

Consultation on a Revised Early Years Foundation Stage (EYFS)

Consultation Response Form

The closing date for this consultation is: 30
September 2011

Your comments must reach us by that date.

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If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

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Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name Early Childhood Forum

Organisation (if applicable)

Address: National Children's Bureau
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London
EC1V 7QE

If your enquiry is related to the policy content of the consultation you can email: revisedeyfs.consultation@education.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 0370 000 2288

e-mail: consultation.unit@education.gsi.gov.uk

The consultation questions are in four sections, following the format of the revised draft EYFS framework. The four sections are:

1. The **introduction** to the EYFS, which describes its overall aims and principles.
2. The **learning and development** requirements. This section explains what all early years providers must do to support young children's learning and development. It includes the early learning goals, which describe the things that most children should be able to do at the end of the year in which they turn five.
3. The **assessment** arrangements, which explain how providers should observe, report and plan for children's progress.
4. The **safeguarding and welfare** requirements, which specify what providers must do to keep children safe and healthy in early years provision.

Please tick one category that best describes you as a respondent.

<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Maintained School	<input type="checkbox"/> Independent School
<input type="checkbox"/> Childminder	<input type="checkbox"/> Nursery	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Early Years Sector Representative	<input type="checkbox"/> Play Sector	<input type="checkbox"/> Breakfast/Afterschool Club
<input type="checkbox"/> Pre-School/Playgroup	<input type="checkbox"/> SEN Provision	X Other

Please Specify: The Early Childhood Forum (ECF) is a coalition of 61 professional associations, voluntary organisations and interest groups united in their concern about the well-being, learning and development of young children from birth to eight, their families, and the practitioners who work with them. ECF aims to bring together partners in the early childhood sector to promote inclusion and challenge inequalities, and to champion quality experiences for all young children and families. It is hosted by NCB.

ECF members

4Children
Action for Children
Association of Educational Psychologists (AEP)
Association of Professionals in Education and Children's Trusts (ASPECT)
Association of Teachers and Lecturers (ATL)
Black Voices Network
British Association of Community Child Health (BACCH)
British Association of Adoption and Fostering (BAAF)
Campaign for Advancement of State Education (CASE)
Children in Scotland (CiS)
Children in Wales (CiW)

Council for Awards in Children's Care and Education (CACHE)
Council for Disabled Children (CDC)
Unite / Community Practitioners and Health Visitors Association (CPHVA)
Daycare Trust (DCT)
Early Childhood Studies Degrees Network
Early Education
Early Years (formally NIPPA)
Early Years Equality (EYE)
Fatherhood Institute
Forum for Maintained Nursery Schools
Full Time Mothers
High/Scope UK
ICAN
KIDS
Learning Through Landscapes (LTL)
Local Authority Early Years Network (LAEYN)
Mencap
Montessori Education UK
National Association of Head Teachers (NAHT)
National Association for Primary Education (NAPE)
National Association of Nurseries in Colleges & Universities (NANCU)
National Children's Bureau (NCB)
National Campaign for Nursery Education (NCNE)
National Childminding Association (NCMA)
National Day Nurseries Association (NDNA)
National Deaf Children's Society (NDCS)
National Froebel Foundation (NFF)
National Literacy Trust (NLT)
National Network Of Family Information Services (NAFIS)
National Portage Association (NPA)
National Union Teachers (NUT)
Out for Our Children
Parenting UK
Parents for Inclusion
Play England
Preschool Learning Alliance (PLA)
REU (formerly Race Equality Unit)
Refugee Council
Royal National Institute of Blind People (RNIB)
Save the Children (SCF)
Scope
Special Educational Consortium (SEC)
Special Educational Needs Joint Initiative for Training (SENJIT)
Steiner Waldorf Schools Fellowship (SWSF)
Trade Union Congress (TUC)
Training, Advancement & Co-operation in Teaching Young Children (TACTYC)
UNISON
Voice - Union for Education Professionals
What About the Children (WATCh)

World Organisation for Early Childhood Education (OMEP)

Introduction

The introduction to the EYFS describes its overall aims and principles. The Government agrees with the Tickell Review findings, that the aims and principles should remain in place, but that the EYFS overall could be simplified and shortened.

1 Is the introduction to the revised draft EYFS, and the explanation of its principles, clear? If not, what changes would you suggest?

Yes

X No

Not Sure

Comments: We welcome the fact that the framework applies to all early years providers.

We would like to see the following changes:

- remove the reference to school readiness. Teaching in the early years should not *be focused on improving children's school readiness* but on supporting the learning and development needs of each child. This was clearly explained by Dame Clare Tickell in her report.
- add references to the importance of the health development of each child
- retain the original themes and principles– these have been changed and are not as clear or as powerful as the original ones which have been taken on board by practitioners.
- in para 1.10 it is inappropriate to state that there will be a move towards adult-led learning as children start to prepare for reception class. Reception classes are part of the EYFS and should not be referred to as a separate entity. As you state there should be a 'fluid interchange between activities initiated by children, and activities led or guided by adults.' This fluidity should be determined by the child's stage and their learning needs – not by the title of their year group. As it stands this paragraph will lead to formalised teaching in Reception classes, especially if staff are not qualified in early years.

The document also needs to demonstrate further clarification on the importance of learning through play as recommended by Dame Clare Tickell.

It should be made clear that the term *settings* includes childminders providing home-based care.

We would also like to know if the principles are still underpinned by the Principles into Practice cards and the sixteen commitments. These were a strong element of the previous framework.

There will be no learning development without good health. A child's health is barely acknowledged in the proposed revised framework, and yet it is essential requirement if children are to thrive.

Section 1 - Learning and Development Requirements

This section of the EYFS explains what early years providers must do to support young children's learning and development.

The Tickell Review recommended some changes to the EYFS *areas of learning* and that these should be in two categories: three *prime* areas which reflect the essential foundations all children need if they are to develop further: and four *specific* areas in which the prime skills are applied. The revised draft EYFS also suggests the broad areas of focus for educational programmes in each area of learning.

The *early learning goals* describe what most children should be able to do by the end of the year in which they turn 5. The Government agrees with Dame Clare Tickell, that there are more goals than is necessary or useful in assessing children's progress in the current EYFS. Accordingly, the revised draft EYFS reduces the number of early learning goals from 69 to 17.

The Tickell Review also suggested that the learning and development requirements should not apply in full to settings where children spend limited time, outside school hours - for example, holiday and wraparound care. The revised draft EYFS suggests that where children attend more than one setting that providers should work together, with parents, to determine how they can most appropriately support that child.

2 Do you agree with the proposals that there should be three *prime* areas of learning and development? The three *prime* areas are: personal, social and emotional development; physical development; and communication and language (paragraph 1.3).

Yes

X No

Partly

Not Sure

Comments: While we agree that these three areas are extremely important, there is a danger that this approach conflicts with the original principles that all areas of learning are equally important. Since this approach has been announced there has been a tendency to suggest that these three are for the Under 3s and the specific areas are for the Over 3s. This practice would be entirely inappropriate when we are promoting a developmentally appropriate curriculum. It shows little understanding of child development and does not recognise that children learn in different ways at different times.

There is a danger that children under 3 will not be exposed to the specific areas particularly those relating to the expressive arts and design.

3 Do you agree with the proposals that there should be four *specific* areas of learning and development? The four specific areas are literacy; mathematics; understanding the world; and expressive arts and design (paragraph 1.4).

Yes

X No

Partly

Not Sure

Comments: We support the change of title back to mathematics from PSRN. As in our response to question 2 we are concerned that all areas of learning will not be given equal weight and seen as inter-related.

We are also concerned that these areas will be seen as relating to older children or that children are not introduced to elements of understanding the world or expressive arts and design until later. These may be the very areas which capture their imagination and curiosity and promote language development and their confidence as learners.

4 Paragraph 1.6 explains how learning in the prime and specific areas should be supported. Is this a clear explanation? If you ticked no, or not sure, please say how this could be clarified.

Yes

X No

Not Sure

Comments: We strongly agree that all practitioners must consider the individual needs, interests, and stage of development of each child in their care, and must use this information to plan a challenging and enjoyable experience for each child in all areas of learning and development. However we strongly disagree that the three prime areas should only be associated with younger children. Some children will need to continue to focus on these for a longer period and this element of para 1.6 conflicts with the excellent first sentence quoted above.

Early Learning Goals

We are proposing to reduce the number of early learning goals from 69 to 17. The 17 Goals are all covered by the 7 areas of learning and development (3 prime areas and 4 specific areas). Appendix 4 of the revised draft EYFS describes the detailed content of the goals, which practitioners and teachers would use to assess children's development and achievement.

For each of the 7 areas of learning and development listed below in 5 a) - g), please say whether you agree with the early learning goals which relate to them.

A. Prime Areas of Learning and Development

5 a) **Personal, social and emotional development:** Self-confidence and self-awareness, Managing feelings and behaviour, Making relationships

Yes

No

X Partly

Not Sure

Comments:

We agree with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

5 b) **Physical Development:** Moving and handling, Health and self-care

Yes

No

X Partly

Not Sure

Comments:

We agree with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

5 c) **Communication and Language:** Listening and attention, Understanding, Speaking

Yes

No

X Partly

Not Sure

Comments:

We agree with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

B. Specific Areas of Learning and Development

5 d) **Literacy:** Reading, Writing

Yes

X No

Partly

Not Sure

Comments:

We do not agree with the Early Learning Goals.

In both the Reading and Writing sections the following requirements are set too high and should be moved to the Exceeding column:

- using phonic knowledge to decode regular words and read them aloud accurately (Reading)
- They use their phonic knowledge to spell words in ways which match their spoken sounds and make use of high frequency spellings (Writing)
- write.....simple stories

The first sentence in the Writing column should read as it was in the original goal:

Write their own names and other things such as labels and captions, and begin to form simple sentences, sometimes using punctuation

We propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

5 e) **Mathematics:** Numbers, Shape, space and measures

Yes

No

X Partly

Not Sure

Comments:

We agree generally with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

Time is a difficult concept for young children – children do not fully master this until well beyond the age of five.

5 f) **Understanding the World:** People and communities, the World, Technology

Yes

No

X Partly

Not Sure

Comments:

We agree with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

5 g) **Expressive Arts and Design:** Exploring and using media and materials, Being imaginative

Yes

No

X Partly

Not Sure

Comments:

We agree with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

5 h) Do you agree that the early learning goals define clearly enough what children should be able to do by the end of the school year in which they turn 5? If you ticked no, or not sure, please indicate which goal(s) you consider unclear and suggest how the goal(s) could be clarified.

Yes

X No

Not Sure

Comments:

Please see response to 5 d)

We agree with the Early Learning Goals but propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

It does need to be acknowledged that at some times and for some children learning may not always be linear.

The Government is keen to ensure that the EYFS helps ensure children's English language skills are sufficiently developed to allow them to take full advantage of Key Stage 1 and the opportunities that schools offer. It also recognises that bilingualism is an important asset conferring positive advantages for children's learning and development. The revised draft EYFS tries to strike a balance between supporting children's overall language development, and ensuring appropriate opportunities are provided for children to reach a good standard of English and be ready for school. It also seeks to ensure that the assessment requirements appropriately measure children's progress in English, taking due account of the needs of children who have not had the appropriate time or support to develop their English language skills.

6 Does paragraph 1.7 of the revised draft EYFS get the balance right?

Yes

X No

Not Sure

Comments:

We agree that children should be given opportunities to develop their home language in play, that practitioners should work closely with parents and explore issues regarding language delay. However it should be recognised that practitioners may need support from adults who speak the child's home language in order to do this successfully.

Access to interpreters and family health and well-being will have a huge impact on how the child adjusts particularly if the family are asylum seekers or refugees

The purpose should be to promote the child's competence in English not merely in preparation for Key Stage 1. The child's level of competence and confidence in English at the point of transition will depend on many factors for example how long they have been in the country, their parents' competence in English, whether they have arrived in the country having experienced trauma. Key Stage 1 teachers may need to continue to have access to the support of other adults who speak the child's home language.

7 The EYFS requires providers to support children through *planned, purposeful play*. The Tickell Review recommended that this requirement should be explained more clearly. Do you agree that paragraphs 1.10 and 1.11 of the revised draft EYFS clearly outline expectations of the approach practitioners should take to supporting children's learning?

Yes

X No

Not Sure

Comments:

In paragraph 1.10 the final sentence is inappropriate. It places reception classes outside the EYFS rather than within it. The move as children achieve in this stage should be towards increasing the level of challenge from the adult not more adult led activities.

In paragraph 1.10 planned, purposeful play needs more emphasis and explanation. The references to play also need to be continued throughout the document.

The needs of children from Birth to 3 are missing in so much of this document.

Paragraph 1.11 will be a crucial aspect of the new framework. It is too simplistic to try to define these terms in 1 sentence. There should be an appendix expanding on these terms.

There is too much emphasis on adult- led play

We have included with this response the ECF leaflet on Play which was

developed with the participation of all our members

8 a) Paragraphs 1.14 - 1.15 explain the learning and development requirements for settings where children spend a limited amount of time, outside school hours - for example, holiday and wraparound care. Do you think these paragraphs contain appropriate requirements for wraparound and holiday providers? Please explain.

X Yes

No

Not Sure

Comments:

8 b) Are the requirements explained clearly?

X Yes

No

Not Sure

Comments:

Section 2 - The Assessment Arrangements

There are two types of assessment in the EYFS. The first is formative assessment which practitioners should use on an ongoing basis to identify children's needs and plan activities to meet them and support children's future progress. Careful observation is particularly important. Many people who responded to the Tickell Review were in favour of continuing to require this type of assessment, although some people expressed concerns about the paperwork that was associated with it. It appears that paperwork may often be a response to *perceived* pressures, or reflect practitioners' own training needs, rather than the requirements of the EYFS. The revised draft EYFS retains the requirement that practitioners undertake on-going formative assessment but aims to make clear that the paperwork associated with assessment should be limited.

9 Paragraph 2.2 aims to discourage practitioners from completing excessive levels of paperwork. Do you think these paragraphs would achieve this aim? Please explain.

Yes

No

Not Sure

Comments:

The penultimate sentence (Key achievements.....) needs to be strengthened e.g. Key significant achievements.....

This needs to be accompanied by training and guidance stressing that not all observations will be recorded in written form. It may be photographic, notes on post its or merely in the practitioner's head.

10 Do you have any further comments on paperwork associated with the formative assessment of children's learning and development?

Yes

No

Not sure

Comments:

All practitioners new to the EYFS should have training on Observation and Assessment

The second type of assessment is summative assessment, in which practitioners step back and record what children can do across all of the areas of learning, to review their progress at a given point in time. This includes an assessment of children's achievements, and the extent to which progress is as expected, against benchmark standards. It is useful for parents as well as early years practitioners in understanding a child's level of development, and in supporting their future learning and development.

Currently, the only summative assessment required by the EYFS is at the end of the year in which children turn 5. It is called the EYFS Profile. A significant number of people have raised concerns about the EYFS Profile in its current form. Some respondents to the Tickell Review felt that it was not challenging enough for more able children but was too challenging for some other children - including children born in June, July and August, who will be the youngest in their school year. Many early years practitioners also highlighted that the EYFS Profile is not always used by Year 1 teachers (teaching pupils aged 5-6 years), owing to the lack of connection between the content of the EYFS Profile and the National Curriculum.

It is proposed that:

a. the EYFS Profile is slimmed down to reflect the proposed (reduced) 17 early learning goals;

b. 'emerging' and 'exceeding' bands are included in the assessment measures, to help identify clearly where children are working towards or have gone beyond the goal. This aims to provide clear information on children's progress for parents and to help Year 1 teachers to support very young children, gifted and talented children or children with additional needs;

c. the wording of the goals is amended to fit more clearly with the goals of the National Curriculum (and the wording of the National Curriculum will be considered in relation to appropriate continuity with the EYFS).

11 Do you think the revised draft EYFS Profile would provide an improved vehicle for capturing the essential information about a child's development at the point at the end of the EYFS? Please explain.

<input type="checkbox"/> Yes	<input type="checkbox"/> No	X Partly
<input type="checkbox"/> Not Sure		

Comments:

Generally yes with the following reservations:

It is important that the EYFS profile information is kept at school level and not published as league tables.

It is unclear how the EYFSP as it stands can give a 'clear and rounded picture of all of a child's needs' (2.10). It is important that all children can have their progress and attainment recognised in the EYFSP. Currently, a number of children score zero. Whilst this is now recorded as AA (indicating that the child has been assessed using alternative assessment methods) the EYFSP should include all children. The profile should be extended to ensure that the attainment of all children can be recognised.

There will be some children who, for a variety of reasons, do not achieve at the emerging column. A further column should be added before Emerging called Early. This would mean that achievements of all children would be recognised – incredibly important for their self-esteem and for their parents.- this would make the document truly inclusive.

It is important that the EYFS profile information is shared with parents.

12 Do you agree with the content of the 'emerging' and 'exceeding' bands? Please explain.

<input type="checkbox"/> Yes	<input type="checkbox"/> No	X Partly
<input type="checkbox"/> Not Sure		

Comments:

We do not agree with the content of the Literacy element.
See response to question 5 d)

13 Do you agree that the terms 'emerging', 'expected' and 'exceeding' appropriately describe levels of progress? Please explain.

Yes

No

X Partly

Not Sure

Comments:

We agree with the general approach of the emerging and exceeding bands. We propose that the Emerging column should be the same text as that in the 36-48 months column in Appendix 3. If this is not done there is no continuity between the two tables.

A further column should be added before Emerging called Early. This would mean that achievements of all children would be recognised – incredibly important for their self-esteem and for their parents. This would make the document truly inclusive.

The current proposals suggest that practitioners assess children's development in each of 17 proposed areas at an 'emerging', 'expected' or 'exceeding' level: roughly what would developmentally be expected from a 5 year old (expected), a 6 year old (exceeding) and a 3-4 year old (emerging). There will be some children who, for a variety of reasons, do not achieve at the emerging column. Practitioners will have no framework to report to the Y1 teacher and to parents about what a child knows, understands and can do. This risks some children being excluded from the EYFSP - we do not want a 'pre-EYFS' approach as in pre-NC P levels. A further category should be added below 'emerging' called 'early'. Reference can be made to the Early Support Programme Developmental Journals which are a good way of recording the progress of children with SEN/disabilities, and recommended in the SEND Green Paper.

Practitioners will need training on moving to a best fit approach.

14 The revised draft EYFS asks practitioners to supplement the Profile and give Year 1 teachers a short commentary on each child's skills and abilities in relation to the three characteristics of effective learning (paragraph 2.7). Do you agree this is helpful? Please explain.

Yes

No

Not Sure

Comments:

We agree that this would be helpful but as it stands there is insufficient guidance to practitioners on the characteristics of effective learning.

See response to question 7.

15 Do you have any further comments on the proposed revised draft EYFS Profile?

Yes

No

Not Sure

Comments:

We support the entry at the top of the EYFS Profile for the age of the child in months. There should be a place on the summary to record significant facts which could have affected a child's level of achievement e.g if the child was premature, date of entry into the country if not born in England, gender and the child's state of health as even mild medical conditions can affect a child's ability to learn.

Early years settings have a duty to collect EYFS Profile data and provide it annually to their local authorities. Local authorities need to provide

this annually to the Government. These duties will remain.

The Government has also considered the difficulties which can be experienced by children if they need additional support and their needs are not identified at an early stage. For many children, identifying their needs at age 5 is not soon enough to help them catch up to be successful learners in school. In response to this, building on Dame Clare Tickell's advice, we propose that a summary of children's development is provided to parents when their child is aged between 24 - 36 months. This must cover the prime areas of learning. Its purpose is to identify where children may need some additional support and to help practitioners work with parents and others to provide that tailored support. It is for practitioners to decide what the summary might include beyond the above requirements, reflecting the development needs of each individual child, and to decide on the format for the report.

For the longer term the Government is exploring the feasibility of a single integrated review at around age 2 (as recommended by Dame Clare Tickell), in which health and early years providers jointly assess children's progress, and work together, and with parents, to plan tailored support as appropriate. This would build on and strengthen the progress review we propose to introduce for September 2012 (as outlined above) to help ensure all children reach a good level of development at age 5 and are ready and able to learn in school.

16 Do you agree there should be a requirement for providers to give parents a written summary of their child's development in the prime areas when their child is 24 - 36 months (paragraphs 2.3-2.4)? Please explain.

X Yes

No

Not Sure

Comments:

This should be presented in the context of a meeting with parents not just sent as a written report.

The summary should be prepared in partnership with parents and the family health visitor.

17 Do you have any further comments on the 24 - 36 months summary of development?

X Yes

No

Not Sure

Comments:

There should be a place on the summary to record significant facts which could have affected a child's level of achievement
e.g. if the child was premature, date of entry into the country if not born in England, gender

The Tickell Review recommended that the EYFS should be clearer about how children with special educational needs should be assessed.

18 Do you think that paragraph 2.10 of the revised draft EYFS is clear in relation to the assessment of children with special educational needs?

Yes

No

Not Sure

Comments:

EYFS is an inclusive framework and its assessment should be too. The formative assessment of achievement, interests and learning styles which underpins EYFS should inform the summative data required for EYFSP. It should also be acknowledged that it will be essential for some children to continue to access additional specialist assessments e.g. for visual impairment from a Qualified Teacher of Visually Impaired Children. There is insufficient reference throughout the EYFS to the use of specialist support services - knowing when and how to call in specialist help, such as that provided by specialist visual impairment support services, is an important element of inclusive practice. This means providing any additional support required to include children with known or emerging SEN, using a graduated response as outlined in the current SEN code of practice. There are, however, growing concerns about the capacity of support services to respond where early years is one of the areas under threat as a result of cuts.

We recommend the addition of a further category below Emerging called Early. Reference should be made to the Early Support Programme Development Journals which are a good way of recording progress of children with SEN/disabilities and is recommended in the SEND Green Paper.

19 Do you have any further comments on the assessment of children with special educational needs?

X Yes

No

Not Sure

Comments:

Assessments should involve parents and children and should build on a person centred approach.

The role of the SENCO in the early years setting should be highlighted and considered one which can offer all practitioners support and opportunity to share effective methods of observation and assessment to inform early identification and ongoing access to the EYFS. The importance of having highly skilled SENCO's in Primary and Secondary education has been recognised and supported to develop leadership in providing better outcomes for children and young people at school. The EYFS and associated guidance could provide a significant and necessary emphasis of the skills and knowledge of Early Years SENCO's in leading practice amongst providers in the sector. This would be supported by the Area SENCO/EY consultant guidance which still awaits publication.

There should be more references to joint working with other professionals e.g. health visitors, the school nursing service, speech and language therapists.

Section 3 - Safeguarding and Welfare Requirements

This section explains the requirements that all early years providers must meet, in relation to children's safety and welfare. In the main, the current welfare requirements were supported in responses to the Tickell Review. The revised draft EYFS aims to simplify and clarify existing requirements. It also provides additional guidance on child protection.

20 Do you agree that the safeguarding and welfare requirements are set out clearly and cover the right areas? Please explain.

X Yes

No

Not Sure

Comments:

21 The requirements for staff training on safeguarding now include examples of inappropriate staff behaviour which are warning signs for the possibility of child abuse (paragraph 3.9). Do you think this will better equip staff to take action to protect children where necessary? Please explain.

Yes

No

Not Sure

Comments:

The examples are helpful but members of staff do not constantly refer to the document once it is published. Therefore training and a requirement for updating is the only way this area will be improved. Rigorous staff supervision for both monitoring and support can also help.

All staff need safeguarding training so they are fully aware of their roles and responsibilities.

We would also like to see a requirement to keep a record of safeguarding training undertaken by individual members of staff including during their induction period.

22 Do you think that the requirement for staff supervision (paragraph 3.19) would help leaders and managers support their staff and keep children safe from harm? Please explain.

Yes

No

Not Sure

Comments:

This will only lead to improvements if managers are suitably experienced and appropriately trained and themselves have access to regular supervision.

It would be helpful if Ofsted asked to see records of staff supervision to check if it was happening and on the quality of the process.

23 The current EYFS sets a lower age limit of 17 for people looking after children unsupervised whilst the General Childcare Register (GCR) for those looking after older children sets a minimum age of 18. We think that it is important that our youngest children should be looked after by responsible adults. We therefore propose that only those over the age of 18 should be counted in ratios for both the EYFS and the General Childcare Register. Do you agree that we should raise the age limit in the EYFS?

X Yes

No

Not Sure

Comments:

We would also like to see an increase in the proportion of staff who hold appropriate qualifications. We recommend that a commitment is made to a minimum level 3 for all staff with an explicit timed CPD pathway to show how staff will be supported to achieve this.

24 Childminders have previously been allowed six months to complete their training after registration. This means that they can look after children without having been trained in the EYFS. Do you agree that childminders should be trained to understand fully the requirements of the EYFS before they can register and look after children? Please explain.

X Yes

No

Not Sure

Comments:

25 a) Paragraphs 3.54 and 3.64 explain the requirements for risk assessments by settings. Do you think the explanation is clear? Please explain.

X Yes

No

Not Sure

Comments:

25 b) Do you think this would help providers keep children safe without completing unnecessary paperwork? Please explain.

X Yes

No

Not Sure

Comments:

We agree but would emphasise that the paperwork alone does not keep children safe. That is dependant on the quality of the staff members and the quality of the training and supervision they experience.

26 Do you have any further comments on the safeguarding and welfare requirements?

Yes

No

Not Sure

Comments:

3.58 Outdoor opportunities

The proviso for exemption for outdoor opportunities is totally inappropriate. The example given – poor weather conditions – gives staff who do not enjoy working in the outdoors an excuse for depriving children of this important aspect of the curriculum. Some staff would interpret rain as poor weather. The previous document and other international documents refer to unsafe weather conditions and define this as where the media gives weather warnings. We request that in this paragraph 'poor weather' should be changed to 'unsafe weather'.

We believe that all group settings (I.e. excluding childminders) should be required by statute to have an outdoor area. A date should be set for all settings to comply with this requirement. This could be done over a periods of 2 years.

Staff ratios

The proposal to consider staff ratios in non-school settings by setting rather than rooms/groups is of concern. This could lead to managers in periods of staff absence/shortage doubling up rooms or farming children out. This will disrupt the key person relationships, planning and overall continuity.

3.25

The previous document stated that students should not be included in ratios. This seems to have been omitted. We request that this is reinstated.

3.27

The document should give more examples and limits for 'short lengths of

time' and very particular circumstances.'

3.36

The situation is not clear as to when a second teacher needs to be introduced in a nursery class. Traditionally this has been done after 39 children. This urgently needs to be addressed as beyond this number the teacher role becomes supervisory and less effective.

We propose 1 teacher supported by qualified Level 3 staff in a ratio 1:13. After 39 children a second teacher should be introduced.

3.37

The issue of reception classes being subject to infant class size legislation was raised by ECF when EYFS was introduced. We were told this would be addressed in subsequent legislation. It has not been addressed. The position of reception classes was raised again by Dame Claire Tickell. This matter needs urgently addressing so that the place of reception classes in the EYFS is confirmed. At present a reception class could legally be staffed by one teacher. This is not appropriate or safe and leads to poor quality provision.

Ratios in classes with 3 and 4 year olds.

We believe that an appropriate ratio would be 1:10 This would fit in with groupings of 30 and allow staff to offer high quality support to children's learning.

Inspection Arrangements

Ofsted inspection assesses how well providers meet the standards of the EYFS and Ofsted publishes inspection reports on its website.

If providers breach any of the welfare requirements Ofsted can issue a Welfare Requirements Notice. If providers do not comply with the Welfare Requirements Notice by the date specified, then Ofsted can cancel the provider's registration and prosecute as they judge appropriate.

There are some breaches of requirements which can lead to immediate prosecution without a Welfare Notice first being issued. These are detailed at (paragraph 3.79 and 3.80) of the draft EYFS. The Government is considering whether the system for handling breaches of requirements could be simplified and would welcome views on whether any of these requirements could be appropriately dealt with through Welfare Notices rather than under caution/through prosecution.

27 Do you think that we should remove the automatic offence from any of the welfare requirements? If so please specify which ones need not carry an automatic offence. Please explain.

Yes

X No

Not Sure

Comments:

28 The Government would also welcome views whether Ofsted's powers are sufficient in the area of learning and development. Should the Government introduce a system similar to Welfare Notices for breaches of the learning and development requirements?

X Yes

No

Not Sure

Comments:

General

29 Overall, do you think that the revised draft EYFS is clear and easy to navigate? Please explain.

Yes

No

X Not Sure

Comments:

In our experience practitioners read the documents on publication and are then put to one side. It is therefore imperative that local authorities continue to provide training on EYFS focussing on different aspects. Induction courses should continue to be offered to practitioners who are new to this stage.

The Principles into Practice cards offered an excellent vehicle for training – it is not clear from the consultation whether these will continue to be part of the overall document. We strongly recommend that the cards should be retained and continue be used as a core training document to support practitioners in the implementation of EYFS.

There are insufficient references to play in the document.

30 Do you think the Government should make any further revisions to the EYFS, to simplify and shorten it further? Please explain

Yes

No

Not Sure

Comments:

It should not be simplified further. However supporting documentation should be produced to support implementation e.g.

- Leaflets for Parents
- Principles into Practice cards
- Area SENCO guidance (awaiting publication)
- Reference to the Early Support materials

31 Do you think that the revised draft EYFS would support effective partnership working with parents and carers, enhancing their involvement in children's' learning and development? Please explain.

Yes

X No

Not Sure

Comments:

Not on its own.

Training is needed in this area and parents' leaflets need to be produced to inform parents of the principles of EYFS.

These should be shared with parents at meetings preferably with the key person.

32 Please use this space for any other comments on the proposals.

Comments:

We believe the document needs a clearly stated reference and commitment to the United Nations' Convention on the Rights of Children.

We have included with this response our leaflet on Children's Rights.

We would like to see a greater emphasis on equality and inclusion throughout the EYFS, with effective practice exemplified and high quality training provided for all practitioners, building on the stated aims and principles

There need to be more references to play throughout the document.

Section one emphasizes the importance of children being 'school-ready' but makes no attempt to define the meaning of school-readiness.

We are concerned that without a clear definition of the meaning some practitioners may interpret it in a way which leads to a 'too formal too soon' approach for young children. The EYFS is not simply a preparation for 'school-readiness'. The EYFS must be regarded as a distinct and important phase in its own right. There is a danger that for some practitioners school readiness will lead to pressure for a more formal approach before children are developmentally ready. This can have a negative impact on children's overall enjoyment of learning.

We believe that the ethos of the learning environment for children up to the age of seven should be play-based.

Much of the document ignores the importance of the child's health development – without good health children will not achieve as they should, poor health has a massive impact on children's ability to learn.

There need to be more references to partnership working.

The Revised EYFS includes none of the Tickell Review recommendations on the appropriateness of provision and pedagogy in the early years and instead focuses on 'instruction' and 'accuracy', particularly in the 'Communication and Language' section.

We would like to see the EYFS being extended until the end of Key Stage 1 to provide a greater continuity of appropriate learning opportunities for children up to the age of 7. This would provide children with experiences which are relevant to their stage of development and provide a vital foundation for their future.

There should be an explicit read across to the Healthy Child Programme and the SEND Green Paper so that practitioners are clear on how these frameworks fit together.

33 Please let us have your views on responding to this consultation (e.g. the number and type of questions, was it easy to find, understand, complete etc.)

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

All DfE public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Co-ordinator, tel: 01928 438060 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 30 September 2011

Send by post to: CYPFD Team, Department for Education, Area 1C, Castle View House, East Lane, Runcorn, Cheshire WA7 2GJ.

Send by e-mail to: revisedeyfs.consultation@education.gsi.gov.uk