

Submission to the Department for Education consultation on proposed changes to the statutory framework for the early-years foundation stage.

January 30th, 2020

Although it is reception teachers who formally assess children against the ELGs as part of the EYFS profile, the ELGs are well known to most early years practitioners and are a vital component of all early years practice. A revised EYFS should acknowledge that.

For practitioners the ELGs are primarily used to support planning and next steps as part of their ongoing observations, and provide a source of ideas, guidance and reassurance. PACEY members have told us that they can be useful to show to parents, particularly in the year before a child enters reception, to explain what they are working towards and how that is supported in their setting.

Therefore, any changes to the existing EYFS profile are likely to have a significant impact on daily early years practice in all settings – not just reception classes.

It is critical then, that early years practitioners be given support and training to navigate and effectively deliver the changes. This must be properly resourced. Furthermore, many early years practitioners currently access the ELGs through non-statutory guidance such as *Development Matters*, and we therefore hope that this document will be revised in line with the changes to the ELGs in a form that is appropriate and usable for all early years practitioners.

In revising the EYFS profile, the stated government aims were to:

- reduce workload,
- improve outcomes
- improve social mobility.

While we fully support these ambitions, we are concerned that the proposed changes to the profile are unlikely to deliver.

- Practitioners do not see changes to the EYFS as likely to reduce workload. Rather, a reduction in workload would require increased resources to support their work with children and families, aligned with much clearer guidance on expectations. We know that there is a persistent issue of problematic cultures and behaviours which drive the workload problem with some practitioners still being cautious about changing their practice ‘just in case’. Ofsted’s ongoing myth-busting efforts around the EIF have helped but this doesn’t replace the need for formal training that supports

practitioners to understand the requirements of the revised EYFS and as part of this addresses the issues of workload, expectations on recording and record keeping.

- Throughout our response you will see out concerns about the ability of the revised profile to improve child outcomes. For example, despite the desire to avoid it there is a danger that the changes to the ELGs exacerbate the tendency towards using the framework as a tick list, and at worst not even a consistent tick list. For example, measuring a crude increase in new vocabulary or the workings of handwriting as an easy measure of progress undermines a more in-depth appreciation of the child's understanding and ability to communicate. It is also true that a better trained workforce, with time to work with parents and carers, would make more difference to children's outcomes than changes to the EYFS, and that must be accompanied by appropriate pay and conditions.
- There are further doubts about the ability of the reformed EYFS to deliver positive social mobility. We are concerned that too many of the goals are developmentally inappropriate, potentially leaving many children behind, and that there is excessive reliance on overly formal mechanisms, such as a dependence on knowledge and facts gained from books and reading rather than through experiences, relationships and other important sources of knowledge. There is a danger that the existing problem of the ELGs for literacy and maths being set too high will be exacerbated with profound implications for the development of children that are summer-born, that have special educational needs and disabilities (SEND), have English as an additional language (EAL) and/or have other disadvantages. The early years care and education of a child offers the opportunity to make a life-long difference to his or her opportunities and aspirations. Ensuring strong attachments, effective self-regulation as part of a child positive social and emotional development is as important as their physical and educational early development. As government knows, disadvantaged children require effective early intervention that is appropriate to their abilities and challenges, and which is delivered by experience and well qualified staff. Too much focus on their educational development risks a less rounded and balanced approach which is so critical to giving disadvantaged children the firm foundations they need. Also that early intervention in education should be supported by wider early years services such as speech and language therapists, educational psychologists, mental health services and SEND specialist support.

As is clarified in our full response, our additional overarching concerns are:

- The language of the new profile is overly formal and restrictive and lacking in an expression of learning as something to enjoy and embrace. Furthermore, the existing ELGs have no references to 'teachers' and 'classes' and we consider this change to be narrow and exclusionary for other early years practitioners, such as registered childminders, that work with the EYFS profile.

- The language has become more prescriptive and therefore limiting. For example, the use of the term 'draw and paint' omits a vast number of creative pursuits and the emphasis on 'books read in class' as a source for knowledge places limits on the young child's ability and desire to learn from all aspects of their environment as appropriate to them.
- There is a danger that the new ELGs will lead to an increasingly tick box approach. Furthermore, as demonstrated in the pilot, there is clear evidence that subjects which are not assessed receive less attention, even though in theory this should not be the case. This has been evidenced in the past with previous EYFS revisions, made worse by an industry of commercial advisors and trainers promoting what matters most and how to prepare for changes.
- There is an inclination towards more easily measurable (and superficial) targets and outcomes rather than those that would show a deeper understanding of the child's development and understanding. For example, we believe it is essential to include shape, space and measure in the ELGs and not just rely on easier to define mathematical principles such as numerical patterns.
- The new profile contains a number of unclear and vague phrases, for example the need for 'deeper understanding'.
- The inclusion of technology must be re-instated and not just limited to information technology. All children, particularly those that may not access such opportunities outside of their early years setting, should have access to a wide range of mechanical and analogue technologies, for example engineering and design and technology experiences such as construction, woodwork, making films and videos.

Q6. Please give us your views on whether the activities described in each of the proposed educational programme summaries support children's learning and development throughout the EYFS.

Please provide your view below, being specific about which educational programme this applies to where appropriate.

We are concerned that the revised EPs will not effectively support children's learning and development throughout the EYFS.

The extensive literature review *Getting it Right in the Early Years Foundation Stage: A review of the evidence*¹ indicates no support for extensive changes to the EYFS, and those that it does support are not consistently reflected in the proposed changes.

Overall there should be more focus on practical application of mathematical, communication and language and literacy skills in real world contexts which have meaning for the child and which can be replicated and built upon in their home / family settings.

The current EYFS requirements on teaching and learning approaches are supported by recent evidence but the value of a balanced teaching approach which incorporates play-based and relational pedagogic approaches, alongside more structured learning and teaching, needs to be recognised more fully.

Some additional guidance for teaching Understanding the World is needed to ensure that the development of citizenship and children's rights are at the forefront. It is also an opportunity for children to understand a wider perspective of the world beyond their personal environment. So for example, positive role models are important, particularly for girls and we would welcome some guidance here on how to challenge gender stereotypes for both boys and girls. There is clear evidence that this stereotyping is unconsciously embedded in many aspects of our lives and supporting practitioners to positively counter this in partnership with parents and carers in the early years is as critical as it is in later stages of a child's education.

Technology should be reinstated, and more attention should be given to the teaching of science and the implications of children growing up in a digital age.

More time and attention should be given to supporting creativity including Expressive Arts and Design (along with problem-solving) in children's development as underpinning all areas of learning.

Communication and Language

The first sentence undermines the principle of the three prime areas of learning and the importance and interconnectedness of them all and as such is out of kilter with the emphasis on this throughout the rest of the EYFS.

Both here and in the introduction to Literacy, it should be made clearer that children best understand words when they experience them in first-hand contexts, through spoken language, not in the more abstract situations of being read to. Children develop their language best when they experience oral interactions about real experiences, where there is a meaning to the vocabulary and where they are stretched to use more complex language in order to express themselves fully. Although it is vital that disadvantaged children in

¹ <https://www.early-education.org.uk/sites/default/files/Getting%20it%20right%20in%20the%20EYFS%20Literature%20Review.pdf>

particular are given the opportunity to expand their vocabulary, that cannot be done solely through reading as the EP suggests.

It is also of concern that the EP is skewed towards older and more able children, for example with (one of many) references to ‘the teacher’. This does not apply to the early language development of babies and toddlers or to other early years settings outside of formal education such as childminders. Further the formality that is alluded to in the EP underplays the importance of vocalisation, gestures and physical body language in how children learn to communicate, listen and focus attention.

Personal, Social and Emotional Development

Good personal, social and emotional development is fundamental to all areas of learning and should receive greater prominence throughout the profile, not least in recognition of the heightened importance this has for children experiencing disadvantages. When children are anxious, stressed or feel unsafe or lacking in care it is impossible for them to learn to their full capacity. This aspect of their learning and development should therefore be understood in the context of their lives as a whole and not just within the EYFS setting. We would therefore like to see more consideration and time given to the life of the child outside of the early years setting, for example the need for a positive relationship with parents and carers in order to foster a positive home learning environment.

Young children learn through and with others, and so a sense of belonging and self-worth is vital to enable the children to build trust and relate to others. However, the references to learning how to make good friendships, co-operate and resolve conflicts peacefully are not appropriate for most children under 5. The current focus needs to be reinstated so that the EYFS remains a framework that is reflective of children from 0-5 years old.

There is also a very simplified approach to self-regulation, where children are expected to ‘set themselves simple goals, have confidence in their own abilities, to persist and wait for what they want and direct attention as necessary.’ It cannot be implied that children will typically have fully developed these skills by the age of 5. As stated above, we are particularly concerned that for those children that have more difficulty with emotional and physical self-regulation (for example, be that down to trauma or disability), the prescriptive nature of the EYFS is setting them up for failure. As previously stated, this needs to be changed so that the final EYFS reflects the important or secure attachments and how to support young children from 0-5 to develop their ability to self-regulate.

Physical development

Physical development is closely related to cognitive development and physical and mental wellbeing. These benefits should be reflected fully. There should be acknowledgment of how young children learn through their bodies and their senses when they are actively exploring their surrounding environment and events, including through play.

Physical development also includes health and self-care which we would like to see return to this section. For example, maintaining continence is an important skill within self-awareness and bodily control.

We agree that education surrounding healthy food choices and a balanced diet is essential, particularly in light of the childhood obesity crisis, however we are concerned that this should be provided in a way that is appropriate to different stages of development in children, and the impact that has on appetite, taste and self-regulation.

Literacy

It must be made clearer here, and in the CL EP, that CL is the root of effective literacy. In other words, literacy is a subset of CL, not the other way around.

The revised EP for literacy is more inclined towards formal settings involving ‘classes’ and ‘teachers’. As such the wording of the EP is written as if it applies to children who are beginning to read. It needs to be applicable across the whole age range of the EYFS and as such it should include activities that are appropriate prior to formal reading such as the use of symbols and mark-making. It also needs to acknowledge the importance of partnerships with parents and carers in developing literacy and that much learning that takes place towards the development of reading happens outside of the formal class setting.

This use of ‘handwriting’ as an indicator raises a similar issue. Handwriting is a physical fine motor skill that is dependent upon many factors in a child’s development. It is not necessarily part of the skill of conveying and sharing meaning and understanding. Further, there are other ways of communicating through text, such as computer work.

We would also like to see greater recognition of the use of song and rhymes here and throughout. We see that as an important link with communication and language development that in a collective way can contribute to confidence, self-regulation, listening skills etc.

Again, the fundamental issue is the emphasis that is placed on meaning, understanding and application for each child at their respective level of development, ahead of mechanical capabilities. Young children are motivated to read and write by the sense that it gives them greater chances to discover new, interesting things and a chance to better record, express and share their ideas (not by the desire to capture expanding knowledge).

Mathematics

Mathematics should focus on practical activities, including manipulating objects and playing games; problem solving and exploring ways of using mathematics knowledge and curiosity. It is vital therefore that shape, space and measure are retained with the EP and ELGs because of its importance in spatial reasoning and for wider STEM learning.

The EP should focus on how maths is embedded in all aspects of children’s daily experiences, with opportunities for experimenting and problem-solving so that the core

principles of mathematics are built on an understanding of how they are relevant to a child's actual world. It is worth noting that this can happen in any good quality early years setting but should also include an understanding of how the child is or isn't learning outside of the setting, for example at home.

Understanding the World

The original version of the EP said, 'Understanding the world involves guiding children to make sense of their physical world and their community through opportunities to explore, observe and find out about people, places, technology and the environment.' The revised version fails to map this out clearly. The EP goes on to be excessively prescriptive in how to achieve an understanding of the world, for example it is framed around the experiences (visits, days out) offered by the school or setting, or most worrying those that are learned from the children being read to. In terms of suggested places to visit the list of 'parks, libraries and museums' really lacks imagination and we know that many settings go beyond that limited list.

Neither is it helpful to be so restrictive in the suggestions for who the children should meet to broaden their understanding. For example, there are many more significant individuals in our communities those (undoubtedly important) 'who help us'. This is a useful place to boost the opportunity for children to meet and have a chance to develop an understanding of different people beyond their immediate communities and expectations. For example, it is a chance to challenge gender stereotypes or give disadvantaged children an insight into opportunities they might not otherwise see

Again, it is unacceptable that all reference to technology has been lost. Children's emergent engagement with the world will be through science, technology and the mechanics of the world around them. We are particularly concerned that children from more vulnerable or disadvantaged background should have access to digital learning, to keep up with their peers and to cover areas of vulnerability such as internet safety. This is increasingly important as primary schools grow their use of the internet as a learning tool.

Expressive Arts and Design

This EP does not set out an educational programme, the opportunities that children should be given, but rather it gives a rationale for it to exist.

An EAD EP should prioritise exploration of children's creatively and problem-solving skills, not performance. The importance of this creative process for a child's well-being should also be emphasised.

Therefore, the EP should not be about children developing 'artistic and cultural awareness' or 'see, hear and participate in', or 'interpreting and appreciating'. These are passive ways of experiencing other people's creativity rather than the children enjoying their own.

Q7. Please give us your views on whether the proposed ELGs are clear, specific and easy to understand.

Please provide your views below, being specific about which ELGs they apply to where appropriate.

Our answers in regard to specific ELGs are combined in our response to Q8.

Overall, we have a concern that the way that the ELGs are presented lends them to be used as a simple tick list to ascertain a binary decision on a child's attainment based on one off experiences with that child.

Furthermore, even within that limitation, the pilot evaluation suggests that professional judgements based around the concept of 'best fit' were applied to the bulleted ELGs in a range of ways and not consistently. For example, should all the statements be met or just some of them? What is meant by deeper understanding? Likewise, there is repeated use of the term 'children at the expected level will...' Does this mean that all children should be expected to reach this level regardless of their individual situation? If this is the case it is unrealistic and setting some children up for failure.

It is well known that despite direction that the ELGs or for example, *Development Matters*, should not be used as a tick list, it will still happen.

Q8. Please give us your views on whether the proposed ELGs contribute to a well-rounded assessment of a child's development at the end of reception year.

Please provide your views below, being specific about which ELGs they apply to where appropriate.

Communication and Language

We believe that communication and language remains absolutely critical to the early education and development of children and as such the EYFS should retain these ELGs under CL and not reduce it to two.

Listening, attention and understanding

The pilot evaluation suggests that some teachers thought that this ELG was more to do with speaking than listening. This suggests that the importance of attention as a pre-requisite to effective listening has been lost from the original iteration.

The revised ELGs put increased emphasis on Literacy by increasing the number of Literacy ELGs, at the expense of Communication and Language. The draft goals in their current form are not based in the extensive research evidence about how children learn language. For instance, the existing ELG for "Listening and attention" has lost all reference to attention, and the ELG for Understanding has disappeared altogether. Speech and language experts have shown that these are vital components to children's development of language, and to practitioners' understanding of how best to support language development, but this understanding is not reflected in the new draft.

There is significant evidence that the strongest support for development of language is serve-and-return conversation, following the child's lead and area of interest. As stated above, the draft has too much emphasis on reading to children, which while important is relatively less useful for young children. Younger children need immediate feedback on their own efforts to put ideas into words, with support to expand or remodel the child's words through to-and-fro conversation.

We recognise that expanding a child's vocabulary is an important prerequisite for their future learning, understanding and confidence. However, while the size of a child's vocabulary is a useful measure for researchers, for early years practitioners it is less so. For example, a 'new word' for one child may not be for others. Too much emphasis on 'new words' could lead to a narrow planning of teaching vocabulary lists at the expense of more valuable interactions and conversations which are the core of strong language learning.

Speaking

Here again there is an over emphasis on vocabulary rather than communication and understanding. The term 'recently introduced vocabulary' is very hard to apply.

The expectation of full sentences in oral language is unrealistic. It implies the application of principles of grammar that few adults do in regular conversation.

Across the ELG the emphasis should be on a child's emerging understanding, as opposed to correct use of grammar. For example, with past, present and future, children at different levels of development will express their understanding of this at different levels of comprehension and not necessarily in correct sentence form. Following on from that, the reference to conjunctions should be removed.

Personal, Social and Emotional Development

Self-regulation

This ELG is unclear and too abstract. There are a number of interpretations and applications of 'self-regulation' and this ELG lacks clarity for what the practitioner is aiming towards. For example, following instructions is not self-regulation on its own and nor is 'good behaviour'. This section requires a more inclusive understanding of how different children, from different backgrounds, develop their understanding of their environment and appropriate behaviour.

There is too strong an emphasis on compliance with the teacher rather than, for example working and cooperating in groups and with peers.

Managing self

This ELG is also unclear. It has brought together a number of previously distinct areas such self-confidence, managing feelings, behaviour, health and self-care. Further, the ability to ask for help when needed has been lost.

The term 'know right from wrong' is too abstract, open to interpretation or misinterpretation.

We are also concerned about the removal of the reference to the importance of physical activity for good health and reference to the importance of talking about ways to keep safe and healthy. This is particularly worrying for those children that will not have those interactions outside of the early years setting.

Building relationships

We believe it is wrong to use the term 'work' with young children and wrong to put the emphasis on a child to build relationships and healthy 'positive' attachments with adults and peers. The onus for building attachments should be on the adult. This is particularly true for children that may have experienced trauma or who, for other reasons, have particular difficulty with attachment.

Physical Development

Gross motor skills

We support these ELGs as far as they go. However, we feel there is scope for further depth. Beyond 'moving' we would like to see incorporation of some sense of co-ordination, spatial awareness and balance.

The reference to 'strength' is vague and hard to measure. For example, the expected strength of any group of 5-year olds will surely vary hugely according to many factors specific to each individual and the difference between age groups will be even more varied. Equally vague is the reference to 'moving energetically'. There should be appropriate wording that does not risk excluding the achievement of children with SEND.

Fine motor skills

Again, here there is a risk of excluding children with disabilities; the very prescriptive reference to the use of the tripod grip for example. Equally, using the term 'drawing' discounts those children who are at the stage of mark-making or using equipment and materials in different ways.

Literacy

Comprehension

As stated above, the use of the term 'recently introduced vocabulary' is not helpful and too mechanistic a criteria for measuring the development of a child's communication and language skills. The emphasis should be on a child's understanding of how and why and not a quantity of words.

We would argue that the ELGs for comprehension and word reading could be combined in one ELG.

Word reading

We are concerned that this ELG is overly prescriptive, leaving little room for a practitioner's application of fun and enjoyment and where appropriate the use of props and pictures in developing a child's reading.

We also feel that this ELG is developmentally inappropriate for many children. The EYFS should focus on emergent reading rather than technical markers such as saying a sound for each letter and 10 digraphs.

Writing

There is too great an emphasis on the mechanics of handwriting in this ELG. The question should be can a child's writing be read and understood by themselves and by some others.

Mathematics

We support the views of the Early Childhood Maths Group, of which PACEY is a member. Namely that:

Focusing on a deep understanding of the numbers up to 10 is an improvement on the previous requirement to count to 20, although up to 12 is preferable.

The ELG numerical patterns is not necessary as in the main these bullets are part of numbers. There is a danger that they will become another measure with which to test children.

The reinstatement of shape, space and measure is preferable as it gives children a wider experience of mathematics which is more instinctive to them.

The ELG should not be about recall learning. Quick fire recall is not an appropriate target for young children.

There are a number of vague terms, such as 'deep understanding' and 'patterns within numbers' that lack clear meaning.

The inclusion of evens and odds and double facts is not appropriate for children in the EYFS age group.

Understanding the World

Past and present

People, culture and communities

There is no discernible reason to separate these two ELGs out from the existing people and communities and the separation has caused, for example, 'lives of people around them...' to be placed in Past and present when it should belong in People, culture and communities.

For children in the EYFS group their understanding of history is that which relates to their own world and personal experience. There is little value in expecting this age group to gain

from learning about wider history from books, reading in class etc. As was outlined in the pilot evaluation, 'children often struggled to understand the history topics they had embedded into the classroom'.

Again, there is too great an emphasis on the formality of 'books read in class' over the value of experience and conversation and learning at home. This is particularly of note in the case of childminders who seek to enrich children with active learning. It isn't appropriate to expect children in the EYFS age group to be able to recall, 'narratives, characters and figures from the past.'

Equally it is hard to expect a child up to age 5 to understand and address differences between this country and other countries. Learning about other countries in an abstract sense from books and maps is unlikely to be as enriching as drawing on personal stories and understanding the different family histories of those around them.

Natural world

The requirements of this ELG are based on Key Stage 1 criteria with challenging expectations around observation, drawing and reading. As stated, a number of times above, it is more appropriate for young children to explore their natural world through experience and discussion and appropriate mark-making, which for some children may include drawing.

We see no reason to restrict a child's observation of change in the world to the seasons and states of matter. It should be open to a practitioner's imagination and allow for other areas such as cooking, natural aging and decay and life-cycles. Again, this is an area where partnership with families is important.

As said, we believe it is critically important to reinstate the reference to technology under understanding the world. Children should be encouraged and have the opportunity to engage with broader STEM activities from an early age and that should include all forms of technology including engineering, design, woodwork etc. The inclusion of information technology is also crucial, particularly for those that do not have the opportunity to develop skills in this area at home and for those that safety online is particularly important.

Expressive Arts and Design

Creating with materials

This ELG too has been redrafted in a more restricted form. It is hard to see the rationale for changing 'explore' to the more specific, 'create'. 'Draw and paint' is also a restrictive definition that excludes play and learning with collage, modelling with clay etc.

Being imaginative and expressive

In the same vein, being imaginative and expressive should include all the creative arts, not just stories and songs. It's important to understand that children can effectively form narratives when alone, as well as with peers and adults. We are concerned about the use of

the term 'perform' over 'sing' songs. There should be no expectation that children perform with or for others.

Equally, if this ELG is about being expressive, why should a child be expected to 'try and move in time with the music'?

There is a danger that the prescriptive nature of this ELG will limit children's imaginations rather than encouraging them to flourish.

Q.11. What are your views on removing the LA statutory element of EYFSP moderation?

Whilst PACEY doesn't have direct experience of this matter and most providers are not involved in this process, we are aware that it can be a significant additional paperwork burden. However, this is due to the varied ways in which local authorities deliver moderation. Rather than removing it, stronger guidance and best practice sharing would be more effective. We remain supportive of the EYFSP as opposed to proposals for baseline assessment and, as such, the process needs to be improved not removed.

Q.12. What are your views on whether removing the LA statutory element of the EYFSP moderation will help to reduce teacher workload?

We do not support removal of the statutory element and, as stated in Q11 support process improvement instead.

Q.13. What alternatives to LA statutory moderation do you think could help to ensure consistency of EYFSP judgements across the ELGs?

We do not have the expertise to propose alternatives.

Q.14. What are your views on the proposal to remove the 'exceeded' judgement from the EYFSP?

We broadly support this as a measure to reduce the pressure on high performance for young children.

Q.15. Should the requirement in the EYFS framework to 'promote the good health of children' also include oral health?

We are supportive of this so long as it is backed up with effective training and guidance of practitioners.

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