THE EYFS CONSULTATION

From our initial reading, while certain aspects of the Framework have been improved – for example, the reduction in the number of areas of learning and development; the identification of underpinning ‘prime’ areas of learning and development – we have serious concerns about a number of issues.

However, it’s worth noting that we’re pleased to see the emphasis on observation to inform assessments and planning. In addition, the role of the key person now appears in the Learning and Development requirements (1.12) as well as in Safety and Welfare Requirements and there is a welcome emphasis on the role in making a link with and engaging parents as well as a settled relationship with the child.

We list below, in bullet points for ease of access, some of the initial responses of the TACTYC Executive. Not all of us agree with every point made but hopefully these comments will stimulate TACTYC members to engage with us in a debate on the proposed Framework so that we can accurately represent your views in our formal response, We do hope that members will also make their own responses to the consultation. TACTYC’s response will be posted on the web in due course!

Our initial overall comments

We are extremely concerned that throughout the document the significance of play and playful learning are not adequately emphasised and there is an isolation between the curriculum for this age group in the UK and in the rest of Europe. This perspective goes against the extensive published evidence from numerous academic studies of babies and young children’s learning in this country and internationally. In essence, we start children on formal learning much, much earlier than other comparative countries (who then often do much better on international comparisons than children in this country.

It also appears to us that in many sections of the document, the Reception Year is not seen as part of the EYFS at all.

Members of the TACTYC Executive see ‘school readiness’ (see, for example, 1.1; 3.37) as a problematic concept when narrowly interpreted (our review on school readiness will be published later this year). We think that education in the early years should not simply be focused on preparing children – let alone babies and toddlers – for later (subject-based) learning: we should be concerned with young children’s ‘beings’ – within and beyond the school context – as well as their ‘becomings’.

We are also concerned that throughout the document there appears to be an emphasis on the need to ‘prepare young children for the reception class’ (1.1) by an increase in adult-led learning (1.10) (presumably from the age of three). In connection with this we are concerned about the inappropriate use of the word ‘work’ in the context of a curriculum for young children from birth to 5-years.

We have concerns that, whilst appearing to reduce teachers’ workload, the considerable reduction in the number of ELGs will further narrow the adult-directed teaching in reception classes and contribute to increased narrowing of children’s experiences in the final year of the Foundation Stage.

We believe that, if given the opportunity to play and explore in rich and stimulating indoor and outdoor environments, supported by highly skilled professionals, young children will demonstrate their capabilities and learn knowledge, skills and concepts in appropriate
ways; ways that also support the development of positive learning dispositions. Such dispositions are a true foundation of later learning.

**Overarching principles**

- The proposed curriculum has rewritten the EYFS themes, losing 'Enabling' environments, and leaving out physical and emotional environments. The 'unique child' has lost 'capable learners from birth (VI).

**Section 1: The Learning and Development Requirements – introduction**

- Early years providers must guide the development of children’s capabilities with a view to ensuring the children in their care complete the EYFS ready to benefit fully from school' (1.1) 'This statement clearly ignores all concerns and evidence about the literacy Early Learning Goals (ELGs) and shows that reception children are not perceived to be part of the EYFS. There is no recognition (again) that some children at the end of reception children will only just be 5 years old, almost a whole year younger than some of their class peers. (1.1)

**Play and pedagogy**

- There is no reflection in the document on our current understanding of play (referring to play that is 'planned, purposeful' is, as we’ve pointed out many times, very unhelpful) and the document is totally muddled in trying to dictate the pedagogy of adult-led in relation to the idea of play and playfulness. How many more times do we need to defend play as a key way of learning in early childhood? The documentation produced earlier about play, playful learning and playfulness should be reinstated within this document (1.10).

- The suggestion is that more adult-led activities are required as children approach 'reception': as 'reception' takes in younger and younger children, this is totally inappropriate. Children learn from their own explorations – some sensitively and skilfully guided by professionals - and, in this way, also develop healthy dispositions to learning (something equally missing from the document) (1.10).

**The areas of learning and development**

- The description of the prime areas as ‘particularly important for igniting children’s curiosity and enthusiasm for learning’ (1.3) is questionable. There is much more than this - including play - to engaging children in their own learning.'

- The ELGs’ expected levels are included in the main body, which only continues the misunderstandings from the existing document that these apply to five-year-olds and not birth onwards (following 1.9).

- The review document presented three levels in the EYFSP outline with an acknowledgement that some children are younger and that children develop at different rates. This is lost from the framework, with an implication of under-achievement for many children (1.8).

- The document reduces and diminishes the Characteristics of Learning – (playing and exploring, active learning, creativity and critical thinking). We see these, and the responsibility of practitioners to foster them, as highly significant (1.11).
The outlines of Educational Programmes are incomplete and need careful development. The idea of emergent literacy and numeracy, for example, appear not to be emphasised. For example, ‘Mathematics’ is very limited and limiting, focusing on a very narrow set of skills and with no mention of children’s own meaning-making through marks and symbolisation. ‘Understanding the world’ is also very limited – there is so much more that that outlined here that children will want to know, understanding, explore and experience (1.5).

The requirement is that communication and language must be assessed in English, without making any distinction between the 2-year-old just entering a setting and EYFSP (1.7)’ and the importance for many young children to develop confidence in building relationships and communicating with others, including confidence in communicating in their first language.

The view of ‘communication’ perpetuated by the document continues to exclude the diverse range of modes and media that children use (i.e. multimodal) and fails to acknowledge communications other than oral.

The document fails to reflect the Tickell report recommendation on the Characteristics of Effective Learning as underpinning all the educational programmes, in reducing and burying these, the proposed framework has become worse than the existing EYFS version by leaving out of the required educational programmes crucial attention to developing children's dispositions and attitudes, creative thinking and problem-solving, with no sense of practitioners’ responsibilities to foster these (1.11).

Once again, the expectations of literacy achievements are destined to be unachievable by many young children. We MUST remember that our children are the youngest in Europe/internationally to go to school and we know well that formal learning is not relevant to many of these children who have not yet reached appropriate motor development, e.g. to write and form letters (Appendix 4).

There is nothing in the learning and development section that reflects babies and toddlers.

Section Two: Assessment

- Whilst the document briefly mentions adult-child observations, this would benefit from an emphasis that adults’ observations of babies and children’s play be informed by their understanding of play and early childhood development.

- Clearer emphasis needs to be made that the ELGs are assessment tools for the end of the reception year, rather than aspects to be taught during the Foundation Stage (particularly in Reception classes).

- Para. 2.7 states: ‘Providers must supplement the Profile assessment with a short commentary on each child’s skills and abilities in relation to the three key characteristics of effective learning’ (paragraph 1.11). This would be better as ‘on each child’s strengths’.

- (Para 2.7 continued) ‘This will give Year 1 teachers helpful background and context when considering each child’s stage of development and learning needs.’ The phrase ‘stage of development’ suggests a perspective of young children’s learning and development that is no longer considered appropriate by experts in the field.

Section Three: Safeguarding and Welfare Requirements
Staff qualifications, training, support and skills

- The required levels for staff qualifications are not adequate for 2012: by then the EYs framework should show a shift from what was acceptable in 2008 and be more aspirational: this section in the consultation document does nothing to press the sector towards upskilling. It is reasonable to expect all rooms/age group leaders to be at level 3, to have a higher proportion than 50% of the rest of the staff at level 2 and to be training towards level 3, with the requirement that any unqualified staff must be on a training programme towards level 2. This would strengthen the consultation docs current statement that ‘3.22 In particular, providers should consider supporting those staff without any relevant qualification to obtain a relevant level 2 qualification (p 19)’. Also, if level 3 is to remain acceptable as a leader/manager qualification, it is reasonable that they too must be on a training programme to further their qualifications to lead. This section should be strengthened to more closely reflect Tickell's review, which was so clear on this: ‘I recommend that the Government retain a focus on the need to upskill the workforce, to commit to promoting a minimum level 3 qualification and to maintain the ambitions for a graduate-led sector’ (Tickell, 2011, p 41, sect 5.5).

Staff-child ratios

- The reception class is not a 'school' in the sense used in the document – it is part of the 'early years' and should be staffed accordingly with high quality practitioners as all research has shown to be vital. The document lists the 1-to-30 maximum ratio, but makes no mention of best practice in providing skilled teaching assistants for these young children (3.37).

Learning environments

- We are concerned about the comment that children should go outdoors daily unless 'inappropriate' for 'poor weather conditions' (3.58). We believe strongly that children should learn outdoors both despite and because of different weather conditions. This statement also weakens the existing document which says unless 'unsafe' weather conditions (3.58).

Safety and suitability of premises, environment and equipment

- The requirement for separate 'baby rooms' is retrograde. Some of the best settings provide family groupings so that babies and toddlers can mix with older children, not be in a separate baby room, and can stay with the same key person throughout their time in a setting, rather than the disruptive (to attachments – so vital to development of babies and toddlers) method of moving children on from a baby room to a toddler room to a pre-school room, changing KPs and environment as they go and causing too high a number of transitions for settled relationships. (3.59).

Inspection and Enforcement

- The focus on safeguarding is important but it is not sufficient to suggest that the only training which needs to be given to practitioners is on this issue. There is much for practitioners still to learn about aspects of curriculum and pedagogy that require in-depth training and education (3.9), particularly their subject knowledge of play.