

## **Early Years Alliance: Draft response to the DfE consultation on Early Years Foundation Stage Reforms**

DfE is seeking responses from the early years sector on its proposed reforms to the Early Years Foundation Stage. The consultation is open until 31<sup>st</sup> January 2020. Submissions can be made on line via [www.education.gov.uk/consultations](http://www.education.gov.uk/consultations). Email submissions can be made via [eyfs.consultation@education.gov.uk](mailto:eyfs.consultation@education.gov.uk)

Submissions by post should be sent to:

EYFS consultation  
Early Years and Schools Group  
Department for Education  
2<sup>nd</sup> Floor, Sanctuary Buildings  
Great Smith Street  
London, SW1P 3BT

The Early Years Alliance's draft response to the proposed changes to the Educational Programmes, Early Learning Goals and other elements of the EYFS is outlined below.

**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.**

The Early Years Alliance welcomes the opportunity to contribute to the consultation on the revised EYFS. This response is informed by comments received from our 14,000 members across England via local and national meetings and online webinars and forums. The Alliance has also been actively engaged with a coalition of 12 early years organisations and stakeholders which produced:

- a) academic research which found no evidence to support extensive changes to the current Early Years Foundation Stage (EYFS) framework ([September 2019](#)) and;
- b) a survey of 3,000 early years practitioners which demonstrated that concerns over increasing workload and stress on the part of the early years workforce is not a result of the EYFS ([October 2019](#)).

This response draws on these pieces of work.

It is disappointing that this consultation seeks views on the proposed revised educational programmes and Early Learning Goals in isolation from the rest of the revised EYFS. It is possible that some of the comments made below about the educational programme summaries are covered elsewhere in the revised framework.

There were also a number of elements in the draft EYFS piloted in schools in 2018-19 that caused concern to the Alliance and its members.

### **Removal of reference to ‘learning differently’:**

While it could be argued that the proposed removal of the reference to children ‘learning differently’ in the overarching principles reflects recent neuroscience and research evidence that moves beyond previous views of different learning styles (kinesthetic, auditory, visual), early years practitioners have raised concerns that the removal of this phrase implies that there is ‘one way’ that children should experience the early years environment. Many in the sector feel that this phrase reflects the range of activities that practitioners use to stimulate children’s learning – child-initiated, adult led, etc. As such, its proposed removal is a cause of real concern and needs to be addressed fully in the statutory framework itself as well as the proposed revision to Development Matters.

### **An overly-narrow focus on the education programme ‘activities’**

The current version of the EYFS (paragraphs 1.5 -1.11) outlines how early years provision should be delivered as well as neatly summarising the aims and intention of each of the seven areas of learning.

This narrative includes the essential nature of play for children’s development, the centrality of the characteristics of effective learning, the role of skilled adults in supporting children, engagement with parents and professional support survives when concerns are identified about progress and the vital role of the Key Person. These essential principles underpin effective early years practice and must be presented centrally within the revised EYFS.

We are therefore concerned that the proposed educational programmes focus mainly on focus on the content of provision and that the message being sent to practitioners is: “Just cover these topics”. Such

an approach would undermine the very essence, values and principles on which the EYFS is based.

This concern is reinforced by the fact that the educational programmes have been separated into each learning and development area. While the consultation document states that “all areas of learning and development are inter-connected and complement one another,” there is a risk that this message is lost as a result of the changed format.

The message must be clear and strong: early years practice is holistic and focuses on all areas of learning delivered within the principles and concepts of the characteristics of effective learning.

### **Lack of focus on younger children**

The consultation document explains that a stated aim of the reforms is children’s preparation for year 1. This results in many of the proposed educational programmes ignoring the fact that the EYFS covers the 0-5 age range and few refer directly to supporting the learning and development of younger children.

This reinforces concerns of a policy gap between EYFS provision in nurseries, pre-schools and childminding settings and that which is expected in reception classes. This policy gap is also present in the very different expectations of Ofsted outlined in the Early Years Inspection Handbook versus the sections in the Schools Handbook covering nursery and reception class provision. The proposed educational programmes have only heightened these concerns that the holistic nature of the EYFS Framework as applying to children from the age 0-5 is being undermined.

### **Lack of reference to children with additional needs**

We are also concerned about how little attention the educational programmes pay to how to support the learning and development of EAL children or those with additional needs and or disabilities. The Alliance believes this review has missed an opportunity to reinforce and strengthen the importance of recognising and meeting the needs of children with additional needs and/or disabilities.

## **Comments on specific educational programmes**

### **Communication and language**

The consultation is correct to highlight the central importance of communication and language development. However, we are concerned that the reference to ‘spoken language’ in the educational

programme could exclude those children who are pre-verbal (note our previous comments about the EYFS covering ages 0-5) and those who may never acquire speech.

There is also no mention of support for bilingual/EAL as outlined in the current EYFS para 1.7.

The Coalition's research found evidence to maintain "the current emphasis on all the prime areas within the EYFS as particularly crucial and time sensitive in the early years and their foundational nature in relation to all later learning, including the importance of communication and language skills as a basis for literacy." (Pascal et al, 2019, p8). However, the statement in the proposed changes that spoken language "underpins all seven areas of learning and development" fails to acknowledge the interconnected nature of the prime areas coupled with the Characteristics of Effective Learning. As such, we would recommend that this statement is amended to make clear that spoken language is a key skill closely connected to the other prime areas.

### **Personal, social, emotional development**

The Alliance welcomes the emphasis given in this educational programme to the importance of attachment and strong, warm and supportive relationships with adults as a basis for learning. The Coalition research (c.f., p.18) outlined the academic discourse distinguishing between executive function and the broader concept of self-regulation and this issue is addressed in the Alliance's response to Q7 below.

### **Physical development**

It is notable that this educational programme is shorter than the others, and that it focuses on activities that are beneficial to children's development but fails to recognise the importance of children's understanding of healthy diets.

The early years are important for establishing good eating habits and awareness of diet and nutrition. This is acknowledged to some extent in the ELG for PSED (under 'managing self') which refers to the importance healthy food choices. However, we do not believe that this reference alone gives necessary focus to the issue and recommend that more detail on how practitioners can support approaches to a healthy diet should be included in the physical development educational programme.

## **Literacy**

The current educational programme neatly outlines that the aim in the early years is to 'ignite' children's interests in reading and writing. However, in contrast, the proposed educational programme focuses on outlining a series of functional elements that must be delivered to children. As such, while it acknowledges the important role teachers play in this by sharing their own enjoyment of reading, the clarity of this message has been lost.

The Alliance is also concerned that the literacy educational programme appears to focus on provision for older children. Some literacy experts suggest that these activities are more appropriate for most children beyond the age of five (Nancy Stewart, *Reading Between the Lines, Nursery World*, 2019). There is no reference to the support younger children need to develop the fundamental skills of symbol recognition and decoding that support reading and writing in later life.

## **Mathematics**

Similarly, the mathematics educational programme outlines the learning process the wrong way around. Encouraging 'children's curiosity about number, shape, space and measure' are the key concepts on which practitioners should focus for the majority of the EYFS. However, these are only referenced at the end of the narrative.

The concepts of mathematics and its related language should be developed in partnership and discussion with children to ensure that the use of number as symbols to represent these concepts is securely in place.

The reinstatement of 'shape, space and measure' into the document is welcome but the Alliance remains concerned that this is no longer an ELG in itself. Research points to a focus on spatial reasoning, which includes visualising spatial relations, which is underpinned by a range of spatial experiences, including construction and puzzle activities.

Spatial mathematics education also has potential for improving attitudes to mathematics for underachieving groups and individuals (Verdine et al, 2017, cited in Coaliton Research, op. cit). On this element the Alliance supports the proposal of the Early Childhood Mathematics Group suggestion that the educational programme should emphasise positive attitudes towards mathematics and mentions enjoyment while specifying the focus for shape, space and measures.

*‘Children’s enjoyment and curiosity about number, shape, space and measures should be fostered through their interactions with people and the world around them. Developing a strong grounding in number and spatial reasoning is essential for all children to develop life-long confidence and competence in mathematics. Children should be able to count confidently, developing deep understanding of numbers to 10, the relationships between them and the patterns therein, through the use of a range of manipulatives. Children should begin to make comparisons about size, length, weight, capacity and time. They should engage in construction and pattern-making activities and learn about position and direction. Mathematical development, like all effective learning, depends upon playing and exploring, active learning, and creating and thinking critically. (ECMG 2019).*

### **Understanding the world**

The current education programme is clear and concise in its description of the practitioner’s role in ‘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’ (p8).

The proposed educational programme does little to improve this and we are concerned that the explicit references to the benefits in terms of vocabulary and word recognition suggest that the DfE’s view is that a greater sense of self within the world is not considered sufficient on its own and needs to be justified as contributing to improved speech and language.

### **Expressive arts and design**

The current EYFS narrative makes reference to enabling children to ‘explore and play with a wide range of media and resources’. This resonates with practitioners across the EYFS age range, whether they are in the baby room or a reception class. We are disappointed, therefore, that the focus on expressive arts and design now appears to be on the higher age range and does not include younger children.

**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.**

A stated aim of the EYFS review is to make the ELGs clearer, more specific and easier for teachers to make accurate judgements. However, it is the Alliance's view that the proposed changes will fail to achieve this.

We are concerned that in revising the presentation of the goals into a series of bullet point statements, DfE will inadvertently promote a 'tick-box' approach to EYFSP assessment. Reception teachers who undertake EYFSP assessment have expressed concerns that the move from a narrative explanation of each goal to a bullet point of three requirements for each is considered a step toward an NVQ-style, competence approach to assessment. We share concerns that they have raised that such an approach risks moving children's learning and development, and the early years practice that supports it, from an art to a science. While it's possible that this will provide more accurate predictions of future attainment, a framework which encourages a tick-box assessment should be regarded as a retrograde step.

Some EYFSP assessors have suggested that looking for observational evidence for each ELG will take longer than the current observational 'best fit' assessment.

Practitioners must consider the whole of each ELG when making their decision and avoid splitting the descriptor into sections and ticking them off a list. The most accurate picture of the child's overall embedded learning will come from a holistic view of the descriptor. If the ELG description best fits a practitioner's professional knowledge of the child, then their learning and development can be judged as 'expected' (EYFSP Handbook, 2019). This 'professional judgement' approach to assessment can be delivered with little interference to children's learning experiences, something that would not be the case if activities designed to evidence progress and achievement are created to tick boxes.

### **Comments on individual ELGs**

#### **Communication and language**

Communication and language is an important focus of government concern. However, while the Alliance welcomes the attention being paid to this, we are surprised and concerned that the number of ELGs in this area is being reduced from three to two.

### *Listening, attention and understanding*

Understanding develops earliest in young children through reading facial expressions and non-verbal communication. Building on this underpinning knowledge, children link sound meanings to communication – this is the basis for language development. Removing ‘understanding’ as a separate goal shows a lack of appreciation of this essential skill. As such, we believe that the understanding ELG should be retained as a separate goal within the Prime Areas rather than being transformed into ‘comprehension’ within the literacy ELG.

In addition, the final bullet point under this ELG – “Hold conversation when engaged in back-and-forth exchanges” – is not clear, and is likely to cause unnecessary confusion for practitioners as it is difficult to perceive of a conversation that is not a back-and-forth exchange. We recommend either revising this point to make its intention clearer, or reconsidering if it is worth including at all.

### *Speaking*

The requirement for children to make use of ‘recently introduced vocabulary’ is likely to be both unclear to practitioners and difficult for EYFSP assessors to evidence.

While the current ELG states: ‘children express themselves effectively showing awareness of listeners’ needs’, the proposed requirement for ‘using full sentences’ and ‘making use of conjunctions’ overcomplicates this desired outcome. The focus in the EYFS should be on encouraging children to express their feelings and relate their experiences in whatever format works best for them.

### **Personal, social and emotional development**

We are concerned that the proposed changes for the PSED ELG do not improve on the current ELGs in this area and will only confused those working to ensure that children are confident, have a secure sense of self and socialise appropriately with their peers and adults.

The introduction of the concept of self-regulation is regarded as a complex area of research. This was highlighted by the Coalition research, which dealt at length and detail with the inter-relationship of research into self-regulation, executive function and elements of the characteristics of effective learning (c.f., pp 18 – 20). The Coalition found these to be important components and indicators of future academic and wider adult success and their inter-relatedness is an evolving field of research. As such, attempting to break them down into a series risks undermining the holistic nature of children’s early



development in this area.

We disagree with the decision to try to bring together elements from three existing ELGs into one (managing self). This ELG fails to articulate the appropriate expectations of children by age five as clearly as the current ones for self-confidence and managing feelings,

As outlined above, we also believe that health and elements of basic hygiene, personal needs and healthy food choices should be included as part of the physical development ELG rather than here.

The inclusion of 'work' within the building relationships ELG is unhelpful as, for children aged 0-5, play is work so this term is either tautological or is an interpretation for young children that is inappropriate.

### **Physical development**

The removal of health and self-care means this ELG focuses solely on fine and gross motor skills. This is a limited and limiting consideration of young children's physical development. As one of the prime areas of learning and development, the focus needs to be broader than acquisition of muscle development and control. As such, we recommended that the current inclusion of health and self-care in this Prime Area remains, as it expresses to practitioners the need to consider physical development in the round.

Stronger emphasis should be given in this ELG to supporting understanding of diet as part of a healthy lifestyle.

The reference to 'in almost all cases' within the fine motor skills ELG is vague and will not aid EYFSP assessment.

### **Literacy**

The rationale for changing the literacy ELG refers to children within the EYFS as 'pupils', a term that would not be used by EYFS practitioners and suggests that children in this age range are in formal education. We recommend that this reference is changed.

The focus of the revised reading and writing ELGs removes the current reference to understanding and appear disinterested in whether what the child has read or written has any meaning for them. As such, there is the risk that reading and writing become abstract chores, bearing little reference to the child's world. This concern could be addressed if the reading ELG combined both recognition of the words and a focus on comprehension of what they mean. This would then allow understanding to be retained as a

discrete ELG under communication and language.

## **Mathematics**

The removal of space, shape and measure is a major concern to practitioners across the sector. Young children gain an understanding of and interest in mathematics through real world contexts. For example, the relative size of boxes, the differences in volume (or not) between tall thin cups and short, fat ones immerse children in mathematics in an engaging and real sense. Shape, space and measure should be a discrete ELG within the mathematics area. The Alliance shares the view of the Early Childhood Mathematics group on this matter:

*“It seems obviously desirable that young children develop early familiarity with the properties of shape and measures and the language to describe and compare these, in order to progress in learning about geometry and measures in Key Stages 1 and 2. Furthermore there is increasing evidence that early spatial skills are predictive of later mathematical achievement (Young et al, 2018) and that teaching these improves mathematics, including number understanding (Cheng & Mix, 2014; Hawes et al, 2017).”* (quoted in [ECMG 2019](#)).

The Alliance welcomes the proposed number ELG’s focus on a deep understanding of number to 10, instead of 20. This is broadly in line with current research (quoted in [EIF 2018](#)) and emphasises depth of understanding about number composition. Similarly, the inclusion of ‘subitising’ also encourages children to focus on appreciating and understanding the ‘make up’ of numbers.

However, the final requirement to ‘automatically recall’ (without reference to rhymes, counting or other aides) number bonds up to 5 and some number bonds up to 10, including double facts, appears to move away from this attention to depth of understanding and instead unhelpfully focuses on recall or rote learning of number symbols.

We are also concerned by the requirement outlined in the numerical pattern ELG for children to count confidently beyond 20. This requirement is not supported by research and again suggests a focus on learning by rote over and above the development of conceptual understanding. It also appears to contradict the focus of ‘up to 10’ in the proposed number ELG which immediately precedes it.

## **Understanding the world**

The rationale for change suggests that Primacy Assessment Consultation feedback indicated that the

current ELG was vague. However, the proposed ELG bullet points on a range of topics fails to capture the current requirement that children reflect upon and are sensitive to differences in the world, cultures, and peoples around them.

The repeated references to ‘what is read in class’ in these statements risks sending a message to teachers that their focus should be on acquisition of content and knowledge, rather than lived experience and reflection.

### **Expressive arts and design**

In this area of learning, the value of process over product is particularly important. However, as with the other ELGs, the reduction of holistic narrative into bullet points undermines the creative and expressive aspects of learning outlined by the current ELGs and turns them into a mere series of functions to be undertaken.

We are particularly disappointed that ‘exploring’ materials and media has been replaced by the removal of using materials in ‘original ways’ from the ‘being imaginative and expressive’ ELG. This move is contradictory as it requires practitioners to support imagination and expression without encouraging originality.

**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.**

The proposed new ELGs attempt to push inappropriate focus on numbers and reading, something we believe will skew provision throughout the EYFS, as changing the ‘end product’ of the framework will inevitably change the process.

The Alliance is concerned that these changes will put pressure on Reception class teachers to focus on children gaining a ‘good’ level of development in these inappropriate ELGs and that this, in turn, will influence the focus of provision to children in those classes and by extension the provision of their ‘feeder’ nurseries, pre-school and childminders. Teaching ‘to the goals’ will create an inappropriate focus on formal provision at the expense of a broad, child-centred and play-based experience that evidence shows is the best foundation for later educational achievement.

The stated aims of the EYFS review include the desire to strengthen literacy and numeracy outcomes to ensure all children have a good grasp of these areas of learning in preparation for year 1. However, the Coalition analysis concluded that the latest evidence did not support the proposed changes to the literacy areas of learning. It found:

*“The wider reviews of evidence, such as The 100 Review (Pascal, Bertram et al., 2017), and the DfE Review (Pascal et al, 2017) support the case that children need to acquire basic phonology, syntax, and vocabulary as a fundamental basis in the process of becoming literate. **Promoting higher order literacy skills before the child has secure development in oral language will lead to problems for these children.**” (Dockrell et al, 2010; Payler et al, 2017; Pascal, Bertram et al, 2017; Pascal et al, 2018).*

*“The evidence indicates that **literacy learning should be a key element in the EYFS from birth, but that it is fundamentally linked to language development and relies on the secure development of language skills and understanding.**” (op.cit., p22, emphasis added).”*

Similarly, for mathematics, the research indicates that while pre-school mathematics, and especially number sense, predicts later achievement in school and enhances life chances, the emphasis should be on depth of understanding rather than broad, detailed expectations of ‘formal mathematics as indicated by the proposed ELG focus on number manipulation. “Recently, pattern awareness has been found to significantly predict later achievement, for instance by identifying the unit of repeat in a repeating pattern with objects.” (Rittle-Johnson et al, 2016). Therefore, the evidence suggests that practical pattern-making, but not abstract number patterns, should be included in early mathematical education, as may be suggested by the proposed numerical patterns Goal.

However, the evidence from Soto-Calvo et al’s longitudinal study (2015) demonstrates how the development of counting and calculation are supported by different cognitive abilities which do not develop fully until around the age of six (Pascal et al, 2018, p.24). Gifford (2014) also cites research which suggests that **“children’s understanding of each number being ‘one more than the one before and one less than the one after’ does not develop until around the age of six, indicating that engagement with formal mathematics may best be delayed with children who are not secure in this ability.”** (Payler et al, 2017, p.67). Like literacy, the evidence indicates that informal mathematical learning should be a key element throughout the EYFS, but that some basic mathematical operations rely on the development of cognitive abilities which may not be in place until the end of the Foundation years.’ (op. cit. p23, emphasis added).

The key points identified by the research are as follows:

*“When educational attainment through primary school and beyond are prioritised as goals for the Foundation years, securing good child outcomes which are identified under Characteristics of Effective Learning, Communication and Language Development, Personal, Social and Emotional Development and Physical Development should be prioritised.*

*“Focusing too soon on Literacy outcomes during the Foundation years may be detrimental to the longer-term attainment of those children who are not yet secure in oral Language outcomes, including an understanding of how language works in the wider social and cultural context.”. (op cit. p28).*

**Q9. What are your views on removing the LA statutory element of EYFSP moderation? Please provide your views below.**

The Alliance does not support the removal of the statutory element of EYFSP moderation.

Moderation of any assessment carried out by a range of assessors is vital to secure integrity and standardisation. For the process of moderation to be a success, it needs to be adequately resourced and all involved suitably and regularly trained.

**Q10. What are your views on whether removing the LA statutory element of the EYFSP moderation will help to reduce teacher workload? Please provide your views below.**

Respondents to the Coalition survey did not indicate support for the removal of local authority moderation. It was not felt that this requirement, or those of the EYFS more broadly, contributed to the sense of work overload being experienced by many in the sector. Rather, work overload was attributed to pressures to meet perceived or actual requirements from Ofsted, local authorities or leaders and managers. This was in line with responses to the Alliance’s own survey into the well-being of early years practitioners, Minds Matter (Early Years Alliance, 2018).

**Q11. What alternatives to LA statutory moderation do you think could help to ensure consistency of EYFSP judgements across the ELGs? Please provide your views below.**

The Alliance does not support the removal of LA statutory moderation.

**Q12. What are your views on the proposal to remove the 'exceeded' judgement from the EYFSP? Please provide your views below.**

The Alliance has no objection to the removal of the 'exceeded' judgement. However, the EYFSP should not be viewed as a pass/fail assessment. Rather the emphasis should be on securing the necessary support for those children identified as 'emerging' in any area of learning.

**Q13. Should the requirement in the EYFS framework to 'promote the good health of children' also include oral health? Please provide your views below.**

Oral health should be included in the requirement to promote the good health of children. This should also be supported by strengthened references to children's understanding of the importance of healthy diet and lifestyle in the Physical Development ELGs.

**Q14. Please provide any representations and/or evidence on the potential impact of our proposals on people with protected characteristics for the purposes of the Public Sector Equality Duty (Equality Act 2010).**

The educational programmes should reflect the needs of children with additional needs and/or disabilities. The language and communication elements need to reflect the needs of children with EAL and/or those with a speech or hearing disability. For example, the speaking ELG requires participation in class, small group and one-to-one discussions. This may be challenging for EAL children and children with disabilities.

The Alliance would welcome recognition within the EYFSP assessment of the circumstances of summer-born children. These children may have had up to 20% less experience of early years provision and the

assessment process should control for this.

The full draft of the EYFS should be informed and reviewed by SEND experts to avoid any unintended exclusion of particular groups of children.