainability of provision, with a valued workforce;
- Provide further information on the Strategic Childcare Accessibility fund, including how need will be assessed;
- Clarify actions relating to newcomer children, and Irish-medium education;
- Clarify how a diverse and culturally competent workforce will be achieved.

### **Objective 3.2: Enhance accessible Early Learning and Childcare for children with additional needs.**

The Commission welcomes action to address challenges for families with children with SEN/D, in accessing appropriate provision. It is important that early learning and childcare providers meet their duties under the equality legislation, including in relation to reasonable

adjustments. DE and DoH should ensure providers are aware of these duties, and what supports are available to help them provide reasonable adjustments.

We also note funding for providers that can support the meeting of diverse needs of children, including disabled children. Research by Playboard<sup>30</sup> highlighted the barriers school-aged childcare providers, including childminders, experienced to access specialist equipment and resources. Currently, children with SEN/D may get supports in schools that they are not able to access in childcare.

2023 research commissioned by DE<sup>31</sup> found that many parents of children with disabilities, special needs or other additional needs reported challenges in accessing childcare. The research<sup>32</sup> also raised concerns around the training of providers to work with disabled children.

Likewise, a 2023 survey conducted by Employers for Childcare found<sup>33</sup> that responding families who had a disabled child used fewer hours of childcare, were twice as likely to be using no childcare at all, and more likely to be using informal childcare only.

The Commission welcomes improvements to programmes such as the Fair Play and Holiday Start Scheme, which can support disabled children. Concerns have previously been raised with the Commission about the gaps in these programmes, such as the limitation of the Fair Play Grant Scheme to the academic year. However, we understand that these funds are limited and have previously only been awarded to a small proportion of providers<sup>34</sup>.

We note proposals to increase the number of Approved Home Childminders. We recognise and welcome that this could benefit children with complex needs<sup>35</sup>. However, we would also highlight the importance of ensuring disabled children have opportunities for social interaction with other children.

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<sup>30</sup> PlayBoard NI (2025) [State of the Sector School-Age Childcare Report](#), pp. 13-15

<sup>31</sup> RSM (2023) [Review of Childcare Services in Northern Ireland](#), p. 46-47.

<sup>32</sup> RSM (2023) [Review of Childcare Services in Northern Ireland](#), p. 54-55.

<sup>33</sup> Employers for Childcare (2023) [Northern Ireland Childcare Survey 2023](#), p. 33.

<sup>34</sup> RSM (2023) [Review of Childcare Services in Northern Ireland](#), p. 61.

<sup>35</sup> NICMA (2025) [Understanding the childcare needs of families with children who have disabilities or additional needs](#), p. 27-28

It is welcomed that the Department will give consideration to considering the upper age limit which young people with SEN/D can access registered childcare provision. However, we would urge this issue to be given consideration at an early stage, especially given that initial steps have been taken in relation to the Review of Minimum Standards<sup>36</sup>.

Recommendations:

- Support providers to meet their duties in the equality legislation;
- Give earlier consideration to the upper age limit for young people with SEN/D to access registered childcare provision.

**Objective 3.3: Enhance the early years infrastructure through a skilled and valued workforce.**

The Commission welcomes actions to support the early years workforce. It is important that those working with older children are also appropriately skilled and valued, and different provider types, including childminders, are included within actions.

Reflecting the key role of childcare and early learning in children's development, the work of providers, predominantly women, should be properly valued and remunerated, with appropriate workforce development opportunities.

The proposed development of a SEN/D CPD framework is welcome. Recent research commissioned by the Department<sup>37</sup> highlighted concerns in relation to training of childcare providers working with children with disabilities.

However, the *A Fair Start* Expert Panel on Educational Underachievement<sup>38</sup> recommended that the CPD Framework for the Early Years sector should explicitly include training on meeting the needs of Roma, Traveller, newcomer and looked-after children, which should also be considered.

In building the capacity of the sector, consideration should be given to how the sector can meet the needs of key equality groups.

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<sup>36</sup> DoH (2025) [Consultation on Proposals to amend the Minimum Standards for Childminding and Day Care for Children Under Age 12](#)

<sup>37</sup>RSM (2023) [Review of Childcare Services in Northern Ireland](#). p. 47, 54-55.

<sup>38</sup> ECNI (2024) [Childcare and Early Learning Policy Position Paper](#). p. 8.

We note that the Workforce Plan includes a focus on supporting gender diversification and ensuring that the workforce reflects the ethnicities of the children and families it supports.

The Commission has previously raised these issues, particularly the low numbers of men in the workforce. A more diverse workforce could support the improvement of the availability of childcare for children and address gender stereotyping around caring roles and responsibilities. Actions should also support disabled people accessing and remaining in the workforce.

The Commission is available to provide advice on equality legislation, including lawful positive action, across the equality grounds.

Recommendations:

- Value the ELC workforce, with appropriate remuneration and workforce development opportunities;
- Include wider equality groups within the proposed CPD Framework;
- Include disabled people in actions to diversify the workforce.

## **Delivery and Accountability**

It is not clear from the draft Strategy how Action Plans will be developed and published. It will be important to ensure that actions are taken across Departments and delivery partners. Actions should be prioritised, measurable, time-bound and resourced.

We welcome that the Stakeholder Engagement Forum will continue to support partnership working. This should be meaningful; to benefit from their expertise and experience, key stakeholders from across the equality grounds should be fully involved in the design, delivery and review of the Strategy.

We note the timeline, objectives and steps to monitor the implementation of the Strategy, and welcome the proposed cross-Departmental approach, and proposals to review the Strategy in the third and sixth years. Whilst recognising the financial context, we would urge ambition in relation to the timeline, particularly for actions which may be low-cost. Spend and actions should be monitored to assess how they address educational inequalities across the equality groups.

The Commission continues to recommend the collection and sharing comprehensive equality data to underpin the targeting of interventions and tracking of equality impacts.

Key datasets should contain comprehensive equality data to facilitate full equality analysis, including intersectional analysis. Where there are small sample sizes, consideration should be given as to how to gather information on how policies are impacting on particular groups.

Recommendations:

- Clarify how annual Action Plans will be developed and published, including how key stakeholders from across the equality groups will be able to meaningfully input;
- Ensure actions within the Plans are prioritised, measurable, time-bound and resourced;
- Take an ambitious approach to the timeline, particularly for low-cost actions;
- Monitor spend and actions to assess how they address educational inequalities across the equality groups;
- Collect and share comprehensive equality data to underpin the targeting of interventions and tracking of equality impacts.

## **Conclusion**

We welcome that the Department is progressing actions to strengthen early learning and childcare. However, clarity is needed as to what is achievable given the financial situation.

The Commission is available to provide further advice in relation to the Strategy.

**ECNI**

**March 2026**

## **Annex 1: The Equality Commission for Northern Ireland**

The Equality Commission for Northern Ireland ('the Commission') is an independent public body established under the Northern Ireland Act 1998.

In general terms, our statutory remit provides that we are to:

- promote equality of opportunity and affirmative action
- work towards the elimination of unlawful discrimination and harassment
- keep relevant legislation under review
- promote good relations between persons of different racial groups and good disability practice
- overseeing the statutory equality duties on public authorities.

The Commission's remit also includes overseeing the statutory duties on public authorities to promote equality of opportunity and good relations under Section 75 of the Northern Ireland Act 1998, and the disability duties under the Disability Discrimination Act 1995.

The Equality Commission has been designated to act as an 'independent mechanism' jointly with the Northern Ireland Human Rights Commission (NIHRC), to promote awareness of, and monitor the implementation of the United Nations Convention on the Rights of Persons with Disabilities with regard to Government's obligations in relation to Northern Ireland. Together with the Equality and Human Rights Commission (GB) and Scottish Human Rights Commission we form the United Kingdom's Independent Mechanism (UKIM).

Further, the Commission, along with the NIHRC, is mandated in accordance with Article 2(1) of the Windsor Framework (formerly Protocol on Ireland/Northern Ireland) of the UK-EU Withdrawal Agreement to oversee the UK Government's commitment on rights and equality in Northern Ireland (NI) after EU withdrawal.

## **Annex 2: Summary of Recommendations**

We recommend action to:

- 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 from existing childcare schemes, such as Bright Start and Women's Centre Childcare Fund, and clarify future plans;
- Ensure appropriate, accessible, flexible and affordable childcare and early-years provision that meets the diverse and intersectional needs of all children, including school-aged children;
- Progress the standardisation of special school pre-school provision and clarify the timeline;
- Ensure funds to address additional pupil-related factors are used to support the needs of children with additional needs across the equality groups;
- Ensure that if the Toybox programme is expanded, the specific needs of Traveller and Roma children continue to be addressed, alongside meeting the needs of children from other minority ethnic communities;
- Clarify how children facing disadvantage and those with additional needs will be identified and supported;
- Consider the needs of all parents when supporting them as primary educators;
- Promote equality and good relations and tackle prejudice through the development of the Early Years Framework;
- Tackle gender-based stereotypes and prejudicial attitudes;
- Help parents overcome barriers to employment and training, including in relation to school-aged, wraparound and holiday care;
- Support employers to take forward carer-friendly policies;
- When considering actions to improve affordability, take account of the needs of parents and children from across the equality grounds, the sustainability of the workforce, and lessons from other jurisdictions;
- Consider the impact of navigating different systems of financial support for parents from particular equality groups;
- Improve the collection and sharing of disaggregated equality data in relation to childcare, including for older children, to inform actions and track impact;
- Make information on childcare and early-years provision accessible;

- Ensure the sustainability of provision, with a valued workforce;
- Provide further information on the Strategic Childcare Accessibility fund, including how need will be assessed;
- Clarify actions relating to newcomer children, and Irish-medium education, when building the sustainability and capacity of the sector;
- Clarify how a diverse and culturally competent workforce will be achieved;
- Support providers to meet their duties in the equality legislation;
- Give earlier consideration to the upper age limit for young people with SEN/D to access registered childcare provision;
- Value the ELC workforce, with appropriate remuneration and workforce development opportunities;
- Include wider equality groups within the proposed CPD Framework;
- Include disabled people in actions to diversify the workforce;
- Clarify how annual Action Plans will be developed and published, including how key stakeholders from across the equality groups will be able to meaningfully input;
- Ensure actions within the Plans are prioritised, measurable, time-bound and resourced;
- Take an ambitious approach to the timeline, particularly for low-cost actions;
- Monitor spend and actions to assess how they address educational inequalities across the equality groups;
- Collect and share comprehensive equality data to underpin the targeting of interventions and tracking of equality impacts.