

EYFS consultation - Word version for TACTYC

1. What is your name?

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3. What is the name of your organisation?

TACTYC: Association for Professional Development in Early Years (Registered Charity No: 1181278)

4. In what capacity are you responding to this consultation? Please select one option from the list below. .

Childminder / **Early years sector representative body** Local Authority
Maintained Nursery School – head teacher Maintained Nursery School –
teacher/practitioner Parent/carer Private, voluntary or independent early years
group setting – manager Private, voluntary or independent early years group
setting – practitioner School – head teacher/senior leader School – reception
teacher School – other Teaching union Training provider Other

5. If you answered "Other" please specify in what capacity you are responding to this consultation.

Educational Programmes

The EYFS framework sets out brief, high level summaries of the sorts of activities that practitioners and teachers should undertake with children from birth to reception, under each of the seven areas of learning. These summaries help to inform educational programmes for early years settings and reception classes. These were revised as part of the pilot EYFS framework to give greater clarity and specificity in supporting effective daily practice across the 0-5 age range covered by the EYFS. We have been working with experts to further finesse the new proposed educational programme summaries, on which we seek your views and feedback. More detailed curriculum guidance on early years education from birth to reception is being developed separately alongside these reforms through an update of the 'Development Matters' guidance. The new curriculum guidance will remain non-statutory and does not form part of this consultation.

Proposed educational programmes

Communication and Language The development of children's spoken language underpins all seven areas of learning and development. Children's back-and-forth interactions from an early age form the foundations for language and cognitive development. The number and quality of the conversations they have with adults and peers throughout the day in a language-rich environment is crucial. By commenting on what children are interested in or doing, and echoing back what they say with new vocabulary added, practitioners will build children's language effectively. Reading frequently to children, and engaging them actively in stories, non-fiction, rhymes and poems, and then providing them with extensive opportunities to use and embed new words in a range of contexts, will give children the opportunity to thrive. Through conversation, story-telling and role play, where children share their ideas with support and modelling from their teacher, and sensitive questioning that invites them

to elaborate, children become comfortable using a rich range of vocabulary and language structures.

Personal, Social and Emotional Development

Children's personal, social and emotional development (PSED) is crucial for children to lead healthy and happy lives, and is fundamental to their cognitive development. Underpinning their personal development are the important attachments that shape their social world. Strong, warm and supportive relationships with adults enable children to learn how to understand their own feelings and those of others. Children should be supported to manage emotions, develop a positive sense of self, set themselves simple goals, have confidence in their own abilities, to persist and wait for what they want and direct attention as necessary. Through supported interaction with other children they learn how to make good friendships, co-operate and resolve conflicts peaceably. These attributes will provide a secure platform from which children can achieve at school and in later life.

Physical Development

Physical activity is important in children's all-round development and to enable them to pursue healthy and active lives. Through opportunities to be active, children develop coordination, control and precision of movement. Children need to develop strength and the habit of exercise, as well as precision when using small tools correctly.

Literacy

Reading consists of two dimensions: word reading and comprehension (both listening and reading). It is important to develop both aspects. Good language comprehension, necessary for both reading and writing, draws from linguistic knowledge and knowledge of the world. By listening and talking about stories, rhymes and poems, and non-fiction books, children develop knowledge of themselves and the world in which they live. Skilled word reading involves both the speedy working out of the pronunciation of unfamiliar printed words (decoding) and the speedy recognition of familiar printed words. Writing involves transcription (spelling and handwriting) and composition (articulating ideas and structuring them in speech and writing). It is also crucial for children to develop a life-long love of reading; by reading books in class and demonstrating their own enjoyment, teachers will pass on the joy of reading.

Mathematics

Developing a strong grounding in number is essential so that all children develop the necessary building blocks to excel mathematically. Children should be able to count confidently, develop a deep conceptual understanding of the numbers to 10, the relationships between them and the patterns therein. By providing frequent and varied opportunities to build and apply this understanding – such as using manipulatives – children will develop a secure base of knowledge from which mathematical mastery is built. In addition, children's curiosity about number, shape, space and measure should be encouraged and furthered through opportunities to apply their growing understanding of the mathematical world to the world around them.

Understanding the World

The frequency and range of children's personal experiences increases their knowledge and sense of the world around them – from visiting parks, libraries and museums to meeting important members of society such as police officers, nurses and firefighters. In addition, listening to a broad selection of stories, non-fiction, rhymes and poems will foster their understanding of our culturally, socially and

ecologically diverse world. As well as building important knowledge, this extends their familiarity with words that support understanding across domains. And enriching and widening their vocabulary will support later reading comprehension.

Expressive Arts and Design

The development of children's artistic and cultural awareness supports their imagination and creativity. The quality and variety of what children see, hear and participate in is crucial for developing their understanding, self-expression, vocabulary and ability to communicate through the arts. The frequency, repetition and depth of their experiences are fundamental to their progress in interpreting and appreciating what they hear, respond to and observe.

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.

General comments across all proposed educational programmes

The research evidence presented in the Pascal et al. (2019) review, commissioned by the Early Years Foundation Stage Coalition, supports retaining the current structure of the EYFS including the importance of the **prime areas** (Communication and Language (C&L), Physical Development (PD) and Personal, Social and Emotional Development (PSED)). The practitioner survey undertaken by the Early Years Foundation Stage Coalition (2019) also demonstrates high levels of support for the current structure, and particularly strong support for the prime areas of learning in their existing form. We therefore welcome the decision **to leave the architecture of the EYFS unchanged** but question the value of redrafting every educational programme and early learning goal. Every effort should be made to avoid inadvertently leading practitioners to use statements for tick box assessments. We are concerned that overall, the proposed educational programmes demonstrate a lack of understanding of children's learning and development and the adult role in supporting them; they are unfit for their stated purpose of informing educational programmes from birth to reception. If they are intended to summarise the 'sorts of activities' that promote development across all areas, it is striking that there is no reference to children's play – the central arena for children to set and meet their own challenges, learn about themselves and others, build concepts and language to reflect their experiences, and so on. There is extensive evidence about the value of play in learning across all seven areas of learning and development (BERA-TACTYC 2017; Pascal et al. 2019), and crucially also in strengthening the Characteristics of Effective Learning. There is a vital contribution to be made by skilful adults in children's playful learning, including establishing time, space, resourcing, expectations, and through high quality responsive interactions in the context of children's play. These aspects of the adult's role should hold a central place in the educational programmes.

The fact that play is not referred to within the educational programmes is an indication of the perspective of a 'taught' curriculum for young children, which is at odds with the most effective practice. As the authors of the most recent literature review concluded, 'There remains strong evidence of the value and benefits of a play-based pedagogy for children throughout the Foundation years and even beyond' (Pascal et al. 2019:42). The report goes on to highlight the strength of a balanced teaching approach, 'blending adult-framed activities with play-based, child-

led, relationship approaches, and incorporating adult-scaffolded learning objectives' (p. 42), which is currently called for in the EYFS.

There is also a disappointing lack of reference to the importance of meaningful contexts; young children build concepts from concrete experiences in play and other activities, and most will not be able to respond to decontextualized and abstract information from 'listening to books' which is repeatedly referred to in the Educational Programmes (EPs). Indeed, the draft EPs are highly flawed as they do not represent the needs of the youngest children and most have little or no relevance to babies or children under three. See for example the proposed programme for communication and language, which omits references to the earliest underpinning phases of developing Communication and Language (CL) (see comments relating to CL below).

Practitioners in the Early Years Foundation Stage Coalition (2019) survey made clear that the changes proposed will not lead to improvement in **children's outcomes, or social mobility** as it is not the EYFS document itself that drives this but the quality of the home learning environment, appropriate funding and the expertise of early years practitioners. Survey respondents indicate a need for improved funding, specialised training and resources to release practitioners to engage with families and other professionals, as well as to provide greater support to children who may need additional time and attention.

Comments relating to individual educational programmes Communication and Language

While the proposed programme for CL is an improvement over the pilot version in that it highlights the importance of back-and-forth exchanges, these are couched in terms of activities that are relevant to older children, and leaves out all phases of the foundations of communication and language – e.g. establishing rapport, contingent responses, joint attention, building understanding through gesture and facial expression, musical exchanges. The EP for CL is also flawed in its opening statement that CL 'underpins all seven areas of learning and development'. This demonstrates a lack of understanding of the interconnected nature of the prime areas. It could more accurately be said that the prime areas together with the Characteristics of Effective Learning (CoEL) underpin all areas of learning and development.

In the EP, account should be taken of children who are bilingual, or who are becoming bilingual, for whom English may be an additional language, and children who are using alternative communication systems such as sign-language. The EP for Communication and Language should make it clear that supporting language development encompasses valuing the continued development of the child's home language, or sign language where appropriate, as well as English (Drury and Robertson, 2008).

It does not make sense to remove Understanding from the CL in the prime area. Understanding develops first through reading facial expressions, understanding gestures, then linking meanings to words and learning to follow sentences. From babies on up, understanding of language comes before beginning to use language, and then reading can build on that foundation. It misrepresents language development – and doesn't help practitioners or parents know how to support children – if Understanding is left out of CL.

The importance of vocalisations, facial expression and gesture for babies and toddlers in particular should be visible.

Physical development

Physical development is about more than activity; the way physical movement and experience is closely linked to cognitive and personal development is absent from this EP. For example: Vestibular and proprioceptive developments are fundamental for moving and handling, for understanding oneself in space and for developing mental concepts. Therefore, movement is important for developing sensory and cognitive abilities; children learn through their bodies and senses as they actively explore the world.

Physical development is also central to self-awareness. For babies and toddlers this occurs through their experience of physical care events; the way feeding, changing and dressing are carried out influence the child's feelings about themselves. Such physical care events are a significant aspect of daily practice in early years settings yet are conspicuous by their absence in any part of the EYFS. Therefore, self-care should be restored to this section and should include reference to sensitive, individualised care of children that supports not only their self-care skills but their positive sense of self and positive relationships.

Personal, Social and Emotional Development

The PSED proposed EP appropriately describes the importance of underpinning attachments. Much of the text, however, goes on to illustrate the confusion in this area with aspects of self-regulation – a conclusion which reaches extremes in the Early Learning Goals. Listing what children ‘should be supported to’ do (‘manage emotions, develop a positive sense of self, set themselves simple goals, have confidence in their own abilities, to persist and wait for what they want and direct attention as necessary’) is not a summary of activities – the adult role as promised – but merely a list of developments jumbled together from CoEL and Listening and Attention. There is no reference to supporting the experiences of children’s home cultures as crucial to their development in this area. Opportunities through play and culturally relevant resources are essential for young children to adjust to new relationships and cultural norms are essential for future adjustment to school and educational attainment. (Houston, 2019; McDowall Clark, 2017).

The term self-regulation is being used to mean self-control and compliance, which it does not. Self-regulation is how effectively a child can deal with and recover from stress; how they can keep an internal balance between the 5 domains of their physiology, emotions, cognition, social environment and empathy. All these domains influence each other; therefore you cannot expect a child to ‘direct their attention’ (cognitive domain) if the stressors in their bodies or the social environment (such as a noisy classroom) are too high. Research shows that when these stressors are removed, mood or behaviour problems often disappear (Shanker 2015), which suggests strongly that the focus here should be on provision and practice not on developmental outcomes

Literacy

While the educational programme states an aim to describe activities adults can undertake with children from birth onwards to support learning in Literacy, this EP has nothing to do with young children who are in the pre-reading phase – in other words, most of the EYFS age range. Where is the mention of mark-making,

environmental print, familiar symbols, and so on? It talks about skilled recognition of printed words and decoding, and writing as a combination of spelling and handwriting, and composition. There is a good argument that handwriting doesn't belong in writing, since it is a fine motor skill and so sits in Physical Development in the current EYFS. Writing – communicating meaning – might be on paper, but it could also be through typing on a computer screen, with magnetic letters on a fridge, or with augmented systems.

We argue that the following aspects of the Literacy EP belong in the national curriculum; in their current form they bear little resemblance to what is an appropriate educational programme for young children birth to five years: *'Skilled word reading involves both the speedy working out of the pronunciation of unfamiliar printed words (decoding) and the speedy recognition of familiar printed words. Writing involves transcription (spelling and handwriting) and composition (articulating ideas and structuring them in speech and writing)'*. We would also like to see more emphasis on children's **familiar** worlds as the launch point for young children making sense of and expressing experiences in and through literacy.

Indeed, the most important part of supporting Literacy is left to the very last line, *'It is also crucial for children to develop a life-long love of reading'*. We suggest putting greater and earlier emphasis on love of reading and motivation to write in the EP for Literacy, making it a meaningful and therefore fascinating area for children of all ages.

Mathematics

The proposed educational programme for mathematics gives a very narrow take on mathematics and children's use of numbers. Concentrating just on numbers to ten gives an unrealistic limited scope to the world of numbers and, more importantly, to the world of children's numbers. We recommend that children need to be *discussing* numbers beyond ten to get a feel of the reality of numbers in their world and understand the pattern of numbers beyond ten including the understanding of passing the tens' boundary.

Subitising is a useful skill that children use and it is important for teachers to keep that in mind. However, to give it such prominence may foster the use of flash cards and rote learning.

Using practical objects (manipulatives) to count and move around is one way children learn. However, they also learn and communicate in a variety of ways and this needs to be recognised in the educational programme. For example, some researchers dispute the over-emphasis on practical mathematics (Askew, 2001; Carruthers and Worthington, 2011) because it does not necessarily bridge the gap between concrete and abstract learning. Children's ways of representing and understanding can also be accessed through, for example, gesture (Flewitt, 2005) and graphics (Carruthers, 2015; Worthington, Dobber and van Oers, 2019)

There seems to be an influence from Mastery Learning which was not intended for younger children and again this has seriously limited the scope of children's mathematics within this programme. There is no sense of children's mathematical

understanding or listening to children, which research over the last twenty years has increasingly promoted.

Expressive Arts and Design

We would like to see clearer emphasis on supporting music development and suggest the following, 'The development of children's artistic and cultural awareness supports their imagination and creativity. The quality and variety of what children see, hear and participate in is crucial for **developing their understanding, self-expression, vocabulary and ability to communicate through the arts, which includes music (Music Development Matters)** The frequency, repetition and depth of their experiences are fundamental to their progress in interpreting and appreciating what they hear, respond to and observe'.

The rhythm and steady beat from musical activities also supports very young children with their early reading development (see for example Fisher and McDonald 2001; Telesco 2010).

References

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The Early Learning Goals

The ELGs define the level of progress children should be expected to have attained by the end of the EYFS. Seventeen ELGs make up the EYFSP. The ELGs are an endpoint assessment and should not be used as a curriculum. At the end of reception year, each child is currently assessed as either 'emerging', 'expected' or 'exceeding' against each goal. Assessments are carried out through a 'best fit' approach. 'Best fit' does not mean that the child has equal mastery of all aspects of the ELG. Practitioners should look at the whole of each ELG description when making this summative judgement. A child will be judged to have reached a 'good level of development' if they achieve 'expected' against the ELGs under the prime areas of learning and the specific areas of literacy and mathematics¹². All 17 draft

revised ELGs and descriptors have been reviewed following the independent pilot evaluation. We recognise that the descriptors will need high quality exemplifications to support teachers in making confident and consistent judgements as part of the assessment. This consultation seeks your feedback on changes to the ELGs.

Communication and Language: rationale for change

Communication and language is a critical area of learning within the EYFS, and it underpins and influences all other areas. We know from the growing body of research that vocabulary at age 5 is one of the strongest predictors of outcomes for children and these benefits continue into adult life. However, too many children leave reception year without the necessary language and vocabulary and it becomes increasingly difficult for these children to catch up with peers as they progress through key stages 1 and 2. The revisions under this area of learning focus on the key aspects which, when supported by teachers, make a difference in narrowing language development gaps and increase overall attainment for all children. This includes a stronger focus on teachers reading to children and developing and enriching their vocabularies.

Proposed ELGs

Listening, Attention and Understanding ELG

Children at the expected level of development will:

- Listen attentively and respond appropriately when being read to and during whole class discussions and small group interactions;
- Make comments about what they have heard and ask questions to clarify their understanding;
- Hold conversation when engaged in back-and-forth exchanges with their teacher and peers.

Speaking ELG

Children at the expected level of development will:

- Participate in small group, class and one-to-one discussions, offering their own ideas, using recently introduced vocabulary;
- Offer explanations for why things might happen, making use of recently introduced vocabulary from stories, non-fiction, rhymes and poems when appropriate;
- Express their ideas and feelings about their experiences using full sentences, including accurate use of past, present and future tenses and making use of conjunctions, with modelling and support from their teacher.

Personal, Social and Emotional Development: rationale for change

PSED is one of the prime areas of learning within the EYFS. Following feedback from the primary assessment consultation (2017) and after discussion with experts, we proposed the introduction of a new ELG on self-regulation. A child's ability to self-regulate their emotions and behaviour, control their attention span, and remain task orientated helps to develop non-cognitive and cognitive skills needed to succeed. Strong evidence is emerging about self-regulation as a predictor of pre-reading skills and later outcomes in maths and literacy. Building relationships, particularly with peers, reflects other important emotional and social skills. This area of learning

The 12 ELGs which make up the current good level of development are: listening and attention, understanding and speaking (communication and language); moving and handling and health and selfcare (physical development); self-confidence and self-awareness, managing feelings and behaviour and making relationships (personal, social and emotional development); reading and writing (literacy) and numbers and shape, space and measures (mathematics).

complements the key principles of the characteristics of effective learning. In addition, we have moved health and self care (formerly under physical development) into this area of learning.

Proposed ELGs

Self-Regulation ELG

Children at the expected level of development will:

- Show an understanding of their own feelings and those of others, and begin to regulate their behaviour accordingly;
- Set and work towards simple goals, being able to wait for what they want and control their immediate impulses when appropriate;
- Give focused attention to what the teacher says, responding appropriately even when engaged in activity, and show an ability to follow instructions involving several ideas or actions.

Managing Self ELG

Children at the expected level of development will:

- Be confident to try new activities and show independence, resilience and perseverance in the face of challenge;
- Explain the reasons for rules, know right from wrong and try to behave accordingly;
- Manage their own basic hygiene and personal needs, including dressing, going to the toilet and understanding the importance of healthy food choices.

Building Relationships ELG

Children at the expected level of development will:

- Work and play cooperatively and take turns with others;
- Form positive attachments to adults and friendships with peers;
- Show sensitivity to their own and to others' needs.

Physical Development: rationale for change

Physical development, as one of the three prime areas, is central to ensuring that children develop their core strength and larger muscle groups in a co-ordinated way so that they have the confidence to be active and healthy. Building strength in these muscles provides a solid basis for children to develop their fine motor muscle strength, which will be critical for being able to hold a pencil effectively for writing and drawing with accuracy and working with other small tools. These ELGs have been designed to ensure sufficient focus is given to both gross and fine motor skills. Self-care has been moved to sit under PSED.

Proposed ELGs

Gross Motor Skills ELG

- Children at the expected level of development will:
- Negotiate space and obstacles safely, with consideration for themselves and others;
- Demonstrate strength, balance and coordination when playing;
- Move energetically, such as running, jumping, dancing, hopping, skipping and climbing.

Fine Motor Skills ELG

Children at the expected level of development will:

- Hold a pencil effectively in preparation for fluent writing – using the tripod grip in almost all cases;
- Use a range of small tools, including scissors, paint brushes and cutlery;
- Begin to show accuracy and care when drawing.

Literacy: rationale for change

It is essential that all children are given the opportunity to develop a love of books, as well as the underpinning skills needed to develop into fluent readers and writers. In

line with the simple view of reading, the revised ELGs reflect both the importance of ensuring children are taught to decode using systematic phonics as well as developing their language comprehension. By developing both crucial aspects, all pupils will be best prepared to become confident readers.

Proposed ELGs

Comprehension ELG

Children at the expected level of development will:

- Demonstrate understanding of what has been read to them by retelling stories and narratives using their own words and recently introduced vocabulary;
- Anticipate – where appropriate – key events in stories;
- Use and understand recently introduced vocabulary during discussions about stories, non-fiction, rhymes and poems and during role-play.

Word Reading ELG

Children at the expected level of development will:

- Say a sound for each letter in the alphabet and at least 10 digraphs;
- Read words consistent with their phonic knowledge by sound-blending;
- Read aloud simple sentences and books that are consistent with their phonic knowledge, including some common exception words.

Writing ELG

Children at the expected level of development will:

- Write recognisable letters, most of which are correctly formed;
- Spell words by identifying sounds in them and representing the sounds with a letter or letters;
- Write simple phrases and sentences that can be read by others.

Mathematics: rationale for change

The maths ELGs have been refocused on children being able to achieve greater depth, in relation to recognising and understanding numbers, quantity and patterns. This will be important to ensure children have the confidence and strong grasp of basic numbers in preparation for key stage 1. Shapes, space and measure is included in the proposed mathematics educational programme. The proposed ELGs will focus on number and numerical patterns.

Proposed ELGs

Number ELG

Children at the expected level of development will:

- Have a deep understanding of number to 10, including the composition of each number;
- Subitise (recognise quantities without counting) up to 5;
- Automatically recall (without reference to rhymes, counting or other aides) number bonds up to 5 (including subtraction facts) and some number bonds to 10, including double facts.

Numerical Patterns ELG

Children at the expected level of development will:

- Count confidently beyond 20, recognising the pattern of the counting system;
- Compare sets of objects up to 10 in different contexts, considering size and difference;
- Explore and represent patterns within numbers up to 10, including evens and odds, double facts and how quantities can be distributed equally.

Understanding the World: rationale for change

Feedback from the primary assessment consultation (2017) suggested that the ELGs under this area of learning are the most vague. These have been revised to reflect specific categorisation into historical and current figures, geography and natural science. The revisions aim to support greater depth of understanding of these areas through the new ELGs and, importantly, help support language and

wider vocabulary development through broader experiences and being read to from non-fiction books. Information Technology (IT) has been removed as an ELG, as the consensus from our experts, primary assessment consultation responses and the pilot evaluation suggests that this has little value as an end-point measure in itself.

Proposed ELGs

Past and Present ELG

Children at the expected level of development will:

- Talk about the lives of the people around them and their roles in society;
- Know some similarities and differences between things in the past and now, drawing on their experiences and what has been read in class;
- Recall some important narratives, characters and figures from the past encountered in books read in class.

People Culture and Communities ELG

Children at the expected level of development will:

- Describe their immediate environment using knowledge from observation, discussion, stories, non-fiction texts and maps;
- Know some similarities and differences between different religious and cultural communities in this country, drawing on their experiences and what has been read in class;
- Explain some similarities and differences between life in this country and life in other countries, drawing on knowledge from stories, non-fiction texts and – when appropriate – maps.

The Natural World ELG

Children at the expected level of development will:

- Explore the natural world around them, making observations and drawing pictures of animals and plants;
- Know some similarities and differences between the natural world around them and contrasting environments, drawing on their experiences and what has been read in class;
- Understand some important processes and changes in the natural world around them, including the seasons and changing states of matter.

Expressive Arts and Design: rationale for change

The ELGs under this area of learning have been revised to be clearer and more specific and to underpin the importance of children being able to demonstrate imagination and creativity through a wide range of experiences and working with different materials. These ELGs can particularly support children's language and vocabulary development outcomes through role play, making up their own stories and singing.

Proposed ELGs

Creating with Materials ELG

Children at the expected level of development will:

- Draw and paint using a range of materials, tools and techniques, experimenting with colour, design, texture, form and function;
- Share their creations, explaining the process they have used;
- Make use of props and materials when role playing characters in narratives and stories.

Being Imaginative and Expressive ELG

Children at the expected level of development will:

- Invent, adapt and recount narratives and stories with peers and their teacher;
- Sing a range of well known nursery rhymes and songs;
- Perform songs, rhymes, poems and stories with others, and – when appropriate – try to move in time with music.

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.

The research reviewed by Pascal et al. 2019 emphasises the **holistic and interrelated nature of all the areas of learning**. However, the educational programmes and ELGs should be clearly articulated as distinct areas; the attempt to weave references to communication and language through other areas of learning may not improve clarity or help improve pedagogy.

Research evidence confirms the importance of **communication and language** skills in general, and as a basis for literacy (Pascal et al. 2019; BERA-TACTYC 2017).

This section of the current EYFS is highly rated by practitioners. The evidence provides no justification for reducing the number of ELGs under CL from three to two while increasing the number of literacy ELGs from two to three. Research evidence provides no evidence to support giving literacy or mathematics greater emphasis than any other areas of learning within the EYFS. The increased number of literacy ELGs is also likely to have a negative impact on the number of children achieving a Good Level of Development (GLD) as the current statistics show that the ELGs for literacy and maths are already set too high and are achieved by fewer children than other areas of learning. This is likely to work against government's aim of closing the attainment gap. Retaining the ELG Understanding within CL is essential as oral language is the foundation on which literacy is built.

Comments on Individual ELGs

Communication and Language: rationale for change

The emphasis on vocabulary in the stated rationale for change is not clearly articulated. Rather, vocabulary is a proxy measure for the richness of language; how children use language to communicate is more significant. Therefore, the focus of educational programmes and ELGs should be on CL broadly and not on decoding/reading.

An ELG on Understanding is essential in CL to cover the foundational nature of oracy before literacy. 'Focusing too soon on Literacy... 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.' (Pascal et al. 2019)

We suggest the following points and edits to the CL ELGs:

Listening, Attention and Understanding ELG

'Listen attentively and respond appropriately when being read to and **during whole class discussions** and small group interactions'.

This is extremely difficult for children who are developing as bilinguals, or children with EAL, or with any form of speech or hearing difficulty/disability, or children with no speech.

In response to criticism from the sector that the vital strands of Attention and Understanding had been omitted from Communication and Language, the DfE has changed the ELG from 'Listening' to 'Listening, Attention and Understanding'. However, only one word of an already unsatisfactory ELG has been changed: '*whole*

class and small group discussions' has become '*whole class discussions and small group interactions*'.

As regards listening and attention, this ELG shows no awareness of CL development and clearly no input from Speech and Language Therapists. This is especially surprising bearing in mind the recent specific recommendations for DfE contained within the recent *Bercow Ten Years On* report.

It is critical that Attention be properly included as part of this ELG. It is a prerequisite of effective listening, and for children with communication and language delay it is the first aspect that must receive focus in supporting progress. Development Matters sets out very clearly how it develops from fleeting to integrated attention and the ways this can be enhanced by adults helping children to focus their attention.

A criticism of the first version of this revised ELG was that *Make comments about what they have heard and ask questions to clarify their understanding* belonged in Understanding. However, it is not appropriate to shoehorn Understanding in with Listening and Attention. It needs a separate ELG to reflect professional understanding of language development. Understanding (receptive language) comes before speaking (expressive language) and must receive specific attention.

The current ELG on Understanding is 'Children follow instructions involving several ideas or actions. They answer 'how' and 'why' questions about their experiences and in response to stories or events.' Making comments about what you have heard does not necessarily indicate understanding whereas answering questions about "how" and "why" is an appropriate marker for the stage, and ties in with the Development Matters guidance; understanding this sort of question is not typical for younger children.

The third bullet point of this ELG *Hold conversation when engaged in back-and-forth exchanges with their teacher and peers* is a tautology and does not make clear how the ability to converse relates to either listening, attention or understanding.

Speaking ELG

'Children at the expected level of development will:

- Participate in small group, class and one-to-one discussions, offering their own ideas, using recently introduced vocabulary **at their appropriate stage of development;**
- Offer explanations for why things might happen, making use of recently introduced vocabulary from stories, non-fiction, rhymes and poems when appropriate;
- Express their ideas and feelings about their experiences **using full sentences, including accurate use of past, present and future tenses and making use of conjunctions, with modelling and support from their teacher.**
- **Use talk to take on different roles in imaginative play, to interact and negotiate with others.**

An emphasis to be on *how* ideas are expressed is not appropriate for 5-year-olds. Children up to five need to be encouraged to share their feelings and relate their experiences in whatever format works best for their own stage of development. Given increasing numbers of children now being identified with SLC needs (DfE ELG data), full sentences with tense/conjunction appropriateness are not at the expected level for most. Testing out tenses and planning ahead is. (See The Communication Trust, 2017 & 2018; Early Intervention Foundation 2017).

In this iteration the 'new vocabulary' of the piloted version has been changed to 'recently introduced' vocabulary. This seems merely cosmetic as nothing else around it has changed. There is no explanation of what is meant by 'recently introduced vocabulary'. Recently introduced to whom? Is it still new or recently introduced when we use it in different contexts and for different purposes? How much of it is nouns, adverbs, adjectives, verbs, adverbial phrases? What about EAL? Or using foreign language phrases? Or body language etc? Knowing vocabulary is a proxy indicator, and not one we should expect practitioners to measure as part of the ELGs. It can lead to a 'tick list' approach and teaching sets of words.

The current ELG contains the fundamentally important aspects where children *express themselves effectively, showing awareness of listeners' need and They develop their own narratives and explanations by connecting ideas or events.* There is nothing here about expressing themselves effectively and actively communicating with others taking listeners' needs into account; nor clarity around the importance of using language for thinking in narratives and connecting ideas. These are the ways language supports learning across all areas, not just repeating vocabulary whether it is characterised as 'new' or 'recently introduced'. Full sentences are not an important element and can be artificial in conversation. Connecting ideas and events indicates more complex sentence/grammatical structures.

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Personal, Social and Emotional Development ELGs

These ELGs are confusing and unhelpful in jumbling together aspects of self-regulation, executive function, and even health and physical self-care. The existing ELGs accurately reflect this centrally important, prime area of learning and development. (Personal=Self-confidence and self-awareness; Social=Making

Relationships; Emotional=Managing feelings and behaviour). The proposed ELGs represent a significant backward step; the existing ELGs should be kept. Research affirms the central importance of the **Characteristics of Effective Teaching and Learning** (CoETL) - playing and exploring, active learning and creating and thinking critically (Pascal et al. 2019). These have been emphasised by the growing body of research on self-regulation and executive function. We welcome the decision to leave the Characteristics unchanged, but we believe the introduction of an **ELG on self-regulation** under PSED is not helpful as it is a much-misunderstood term and its use here is both confused and confusing. Emotional aspects of self-regulation fall under PSED, but many other aspects are more appropriately located within the CoETL.

We suggest the following points and edits to the PSED ELGs:

Self-Regulation ELG

Children at the expected level of development will:

- Show an understanding of their own feelings and those of others, and begin to regulate their behaviour accordingly; **(current Managing feelings and behaviour)**
- Set and work towards simple goals, being able to wait for what they want and control their immediate impulses when appropriate; **(current CoEL)**
- Give focused attention to what the teacher says, responding appropriately even when engaged in activity, and show an ability to follow instructions involving several ideas or actions. **(current Listening and attention)**

Although focusing more on self-regulation is a welcome intention, it does not belong here and this will serve only to confuse practitioners more. Self-regulation is already covered within the EYFS through 'emotional regulation' in Managing feelings and behaviour, and cognitive regulation in CoEL. Executive function, which this is also making an attempt to address, is more developmental than learned, though supporting CoEL through plan-do-review for child-initiated activity could be helpful (see Educational Endowment Foundation findings and recommendations).

Managing Self ELG

Children at the expected level of development will:

- Be confident to try new activities and show independence, resilience and perseverance in the face of challenge; **in CoEL**
- Explain the reasons for rules, know **right from wrong** **Difficult for ethicists! According to whom? Far better to say 'understands actions have consequences'; the existing ELG is far better** and try to behave accordingly;
- Manage their own basic hygiene and personal needs, including dressing, going to the toilet and understanding the importance of healthy food choices. **This should be part of Physical development. This ELG is jumbled and needs to be picked apart and redrafted.**

Literacy

We suggest the following points and edits to the proposed Literacy ELGs:

Comprehension ELG

Children at the expected level of development will:

- **Demonstrate understanding of what has been read to them by retelling stories and narratives using their own words and recently introduced vocabulary;**

- Anticipate – where appropriate – key events in stories;
- Use and understand recently introduced vocabulary during discussions about stories, non-fiction, rhymes and poems and during role-play.
- **Identify points of interest from chosen images, pictures, screen and text and link to familiar life events**

We need to consider the family lives and society, and ICT. Literacy is not just print-based, including for young children.

This is all oral, so clearly belongs in CL, rather than in literacy, even though it is all in the context of stories.

Word Reading ELG: Should be called 'Reading', and include both word reading and comprehension.

Children at the expected level of development will:

- Say a sound for each letter in the alphabet, **in context** (and at least 10 digraphs)
Why digraphs? What purpose will this serve children who are not interested in reading and struggling with SLC?
- Read **some familiar** words consistent with their phonic knowledge by sound-blending;
- **Begin to read aloud simple sentences** and books that are consistent with their phonic knowledge, ~~including some common exception words.~~
We think that the focus should shift to rhyming – completing a rhyming string in the context of familiar stories, rhymes and songs, e.g. Use a simple phoneme frame to build familiar CVC, CVVC words to read aloud.
Should include comprehension

Writing ELG

Children at the expected level of development will:

- Write **familiar** recognisable letters, ~~most of which are correctly formed;~~
- **Begin to spell some familiar** words by identifying sounds in them and representing the sounds with a letter or letters;
- **Begin to write simple phrases** and sentences that can be read by others to **communicate meaningful messages**

Reading and writing are forms of communication, and the ELGs need to reflect that they involve children giving and receiving messages, with exchanging meaning as integral to literacy. Otherwise, reading and writing become abstract skills to be taught outside of meaningful contexts, which will demotivate many young children.

Mathematics ELGs

The research evidence on early years **mathematics** reviewed by Pascal et al. 2019 supports the changes to the **ELG Number** for example in relation to focusing on depth of understanding of numbers to 10. However, we suggest that this emphasises mastery learning and that the word 'depth' in these ELGs has been overused and not sufficiently explained. The evidence on the importance of locating maths in real world contexts that have meaning for the child, and the importance of spatial thinking for building understanding and skills in science, technology, engineering and maths (STEM) do not support the removal of the **ELG Shape, Space and Measure**. The evidence around mathematical thinking supports the importance of pattern, but this should not be restricted to numerical patterns as in the proposed new **ELG Numerical Patterns**.

There is no prominence of problem- solving and enquiry within the ELGs. As Mathematics Professor, Celia Hoyles (Institute of Education) stated very recently at a Maths Conference (15th November 2019) “Problem- solving, that is what mathematics education is still about”. We know that children are seekers of meaning and highly inquisitive; we need a mathematics programme that responds to that. Unfortunately, the mathematical ELGs are represented in the format of a test or a check list and that is what they might become. Where is the child?

Understanding the World ELGs

The research evidence (Pascal et al. 2019) underlines the importance of Understanding the World including a stronger emphasis on the teaching of science and the implications of children growing up in a digital age, as well as focusing on citizenship and children’s rights. The revised ELGs in this area of learning need significant changes to address these points.

Past and present

- Recall some important narratives, characters and figures from the past encountered in books read in class.

We suggest that this should be ‘know about relevant past and present in their own lives’, rather than a focus on ‘important knowledge’. We believe that the current ELG is better

People Culture and Communities ELG

Children at the expected level of development will:

- Explain some similarities and differences between life in this country and life in other countries, drawing on knowledge from stories, non-fiction texts and – when appropriate – maps.

As above, we believe that this ELG is worse than the current one and is inappropriate.

Expressive Arts and Design

We believe that these are not an improvement on the existing ELGs. Rather, the existing ELGs should be retained.

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.

Practitioners made clear the importance of the close relationship between the EYFS Statutory Framework and the non-statutory guidance including Development Matters. This in turn means that one document cannot be changed without addressing the supporting documents which are heavily used by the sector. Consulting on partial changes without the detail of how these fit into the entire Framework and non-statutory guidance is therefore problematic.

Please refer to our comments above regarding the omissions of important aspects of Understanding the World, the lack of emphasis on Shape, Space and Measure, the limited notions of pattern with regard to mathematical patterns, and the comments made above with regard to the Literacy ELGs. We believe that these shortcomings undermine a well-rounded and appropriate assessment of children’s development at the end of reception.

A stronger focus should be placed on the CoEL (Pascal et al. 2019). If DfE is serious about giving a place to self-regulation, these should be part of the assessment (such as in the Bristol model which has been suggested to DfE on numerous occasions).

The EYFSP assessment process

The primary purpose of the EYFSP assessment is to support individual children's successful transition from the EYFS to year 1, providing teachers with the information they need to assess which children will need further support to be able to catch up and keep up with their peers. The EYFSP also provides a national and local population-level assessment of child development at age 5, including attainment for particular groups, e.g. children eligible for free school meals and those with SEND. It is not used as an accountability measure for schools.

We heard through the primary assessment consultation and teacher feedback that the current EYFSP assessment process drives excessive workload, through unnecessary collection and recording of evidence for use in making judgements and for moderation purposes. A key objective of our reforms to the EYFSP is to look at ways in which these burdens can be reduced significantly.

We tested this in the EYFSP pilot through: streamlining the assessment guidance and making it succinct and clear; reinforcing the message that teachers are not required to collect unnecessary evidence in order to assess children, rather they should use their knowledge to make a professional judgement on how each child should be assessed; and asking the pilot schools to undertake their own moderation in the absence of LA external moderation, as we have heard that external moderation processes can put pressure on schools, and increase workload, as they prepare for a LA visit.

Moderation

Moderation allows practitioners to benchmark EYFSP judgements and to ensure consistent standards and reliable outcomes. It should be a collaborative process with colleagues, based on professional dialogue.

Moderation should begin with each individual setting and schools moderating EYFSP data internally each year. Schools should also work together to arrange inter-school moderation so that practitioners can share experiences and develop their assessment skills. We do not moderate the EYFSP assessment data at a national level, however, LAs have a statutory duty to externally moderate EYFSP data in 25% of local schools each year.

While moderation is an important part of ensuring that the EYFSP produces trusted assessment outcomes, practitioners have told us that the external moderation process can be burdensome. Some have said that external moderation is contributing to the perception of the EYFSP as a high stakes accountability measure for practitioners and for schools and is leading to unnecessary gathering of physical evidence to support professional judgements. We also believe that a clearer and more specific set of ELGs, combined with high quality exemplification materials, should improve the accuracy and consistency of teacher judgements, hence reducing the reliance on LA moderation.

We would like to seek feedback on the proposal to remove the statutory requirement for LAs to externally moderate EYFSP judgements, as a means of supporting and empowering teachers to make rounded judgements about a child's development without being over-burdened by the collection of physical evidence. Schools would be expected to continue to moderate internally and with other settings to ensure consistency of judgements and that the EYFSP produces trusted assessment outcomes. We would also like to seek your views on alternatives to statutory LA moderation to ensure the EYFSP remains a trusted and valid assessment.

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

See response below to Q10, which also covers this.

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.

The Early Years Foundation Stage Coalition survey results clearly showed that practitioners did not consider the EYFS Statutory Framework to be generating **unnecessary workload** (Early Years Foundation Stage Coalition 2019). Rather, it is the way non-statutory guidance documents are used as checklists which is problematic. Practitioners' lack of confidence in their professional knowledge can lead to an over-reliance on paperwork to evidence learning. It was also attributed to pressures to meet perceived or actual requirements from Ofsted, local authorities or leaders and managers. However, practitioners in the Early Years Coalition survey did not suggest local authority moderation should be removed. When done well there is no need for it to generate additional data. Moderation meetings are in some cases the only early years-specific training reception teachers receive, and removal of this requirement would further hollow out the early years expertise in local authorities.

Reference

Early Years Foundation Stage Coalition (2019) *Early Years Foundation Stage - Mapping the Landscape. Responses from Early Years Foundation Stage Coalition Survey May 2019 Initial Analysis*. Available online at <https://www.early-education.org.uk/sites/default/files/Headlines%20from%20EYFS%20practitioner%20survey.pdf>. Accessed 26.11.19.

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.

EYFSP judgement criteria

Currently when teachers make a judgement on children's attainment against the EYFSP, they will assess whether a child is 'emerging', 'expected' or 'exceeding' across each of the 17 ELGs. Children who can broadly demonstrate the ELG descriptor will have met the expected level of attainment for the ELG. This does not mean that the child has equal mastery of all aspects of the ELG and practitioners should look at the whole of each ELG description when making this summative judgement. The 'expected' level across 12 of the ELGs² forms the GLD composite metric which helps teachers, school leaders and government gauge how many children are meeting the expected standards for key educational and developmental outcomes by age 5.

The 'exceeded' level also has descriptors against the 17 ELGs, but as part of our reforms we heard from experts, practitioners and teachers that this set of descriptors is unhelpful in making consistent and accurate judgements, as there are inherent

challenges in what level to pitch exceeded descriptors. We also heard that judging children as exceeded against descriptors generates additional unnecessary collection of evidence and creates workload pressure for internal and external moderation events.

There has also been consensus amongst key stakeholders that, in terms of the early years, our focus as practitioners and government should be on efforts to increase the number of children who achieve expected levels of development by the end of reception and closing the GLD gaps, particularly between disadvantaged children and their peers.

The ELGs have been revised to provide more specificity about the expected levels of development at the end of the reception year. Revised curriculum guidance will ensure that all children, from those emerging to those far surpassing the expected level of development, are challenged and stretched during the reception year. With this in mind, we would like to hear your views on our proposal to remove the exceeded criteria from the EYFSP so that teachers can prioritise their support to children who are emerging and consolidate learning and development for children who are on track for expected levels of development. Teachers will still be required to stretch more able children and support them to excel and provide a narrative for parents and the year 1 teacher, but they will not be required to record the exceeded level to complete the EYFSP for national data purposes.

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

Safeguarding and Welfare

The safeguarding and welfare section in the EYFS framework sets out requirements that all early years providers must meet regardless of type or size of setting. The requirements are designed to support providers in creating settings which are welcoming, safe and stimulating where children can thrive. Any changes to this section should not undermine those principles.

We are proposing to make a minor amendment to the safeguarding and welfare section and we would like to hear your views.

Promotion of oral health

The EYFS framework requires providers to promote the good health of children attending the setting¹⁴. Evidence published by Public Health England suggests that more than 1 in 5 children age 5 have experienced tooth decay with one or more teeth being extracted or filled¹⁵. The promotion of good oral health in the early years can help reduce the incidences of tooth decay and hospital admissions. We propose including the promotion of good oral health as part of the overall promotion of good health, as set out in the EYFS framework. This does not mean 'supervised toothbrushing'.

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

Equalities Assessment

This section asks for your help in identifying any potential impacts of our proposals on people with protected characteristics. The protected characteristics are: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race (including ethnicity), religion or belief, sex, and sexual orientation.

Question on Equalities Assessment

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).

Under the protected characteristic of age, it would be helpful for the month of birth of each child to be noted and taken into account, in order to avoid the danger of summer born children being misdiagnosed as having special educational needs (see for example Squires et al 2012; Norbury et al 2016).

How will the proposals work for children with SEND? Currently, many settings use the Early Support Development Journal, which was developed by Oates et al., which is aligned to and is a more detailed version of the current Development Matters in the EYFS. In the proposed system, where will the guidance or support for children with SEND come from?

We would also like clarification on how the proposed changes align with key ideas that were in place within the statutory guidance such as the **Key Person** approach, which has been an invaluable support for children with potential SEMH needs as well as other types of SEND, and for children in care, on the edge of care or with complex home lives.

The impact of practitioner understanding of cultural diversity has been shown to impact on the assessment of children in the EYFS (Houston 2019). It is essential to analyse any possible bias when making and confirming judgements across all areas of inclusion and equality assessment.

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Houston, G. (2019) *Racialisation in Early Years Education*. Oxon: Routledge.

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