



Údarás Náisiúnta Míchumais  
National Disability Authority

21 September 2018

Katherine Zappone, TD

Minister for Children and Youth Affairs

Department of Children and Youth Affairs

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**Subject: National Disability Authority's Advice regarding Overage Exemptions for the Early Childhood Care and Education (ECCE) Programme**

Dear Minister,

The National Disability Authority welcomes the review initiated by your Department and the Department of Education and Skills, and has been happy to facilitate consultation and to review learning from administration of the overage exemption to date to assist considerations.

You will already have received the **National Disability Authority's Report on the Review of Overage Exemptions for the Early Childhood Care and Education (ECCE) Programme** which sets out findings in this regard

As you are aware, the National Disability Authority's report was based on:

- published research evidence on the retention of children and potential impacts on the child
- details of arrangements for similar processes in peer jurisdictions
- findings of a survey of parents, whose children are currently availing of an **ECCE** overage exemption
- follow up interviews with a number of those parents and



- the findings of the Open Policy Debate, held in Dublin on 28 May 2018

While the National Disability Authority was not tasked with developing recommendations, we would like to take this opportunity to highlight some of the learning from the review process which we hope will be of assistance to both Departments in considering any actions to be advanced.

### **Overage exemption**

The National Disability Authority is of the view that the current system of overage exemptions should cease once an enhanced supportive process for children and parents is put in place.

A key issue for parents who applied for, and received an overage exemption was to have an additional year to enhance the child's level of preparedness for primary school. This additional year is now universally available to all children with the provision of **ECCE** for two years. However, it is critical that the key issues previously influencing parents requesting the additional year will also need to be addressed through an enhanced supportive process. Otherwise, there is a potential risk that the issues which arose for parents under the current overage exemption system, when **ECCE** was only a one year programme, could potentially arise during a two year provision and thereby leave some parents believing that their child will not be ready for school after two years of **ECCE**.

The National Disability Authority does not consider that there is evidence that a third year is in the best interests of the child in terms of a child's personal and social skills development and in transitioning with her/his peers to primary school. However, we believe there may always be some children who may require additional time within the **ECCE** Programme. These children would be very rare exceptions, for example, a child with life limiting conditions. Such rare circumstances could be addressed within an enhanced supportive process under **AIM**.

### **Key issues for parents**

Engagement with parents was central to the review conducted by the National Disability Authority. It is worth noting that the children of these parents had experience of additional time in **ECCE** and most spoke positively of the impact that the extra time in **ECCE** had on the child. However, because they had remained in **ECCE** it was difficult for those parents to say, whether or not, those same outcomes could have been achieved if the child had progressed to primary school with her/his peers. Through that engagement a number of key issues emerged which influenced parents requesting additional time in **ECCE**, including school readiness, supports and services, and information.

## School readiness

Some of the underlying issues for parents in their perception of “school readiness” included:

- the lack of consistent information available about the transition
- the level of understanding as to what support is available in school
- what is needed to access that support
- pupil –teacher ratios
- class size
- what type of learning pedagogy is used in junior infants etc.

In the absence of this information, it was common for parents to feel their child would not be able to cope in primary school and would therefore benefit for a further year in ECCE.

The National Disability Authority advises, therefore, that it is critical there is an agreed transition planning process from early years settings to primary school. This should be a seamless graduated process for the child with a disability. It should involve an earlier engagement during the first year of **ECCE** between the parents, the SENO, the **Better Start** Early Years Specialist, Early Years Practitioner and the setting’s Inclusion Coordinator. This could be a graduated approach where the second year of **ECCE** offers adequate and appropriate engagement with all the related services and supports for the child including the primary school, HSE, as well as those engaged in the process in year one. This should be provided to all children who are availing of **AIM** supports.

Key to this transition planning is ensuring parents know that the services and supports are in place for the child transitioning to primary school.

## Supports and services

Most of the parents interviewed indicated that they experienced services and supports in a disjointed or fragmented manner in the early years of their child’s lives. Many of these parents knew that her/his child had some form of developmental delay and found themselves at best on waiting lists for an assessment from HSE and/or in many cases searching the internet in the hope of getting some information as to what was happening for their child. In many cases, parents described it as “speech/language delay”; in some cases “poor coordination”; “lack of concentration” and/or some form of “challenging behaviour”. In the absence of having an assessment and identifying relevant next steps, parents felt it was better to keep their child in the pre-school and in some cases were prepared to pay for same. This was a key factor in their application for an overage exemption.

In addition, we also found that a significant number of parents availing of the overage exemption either did not hear about **AIM** and/or did not avail of **AIM**.

The National Disability Authority advises that in the development of an enhanced support service consideration needs to be given as to how these children can be identified in order to trigger provision of seamless supports and transition planning. One possible way is that on entry into **ECCE** there is a process for a parent being able to flag any “developmental delay”. **AIM** supports are clearly defined as supports for a child with a disability. This cohort of children who availed of the overage exemption, however, did not necessarily know whether their child had a disability. A simple declaration mechanism for a developmental delay would identify potential children who might require **AIM** supports over the course of the two year **ECCE** programme and thus activate that process as required, in turn mitigating demand for overage exemptions. The National Disability Authority is aware that there are challenges for the HSE in meeting its statutory obligation for Assessment of Need under the **Disability Act 2005** and are looking at ways to address this. It is critically important that a mechanism is established for referral to the HSE under **AIM** to get an assessment and an appropriate intervention in year one of **ECCE** for those children who are on such waiting lists. Otherwise, there is a risk that parents will find themselves not knowing what supports and services their child needs to effect a seamless transition to primary school. If this is not addressed there is the potential for continued demand for overage exemptions after year two of **ECCE**.

### Information

While certain information regarding available supports or the transition between stages of education is available on Government Departments and agencies websites, the reality for a number of parents is that they did not necessarily know what was there or indeed what they should be looking for. Parents often found the current information provision to be disjointed. In particular, policy (and the rationale for same) on the school starting age for all children (including children with disabilities) needs to be clearly communicated to all stakeholders.

The National Disability Authority advises that the Department of Children and Youth Affairs could play a pivotal role in providing basic signposting information to all parents about the range of supports and services that are available to children. This basic signposting information would enable and inform parents as to where they can find further information as required from the relevant services. It could operate according to a ‘one source multiple channels’ principle. This would mean that the Department acts as the primary source of the signposting information and this information could be provided through a variety of channels such as public health nurses, GPs etc. who are already engaging with parents and children at a young age. Further and more detailed information could subsequently be provided at critical stages in a child’s life, for example prior to beginning pre-school, **ECCE** programme.

Similarly, SENOs can play an important role, earlier on in the process, by providing basic information to parents of children with disabilities in year one of **ECCE** regarding

the range of supports available to a child; the learning education model operating in Junior Infants; options in relation to mainstream and special schools and how supports will be provided. It is critical that this information would be provided (year one of **ECCE**) in advance of the more formal process of engagement with SENOs and the primary school in the year that the child would be transitioning to primary education (year two of **ECCE**). Such an approach would ensure consistency and accuracy of the communications to parents and enable parents make informed choices about their children transitioning to primary education.

### **An enhanced supportive process – AIM Plus**

The National Disability Authority recommends that an enhanced supportive process should be developed and integrated within the **AIM** programme of supports. This enhanced supportive process could be called **AIM Plus** and would include, inter alia;

- assessed supports for transitioning for all children with disabilities
- earlier engagement by SENOs with parents of children in the **AIM** programme with a graduated engagement as the child progresses through **ECCE** with **AIM** supports
- co-ordinated engagement with all key stakeholders with parents as part of an integrated planned transition planning process for a child as they move from **ECCE** to primary education
- protocols to underpin the nature and level of engagement including provision of clarity regarding roles and responsibilities in a “whole of early years” approach that enables a seamless transition for the child
- clarification on how exceptions would be dealt with such as for children with life limiting conditions. This should be a child-centred process whereby it could be objectively established that a child’s needs would not be met in primary school and that positive outcomes for the child could not be achieved in such a setting

### **Alignment**

The National Disability Authority advises that in the medium to long term both your Department and the Department of Education and Skills could consider the possibility of enhancing alignment in learning in the early years of children’s lives, in areas, such as:

- the development of a continuum of learning policy for early years that enables parents understand the learning and education in pre-school and primary school and how the various phases interact with each other
- developing a clear set of rules for when children should start school and aligning when a child starts. Currently in **ECCE** a starting age can range from 2 years 8

months to 3 years 7 months, whereas in primary education a child can start from 4 years to 6 years

- addressing anomalies within the various pre-school settings that are funded by the HSE, the Department of Education and Skills and the Department of Children and Youth Affairs. This could provide an opportunity for reconfiguring resources and offering a more streamlined **ECCE** programme with enhanced **AIM** supports

The National Disability Authority's recommendations offer a route to potentially addressing many of the issues that have previously led to requests for the overage exemption. It is hoped that if addressed, the overall demand for the exemption will decrease, but we advise that it would be useful to have a clearly planned and structured approach for those very few exceptional cases that are always likely to arise in any system.

Should you require any additional information and/or clarification regarding the above please do contact me. The National Disability Authority is happy to assist your officials in whatever we can in advancing the deliberations on this review.

Yours sincerely,



**Helen Guinan**  
**Chairperson**