



**HERE NI Response to the Draft Northern Ireland Executive Early Learning and Childcare Strategy**

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**This response was prepared by:**

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## Introduction

HERE NI (previously LASI), established informally in 2000 and formally constituted as a Company Limited by Guarantee in 2004, is a regional organisation that works across all areas of Northern Ireland. We advocate for and support LGBTQIA+ women and their families to improve the lives of LGBTQIA+ women across the North. HERE NI is the only women focused organisation within the Northern Ireland LGBTQIA+ sector.

HERE NI welcome investment in childcare in Northern Ireland and have long awaited the introduction of an Early Learning and Childcare Strategy to tackle poverty, remove barriers for women gaining access to, and staying in, employment, and ensuring that every child has the best start in life. Economic inactivity is one of the biggest problems facing the Northern Ireland economy. In 2025, figures show the number of people not in work or looking for a job has gone up to 26.6% - the highest of the UK regions.<sup>1</sup> We know that women being more likely to be economically inactive, and continue to be overrepresented in low-paid sectors and in part-time and temporary jobs.<sup>2</sup> Unpaid caring responsibilities, including childcare, remain one of the main reasons for women being economically inactive.<sup>3</sup>

While this Strategy does make some short-term alleviations to childcare costs, it fails to set a clear vision for ensuring affordable childcare is universal, sustainable and targets the most low-income families. We also have concerns that the focus of the Strategy is on early years, while childcare continues to be an issue for parents until their children are in their teens. Actions within the draft Strategy including removing the current statutory admissions criteria prioritising children from socially disadvantaged backgrounds when applying for funded pre-school education places, are particularly concerning and risk exacerbating childcare issues for low-income families, rather than alleviating them.

HERE NI also have broader concerns around the use of a subsidy scheme as the mechanism of alleviating costs when the Department does not outline a plan to place caps on childcare providers (75% of which are private providers in NI).<sup>4</sup> Rebecca Harper from Melted Parents noted that: "Many childcare providers were putting up prices now to cover the increases in National Insurance contributions and minimum wage in April".<sup>5</sup> Another woman said the 15% subsidy works out about £400 a month, but as their childcare bill is about £2,000 per month, she described it as "a bit of a drop in the ocean".<sup>6</sup> HERE NI, therefore, suggest that there should be move towards longer term state-funded universal childcare. HERE NI support the wider women's sector and women's policy group call that advocates for a Strategy that supports a public childcare system that seeks regulation of childcare providers to ensure no parent is unable to access or stay in paid work due to the high cost of childcare.

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<sup>1</sup> BBC Article: [The only thing stopping me working is childcare](#) (2025)

<sup>2</sup> Epic Futures NI: [Childcare and Female Economic Inactivity in Northern Ireland](#) (2024)

<sup>3</sup> Epic Futures NI: [Childcare and Female Economic Inactivity in Northern Ireland](#) (2024)

<sup>4</sup> Department of Education Report: [Review of Childcare Services in Northern Ireland](#) (2023)

<sup>5</sup> BBC Article: [The only thing stopping me working is childcare](#) (2025)

<sup>6</sup> BBC Article: [The only thing stopping me working is childcare](#) (2025)

# THEME 1: Supporting children in their early years



## Outcome:

- All children get the developmental support needed in their early years to achieve their full potential, including those facing disadvantage or with additional needs

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

### Actions already underway (April 2024 to March 2026)

- By March 2026, approve an additional 4,700 full-time (22.5 hours per week) funded pre-school education places with a free school meal for eligible children, meaning that half of all funded preschool education places in all areas across Northern Ireland will be provided on a full-time (22.5 hours per week) basis by September 2026.
- Implement 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.

### Actions that will be prioritised next subject to available resources (April 2026 to March 2030)

- In September 2026, consult on legislative changes to remove the current statutory admissions criteria prioritising children from socially disadvantaged circumstances when applying for funded pre-school education places.
- By September 2029, approve 75% funded pre-school places across Northern Ireland on a full time (22.5 hours per week) basis.

### Actions that may take longer to implement (April 2030 to March 2034)

- Continue to progress Pre-School standardisation, with the aim to provide a funded full-time preschool education place for all target aged children whose parents want it.
- Make legislative changes, subject to consultation, to amend the age range for funded statutory pre-school provision, removing the current requirement to enrol children in their penultimate preschool year

## Question 1. To what extent do you agree or disagree with Objective 1.1 and its associated actions?

Please select only one item

- Disagree

Do you have any other comments to make on Objective 1.1 and its associated actions?

The decision to approve additional funded pre-school education places at 22.5 hours per week is welcomed and has the potential to alleviate some financial pressures for parents. However, HRE NI has significant concerns over the consideration of removal of the current statutory admissions criteria which currently prioritises children from socially disadvantaged circumstances when applying for funded pre-school education places. This could worsen the outcomes for children with social disadvantage, and has the potential to create further economic inactivity, particularly among women. Moreover, HRE NI has concerns that this Strategy will not be universal in its application. Objective 1.1 has outlined its aim to approve 75% funded pre-school places across NI by September 2029. To ensure every child has access to pre-school education, the Department should aim to make funded pre-school places available to all children across NI, not just 75%. HRE NI reiterate that only when childcare is universal would it be appropriate to remove the statutory admissions criteria.

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

### Actions already underway (April 2024 to March 2026)

- Provide at least 10% funding boost to enable the Sure Start programme to meet rising demand from over 36,200 eligible children and their families.
- Expand the Sure Start programme to bring within scope an additional 22 most disadvantaged Super Output Areas in Northern Ireland on a permanent basis, increasing access to an additional 2,500 children and their families.
- Further expand Sure Start by introducing a new outreach model, enabling access to around 1,800 additional children and families with evidenced need, regardless of geographical location.
- Fund at least 175 Pathway projects and increase the maximum level of awards from £30,000 to £40,000.
- Introduce a new Pathway funding stream to provide targeted support for over 650 childminders and AHCs.
- Provide enhanced funding to stabilise the Toybox project ensuring that service levels meet the needs of over 150 Traveller and Roma families.
- Undertake a scoping study to identify the needs of newcomer children (0–4 years) in Northern Ireland and how they may be supported within an expanded Toybox project.

### Actions that will be prioritised next subject to available resources (April 2026 to March 2030)

- Continue the category 1 expansions of targeted early learning programmes (Sure Start, Pathway and Toybox) until March 2030 to meet increasing service demands, with the provision of annual inflationary uplifts to consolidate the expanded provision.
- Commission a scoping study to report by March 2027 on options for further expansion of the Sure Start programme.
- Subject to the findings of the scoping study, expand the Sure Start programme to meet identified need.

- By March 2028, expand the Toybox project to include support for Newcomer children (0-4 years) and their families.
- In 2027, conduct a feasibility study of the potential to provide special school nursery provision on a full-time (22.5 hours per week) basis.

#### **Actions that may take longer to implement (April 2030 to March 2034)**

- Continue the expansions of targeted early learning programmes (Sure Start, Pathway and Toybox) in Categories 1 & 2 until March 2034 to meet increasing service demands, with the provision of annual inflationary uplifts to consolidate the expanded provision.
- Agree protocol for sharing of information on children's developmental journeys at key transition points, to support forward planning and ensure better continuity of support.

## **Question 2. To what extent do you agree or disagree with Objective 1.2 and its associated actions?**

*Please select only one item*

- Neither Agree nor Disagree

Do you have any other comments to make on Objective 1.2 and its associated actions?

HERE NI agree that supporting schemes like SureStart through financial and resource intensive investment is a positive step in supporting children who face social disadvantage and children with additional needs. However, if these programmes including: SureStart, Pathway and Toybox are to be expanded, they must provide **full time** spaces and have the same range of educational opportunities as their peers in full time early years provision. Without these full-time places women will still face barriers to getting into, and staying in, work. When looking at measures tackling social disadvantage, there should be recognition of the importance of community-based childcare in areas with the highest need. There is no recognition of the Women's Centre Childcare Fund (WCCF), for example, which is a vital support for children living in areas of social and economic disadvantage, and supports low-income women to get back into work. HERE NI recommend that within this objective, specific support for community-based childcare be increased and expanded, delivered through the WCCF.

### Objective 1.3: Extend developmental provision for children aged 2-3

<b>Actions already underway</b> (April 2024 to March 2026)
<ul style="list-style-type: none"><li>• Provide 1,790 2–3-year-olds with access to the Sure Start Developmental Programme in current and expanded geographical areas and through a new Outreach model.</li></ul>
<b>Actions that will be prioritised next subject to available resources</b> (April 2026 to March 2030)
<ul style="list-style-type: none"><li>• Progressively extend access to developmental support for children aged 2–3, initially prioritising children facing disadvantage and those with additional needs.</li><li>• Develop a holistic approach to child development through integrated family-centered services which brings together Allied Health Professionals, Speech and Language Therapists, early years practitioners, family support teams, and others to develop a targeted programme for children with emerging additional needs, including support for parents and families.</li></ul>
<b>Actions that may take longer to implement</b> (April 2030 to March 2034)
<ul style="list-style-type: none"><li>• Provide access to appropriate developmental provision for all children aged 2–3 (in their pre-preschool year).</li></ul>

### Question 3. To what extent do you agree or disagree with Objective 1.3 and its associated actions?

*Please select only one item*

- Agree
- Do you have any other comments to make on Objective 1.3 and its associated actions?

While HERe NI agree that this objective is a progressive step for ensuring children aged 2-3 have childcare access, there are some concerns if access is not universal; this could leave to a 'postcode lottery' for children, risking leaving some children behind. To ensure no child is left behind, universal provisions should be set in the second stage of this objective (April 2026 - March 2030).

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

### Actions already underway (April 2024 to March 2026)

- Increase the financial support for the development of the Irish Medium (IM) Pre-school Support Service.
- Promote the value and benefits of play, providing professional training and development services to support best practice and promote inclusivity.
- Promote speech, language and communication development for children in the early years and develop a series of universally accessible bite size videos.
- Support staff within the Pre-school Education Programme (PSEP) to engage more effectively with parents to create, sustain and improve positive and nurturing home learning environments.
- Provide the BookTrust Bookstart Baby programme to all babies in their first year.

### Actions that will be prioritised next subject to available resources (April 2026 to March 2030)

- By March 2028, in consultation with early years experts, design and introduce an integrated Early Years Framework for children aged 0-6 that provides a single continuum for children below compulsory school age as they transition to formal education. The unified framework will be used in all ELC providers and will align with the Foundation Stage of the reformed statutory curriculum. The framework will set out broad expectations for children's development across key domains.
- Promote stronger parent-practitioner partnerships across all education and ELC providers, building on existing Ready to Learn Programme and other relevant initiatives including support for children who are pre-term.
- Strengthen Irish Medium (IM) early years immersion and pedagogy through the roll-out of an IM Pre-School Immersion Education Course, including supporting stronger parent-practitioner partnerships.
- Provide high-quality support services and professional advice to both non-statutory and statutory Pre-school Education Programme (PSEP) providers to develop good practice and support them to meet the needs of all children.

### Actions that may take longer to implement (April 2030 to March 2034)

- Introduce a regional approach to ensuring timely and equitable access to speech and language support services in the early years.
- Develop a Play Programme and guidance for inclusive early learning and childcare environments, both physical and learning, informed by professionals across Education and Health.

## Question 4. To what extent do you agree or disagree with Objective 1.4 and its associated actions?

Please select only one item

- Agree

Do you have any comments to make on Objective 1.4 and its associated actions?

HERE NI welcome this objective and its ambition for high quality provision. It is particularly welcome to see the Department's inclusive commitment to investing in Irish Medium Education, which often suffers from a lack of investment. Given these standards for provision, it is even more important that childcare is universal to ensure all children – regardless of cultural or social background – have access to this high-quality care.

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



### Outcomes:

- Families can access more affordable childcare that meets their needs
- Families are better equipped to understand and support their child's learning

### Objective 2.1: Make childcare more affordable.

#### Actions already underway (April 2024 to March 2026)

- Introduce a bespoke Northern Ireland Childcare Subsidy Scheme (NICSS) providing a 15% subsidy on childcare costs for eligible working families. When combined with Tax Free Childcare (TFC) this will reduce bills by up to 32%.

### Actions that will be prioritised next subject to available resources (April 2026 to March 2030)

- Increase the NICSS contribution to 20% for all eligible children from April 2026. Combined with TFC this will reduce bills by up to 36%.
- Subject to satisfactory real time evaluation of the NICSS expansion and analysis of fees, incrementally increase the subsidy up to 30% by April 2030. Combined with TFC this will provide a deduction on childcare bills up to 44%.
- Introduce fee publication requirements for those providers operating the NICSS, to produce greater transparency on the costs of childcare across all providers and enable increases to be monitored and reported.
- Annually increase the cap on the maximum subsidy which can be claimed through the NICSS in line with the associated subsidy percentage and inflation.
- Raise awareness of the full range of financial support available with the costs of childcare, including through NICSS, TFC, Universal Credit (UC) and targeted initiatives for those undergoing education/training.

### Actions that may take longer to implement (April 2030 to March 2034)

- Subject to satisfactory real time evaluation of the NICSS expansion and analysis of fees, increase the subsidy up to 40% by April 2032. Combined with TFC, this will provide a total deduction on childcare bills of up to 52%.
- Extend Digital Economy Act (DEA) powers to Northern Ireland and DE to enable sharing of information from TFC to streamline verification requirements for NICSS users.

## Question 5. To what extent do you agree or disagree with Objective 2.1 and its associated actions?

*Please select only one item*

- Disagree

Do you have any other comments to make on Objective 2.1 and its associated actions?

HERE NI welcome the decision to alleviate financial pressure and understand the benefits that government schemes like Tax Free Childcare offer. However, HERE NI have concerns that the subsidy scheme within a privatised childcare model is not strategic investment. The use of a subsidy scheme as the mechanism of alleviating costs is concerning when the Department does not outline a plan to place caps on childcare providers (75% of which are private providers in NI).<sup>7</sup> Rebecca Harper of Melted Parents noted that: "Many childcare providers were putting up prices now to cover the increases in National Insurance contributions and minimum wage in April".<sup>8</sup> Another woman said the 15% subsidy works out about £400 a month, but as their childcare bill is about £2,000 per month, she described it as "a bit of a drop in the ocean".<sup>9</sup> The

<sup>7</sup> Department of Education Report: [Review of Childcare Services in Northern Ireland](#) (2023)

<sup>8</sup> BBC Article: [The only thing stopping me working is childcare](#) (2025)

<sup>9</sup> BBC Article: [The only thing stopping me working is childcare](#) (2025)

subsidy scheme without regulation would likely be ineffective at tackling the issues with childcare. Moreover, the subsidy scheme is not available to all families, including those on Universal Credit or in receipt of childcare vouchers. Therefore, there is a risk that this scheme will further reduce the accessibility of childcare for families who are on low incomes, working part time or students. Given the experiences of low-income families in receipt of the subsidy scheme to date, the scheme will not be enough to reduce barriers for women entering – or staying in - work, as it may be more financially beneficial for them to remain on Universal Credit. This is not solving the problem with economic inactivity and, to reiterate, is not strategic investment. HERe NI believe a more strategic approach would be following a public model of childcare, rather than emboldening a privatised one which places profit into the hands of providers.

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

### **Actions already underway (April 2024 to March 2026)**

- Encourage uptake of financial support with the costs of childcare, through a promotional campaign to raise awareness of all government support available.
- Conduct and publish Northern Ireland Childcare Survey Official Statistics.

### **Actions that will be prioritised next subject to available resources (April 2026 to March 2030)**

- Provide enhanced information to inform parental decisions in pre-school admissions.
- Establish regular and ongoing sector wide data collection and monitoring to:
  - map supply and demand of childcare provision across all geographical areas; and
  - identify sustainability challenges in specific areas.
- Design and implement a regular data collection programme to monitor trends in childcare requirements and labour market decisions.

### **Actions that may take longer to implement (April 2030 to March 2034)**

- Develop a user-friendly digital platform to improve access to information for parents and providers, taking account of existing FSNI platform and the need to integrate with Make the Call and NI Direct.
- Establish a parental support programme for parents of children age 0–4 with SEN/D.
- Provide enhanced information to parents on the capacity of registered childcare providers to provide inclusive and accessible provision for children with SEN/D.

**Question 6. To what extent do you agree or disagree with Objective 2.2 and its associated actions?**

*Please select only one item*

- Agree

Do you have any other comments to make on Objective 2.2 and its associated actions?

HERE NI agree that access to information should be improved. There needs to be a widespread public awareness campaign around which schemes exist and are available to families; Melted Parents found that 80% of their followers polled reported only hearing about the NI Childcare Subsidy Scheme from Melted Parents, not the government itself.<sup>10</sup> While access to information is important, HERE NI shares the Women’s Policy Group’s concern that the Strategy risks over-stating the degree to which those who do not use childcare do so because they lack information or advice, as opposed to the simple calculation that they cannot afford it.

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<sup>10</sup> Melted Parents: [NICSS Rollout Poll Results \(2024\)](#)

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



### Outcomes:

- A more stable and sustainable ELC sector with a highly trained and valued workforce
- More inclusive and accessible early years provision for children with additional needs

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

#### Actions already underway (April 2024 to March 2026)

- Increase the non-statutory Pre-school Education Programme (PSEP) funding rate to bring it into line with the statutory sector.
- Provide funding support to over 650 childminders/ AHCs to support training and resource needs through the Pathway Fund.
- Train 150 new childminders through Labour Market Partnerships.
- Uplift the level of core funding providing early years sector support.
- Publication of the DfE research study on Childcare Providers Targeted Business Support.

#### Actions that will be prioritised next subject to available resources (April 2026 to March 2030)

- Establish a Childcare Business Advisory service: DfE will lead the development and delivery of a childcare business advisory service to:
  - Create a service that suits the needs of individual providers
  - Give all childcare providers access to a professional advisor who is equipped to identify those issues inhibiting the provider
  - Record common issues and opportunities within the Sector so that a holistic picture of the wider issues facing the Sector can be best understood, thereby enabling support to be tailored over time
- Develop a Strategic Childcare Accessibility Fund, informed by mapping of supply and demand initially focused on:
  - Areas of disadvantage
  - Provision for children with additional needs
  - Rural provision
  - Social Enterprise provision
  - Families working atypical hours
  - wraparound care within the schools estate

- Establish a PSEP Strategic Support Fund to address short-term pressures in strategically important non-statutory pre-school education.
- Amend the current moratorium on Development Proposals (DPs) to facilitate requests for new or additional statutory pre-school provision to be established on a full-time basis.
- Provide annual inflationary uplifts to core Early Years funding.

**Actions that may take longer to implement (April 2030 to March 2034)**

- Ensure access to inclusive, high-quality early learning and childcare environments through increased capital funding, including for children with SEN.
- Continue annual inflationary uplifts to Core Early Years funding.

**Question 7. To what extent do you agree or disagree with Objective 3.1 and its associated actions?**

*Please select only one item*

- Neither Agree nor Disagree

Do you have any other comments to make on Objective 3.1 and its associated actions?

HERE NI agree that centring career development and pay within the Strategy is vital to supporting a sustainable, high-quality early learning and childcare sector. Actions like Departmental financial support to childminders would contribute to ensuring that a career in childcare is appealing and secure. We also see that the annual inflationary uplifts to early years funding would be essential to securing any kind of lasting impact in this area. However, we have some concerns that annual inflationary uplifts would be unsustainable given the budgetary pressures in any given year. The establishment of a Childcare Business Advisory Service to “create a service that meets the needs of individual providers” suggests a model designed to generate considerable profit, rather than, what should be, a model designed as a core tenet of good public infrastructure. Investing in the Women’s Sector Childcare Fund, for example, would be a more strategic investment to achieve the equity in childcare and instrumental in removing barriers for women getting into work.

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

<b>Actions already underway (April 2024 to March 2026)</b>
<ul style="list-style-type: none"><li>• Extend the reach of the Department of Health (DoH) Fair Play Grant Scheme to approximately 80 settings, supporting nearly 400 children.</li><li>• Launch a pilot scheme for recruitment of Approved Home Childcarers (AHCs).</li><li>• Establish Pre-school Inclusion Fund to support pre-school children with Special Educational Needs/Disability (SEN/D).</li><li>• Fund 72 special schools and early years specialist provisions to purchase resources, training or equipment for the benefit of children in pre-school, Primary 1 and Primary 2 in their settings.</li></ul>
<b>Actions that will be prioritised next subject to available resources (April 2026 to March 2030)</b>
<ul style="list-style-type: none"><li>• Further roll-out of the Pre-School Inclusion Fund to support children who have/may have SEN/D.</li><li>• Combine and enhance the DoH Fair Play Grant Scheme and Bright Start Holiday Grant Scheme for Children with a Disability (to ensure a continuum of support across term time and non-term time for all registered childcare providers, including childminders).</li><li>• Test and trial school-based childcare/after-school provision for children in special schools and specialist provision.</li><li>• Build on the AHC pilot to increase the number and training provided to AHCs, including facilitating a matching service between families and AHCs.</li></ul>
<b>Actions that may take longer to implement (April 2030 to March 2034)</b>
<ul style="list-style-type: none"><li>• In conjunction with the review of DoH Minimum Standards, consider the upper age limit which young people with SEN/D can access registered childcare provision.</li></ul>

## Question 8. To what extent do you agree or disagree with Objective 3.2 and its associated actions?

*Please select only one item*

- Strongly Agree

Do you have any other comments to make on Objective 3.2 and its associated actions?

HERE NI strongly agree that SEN/D children are currently under-served within the current childcare model and need increased investment to ensure equal opportunities with their peers. This should be a priority for the Strategy and, once implemented, the Department should undertake regular monitoring to ensure support is provided and working sufficiently for SEN/D children and their families.

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

#### **Actions already underway (April 2024 to March 2026)**

- Provide funding to the Department of Health (DoH) for an additional 900 funded training places, including continued professional development.
- Provide funding to Department for the Economy (DfE) for:
  - development programme for the provision of on-line accredited micro courses by the Further Education Colleges to provide flexible learning opportunities for the childcare sector; and
  - a qualification mapping exercise to identify gaps in terms of management qualifications.

#### **Actions that will be prioritised next subject to available resources (April 2026 to March 2030)**

- Develop a comprehensive ELC Workforce Plan to support the development of the current workforce and incentivise early learning and childcare as a valued career choice.
  - Establish a comprehensive ELC qualification and career framework with pathways for continuing professional development (CPD), including a review of existing qualifications, an accredited ELC programme and enhanced support for staff to move to leadership roles.
  - Develop a specific SEN/D CPD framework for education settings and childcare providers.
  - Monitor the workforce needs of the ELC sector to ensure opportunities are provided for upskilling and reskilling, removing barriers to training opportunities, including support for sub cover.
  - Promote the establishment of a sectoral representative body to support the professionalisation of the childcare sector.
  - Require all ELC providers funded by Government, to pay their staff at least the Real Living Wage.
- In conjunction with the 'Good Jobs' priority in DfE's Economic Vision, promote the Real Living Wage with ELC employing organisations.

#### **Actions that may take longer to implement (April 2030 to March 2034)**

- Strengthen regulation and inspection through collaboration between The Education and Training Expectorate (ETI) and Health and Social Care Trusts (HSCTs).
- In conjunction with DoH, ensure information gathered through Registration and Inspection within HSC Trusts is accessible through appropriate Data Sharing agreements to support longer term policy developments and operational implementation.
- Consult on proposals for placing ELC provision on a legislative basis.
- Review the staff: child ratio in statutory pre-school provision, considering the impact of other related actions to be introduced by this strategy and SEN/D reform.

## Question 9. To what extent do you agree or disagree with Objective 3.3 and its associated actions?

*Please select only one item*

- Agree

Do you have any other comments to make on Objective 3.3 and its associated actions?

Additional comments

HERE NI agree that the childcare workforce should be valued, and this should be reflected in better pay and secure working conditions. The Office For National Statistics calculated the median gross annual earnings for full-time employees was £39,039 in April 2025.<sup>11</sup> For early education and childcare assistants the gross annual earnings are £24, 724; significantly lower than national median gross annual earnings.<sup>12</sup> The Strategy's plan to pay childcare sector workers the Real Living Wage is a positive step forward regarding pay. However, this should not solely be a requirement for all ELC providers funded by Government, it should be across all childcare providers. HERE NI support strategic investment in a skilled childcare workforce, and see this as a key priority for a sustainable and thriving childcare sector in Northern Ireland.

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<sup>11</sup> Office for National Statistics [Employment Earnings in the UK](#) (2025)

<sup>12</sup> Office for National Statistics [Employment Earnings in the UK](#) (2025)

## Question 10

**If you have any additional comments relating to the draft strategy, please enter them in the box below:**

As HRe NI have stated throughout, while this Strategy does make some short-term alleviations to childcare costs, it fails to set an effective strategic plan for guaranteeing childcare is affordable, universal and targets the most low-income families. HRe NI support the wider women's sector and Women's Policy Group who advocate for a Strategy that endorses a universal publicly funded childcare model to ensure no parent is unable to access or stay in paid work due to the high cost of childcare.

The Strategy could also be strengthened through detailed costings of proposed actions to see how much money it will take to implement over the next eight years. The lack of specifics around costings, details around timings and how success is measured (as well as monitored) is concerning. An effective Strategy must address these issues before final publication.

Overall, the Department have an opportunity to be transformative in their vision for childcare by developing a Childcare Strategy modelled on international best practice; that ensures all children have access to high quality care. While there is ambition, particularly within Objective 3 of strengthening a skilled workforce, ultimately the Strategy does not go far enough in pursuing the much-needed transformation of public infrastructure to deliver childcare for all in Northern Ireland.

# Impact Assessments

## Question 11. Do you agree or disagree with the draft Equality Impact Assessment (EQIA)?

*Please select only one item*

- Disagree
- Please add any additional comments in the box below

While the EQIA identifies no adverse impact on gender, HERe NI believe the Strategy could have an adverse impact on some low-income women. For example, if the WCCF is not invested in within this Strategy, low-income women could face further squeezes in their bills and barriers to employment. Additionally, the EQIA does not go far enough in understanding how intersectional identities will be affected by this Strategy, like migrant and refugee women or trans women, many of whom face a lack of social security and economic stability. The EQIA could be improved through consultation with Section 75 groups, and further disaggregated data/research on childcare by the Department.

## Question 12. Do you agree or disagree with the draft Rural Needs Impact Assessment?

*Please select only one item*

- Disagree

Please add any additional comments in the box below

While it is important to see that the Strategy includes rollout to rural settings, there is a risk that this would take time to rollout and not be fully equitable in its provision; risking leaving some children in rural areas behind. Moreover, the EQIA acknowledges that those in rural areas often face higher childcare fees due to lower economies of scale, but no additional support to rural communities is identified within the Strategy to address this.

### **Question 13. Do you agree or disagree with the draft Child Rights Impact Assessment?**

*Please select only one item*

- Agree

Please add any additional comments in the box below

This Impact Assessment is significantly more thorough than the others. It consults with a wide range of stakeholders and stresses that the strategy could unintentionally reinforce inequalities if implementation is uneven (e.g. limited rural provision, insufficient SEN/D support, or affordability gaps). However, it does not pay enough attention to actions within the Strategy like the removal of the current statutory admissions criteria prioritising children from socially disadvantaged backgrounds in its analysis. The impact of this could be that more children from low-income families could fall through the gap when it comes to provision.

**Question 14. Are you responding to this consultation as an individual or on behalf of an organisation? (Required)**

Please select only one item

- Organisation (Go to question 16)

## Respondent details

**Question 15. If you are responding as an individual?**

Name (Required)

Click or tap here to enter text.

Email (Required)

Click or tap here to enter text.

Are you?

Please select all that apply

- A Parent or Guardian
- A Grandparent
- An Early Learning Childcare Practitioner
- Other (please specify):

Click or tap here to enter text.

**Question 16. If you are responding as an organisation?**

**Contact Details**

Belfast LGBT Centre  
1st floor  
23-31 Waring St  
Belfast  
BT1 2DX

**Organisation name**

HERe NI

**Your name**

Sophie Nelson

**Your position**

Senior Policy Development Officer

**Email address**

policy@hereni.org

**Phone number**

028 9024 9452

**Question 17. Which of the following best describes your organisation's sector?** *This will assist us in monitoring the range of users the consultation has reached.*

*Please select only one item*

- Charity/ Community/ Voluntary

Other please state

Click or tap here to enter text.

**Question 18. If your organisation is a childcare provider, which of the following best describes your provider type?**

*Please select only one item*

Other please state

HERE NI have a family support project, where we work with families and provide monthly community activities e.g. daytrips/playtime.

**Question 19. We may need to clarify some aspects of your response. May we contact you to discuss your response to this consultation?**

*(Required)*

*Please select only one item*

- Yes

**Question 20. Consent**

To support transparency in our decision-making process, all responses to this consultation will be made public (subject to our [Modera9on Policy](#) ). This will include the name of the responding organisation (if applicable). However, names of individuals will only be published if you give consent below. Please note that we will not publish your contact details. *(Required) Please select only one item*

- Yes, I consent to my name being published with my response

All responses will be treated in line with the [Department of Educa9on NI Privacy No9ce](#). Please be aware that any informa9on provided in response to this consulta9on could be made publicly available if requested under a Freedom of Informa9on request.