

Ms Cathy Mannion,

Commission for Energy Regulation (CER)
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24,
Ireland

Dear Cathy,

Please find enclosed Early Childhood Ireland's submission to Government, Irish Water and the CER on behalf of our 3,400 members across the country. There are 150,000 Irish children in early childhood education services across the country every day and this submission highlights their needs which must be considered as the water charges plan is finalized.

If you have any further questions or need to contact me to discuss this matter further please do not hesitate to contact me on 01 4040641 or email theeney@earlychildhoodireland.ie

Yours sincerely



Teresa Heeney

CEO

Early Childhood Ireland Water Submission 2014

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Early Childhood Ireland is making this submission to Government, Irish Water and the CER on behalf of our 3,400 members across the country who provide full day care and sessional early childhood education services for over 101,000 children and families every day. Early childhood education services are sites of learning but are also home away from home for many of those children who spend long periods of time, up to 10 hours per day, 50 hours per week in settings across the country. Services have or cater for on average 33 children and employ 5 adults per setting, all of whom in the context of the service, depend on water for reasons of health, hygiene, curriculum and learning.

The issue of water charges is not about ‘the where’ the setting, be it at home, in preschool or full day service, it is about children, their rights and their needs irrespective of where they spend their time. In locating children at the center of the water charges debate, the government has been unequivocal in stating that ‘children are free’.

The Government has made commitments to children. Taoiseach Enda Kenny has categorically stated in the Oireachtas that in relation to water, ‘children’s use will be free. That will not change’. We want to see this commitment upheld for early childhood services, where children spend a significant portion of their day (up to 77% of their waking day).

What Early Childhood is seeking?

In July 2014 Early Childhood Ireland consulted with members on the issue of water charges. Informed by our survey and interviews, we are calling on government and Irish Water to provide for:

1. **Exemption from water charges** for all children in funded early childhood preschool provision (those services delivering the Government ECCE scheme)
2. **Water allowances for every child** in all other early childhood care and education settings (sessional, full and part-time day care)
3. **Exemption** from water charges on early education services **where the water quality is substandard**
4. **Reinstatement of funding for the Green Preschools Programme**
5. **Continued research** on water consumption

The Basis for our arguments:

Three very real reasons why water is necessary and must be available without charge in early childhood settings are:

Rights Basis - Children have a basic human right to access water. This right is enshrined in the UNCRC but for many children in parts of modern Ireland clean drinkable and usable water is not available. Children's rights and well-being are important not merely for the future but in the here-and-now. Budgetary policy should embrace and consider children's well-being in the present but also have a strong future focus 'given that children have the longest futures of any age group' (OECD, 2009).

Developmental Basis - The water needs of infants and young children are much higher than those of adults. Children need access to water to keep them healthy and clean, to help them as they learn good personal care routines. They need and use a lot of water as they learn to manage the process of toileting and handwashing. Children also need to have drinkable water available at this intense and critical point of their development and water is required to meet the basic needs and rights of children in terms of cooking, cleaning and providing for their overall safety and well-being. Hygiene is essential for very young children and helps prevent the spread of EColi, which necessitates high use of water- cleaning, toilets, sinks etc. ECE Services have strict standards to apply to and cannot compromise children's health and safety. Water and good quality water is essential for healthy, growing children.

Curriculum/Learning Basis – Water is an important component used on a daily basis both indoors and outdoors within the early childhood curriculum. Water play and messy play (painting; clay; sand; arts) all support sensory and concept development – vital for the development of creativity, innovation and critical thinking. In these early years, children explore to learn – they touch, feel, wallow and come in contact with everything in the environment, both indoors and outdoors. It is inevitable that those working with young children are responsible for water as a resource but equally they need to be confident that water is available to them in supporting children grow and develop.

These activities require water but so too does the cleaning and care of equipment which is undertaken by the adults and frequently by the children as they learn about their shared responsibility to others (citizenship). Early childhood services cannot operate without generous allowances of water to support children's learning and development.

Early Childhood Ireland members are worried about the volume of water that their services need and use; they are concerned that in cutting back, their compliance with Regulations will be compromised; they are concerned that the learning experiences for children will be reduced, they fear that this additional water bill will be the one to close the service with the loss of jobs. Our members want recognition for their work as well as value and fairness in their dealings with government and Irish Water. Above all, they want a just approach to the issue of water and water quality.

1. Exemption from water charges for all children in funded early childhood preschool provision

Services delivering on the government scheme should be exempted from water charges for two reasons. Firstly, the preschools are sites of education and secondly services cannot sustain additional charges in the context of how the sector is currently funded.

The Government ECCE scheme, introduced in 2010, provides one year of preschool free to parents for their children in the year prior to school entry. 98% of services across the country deliver this programme on behalf of the government. Services that exclusively deliver the ECCE programme on behalf of the government must provide an educational programme to the children (informed by Aistear, the National Early Childhood Curriculum) and staff are required to have higher levels of qualifications. These services are currently exempt from commercial rates and they work to the same calendar as primary schools. In the formal education sector, water charges are not carried by teachers or parents. In contrast preschool services, fully funded through government, are bearing the weight of charges directly. This is unjust. Where services are deemed sites of education, water charges should not be made.

Quality and sustainability are the key issues for the sector, which comprises 65% private and 35% community services. The capacity of services in the sector to operate in ways that meet the needs of parents, children, communities, owner/managers and those investing and carrying financial risks in the business has been seriously curtailed, since under the ECCE scheme no additional charges can be made to parents irrespective of the level of service overheads.

Regulations have always determined the space required per child, the number of children that can be in a service and consequently the number of adults or educators required at any one time. These essential elements and costs of operating the service are capped and at the same time, the ability of services to generate income over and above the ECCE subsidy paid by the government has been eliminated.

2. Allowances for every child in all other early childhood care and education settings (full and part-time day care)

In 2013, approx. 68,000 children took up their free pre-school place. Data from Pobal (survey, 2013)) suggests that current notified services cater for approx. 150,420 children. These figures signal that 82,420 young children (including infants, toddlers) are in other notified (registered) early childhood services. These children require water for indoor and outdoor play, for messy play, as well as for hydration, hygiene and cleaning. Water play fosters learning in all developmental areas and provides opportunities for children to experiment with math and science concepts, strengthen their physical skills, advance their social and emotional skills, and enhance language development (Crosser, 1994; Hendrick, 1996). Without allowances for these developing children, educators and providers are considering options *'I will be thinking about cutting down on the amount of messy play and water play based on the bill I receive'*.

Our members indicate that those billed (40%) are charged on average €1,895 per annum in water charges, but many just cannot sustain a viable service 'With all these extra charges, I am thinking of closing my two preschools that employ four people; 'another bill will make my business unsustainable as we try to keep expenses and therefore charges to parents to a minimum'. Early childhood education services cannot afford any further costs and are already under strain. Water charges cannot be passed on to already pressurized parents. There is palpable anxiety and growing anger in the sector at the ever increasing financial demands on services with no improvements in government subsidy levels and no support for parents – 'we are being constantly hounded about quality experiences for the children and I have only been too happy to do so up until now, but how the Government expects us to survive is beyond me!'

Early Childhood Ireland, along with 95% of our survey respondents are calling on government to live up to its promise that 'children's use will be free' and to provide an allowance per child for water within the service. The level of allowance should be commensurate with data from the national research.

3. Exemption from water charges for early childhood services where the water quality is substandard

Clean water is the right of every child. Just over 32% of our services that responded to our recent survey have issues with water quality. Services experience 'water that has not been fit for drinking since October 2013'; 'water which is dirty and brown at times and necessitates the purchase of bottled water specifically to cook for the children'; 'water which is not good for drinking, which results in very bad limescale';

Early childhood services with substandard water quality should not have to pay for water that is unusable, and should be reimbursed for the extra costs incurred from having to buy in water for the children and service. Services are obliged to meet the requirements of Regulations (pertaining to the availability of potable drinking water, appropriate experiences [with additional water requirements] and clean environments/equipment), they pay taxes, employ in

the region of 25,000 people in the sector, support children's learning and development and enable parents participate in the labour market. Early childhood settings should not have to pay for a service of which they cannot avail or which is not fit-for-purpose.

4. Reinstatement of funding for the Green Preschools Programme

Water is a valuable and finite resource. It is in the early years that children become aware of their responsibility to others and the need to care for their environment. The roots of empathy and social capital (citizenship) are fostered early on and there are great possibilities for children to learn about the ethics and behaviours of using and conserving water. Many of our members (77% who responded to our recent survey) indicated that they already are mindful of and have strategies for conserving water, many of which actively involve the children. The absolute success of the Green Schools programme (at primary and secondary level) spurred 'The Green Preschools Programme', which recognizes those preschools who make the eco-effort.

Unfortunately the funding for this programme has been cut – but only for preschools, even though countless studies have shown that a child's early years lays the foundation for much of that which is to come, their attitudes, patterns of behaviour and dispositions. Social research and Brain research (Shonkoff & Phillips, 2000) highlight children's receptivity to learning in the period birth to three years of age. We contend that investment in the Green Preschools programme will provide a great return for society. The funding for this programme should be reinstated at the preschool level.

5. Continued research on water consumption

We believe that little research exists on water usage in the Irish context. The domestic allowance for children and indeed for the adult population has been based on **insufficient research**. We are calling for a one year study on water consumption throughout Ireland, to give an accurate picture of consumption per household and per child, which in turn will inform free allowances for both children and households.

We caution the adoption of 'estimates of usage', particularly since the ESRI has recommended that Irish Water and the CER "urgently revisit" assumptions on water consumption (as their analysis depends on the type of estates where the meters are installed, the time of day the survey was carried out and may not have factored in seasonal variations).

The water requirements for families, for children and specifically for early childhood services needs to be monitored, assessed and the results used to ensure equity for early childhood providers and fairness for children and families.

Conclusion

Early Childhood Ireland is calling on government, Irish Water and CER to respond positively to our call for exemption of water charges in respect of young children in early childhood care and education settings. We believe that a key focus must be on keeping children healthy, engaging them in learning through play and taking the opportunity to lay down the foundations of social responsibility when it comes to the use and management of a scarce and valuable resource such as water. Our members are committed to their work with children and families and on their behalf we are asking for a fair and equitable approach in relation to the proposed water charges.