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24 March 2026

Dear Sir/Madam,

CSSC response to DE consultation seeking views in respect of the draft Northern Ireland Executive Early Learning and Childcare Strategy

CSSC welcomes both the opportunity to comment on the Department of Education's draft Northern Ireland Executive Early Learning and Childcare Strategy and the Department's acknowledgement that the early years 'are the most important phase for overall development throughout our lives.' While delivering more affordable childcare is a core objective of the draft ELC strategy and represents an executive-wide priority, the focus of CSSC's response will be on the actions which support positive experiences and outcomes for children. School leaders are concerned that while the draft strategy acknowledges the importance of needs based early learning support, the commonly held view of school leaders is that childcare as economic infrastructure, is the dominant preoccupation of the strategy, and affordability rather than quality learning and development the main consideration informing the development of many actions.

Pre-School Standardisation's contribution to supporting children in their early years

CSSC understands the contribution of the pre-school standardisation programme to realising the intentions of the early learning and childcare strategy and has welcomed the move to standardise all pre-school settings to full-time provision, recognising the potential for full-time provision to support enhanced educational outcomes and support the social and emotional development of children during their pre-school year. Settings who participated in the Department's initial pilot to amalgamate for standardisation reported significant benefits to their participation in the pilot, involving as it did a reduction in the number of penultimate age children enrolled, coupled with the ability to facilitate full time hours. The benefits reported by settings included a less rushed experience of curriculum delivery, enhanced inclusion of children with SEN, child readiness for the pre-school curriculum, lunchtime as a learning opportunity, encouraging of increased socialisation skills, and improved opportunities for staff collaboration and planning.

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Mitigating the unintended consequences of a staggered approach to standardisation

CSSC acknowledges EA's role in facilitating the transformation of over 200 settings, 105 in 2025/26 and a further 102 for 2026/27. Controlled school leaders, however, have voiced concerns at the pace of standardisation and are concerned that the standardisation of non-statutory settings appears to be progressing at a more rapid pace than the statutory sector. CSSC has previously communicated these concerns to the Department, and while conscious that the number of non-statutory settings standardising to full time hours are doing so from a context in which full-time hours were not previously available, it remains the case that the standardisation of local non-statutory providers has led to an increased uptake of penultimate aged children for the statutory sector. This development has necessitated adaptations to delivery of the pre-school curriculum and brought with it potential challenges to the long-term sustainability of statutory controlled pre-school provision. School leaders note the specific action included in the draft strategy to make legislative changes to amend the age range for funded statutory pre-school provision, removing the current requirement to enrol children in their penultimate pre-school year. School leaders are concerned that as the numbers of penultimate children increase their settings will be viewed as unsustainable and while CSSC notes that the Amalgamation process is a voluntary route to standardisation, there are concerns that the voluntary nature of this process will become compulsory and settings will be made to amalgamate their part-time provision to full time, reducing the number of places available and thereby reducing high quality teacher led pre-school provision as an option for parents.

Valuing high-quality teacher-led provision and ensuring its sustainability

Various studies have emphasised the positive and lasting effects of high-quality pre-school education provision on children's intellectual and social behavioural development. The Effective Provision of Pre-School Education, 2004 (EPPE) project found that settings employing staff with higher qualifications have higher quality scores and their children make more progress. CSSC notes that the third theme prioritises enhancement of the early years' infrastructure through a skilled and valued workforce. It is therefore vitally important that programmes such as the pre-school standardisation programme are monitored for any potentially detrimental impacts which could reduce the availability of high-quality teacher led provision. This is especially important in the current context with the draft strategy acknowledging the difficulties in attracting and retaining skilled professionals with the appropriate qualifications. The appeal of full-time provision for parents is significant but in the absence of all funded pre-school places being full-time, there is the potential for parents to apply for a place based on considerations of convenience rather than choosing a place based on the quality of provision.

The leaders of controlled nursery schools and units expressed the view that the strategy does not sufficiently acknowledge or communicate the value of teacher led pre-school education and may inadvertently de-value statutory pre-school provision. An emerging theme during most conversations was the view that parents need to be made aware of the different types of pre-school provision available and the research concerning the enhanced outcomes of teacher led provision. School leaders referred to the lack of alignment between

the qualification levels of statutory and non-statutory provision and concluded that statutory settings should have been first to standardise and the standardisation of non-statutory providers progressed following completion of actions within the strategy which address a review of ELC qualifications and career framework. School leaders queried if ETI's views had been sought in determining those settings which would transition to full time hours for 2025/26 and 2026/27. CSSC welcomes the intention of the strategy to strengthen regulation and inspection through collaboration between ETI and HSCTs as a means of ensuring quality provision.

Making pre-school education compulsory

School leaders suggested that making the pre-school year compulsory could contribute to placing greater value on the importance of the pre-school year which is unfortunately regarded by some parents as childcare rather than education. School leaders were of the view that placing pre-school education on a statutory basis could also address patchy school attendance and support the establishment of more consistent patterns of attendance which would support school attendance and learning in the long-term.

Amending the statutory admissions criteria – mixed views prevail

CSSC notes the Department's intention to consult on legislative changes to remove the statutory admissions criteria prioritising children from socially disadvantaged circumstances when applying for funded pre-school education places. Consultation with the sector reveals mixed views about the timing of this course of action and therefore CSSC welcomes the intention to consult on these changes. CSSC would refer to the 2004 EPPE research which confirms that 'disadvantaged children were found to benefit significantly from good quality pre-school experiences, especially where they were with a mixture of children from different social backgrounds. Standardisation has the potential to correct situations where some settings are oversubscribed with children from 'socially disadvantaged circumstances' and ensure that a beneficial mixture of children from different social backgrounds is achieved. Some school leaders strongly believe that children from socially disadvantaged circumstances require full time provision more so than those from more socially advantaged circumstances and to remove this feature of the statutory admissions criteria before full standardisation is achieved is something which should be approached carefully. School leaders of primary schools with nursery units have voiced concerns about the prioritisation of places to children who do not reside within the local community and who are therefore unlikely to transition to P1. For some settings children in the local community, with siblings in the school, have been denied a place in the school within their community and it is for

these reasons that school leaders would welcome removal of the social deprivation criteria for admissions.

Amending the pre-school admissions timetable as a means of ensuring that pre-school education is age-appropriate

Conscious of the Fair Start report's recommendation that the Pre-school education programme should be appropriate to age and stage of child and that funded provision for younger children should be separate to that for children of pre-school age school leaders are of the view that the non-statutory sector with the more favourable staff:child ratio of 1:8 would be better placed to meet the needs of penultimate age children who are not ready for the pre-school curriculum and believe that the non-statutory sector could play a significant role in filling what the Independent Review of Education refer to as the crucial gaps in provision in relation to 2–3-year olds.

In considering the increased number of penultimate aged children enrolled in statutory settings, the leaders of controlled provision articulated significant concerns about the statutory timetable for pre-school admissions. School leaders are not satisfied by the requirement to communicate placements to parents of penultimate aged pupils at the end of Stage 2 of the applications process and are of the view that this 'early' communication of placements prevents statutory settings from offering places to target age children who may engage with the admissions process later in the academic year. School leaders voiced the opinion that penultimate aged children should not be notified of placements until statutory settings have filled their places with as many target aged children as possible and recommend that parents of penultimate aged children should not be notified of the outcomes until August.

Consideration of full-time pre-school education for special schools – an unrealistic aspiration?

It will be crucial that a feasibility study of the potential to provide special school pre-school provision on a full-time (22,5 hours per week) is informed by the views of the leaders of special schools and subject to consultation. Whether a full-time pre-school experience is in the interests of the child should be subject to rigorous consultation with educational psychologists, Allied Health Professionals and school leaders who will be able to comment on the school's capacity and resources required to make a success of a full-time placement. In addition to very valid concerns about the child's readiness for full-time provision, school leaders would refer to the limitations of the schools' estate. CSSC is conscious of the Education Authority's Plans of Action to meet the needs of the current and projected pupil numbers for each of Northern Ireland's 40 special schools. CSSC is aware that these plans are being taken forward in the context of the Minister's 2024 announcement of a SEN capital investment programme and that the delivery of that capital investment will be on an 'unprecedented scope and scale over the next decade.' With many special schools not having the appropriate physical or external space to accommodate demand, this investment is very much necessary but unlikely to address all the accommodation requirements of the special schools' estate. CSSC anticipates that the introduction of full-time pre-school



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provision in special schools will represent a significant undertaking and conscious of the current economic climate, will potentially not be something that can be introduced on a consistent basis across Northern Ireland.

Leaders acknowledge that, in a scenario characterised by sufficient capacity full-time provision could present some opportunities and allow for enhanced Allied Health Professional input. School leaders articulated an aspiration of full-time provision being supported by the presence of health visiting, speech and language support and the input provided by a designated family worker to empower parents to support their child's development in an environment which is known to the child and enhances the child and parent's feelings of safety and support.

More than one special school referred to their inability to currently offer nursery provision on an annual basis and voiced concerns about the significant challenges parents face in accessing early years services. The responsibility that special schools have assumed in signposting families to available community supports is significant as is the positive interventions put in place to support these families which have led to many positive outcomes for children at this developmental stage. However, it is a significant undertaking to provide this support along with every other role assumed by the staff of special schools. To support the efforts of special schools in facilitating full-time provision, support was voiced for the establishment of what was described as a stand-alone early years centre for children with SEN which could provide integrated therapy input, support in meeting sensory needs, specialist teaching and support families with consistent intervention both in the early years setting and the home.

CSSC is aware of the Department of Education's SEN Reform initiatives and the emphasis given to enhancing the role of special schools within local communities. CSSC is aware of communication issued to schools, November 2025, inviting participation in 5 projects which will test and trial new approaches to build detailed evidence for wider system transformation and is aware that a significant role is envisaged for special schools as resource hubs of expertise. CSSC notes that the other projects mentioned in the November 2025 communication are of significant interest to the leaders of primary schools and nursery schools including as they do the 'in-school support model for children in pre-school and foundation stage; SEN Assistant Training in Pre-School and Foundation Stage; Transforming Inclusive Play Environments and Early Intervention/Assessment Hubs. CSSC and the school leaders consulted would welcome further information about the impact of these projects on provision for children with special educational needs and how practitioners experienced the programme. CSSC understands that funding for the programme is for a finite period, ending

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in June 2028 and would emphasise the need for ongoing funding where the impact is felt to enhance SEN services and where projects support wider system transformation.

Barriers and enablers to the introduction of wraparound care provision in special schools

In considering the potential for wraparound care provision in special schools, significant concerns were raised which include the current capacity of the schools' estate, insufficient staffing and the need for training, which is often difficult to source, to support complex needs. School leaders were very clear on the difficulties involved in emulating the arrangements which would be seen in mainstream wraparound care provision. School leaders noted that children with SEN would, if the intention was to establish wraparound care in the school attended by the child, need to be in their designated classroom spaces to support the child's feelings of psychological safety. School leaders queried how the learning environment could be changed into a childcare environment on a daily basis and then returned to its former state in a timely manner.

Staffing will be a significant consideration in the development of any wraparound care provision and would require a significant investment as any plans of this type would not be able to rely on the teaching and/or non-teaching staff of special schools without significant changes to staff contracts. Concerns as to who would manage this type of provision were raised and the view expressed that additional staffing would be required, potentially independent of school-based staff, with equivalent training provided, comparable to that received by school day staff. Wrap around care provision within a special school setting will potentially require a qualified nurse on site for those children with complex medical needs. References were made by school leaders to arrangements in other jurisdictions and it was acknowledged that provision of wraparound care would potentially need to be facilitated by a separate/independent organisation with the relevant expertise to deal with, not only the child's emotional and social development needs, but also for a significant many, their medical needs.

Concerns about the potential barriers to wraparound care provision in special schools also referred to changes which would be necessary to Transport arrangements. School leaders noted that the current system would not be able to accommodate extended hours and with some families unable to access alternative transport which would support their child's attendance this would make wraparound care undeliverable.

The leaders of special schools were of the view that the level of provision required, which for some individual children may require a minimum of 2 to 3 support staff, would not be able to be delivered within standard wrap-around care models. and as one principal summarised would 'not be feasible within a special school setting without significant additional investment, staffing and infrastructure changes.' School leaders referred to the SEN Reform Agenda's Delivery Plan and actions which recognise the challenges in addressing support outside of school hours and term time. The SEN Reform Agenda includes actions which acknowledge that to provide such support will require the support of various partners from the community and voluntary sector as well as the contribution of several government departments which represents a significant undertaking and are an acknowledgment of the

complexities involved for special schools in addressing support outside of school hours and term time.

Ensuring every child receives the necessary developmental support to thrive – a call to expand high quality services

The leaders of special schools and the leaders of nursery schools are agreed that the actions associated with Theme 1 are required but do not include all the necessary actions that staff feel would better support children in their early years and ensure that each child receives the best possible start in life. Controlled school leaders are supportive of efforts to expand services for children facing disadvantage and focused discussion took place on how this would work to support children with SEN. One school leader noted that pre-school settings work to meet the needs of all children, but their focus inevitably turns more frequently to the support required for children with SEN since this is an area of provision which is often compromised due to insufficient resourcing and capacity. The draft strategy must be considered in parallel with the SEN Reform Agenda, and specific actions in the SEN Reform Agenda should be implemented with adequate resourcing. School leaders emphasised the need for early identification of additional needs along with effective early intervention programmes. CSSC is conscious that the piloting of Early Intervention/Assessment Hubs is being taken forward by the Department and this project, representing one of the Department's five SEN Reform initiatives, is close to the vision articulated by the leaders of controlled schools.

School leaders have communicated a vision for the support which would precede the pre-school year which includes more consistent and enhanced support from Health Visitors, access to speech and language therapists, Allied Health Professionals, Occupational Therapists alongside other proven interventions and therapies and meaningful parental support. School leaders in considering the Department's proposals to expand Sure Start provision share the Department's aspiration for expansion, emphasising the potential for all children to benefit from in-house health visiting and speech and language support which is a feature of Sure Start provision. Indeed, an ETI evaluation of Sure Start provision concluded that 'A key strength of the Programme is the improvement in the children's language skills. Comparison with baseline assessments following speech and language intervention demonstrates that almost all the children are making very good progress in their language and communication skills.'

School leaders note that their access to speech and language support is compromised due to lack of available therapists and note that staff's capacity to support speech and language

development is dependent on additional money made available to settings through various funding streams such as the Extended Schools' programme. It is leaders' views that speech and language support should be resourced from the Health budget rather than the Education budget and should be delivered both previous to, and during the pre-school year, and a commitment made to train more speech and language practitioners to meet the demand for a service which has significant implications for a child's ability to thrive and engage with their education.

School leaders also feel that Sure Start expansion could do much to improve the quality of support for parents, better enabling all parents to understand how to support their child's development, a view supported by the aforementioned ETI evaluation. School leaders noted that children often present with attachment difficulties which could be addressed if parents understood the significance of practical actions which support healthy attachment. While school leaders welcome and have expertly delivered programmes such as Getting Ready to Learn, leaders are of the view that parental engagement and understanding of child development needs to be facilitated far earlier than the pre-school year and referred to concerns about parents' access to Health Visiting support which is inconsistent at best. These leaders felt that more targeted support for parents re child developmental milestones and how to support them should be delivered by a Health Visiting Service that is better resourced and made regionally consistent in terms of its accessibility to parents from birth. School leaders note that many children present during their pre-school year with the following developmental deficits: - many are not toilet trained, more children present at pre-school with dummies, lack curiosity due to home environments which introduce digital resources too early and lack the co-ordination skills school leaders would expect them to have at this developmental stage. One school principal noted that parents could be educated on the appropriate developmental milestones when attending GP services during pregnancy or receiving health visiting support post-partum, a time when prospective parents are more available to the key messages which need to be delivered and will best support their child's development.

In continuing discussion about the importance of Health's contribution to the realisation of the Strategy's aims, school leaders noted that 3+reviews which take place during the school year often happen at too late a stage, preventing timely support for progressing an application for statutory assessment. It is the common experience of school leaders that many parents are not informed that their child may have additional needs until the pre-school year and this is attributed to the lack of access to health visiting support preceding the pre-school year which could be a feature of an enhanced NI wide Sure Start programme. One school leader referred to the benefits of the pilot programme SACHEL – Schools and the Community Help Everyone Learn - and described it as an effective model for this type of holistic support inclusive of Education and Health and which also involved Sure Start provision. The programme's overall aim of improving educational outcomes for children from pre-school into P1 and P2 included delivery of parenting support programmes, home visits by health visitors, speech and language support in nursery schools and signposting to other relevant services. Expansion of an NI wide programme, similar to that delivered through the SACHEL programme which was notable for its inclusion of Sure Start services

could ensure that children and their families receive the appropriate developmental support at the earliest possible stage.

The expansion of the Sure Start programme could also address school leaders' concerns about children's access to play prior to the pre-school year. A recent ETI evaluation of the quality of play based activities within the Sure Start Programme, published in 2025, concluded that, 'the play-based learning experiences within the Programme are mostly high quality and are enhancing the children's learning through: a balance of structured routines and creative exploration; purposeful adult interactions; authentic and stimulating resources; and the provision of a wide range of opportunities to develop language and curiosity in meaningful contexts.' The evaluation also commented on the how participation in the programme supported effective transitions with the Inspectorate noting that 'almost all of the children are making very good progress from their individual starting points. The children show high levels of concentration and engagement resulting in sustained play and have well developed independence, social skills, and fine and gross motor skills. Consequently, they are well prepared to transition to their pre-school placement.' Effective, well supported transitions such as those supported by participation in this programme should be the experience of all children. In discussing the barriers to participation for working parents, school leaders noted that online registered training for parents could be developed to supplement the in-school support available through the programme.

Supporting enriched environments to benefit all children including those with additional needs

The need for greater investment in the school's estate was highlighted in the context of the increase in the number of children with additional needs and school leaders referred to how the lack of investment in existing accommodation prevents the development of efforts to support more children with SEN. The increasing complexity of pupil needs presents challenges for the enriched environments which pre-school leaders work to support. School leaders described how the pre-school environment must support the regulation of the children's sensory systems and staff work to create and sustain enriched environments with the aim of stimulating children's curiosity. CSSC is aware of the resourcefulness of several nursery schools in adapting various small spaces to become sensory spaces or to allow for small group withdrawal and these efforts need to be supported and resourced on a wider scale. The effective practice of Dunclug Nursery School in supporting small group withdrawal was highlighted by several principals and the report of an inspection carried out at the school noted that 'Early identification and support for children who have special educational needs is a priority and a significant strength within the nursery school. The

support in place is highly effective, and the children are making excellent progress from their individual starting points.' CSSC therefore welcomes the strategy's inclusion of an action which supports children's access to high quality early learning and childcare environments and welcomes the strategy's mention of 'increased capital funding, including for children with SEN.' Effective resourcing of the school estate cannot be overemphasised. The ETI Compendium of Phase insight reports notes that of the pre-school settings inspected 2021 to 2024, 'a rich and stimulating physical environment, both indoors and outdoors, is recognised by staff as being crucial to the development of the children's curiosity and social interaction and enables the children to connect with and explore nature.'

Enhanced collaboration between Education and Health

CSSC, throughout this response, and in response to previous consultations, has emphasised the need for greater collaboration between Education and Health in supporting the interventions which controlled schools, particularly special schools rely on. CSSC notes that the Department of Education's SEN reform projects include Health input and it is of paramount importance to school leaders that the involvement of Health is effectively resourced to support these projects and other early intervention programmes which will be taken forward as part of SEN Reform Agenda's Delivery Plan. CSSC endorses the actions to be found in the SEN Reform Agenda's Delivery Plan and acknowledges the importance of securing better data sharing between Education and Health to support effective transitions at various stages of a learner's journey. Currently school leaders feel that no one department has effective oversight of a child's development and the support required at various transition points. The strategy's intention to agree a protocol for sharing of information on children's developmental journeys at key transition points, to support forward planning and ensure better continuity of support is therefore much needed and must be inclusive of Health's input.

A review of staff:child ratios must not be delayed

The Fair Start Final Report and Action Plan, 2021, recommended that DE should review staff:child ratios across all pre-school education settings. School leaders are of the view that the staff:child ratio of 1:13 in statutory settings is insufficient and does not support the best efforts of staff to meet the needs of an increasingly more complex pupil profile on a day to day basis but also when accommodating external support which school leaders note is often difficult to access and is often delayed. School leaders described the challenges of maintaining staff:child ratios when working to allow external support from the EA's Local Impact Teams, support which requires that a member of staff is withdrawn to supervise 1:1 or 1:3 group support provided by the relevant officer. The staff:child ratios of 1:8 in non-statutory pre-school provision should be replicated for the statutory sector and be addressed sooner rather than later. To delay consideration of a review of the staff:child ratio which is termed a category 3 action and will therefore not be addressed until April 2030 to March 2034, is to delay a critical action which could significantly benefit the efforts of statutory pre-school providers to meet the educational, social and emotional needs of all children. While CSSC is conscious that the review of the staff:child ratio is to be considered within the context of other related actions introduced by this strategy and SEN reform,

efforts must be made to accommodate the professional judgement of the profession in relation to the current staffing arrangements sooner rather than later taking cognisance of a changed context for statutory settings which are responding to higher levels of SEN and in some settings an increased number of penultimate aged children.

Effectively resourcing pre-school education – addressing teacher workload, school budgets and investment in the training and retention of high-quality staff

Leaders value the flexibility afforded by the Pre-School Inclusion Fund which has been used by several settings to fund additional staffing; however, the resourcing of additional staffing needs to be placed on a more certain footing and not subject to the introduction and subsequent withdrawal of individual funding initiatives. CSSC welcomes the intention of the strategy to ensure 'further roll out of the Pre-School Inclusion Fund' and in endorsing this funding acknowledges how controlled settings have been able to use the funding flexibly to prioritise the needs of their specific context with some funding additional staffing and others specialist equipment, resources or training.

School leaders have articulated the view that every pre-school setting should have a SEN Assistant as a matter of course and in discussing the importance of this role raised the difficulties in recruiting to post, highlighting the barriers to recruitment of poor remuneration and lack of career advancement. CSSC notes the publication of the British Association for Early Childhood Education's comparative analysis of early years workforce policy in the 4 UK nations calls for stronger action across all four UK nations to strengthen qualification requirements for the early years workforce (EYW) and to establish clear career progression routes with appropriate pay and status, in order to address the current recruitment and retention crisis and drive up quality in the sector. CSSC would emphasise that the crisis in recruitment and retention of adult assistants is being keenly felt across the sector and these recommendations represent a partial but key action to resolving this issue.

CSSC notes that review of the adult assistant model is being taken forward as part of SEND Transformation and looks forward to learning of the outcomes of the jointly led Transforming the Support Model (TSM) project being taken forward by the Department and EA. CSSC welcomes the intention to provide greater flexibility for schools in how professional support is provided in the classroom. Consideration of Classroom Assistant contracts is crucial in this context as the allocation of specific hours from the Education Authority's Statutory Assessment and Review Service often does not allow for staff to participate in whole school development opportunities or other training which happens beyond classroom assistant's contractual hours.

School leaders have spoken highly of the skills acquired by their classroom assistants but have also expressed concerns about the lack of training to prepare new recruits for the role. CSSC notes the Department's recent launch of a programme of training designed for classroom assistants who support children with SEN at pre-school and P1 and P2 and is hopeful that this will build the capacity of this crucial workforce. School leaders referred to the high quality of previously available qualifications from the NNEB, (National Nursery Examination Board) for classroom assistants as a model for any new capacity building considered for development. CSSC notes and welcomes the Department's intention to evaluate this training to inform future professional development for classroom assistants.

CSSC has long been aware of the tremendous workload carried out by the leaders of statutory pre-school provision with the leaders of nursery schools assuming the roles of SENCO and Designated Teacher for Child Protection amongst numerous other roles. CSSC notes that actions already underway to support Theme 1 include a revised funding model for non-statutory pre-school education provision that includes paid release time for planning, administration, training and Early Years Specialist support, full staffing costs and overheads.

CSSC is conscious that the Independent Review of Teacher Workload in Northern Ireland acknowledged the workload concerns of teaching principals in nursery schools and recommended the facilitation of release time for principals in the nursery school sector. This recommendation must be actioned imminently to support the administrative demands of the role.

The action in relation to the funding model for non-statutory provision has given school leaders the impression that the challenges faced by their settings are unacknowledged in the draft strategy. The funding model for statutory pre-school education also requires attention and school leaders highlighted the administrative burden of accounting for various funding streams and noted that whilst the additional funding was welcomed, an enhanced LMS budget which absorbed this funding without the additional administrative accountability caused by different pots of money would be far better and allow greater flexibility in respect of what needs resourced in each specific school context.

An Integrated Early Years Framework developed for the early years' workforce by the early years' workforce

CSSC notes the draft strategy's intention to introduce an integrated Early Years Framework for children aged 0 to 6 that provides a single continuum for children below compulsory school age as they transition to formal education. CSSC welcomes the intention to engage with early years experts in the development of this framework and strongly recommends that practitioners views are sought in the development of this framework especially when considering the Department's intention for the framework to align with the Foundation Stage of the reformed statutory curriculum. In respect of the experts who should inform the development of the Integrated Early Years Framework, one school leader referred to the critical importance of engaging with Northern Ireland's experts in neurodevelopmental therapies especially when considering the rapid brain growth experienced during the first three years of life and which can be supported by nurturing environments. The importance

of Education and Health collaborating on the development of this framework was emphasised by school leaders and indeed the need for this collaboration was a recurring theme in conversations with school leaders and mentioned also in reference to successful delivery of the SEN Reform Agenda. In respect of aligning the strategy with the reformed statutory curriculum, school leaders were vociferous in their support of the pre-school curriculum which practitioners believe is a sound document which empowers pre-school educators to deliver a curriculum which is child-led, developmentally appropriate and supports exploratory learning. School leaders, however, note that their Foundation Stage counterparts do not enjoy the same flexibility in approaches and that the P1 experience in some transitions can see the child regress in terms of the independence skills developed during the pre-school year.

School leaders are concerned that there is a lack of continuity with pre-school approaches and a reduction in child-led learning even though the primary curriculum emphasises that in the Foundation Stage children should experience much of their learning through well planned and challenging play which some pre-school practitioners feel is often overlooked at Foundation Stage. The development of a new integrated framework has the potential to address this concern. School leaders voiced concerns at the direction of travel in respect of a reformed curriculum and cautioned against following the example of curriculum reform in England which has been criticised for an overly academic focus which does not accurately reflect child development and lacked the input of classroom teachers in its development.

A SEN CPD framework informed by and supportive of practitioners' skills and expertise

As this response has demonstrated, consideration to effectively meeting the needs of children with SEN dominates conversations with the leaders of pre-school provision across mainstream and special educational settings. Consequently, there are strong views on the deficits in respect of the training available to settings. In considering the development of a SEN CPD Framework which is included in the draft strategy, consideration will have to be given to a wide range of needs, and it is therefore crucial that the views of practitioners are sought. All too often school staff report being given the same advice and guidance from pupil support services which undermines the expertise that staff have developed through their specific interactions and the interventions put in place to support individual children. A framework which supports enhanced collaboration between practitioners is recommended as is better resourcing of schools which could be achieved through reducing the number of individual funding initiatives and the accompanying administrative demands of accounting for what constitute small amounts of money and pooling this funding into healthier LMS budgets which allows for flexibility in how the money is spent and specifically, which training

is prioritised by settings. This would ensure a more responsive approach to meeting the needs of children with SEN.

Co-creation of a vision for early years education

Nursery school leaders noted that their settings account for 71% of all pre-school education provision, however, they feel that their significant contribution to high quality pre-school education is overlooked in the strategy document and that the focus is on enhancing and potentially expanding non-statutory provision to the detriment of the statutory sector. School leaders queried if this was the outcome of prioritising affordability rather than investing in the provision which would support better child outcomes. Leaders queried the Department's long-term vision for nursery schools and asked for transparency and openness to address the uncertainty that dominates at present. Some nursery school leaders are interpreting the lack of investment in the physical infrastructure as intentional and hypothesise a long-term aspiration to see neighbouring primary schools assume management responsibility for those settings who are near local primary schools. Other school leaders have queried what role nursery schools could be asked to assume in the context of an increased need for specialist provisions and again interpret the lack of approach to facilitate such provision which could be expertly delivered by practitioners as a long-term goal to reduce stand-alone nursery provision and thereby missing a crucial opportunity to meet the needs of children with SEN during their pre-school year. CSSC recommends that the department engage with school leaders to address these concerns and collaborate with the sector's leaders on a vision which will make use of the expertise and resourcefulness of staff to meet the needs of all children as they commence their educational journey.

CSSC notes the Ministerial foreword's assurance that many of the actions include initiatives which can be scaled up or down depending on resources and brought forward or moved back. The ministerial foreword notes that this flexibility is key to enable a response to the evolving financial context, but it is even more crucial to allow for an effective response to an evolving landscape in terms of what challenges and supports children's development. It is CSSC's view that those best placed to inform which actions should be prioritised, which actions should be scaled up or down are those who daily work to meet the needs of our children and young people.

CSSC endorses a collaborative approach to achieving the objectives of this strategy and is happy to discuss this response with the Department.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Mark Baker', with a stylized flourish at the end.

Mark Baker
Chief Executive