

Government consultation on Early Years Foundation Stage Reforms

Response of the Association of School and College Leaders

A. Introduction

- 1 The Association of School and College Leaders (ASCL) represents over 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in a rapidly increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
- 2 ASCL welcomes this consultation and the opportunity to respond.

B. General points

- 3 ASCL agree with the need to reform the Early Years Foundation Stage Profile (EYFSP). The government is right to focus these reforms on improving outcomes for all children, improving language and literacy outcomes for disadvantaged pupils, and addressing teacher workload.
- 4 We welcome the proposed changes to the EYFSP assessment process and the criteria used to assess children. We disagree with the proposal to remove the LA statutory element of EYFSP moderation.
- 5 We share the government's concern that "too many children finish the reception year without the language and early literacy skills they need to thrive". The EYFSP results published in October 2019 show a worrying decline in the number of pupils achieving a good level of development, and a growing gap between all pupils and the lowest attaining.
- 6 We support the government's ten-year ambition, set in 2018, to "reduce by half the percentage of children who finish reception year without these skills from 28% to 14%". We strongly agree that the early years are crucial for children's development, for establishing the foundations for future success and for closing gaps between disadvantaged and non-disadvantaged children, and support the government's plans to invest in early educational entitlements, as highlighted in the consultation document.
- 7 However, we do not feel that these proposals go far enough. The government must do more to ensure our early years settings are sufficiently funded, and are staffed by highly skilled and appropriately qualified practitioners. ASCL's recent inquiry into the

[‘Forgotten Third’](#)¹ of young people who do not achieve at least a standard pass (grade 4) in their English and maths GCSEs made a number of recommendations in this area. It called on the government to extend the entitlement to 30 hours of free early education per week to all three- to four-year olds, and to ensure the level of funding is sufficient to meet the cost of sustainable, high-quality provision. It also recommended that the government should work with local authorities and education providers to improve the skills of early years practitioners, working towards ensuring that every early education setting is graduate-led.

- 8 We agree that parents play a crucial role in their child’s early language, and are supportive of the government’s ‘Hungry Little Minds’ campaign to help parents, particularly those living in disadvantage, to support their children in developing these skills. Again, however, we do not feel this commitment goes far enough. We urge the government to develop a clear, cross-departmental strategy to better support families living in poverty. The reforms proposed in this consultation are, in our view, broadly positive, but can only go so far in improving outcomes for disadvantaged children.
- 9 In terms of the key recommendations in the consultation itself, we agree that it is important that children begin Year 1 ready to access the curriculum. However, it is important that this is balanced against a recognition of the importance of the Reception year as an important learning stage in its own right, and that the needs of young children are not distorted by the pressures of accountability. We therefore strongly support the proposal that the EYFSP is not used as an accountability measure for school performance, and urge the government to ensure this message is widely understood.
- 10 Finally, we welcome the strengthened message that teachers should use their professional judgements without reliance upon “unnecessary evidence”, alongside the intention to introduce the revised framework on a voluntary basis from September 2020. This attempt to reduce workload and more robustly value teachers’ professional opinions is to be welcomed. However, we believe that it remains essential that there is proportional, professional moderation which is to the benefit of children and practitioners alike.

C. Responses to specific questions

Q6. Whether the activities described in each of the proposed educational programme summaries support children’s learning and development throughout the EYFS.

11. We broadly agree with the summaries proposed in this section. However, we would like to make the following points and recommendations:

Communication and Language

12. We support the proposal that the “development of spoken language” should underpin all seven areas of learning and development. However, while we agree with the importance of reading frequently to children, there needs to be greater recognition of the different starting points of children, particularly between disadvantaged children and their non-disadvantaged peers. We would like to see a recognition here of the greater challenge

¹ https://www.ascl.org.uk/ASCL/media/ASCL/Our%20view/Campaigns/The-Forgotten-Third_full-report.pdf

faced by some schools in helping children to develop “new vocabulary” and “become comfortable using a rich range of vocabulary and language structures”.

Personal, Social and Emotional Development

13. We support the sentiment behind the use of the phrase “strong, warm and supportive relationships with adults” but we recommend the addition of the word “trusted” in this statement, with regards to the safeguarding of children.
14. While the rest of the guidance is clear, it needs to be recognised that many children may require additional support with Personal, Social and Emotional Development, and that their families may also need guidance and support.

Physical Development

15. The summary is clear, but we would urge the government to include more on health-related issues, particularly the importance of healthy eating for life, in the light of rapidly growing child obesity levels.

Literacy

16. With regard to the statement “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”, it needs to be recognised that this love of reading also needs to be developed outside the classroom – something which is made more difficult as a result of the closure of libraries across the country. Additional resources are needed to support early years settings with this ambition.

Mathematics

17. The language used here should be consistent with that of the section above; children should similarly develop a love for number and mathematics.

Understanding the World

18. The sentence “important members of society such as police officers, nurses and firefighters.” could lead to other occupations not being considered and hence undervalued. It is important to recognise a range of “important members of society” from a full range of backgrounds, to ensure children have as broad an awareness as possible about the world in which they are a part of and to recognise all aspects of diversity.

Expressive Arts and Design

19. We believe very young children benefit hugely from work in expressive arts and design, particularly in the early development of cultural capital which is a key aspect to reducing the gap for disadvantaged pupils. Moreover, strong development in this area forms an essential component of children’s portfolio of skills which they use in the classroom across a range of subjects.
20. The 2019 Durham Commission report highlights that “it is among young people from disadvantaged backgrounds where opportunities for creativity are now most limited”.
21. We therefore recommend that additional weight should be put on the arts within the EYFS reforms, with creativity opportunities strongly encouraged through play and exploration.

Q7. Whether the proposed ELGs are clear, specific and easy to understand.

22. On the whole, the proposed ELGs are clear, specific and easy to understand. We believe that the proposed goals are clear enough to ensure consistent judgement. However, we would like to make the following recommendations:
23. Under the proposed ELGs in Literacy, some children who have English as an additional language (EAL) may struggle with the use of phonics and we do not believe this is correctly reflected in the proposed text. We recommend the government acknowledges this in the wording of this section, for example 'For EAL pupils, systematic phonics are introduced and pupils are taught to use these to decode, as appropriate'.
24. The Fine Motor Skills ELG 'Hold a pencil effectively in preparation for fluent writing - using the tripod grip in almost all cases' at the expected level of development is not necessarily appropriate for children of Reception year, especially alongside 'write fluently'. The word 'fluent' here could relate to the selection of vocabulary used and the style in a piece of writing, rather than a specific focus on the fine motor skill. Instead, the wording of this could say: 'Begin to develop an effective pencil grip' or 'Begin to develop and effective tripod grip.'
25. The 'expected' level of development in the Word Reading ELG, '...and at least 10 digraphs' needs to be clearer. 'At least' could be any number over 10. We suggest rephrasing this as '...and between 10 and 12 digraphs'.
26. We recommend the retention of the 'Shapes, space and measures' ELG. This supports the Number and Numerical Patterns ELGs, and provides additional information about a child's development.

Q8. Whether the proposed ELGs contribute to a well-rounded assessment of a child's development at the end of reception year.

27. We believe there should be greater emphasis on technology and science within the profile, alongside the prominence given to literacy and numeracy.

Q9. Views on removing the LA statutory element of EYFSP moderation.

28. The moderation approaches offered by Local Authorities have been too variable. At its best, good moderation helps to improve professional practice. At its worst it is disruptive, unhelpful and undermines practitioners.
29. However, the removal of moderation would lead to fragmentation and incoherence. We believe that appropriate, proportionate external moderation is essential. We therefore disagree with the proposal to remove the LA statutory element of EYFSP moderation. Instead, government should work with LAs to improve the quality and consistency of their approach to moderation.

Q10. Views on whether removing the LA statutory element of the EYFSP moderation will help to reduce teacher workload.

30. We do not believe that removing the LA statutory element of the EYFSP moderation would help to reduce teacher workload. The real driver of workload is the misconception that the EYFSP forms part of external school accountability. It is this which has led to the excessive attention to documenting evidence. Practitioners should be free to use

professional judgement, recording only what is useful for their own internal needs and to promote continuity. Sensible moderation alongside this is a reasonable requirement.

Q11. Alternatives to LA statutory moderation we think could help to ensure consistency of EYFSP judgements across the ELGs.

31. Local moderation would need to replace statutory moderation if it was withdrawn. Without any form of scrutiny, the only plausible alternative would be desktop, data-based sense checks, with sampling.
32. Schools could choose to work in groups to moderate each other. However, we believe that this would lead to even greater inconsistency than is the case under the current system.

Q12. Views on the proposal to remove the 'exceeded' judgement from the EYFSP

33. On balance, we believe it is better to retain the 'exceeded' judgement. We trust the professional judgement of practitioners to make this assessment. The removal of the 'exceeded' judgement may lead to a perception of lack of challenge in the EYFSP. We are aware parents find the 'exceeded' judgement helpful too.
34. The key issue is not the judgement itself but the provision of evidence. This in turn arises from a misconception about the purpose of the EYFSP as an instrument of accountability.
35. If the intention behind the removal of the 'exceeded' judgement is to reduce teacher workload and, in turn, reinforce that the EYFSP is not a high stakes accountability measure, then we recommend that reference to the EYFS is removed from a school's IDSR, currently listed under the 'Attainment' section where a school's figures are compared against national figures.

Q13. Whether the requirement in the EYFS framework to 'promote the good health of children' also include oral health.

36. We believe an opportunity has been lost in this section to promote the importance of safeguarding alongside health and well-being. Whilst cleaning teeth is important, this section could be much more both in terms of what we teach children and in how adults develop their understanding through additional high-quality safeguarding training.

Q14. 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).

37. There is insufficient recognition in these proposals of the challenges faced by children with complex needs and vulnerabilities. A child with profound or multiple learning difficulties, who at this stage is not likely to have an EHCP, will be assessed against the same criteria as other children. There is a missed opportunity here to consider how the EYFSP might be used to identify and support children with such complex needs.

D. Conclusion

- 27 We are grateful for the opportunity to contribute to this consultation.
- 28 We hope that this response is of value to the process. ASCL is willing to be further consulted and to assist in any way that it can.

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