

Early Education's response to the DfE consultation on the EYFS reforms
Draft as at 17.12.2019

This document is shared for the benefit of Early Education members to invite further comment before we submit our response, and as a reference document for those considering their own individual responses. Any comments should be sent to beatrice@early-education.org.uk before 27 January 2020.

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 revised Educational Programmes (EPs) are not well-drafted to support children's learning and development throughout the EYFS.

The research evidence as summarised in *Getting it right in the Early Years Foundation Stage: a review of the evidence* (<https://www.early-education.org.uk/sites/default/files/Getting%20it%20right%20in%20the%20EYFS%20Literature%20Review.pdf>) does not support extensive changes to the EYFS, and those it does support are not always reflected in the proposed changes, eg increased emphasis on citizenship and children's rights.

Our survey of 3000 practitioners (link to follow) also shows extensive support for the EYFS in its current form. Responses showed that practitioners did not see changes to the EYFS as likely to improve children's outcomes or reduce workload. They say outcomes and workload would require increased resources to support their work with children and families and engage in the interprofessional work needed to support children's needs.

Our specific comments on the EPs are as follows.

Communication & language

The first sentence is out of kilter with the recognition elsewhere in the EYFS about the interconnected nature of the three Prime Areas, and how all three are foundational for children's learning. It misleadingly suggests a primacy about spoken language which is neither developmentally nor chronologically correct. This is not to downplay the importance of Communication and Language (CL), but to ensure there is clarity about the importance and interconnectedness of all three Prime Areas.

Both this section and literacy should refer to the role of CL, especially oral language, as the foundation of literacy.

There is no reference here to how children develop the skills of attention, listening and understanding, which are particularly crucial for younger children. This EP is geared towards older children (eg the reference to "the teacher") not to babies and toddlers and supporting early language development. For example, it overlooks the importance of vocalisations, facial expression and gesture in the earliest stages.

We welcome the reference to the number and quality of conversations. However, children need rich to-and-fro conversations about real experiences, where the vocabulary has meaning and where they are stretched to develop their use of more complex language in order to express and clarify their thinking. New vocabulary is not best introduced through reading as suggested here, with first-hand activities serving only as follow-up practice. This misunderstanding reflects the lack of awareness of understanding as preceding using vocabulary. Children best understand words when they experience them in first-hand contexts, not in the more abstract situations of being read to.

Physical development

This needs some recognition of the importance of physical development and movement for developing sensory and cognitive abilities and that children learn through their bodies and senses in active exploration of the world and events. For example, vestibular and proprioceptive development are crucial for moving and handling, but also for understanding oneself in space and how we develop mental maps and concepts through schematic play.

Physical development includes health and self-care, which should be restored to this section. For example, the development of continence is part of physical development and is affected by self-awareness of bodily processes and the development of the relevant muscles. Being able to dress oneself relies on gross and fine motor skills and proprioception. Healthy eating is a key aspect of ensuring good physical development.

Personal, Social and Emotional Development (PSED)

This section should be first in the list. PSED is fundamental to all areas, including CL—it is impossible to communicate or learn language except in relationship with others. When children are stressed, do not feel safe and cared for, their fight-or-flight response impedes brain activity in frontal lobes and impedes learning. A feeling of belonging and self-worth is vital, because we learn through and with others, and so relating to others is essential. The references to attachments are welcome. The references to learning “how to make good friendships, co-operate and resolve conflicts peaceably” are not relevant to most of the birth to 5 age group, and the current formulation “to form positive relationships and develop respect for others; to develop social skills and learn how to manage their feelings” is better.

There is an attempt to introduce some concepts relating to self-regulation here such as “set themselves simple goals, have confidence in their own abilities, to persist and wait for what they want and direct attention as necessary”. Children within the EYFS may start to develop these skills with support, but it should not be implied that children will typically have fully developed these skills at age 5. Also, this is a very over-simplified approach which is better covered by the characteristics of effective teaching and learning (CoETL), and it would therefore be better simply to cross-reference those here eg “Aspects of personal, social and emotional development are closely intertwined with the cognitive aspects of learning reflected in the characteristics of effective teaching and learning.”

Literacy

The last sentence of this EP about developing a love of reading should be at the start, not as an afterthought eg “Children should be supported to develop a lifelong love of reading through practitioners sharing books and stories and meaningful experiences of reading and writing.” Scrap the reference to teachers, which is not relevant to the younger age groups. Referring only to “reading in class” overlooks the vital role for early years settings in supporting families to develop rich learning opportunities at home, which is an integral part of learning in the EYFS.

This description is written as if the educational programme for literacy applies only to children who are beginning to read. It needs to be applicable across the whole of the EYFS. It should include concepts of print, mark-making, environmental print, familiar symbols, etc.

Both here and in the introduction to CL, it needs to make clearer that CL (especially oral language) is the root of literacy. Listening comprehension – which is what the ELG is about - is not part of reading – it is part of underlying CL and should be re-instated there. Composition in speech is also CL, not Literacy. Literacy must be seen as a subset of CL, not the other way around.

References to “mark making and writing” would be more appropriate than “handwriting” in this context. Handwriting is a physical fine motor skill, and depends on PD. It is not necessarily part of writing, which is conveying meaning in text – which could be on a computer, magnetic letters, or through a practitioner scribing their ideas.

This EP should focus on how reading and writing, as well as being mechanical skills, can be set in meaningful contexts that – as the current EP puts it – will “ignite their interest”. Children’s motivation to decode text comes from understanding that it empowers them to access something they want – stories or information. Motivation to write comes from children wanting to record and express their ideas.

Mathematics

Shape, space, pattern and measure are essential elements of mathematics, and should not be set out as an afterthought to learning about numbers. They provide opportunities to apply and deepen understanding related to number such as estimating, relationships, predicting and pattern, as well as linking to key aspects of the CoETL.

Early years maths should be grounded in children’s practical experience and opportunities for experimentation and problem-solving in relation to real world situations. The EP should focus on how maths is embedded in all aspects of children’s daily experiences and the role of practitioners in drawing out key mathematical concepts and encouraging children to play with mathematical ideas through their daily activities - from construction to snack time. Understanding of number will develop far more effectively when grounded in these foundational mathematical experiences.

Understanding the world

This revised EP fails to convey the key message of what the UW area of learning is about as clearly spelled out in the original version: “UW 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.”

Having failed to explain what UW covers, the new text is unduly specific about how to achieve this – UW is now framed in terms of the experience provided by the school or setting (visits from or to the setting) and being read to. It is neither necessary nor helpful to suggest activity should be focused on “important members of society” (there are many occupations, not just “those who help us”, and many other aspects of community to explore) and or the very limited and unimaginative list of places to visit (“parks, libraries and museums”). It fails to capture the broad experiences children have within their homes and communities, and when out and about in their local area or further afield, whether within the setting or with families. It does not reflect the ways in which children will experience and learn about the world around them in different ways between birth and 5 years old.

All reference to technology has been lost, not just the ELG. This EP should reflect that UW covers children’s emerging engagement with a range of aspects of science, technology and engineering in the world around them (the current ELG is on Technology, not Information Technology as the consultation document erroneously says, suggesting a failure to grasp what this is actually about). We need to encourage engagement with STEM in the early years, not downplay it.

The last two sentences should be removed: the role of UW in supporting language does not need to be spelt out as part of the Educational Programme – the interconnectedness of all areas of learning should be emphasised at the start.

Expressive Arts and Design

The proposed EP for EAD no longer sets out an educational programme - it only gives a rationale.

This EP should not be framed in terms of children developing “artistic and cultural awareness” and reference to “quality” in this context is potentially controversial. Nor should this be about what children “see, hear and participate in”, or “interpreting and appreciating what they hear, respond to and observe”. These are all passive ways of consuming cultural artefacts produced by others.

While children in the early years should have the opportunity to experience art, music, etc, the primary focus should be on active creation and exploration by children, as the current EP very clearly spells out, EAD “involves enabling children to explore and play with a wide range of media and materials, as well as providing opportunities and encouragement for sharing their thoughts, ideas and feelings through a variety of activities in art, music, movement, dance, role-play, and design and technology”.

What defines the curriculum in the EYFS?

The EPs should be the starting point for developing a curriculum in the EYFS and should be written to support an appropriate curriculum from birth to five. Government has repeatedly stated that the ELGs are not the curriculum. While this is technically correct, the reality as HMCI pointed out is that “ Across the whole education sector a mentality of ‘what’s measured is what gets done’ trumps the true purpose of education, and curriculum thinking—the consideration of what needs to be taught and learned for a full education—has been eroded.” As the evaluation of the pilot showed, what is assessed gets prioritised, what is not assessed is marginalised when teachers are under pressure to deliver results. The ELGs therefore must align with the EPs (not the other way round), and the test of the assessment should not only be whether it is an accurate predictor of future success, but also whether it ensures all aspects of the curriculum receive appropriate time and attention.

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.

At times the ELGs seem to suffer from a fundamental confusion as to their nature and purpose. These are summative assessments for parents/carers and teachers delivered according to the assessment principles set out in the EYFS Profile 2019 Handbook:

- *assessment is based primarily on the practitioner’s knowledge of the child – knowledge is gained predominantly from observation and interaction in a range of daily activities and events*
- *responsible pedagogy must be in place so that the provision enables each child to demonstrate their learning and development fully*
- *embedded learning is identified by assessing what a child can do consistently and independently in a range of everyday situations*
- *an effective assessment presents a holistic view of a child’s learning and development*
- *accurate assessments take account of contributions from a range of perspectives including the child, their parents and other relevant adults*

Assessments are therefore professional judgements about best fit on the basis of a range of evidence, not binary test items based on how children perform in a one-off situation in the classroom. They should be clear enough to ensure consistency of judgement but should not attempt to present a simple tick-list of items a child must have achieved in order to “pass”. The evaluation of the pilot found the concept of best fit was applied to the bulleted ELGs in a range of ways, not consistently – should all the statements be met, or just most of them? Does best fit for “knows 10 digraphs” mean knows at least 10 digraphs, or knows 8 or 9 and has achieved most of the other descriptors in the ELG? We know from the widespread misuse of *Development Matters* as an assessment tick-list that simply stating it should not be used as a ticklist will not prevent it from becoming widespread practice to do so.

The repeated use of the phrase “Children at the expected level will...” needs to be addressed. Does “expected” mean that **all** children should reasonably be expected reach this level by the end of reception, regardless of age, gender, EAL, etc? If so, these are clearly unrealistic expectations and should be revised to accordingly. The annual crop of headlines stating that certain groups (FSM, summer born, etc) are failing this benchmark are an indicator that, if not all children are expected to meet these goals by the end of reception, the language used should be changed to indicate that while these may be typical developmental markers, children develop in different ways and that it is not reasonable to expect all children to meet them at a single point in the year regardless of age or other factors.

This is crucial in relation to the expectation which is highlighted in the pilot evaluation that the ELGs should be a sign of readiness for Year 1. If the ELGs are to be an indicator of readiness for Year 1 then every child should be able to achieve them, including the youngest in the year – otherwise the Year 1 curriculum is clearly not appropriate for all children. Yet, the attempts to align the ELGs more closely with Year 1 appears to be creating ELGs which are not achievable by every child. We understand that the government may be reluctant to review the Year 1 curriculum, but unless they do so this lack of alignment will not be resolved.

It is notable that the pilot evaluation found “no evidence that: children’s needs were identified earlier; that children’s needs were better met; or that children were assessed more accurately” as a result of the changes to the ELGs. This must surely cast doubt on the whether the revised ELGs justify the upheaval and expense of implementation.

For more specific areas where the ELGs are not well-written, see below our response to Q8 –the lack of clarity is often entwined with the inappropriateness of content so our comments are combined below.

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

Listening, Attention and Understanding ELG

This needs to include reference to children giving their attention to what others say and being able to respond, including when engaged in another activity (dual attention). Attention is an essential prerequisite to effective listening and needs to be a focus especially for children with communication and language delay.

“Hold conversation when engaged in back-and-forth exchanges” is a tautology. Is this a badly worded attempt at re-phrasing “They give their attention to what others say and respond appropriately”? This would also address the point raised in the pilot evaluation where some teachers thought this ELG was more to do with speaking than listening, showing that the original formulation was better because it highlighted attention and demonstrating their listening skills through their responses.

“Asking questions” belongs in the ELG Understanding, which needs to be under CL, not presented as “Comprehension” under Literacy when the content is all about oral language. Use of “how” and “why” questions is an appropriate marker for children at the end of Reception, and should be kept in the ELG.

Understanding comes before speaking and needs to be addressed by the ELGs for CL, not just mentioned in the title.

If government wants to stress the importance of CL, it should retain three ELGs under CL, not reduce them to two.

Speaking ELG

This ELG should be about children expressing themselves effectively and actively communicating with others, taking listeners’ needs into account. It should also reference use of language for thinking in narratives and connecting ideas and events.

The use of the phrase “recently-introduced vocabulary” is no better than the previous heavily criticised “new vocabulary”. Vocabulary is simply a proxy and should not be used as a criterion when what matters is children’s ability to express ideas clearly and appropriately.

It is not appropriate to make the use of full sentences a criterion for oral language – few of us speak in full sentences in ordinary conversation. Connecting ideas and events indicates more complex sentence/grammatical structures.

We welcome the restoration of the reference to accurate use of past, present and future tenses, as appropriate to this age group. We note that there were concerns within the pilot that this was less achievable for EAL children. However, this should not be the case as long as the emphasis is not on correct grammatical use of tenses, but rather on demonstrating an emerging understanding of the use of past, present and future forms. It is reasonable to expect children by age four to understand basic ideas about the past and future. A child with language delay or one learning EAL might be spontaneously saying “When I a baby” or “When I a big girl” to express awareness of past and future. This is not using “past, present and future forms accurately” and certainly not “accurate use of past, present and future tenses and making use of conjunctions”. However, “with modelling and support from their teacher is the important phrase”. The teacher must use their professional judgment to decide whether the child is almost there on their own or does not yet understand. Referring to “forms” rather than “tenses” would make clearer that this is not about perfect use of grammar, but about understanding the structure of language and how children use it to describe their experiences.

The reference to conjunctions needs to be taken out for the same reasons – this ELG is all about children enjoying talking and thinking and the interactions involved not about teachers focusing on precise grammatical accuracy. Children will use simple forms eg “and” and “then” and teachers can model use of more complex words such as “although”, “because”, etc but how many or which conjunctions should not be a focus.

Physical Development

Gross Motor Skills ELGs

While the idea of ELGs for gross and fine motor skills is potentially helpful and clear, it is limiting, and these ELGs need further attention. The current ELGs make no reference to important aspects of physical development such as the development of proprioception and the vestibular system. Yet the ability to move with co-ordination and balance is as much about these aspects of development as it is about gross motor skills. For this reason, the previous heading of “moving and handling” is perhaps preferable, as “moving” can incorporate some of these wider aspects.

Gross motor bullet 2: This is too vague, as demonstrated in the pilot: What does the expected level of strength, balance and co-ordination for a 5-year-old, compared to a 3-year-old or a 15-year-old? This needs more on balance, coordination and control.

The EYFS should promote children having more physical activity in line with the Chief Medical Officers’ guidelines (which should be clearly referenced within the Statutory Framework). A reference to “Moving energetically” is vague and not helpful as an ELG. What level of skill or co-ordination in jumping, hopping, skipping etc should be expected for a child at the end of Reception? Can the ELG be appropriately worded so as not to unnecessarily exclude its achievement by children with SEND?

Fine Motor Skills ELGs

Using tripod grip is too prescriptive and not important enough to be an ELG -- the effect is more important than the detail of grip, and a range of grips are appropriate and effective. It is also not inclusive of some children with a disability.

It is not clear whether “in almost all cases” is intended to mean “almost all children” or children “in almost all situations”. Given the variation in application of “best fit” to this in the pilot, it is clear that this needs further reformulation.

The reference to drawing could more appropriately be replaced with “when mark-making or using small equipment”.

These two ELGs (Gross and Fine Motor Skills) could be combined to make it possible to keep Health and Self-Care as an ELG under PD which ensures the relationship between these areas of PD are clear to practitioners.

Personal, Social and Emotional Development

Self-regulation ELG

Self-regulation does not belong in PSED. There are certainly elements of emotional self-regulation in PSED, but self-regulation also includes cognitive self-regulation, which sits within the CoETL.

This ELG is very muddled. Giving “focused attention” to their teacher and following instructions is not self-regulation, although self-regulation does support that ability.

This attempt to include self-regulation will not help the sector to understand what self-regulation is, why it matters, or how it develops.

The original ELG is much more helpful than the proposed replacement in relation to self-confidence and self-awareness as it is about what children do and how they do it. The replacement is far too abstract. How will teachers judge whether children are waiting for what they want and controlling their immediate impulses? How often must they see these behaviours?

The skill of working in groups with other children has been lost from this ELG, which is now more focused on compliance with the teacher.

The ELG on managing feelings and behaviour has been unhelpfully split between the ELG on self-regulation and the ELG Managing self, so that the link between understanding one's feelings, linking that to one's behaviour and its consequences and the ethical context has been lost.

Managing self ELG

This is a muddle brings together unrelated aspects of three previous ELGs (self-confidence, managing feelings and behaviour and health and self-care - which should be in PD).

Part of resilience is being able to ask for help when needed, which has been lost from the current version. Perseverance is part of the CoETL and therefore does not belong in the new ELG.

By cutting the ELG for Managing feelings and behaviour there is no longer a sensible place for the second bullet about "right and wrong" - which was in any case better phrased in the original, which had a nuanced understanding of age-appropriate concepts of behaviour and ethics ("know some behaviour is unacceptable"), rather than the current version ("know right from wrong") which is far too abstract and open to interpretation.

The removal of any reference to children understanding the importance of physical exercise for good health is regrettable at a time when obesity is a growing crisis, as this risks becoming another part of the curriculum which then receives less attention. Similarly, the loss of the reference to talking about ways to keep healthy and safe is a lost opportunity to ensure that children are given opportunities to talk about keeping themselves safe in different aspects of daily life.

Building relationships ELG

There is nothing here about recognising feelings of themselves and others.

"Work" is not a word which would often be used to describe activity in the EYFS. If a broader word than "play" is wanted, perhaps "play and learn"?

The second bullet is poorly worded: children from birth onwards form positive attachments, and friendships from at least age 2, so this does not make sense as a bullet point on its own. Positive relationships are the foundation, but the behaviour that might be expected at the end of Reception would typically be co-operative play,

turn-taking, and showing sensitivity to their peers feelings and ideas. The onus for building attachments should be on the adult rather than the child, so this is not an appropriate criterion for an assessment. The evaluation of the pilot showed that teachers did not understand the concept of attachment, as they understandably struggled to decide what this meant in terms of children's friendships with one another.

There is no clear rationale for a name change from "Making relationships" to "Building relationships".

Literacy

Comprehension ELG

The statements in Comprehension belong in Understanding in CL, and the two reading strands of Comprehension and Word Reading should be combined in one ELG. It is not helpful to divide reading in this way, and places undue emphasis by giving Reading two ELGs.

In order to show progression in language comprehension, this needs to include children understanding "how" and "why". This shows is a more nuanced developmental marker than a focus on vocabulary, which could lead to misguided attempts to quantify how many words children should be learning.

Use of the term "recently introduced vocabulary" is no better than the much criticised "new vocabulary" which is an unhelpful mechanistic proxy for gauging whether children have developed good CL skills and have had wide and interesting experiences in order to expand their knowledge and understanding. At this age children will not develop their vocabulary from reading alone but need to connect it with direct experience. The danger of using vocabulary as a criterion was also demonstrated in the pilot where teachers asked "whether children needed to know new vocabulary and *understand it too*." It is deeply worrying that some teachers would contemplate parrot-fashion teaching of vocabulary, which would entirely fail to improve children's comprehension and language and shows that this is not a helpful concept to introduce within an ELG.

Word reading ELG

The sole reliance on phonetic decoding before engaging with meaning of words and texts, though supported by the current government, is a highly contested area. This does not reflect much current expert understanding of the development of reading. The approach is inappropriately restrictive and attempts to dictate pedagogy instead of leaving this to teachers' professional judgement. There is nothing here about using pictures to support the understanding of words and comprehension. Nor is there any reference to enjoyment, which should be fundamental.

Bullet 1 is inappropriate: Saying a sound for each letter and 10 digraphs is too challenging for many children, and as clearly demonstrated by the pilot evaluation there is no clear consensus on current expectations in Phonics teaching to support this. For children with EAL, SEND and summer born children this could be a significant challenge. Also, this will be used as a tick list – adding to workload as

well as defining children's progress in a negative way. The evidence from the pilot suggests it may not even be used as a consistent tick-list as the idea of best fit was applied to it in several different ways. This is one of the changes to the ELGs which could lead to a significant drop in outcomes at the end of the EYFS.

It is not weakness in teaching that leads to many children not achieving the current Literacy ELGs. It is developmentally inappropriate for many children. The EYFS should focus on emergent reading (see comment on draft educational programme above).

Our suggested alternative ELG for Reading:

“Children read and understand simple text using a range of strategies including context, visual memory and phonics. They use their phonic knowledge to decode regular words and read them aloud accurately. They also read some common irregular words. They demonstrate understanding when talking with others about what they have read.”

ELG writing

This is too narrowly focused on the mechanics of handwriting instead of communicating, which is the purpose of writing. Key questions are: Can the child or others can read their writing? Does it make sense to the child? Do they use writing in their play and for other real purposes? In addition, this expectation is beyond the current level of Y1 handwriting. The existing ELG is better than this one, as confirmed by the evaluation of the pilot where teachers found this ELG difficult to interpret.

Our suggestion for the ELG Writing:

“Children write to record their own ideas in a range of circumstances. They use their phonic knowledge to write words in ways which match their spoken sounds. They also write some irregular common words. Their writing can be read by themselves and sometimes by others. Some words are spelt correctly and others are often phonetically plausible.”

Mathematics

We endorse the proposal of the Early Childhood Maths Groups that the revised ELGs for Mathematics should be as set out below, based on their extensive expertise and research evidence.

In particular, as indicated in Q6 above, we strongly argue for the restoration of the ELG Shape, Space and Measure as a key indicator of children's future success not only in mathematics but in other STEM subjects. 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.

Focusing on a deep understanding of the numbers to 10 is an improvement on the previous focus on counting to 20, but the ECMG proposal for numbers to 12 is preferable.

The ELG Numerical Patterns is not necessary as in the main these bullets are part of Numbers. They will just become another way or being able to “test” children – easily measurable and showing a superficial rather than deeper understanding of mathematical patterns. Much better to keep Shape, Space and Measure as it gives children a wider experience of mathematics which they are actually tuned in to develop. Many schematic patterns of thinking are the basis for these aspects of learning so it is crucial to keep them.

The ELG should not be about “recall” or rote learning. The evaluation of the pilot showed that this was not a clear criterion as teachers asked how fast children were expected to recall facts in order to meet expectations. Quick-fire recall is not an appropriate target for young children.

There are a number of unclear phrases in the latest versions of the goals including “deep understanding”, “number bonds” and “patterns within numbers”. The ECMG formulation is much clearer and more specific in setting out what children should know and be able to do.

Inclusion of evens and odds and double facts are not appropriate for all children at this stage and should not be included.

Revised ELGs proposed by the ECMG:

Number ELG

Children:

- With numbers to 12: count out a number of items from a larger group, match numerals to amounts, compare and estimate numbers, predict adding or taking one.
- Subitise (recognise a number of items without counting) up to 5 and recognise how numbers are made up of other numbers.
- notice, copy, continue and create patterns.
- solve practical problems including: adding, subtracting and sharing.
- communicate their mathematical thinking in a range of ways.

Shape, space and measure ELG

Children:

- make comparisons of length, weight and capacity
- begin to identify the rule in a pattern
- select and combine shapes for a purpose and talk about their properties using mathematical and everyday language
- follow directions and describe positions and routes

Understanding the World

Past and present ELG and People, culture and communities ELG

Separating these two ELGs out from the current ELG on “People and communities” is muddled. The original ELG is better, with a deeper approach and supporting development of British Values and social mobility. In the new version “Lives of

people around them... and roles” is about culture and communities yet is put under “Past and present”.

The concept of “past and present” appears to be suggesting that this ELG is focused on the study of history, rather than primarily on helping children understand their place in the world – starting with their family and community, ideas of citizenship (which the research suggests should be more strongly emphasised in the EYFS) and the everyday institutions which form their experiences. Past is personal at this age, and it is not about learning history from books, non-fiction texts, reading in class, etc. This is not at all appropriate for YR, as demonstrated by the findings of the evaluation pilot that “children often struggled to understand the history topics they had embedded into the classroom”. “Past and present” is not an appropriate focus for this ELG, which is an inappropriate attempt to mirror the structure of Y1.

At this age children’s knowledge of the world should be built from experience and conversation, with books very much secondary. The ELG should not reference “books read in class” (repeated here twice), nor should this be about recall of “narratives, characters and figures from the past”, which is inappropriately bringing in elements of the Y1 curriculum. It needs to start with the familiar, and children's daily lives and the lives, similarities and differences of people around them, and meaningful personal histories.

The second and third bullets under *Culture and Communities* should be merged to “know some similarities and differences between different religious and cultural communities in this or other countries”. There should be no specific requirement to address differences between this and other countries – the focus should be on what is meaningful for children given their experiences and family background. Learning about other countries only from non-fiction texts and maps is unlikely to be meaningful to children, and the unnecessarily specific references to these should be removed, but there will be many other ways in which knowledge of other countries will be meaningfully encountered by children in our globally interconnected world. The evaluation of the pilot confirms there should be less emphasis on recall of facts and that content needs to be appropriate to what children can relate to their own experience, while aiming always to extend that experience, for example in relation to diversity.

These two ELGs should be returned to being a single ELG so that Technology can be retained.

Natural World

The points under this ELG are based on Key Stage 1 requirements with the focus on making observations, drawing and children’s reading in class. Children’s exploration of the world around them should be demonstrated through talk and children’s ability to offer conjectures and explanations. Some children will demonstrate their knowledge through drawing, but this should not be a universal expectation.

All kinds of changes are an opportunity for learning about the world – why restrict this only to the seasons and states of matter? For example, many children will

observe life-cycle changes, chemical and physical changes involved in cooking, decaying organic matter, etc.

There is a real need to restore a reference to technology in the Understanding the world area of learning, within the wider context of the importance of building early understanding of and engagement with STEM subjects. NB the current ELG is in technology, not information technology as stated in the consultation document, ie it covers a wide range of mechanical and analogue technologies, not simply the digital world. Children in Reception can engage in a wide range of engineering, design and technology experiences eg construction, simple circuit design, coding, woodwork, making films and videos. These activities relate closely to Expressive Arts and Design as well as Understanding the World, but they need to be explicitly referenced as relating to our scientific and technical understanding of the world, not only to design, and they therefore belong in both areas of learning.

Rather than deleting the Technology ELG because it seems too hard to write an improved and updated version, we should prioritise it to ensure children from an early age are being encouraged to engage in STEM activity, and to ensure this kind of activity is not lost from the curriculum. There is a real risk that a largely female workforce in the early years feels less confident to engage with STEM activities through the lack of encouragement and opportunity towards these in their own education. Removing the ELG could perpetuate the problem.

It is also noteworthy that technology is one of the few ELGs where boys currently outperform girls (suggesting the pervasiveness of gender issues in STEM) and therefore its removal is likely to further increase the perceived gap between girls and boys in the EYFSP.

Expressive Arts & Design

Creating with materials

Why the change from “exploring” to “creating”? The process is more important than the product, so the emphasis should be on the experimenting, not the drawing and painting, etc. Creativity is not the sole preserve of the arts – in the EYFS it is in the CoETL and runs through all areas of the curriculum (eg maths, language, making relationships with others).

“Draw and paint” is a very restrictive definition – what about clay, woodwork, collage, etc? Reference to make music and dancing have been lost other than an overly specific reference to well-known nursery rhymes and songs. The vital creative aspect of children experimenting with and changing music and movement have been taken out. A broader and more inclusive statement is needed. The original ELG is far better than the proposed revision.

Being imaginative and expressive

This is too narrow. Being imaginative and expressive should include all the creative arts, not just stories and songs. This ELG has lost the key point about using media to express children’s own ideas, thoughts and feelings.

Children can construct narratives alone, as well as with peers and teachers.

Why “perform” songs instead of “sing songs”? Not all children will stand up and perform in front of others (as flagged in the evaluation of the pilot), but many will sing as part of a group or alone when engaged with another activity. There should be no expectation that children sing with or for others.

Why “try to move in time with the music” (which if anywhere would belong under physical development)? In this context dance and movement should be included as a form of expression through which children may express ideas, feelings or narratives.

The two existing ELGs are far better than these. The current ELGs highlight becoming familiar with media and materials, and then using them to express their own ideas. The draft has basically framed what was “Exploring and using” as “creating”, in a very limited sense and without cross-referencing the broader concept of creativity as framed in the CoETL. It has retained only a very limited concept of the imaginative side of children expressing their own ideas. Government might wish to take note of the findings of the Durham Commission in relation to creativity in the early years.

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

Please provide your views below.

In many areas LA moderation of the EYFSP is one of the only pieces of early years specific professional development Reception teachers currently receive, and its removal risks further reducing their opportunities to network with peers and develop their knowledge and skills around observation and assessment.

We recognise that when done badly, LA moderation has been thought to increase workload through unnecessary collection of data. However, this is by no means the norm, and it would risk throwing the baby out with the bathwater to remove this requirement. Better to provide better training and guidance at national level to make clear that neither assessment nor moderation require extensive data collection.

It is a weakness of the current system that there is currently no benchmarking across LAs, and that consistency of data at national level is not as strongly assured as it might be. If LA moderation were to be removed, the value of the EYFSP as a national dataset would be further eroded and its use for comparative data at national or local authority level, not to mention in Ofsted inspections, would be very much undermined.

Alternatives which have been proposed including benchmarking groups at local level but these are as likely to perpetuate bad practice as to spread good practice, and provide little or no reassurance of consistency at local or national level. Peer to peer development is limited by the expertise of those participating and provides no guarantee of expert input, nor does it provide a structure for career progression into advisory roles which ensures continuity of pedagogic leadership.

The early years pedagogic leadership within local authorities is now severely eroded and would be further damaged by removing the one remaining statutory duty. The introduction of the revised EYFS will already be severely compromised by loss of expertise within the LAs which could once have helped roll out training nationally.

If the aim of removing statutory LA moderation is to reduce workload, DfE should note that the evaluation of the pilot attributes reduction in workload to “the reduction in the burden of recording observations combined with the understanding they could use their own judgements.” In other words, workload was neither driven by LA moderation nor by the wording of the ELGs, and was best addressed by clearer guidance on expectations. Even so, the evaluation stressed that some practitioners were cautious about changing their practice “just in case”, demonstrating the persistence of the problematic cultures and behaviours which drive the workload problem. There may not be a simple fix to this problem.

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.

We do not believe that removing the LA statutory element of the EYFSP moderation would reduce teacher workload. That will only occur if there are consistent messages about proportionate data collection from all key stakeholders including headteachers and leaders, Ofsted inspectors as well as local authority advisers and moderators.

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.

If moderation is delivered by any means other than local authority advisers, it will simply reinvent the same challenge in another guise as to how teachers are to receive consistent messages about EYFSP assessments, and how to avoid unintended consequences such as the encouragement of excess data collection. There is an established body of expertise among local authority moderators which should be built on, not dismantled.

In addition to external moderation from trained moderators, all teachers in Reception – especially those new to the early years - should have access to appropriate training in early years observation and assessment, so that the standards of professional judgements improve. They must also have access to high quality exemplification materials to support their judgements. This will improve the accuracy of judgements but would not provide a substitute for moderation.

Q12. What are your views on the proposal to remove the ‘exceeded’ judgement from the EYFSP?

Please provide your views below.

We have no objection to the removal of the “exceeding” judgement. This may simplify the process of assessment.

It will make the “emerging”/“expected” divide a purely binary one, and risks further loose talk of the EYFSP results as though they were a pass/fail assessment, rather than a broad brush measure of children’s progress against a set of benchmarks.

Q13. Should the requirement in the EYFS framework to ‘promote the good health of children’ also include oral health?

Please provide your views below.

Yes, oral health is an important component of young children’s health and should be included. This is another reason why the ELG on Managing self should include a reference to children talking about how to keep themselves healthy and safe.

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 new literacy requirements are likely to reduce the number of children achieving the literacy ELGs, with particular impact on children with SEND and boys.

The removal of the Technology ELG is likely to increase the achievement gap between girls and boys in the Profile as this is currently one of the few areas where boys score higher than girls.

The new ELG Gross Motor Skills is less inclusive for some children with SEND than the current Moving and Handling ELG, eg with respect to references to hopping, skipping, climbing, etc.

The reference in the ELG in Fine Motor Skills to the tripod grip is not appropriate for all children, especially some with SEND (the qualified nature of the sentence is too ambiguous to be clear as to whether it is intended to accommodate this).

It would be helpful if a specialist SEND group could review the proposals to ensure that the final version of the ELGs did not unintentionally exclude groups of children and to ensure that best fit judgements would allow sufficient flexibility to be inclusive where possible and appropriate.