

## Daycare Trust Response to the Revised Early Years Foundation Stage

September 2011

Daycare Trust is the national childcare charity, campaigning for high quality, accessible, affordable childcare for all and raising the voices of children, parents and carers. We undertake research, campaign on childcare issues, work with providers in different types of childcare settings, as well as providing information for parents and carers. Our research with parents and providers give a comprehensive and up-to-date picture of early childhood issues and we have drawn on this evidence in our response to the Revised Early Childhood Foundation Stage (EYFS). We previously contributed evidence to the Tickell Review of EYFS and have also had discussions with Department for Education officials.

Daycare Trust supports the aims of the EYFS as a single quality framework and believes that its implementation has substantially improved the quality of early childhood education in England. We are very pleased to note the Government's support for EYFS as a universal framework. We also welcome the greater clarity of the Revised EYFS and feel that it is a much more succinct and clear document than the guidance that is proposes to replace. However, we have some major concerns on the Revised EYFS:

- Daycare Trust is concerned that there is no detailed guidance in the Revised EYFS on working in partnership with parents to support and enrich children's home learning environments. For all children, differences in the quality of their home learning environment has the largest impact on their life chances. Early years providers have many opportunities to improve the quality of children's home learning environments, but we believe that greater guidance for providers on how to support parents with home learning has the potential to deliver significant gains in respect of child development.
- Daycare Trust opposes the division of the seven areas of learning into prime and specific areas of learning as we believe that all seven areas of learning are equally important for children of all ages. We are concerned that this division could be interpreted as suggesting that practitioners focus on the prime areas for

children aged 0-36 months, and on the specific areas from 36 months onwards, rather than all areas of learning progressing through the EYFS period.

- Daycare Trust believes that the current proposals for a 'light touch' and non-standardised 24-36 month development check in the Revised EYFS lack coherence and may not promote the early identification of problems.
- Daycare Trust is very disappointed the Department for Education has not used the opportunity of the Revised EYFS to improve the qualifications profile of early years staff.
- Daycare Trust believes that the Revised EYFS is generally weak on how practitioners can support the learning, development and care of very young children (particularly those under 24 months).

Below, we set out in full Daycare Trust's response to the Government's consultation on the Revised EYFS.

### **The learning and development requirements**

Daycare Trust supports a national framework that outlines an educational programme for young children and sets out early learning goals. We also welcome the stated flexibility of this area of the EYFS for those providing wrap-around and holiday childcare.

While the Revised EYFS provides a clearer outline of the learning and development requirements than does the present EYFS, we are very concerned about the way the Revised EYFS has divided the learning areas into *prime* and *specific* areas of learning. Daycare Trust believes that all seven areas of learning are equally important for children of all ages. By dividing the areas of learning, there is an implicit suggestion that those working with the under threes should focus on the prime areas of learning, while the specific areas of learning are only covered once a child reaches three years. We feel that it is essential that the early years curriculum for the under threes supports their development in literacy, mathematics, world understanding and the arts, just as much as it does for older children.

We have one significant comment about the content of the seven areas of learning. Given growing levels of childhood obesity we would like to see greater emphasis on outdoor play, the development of physical fitness and strength in the *physical development* area of learning. We suggest that an addition is made to the 'Moving and Handling' sub-section:

*“Children should be developing their strength and fitness through daily outdoor play and indoor sport.”*

Daycare Trust works with parents who have disabled children and is committed to improving access to quality early years provision for these children. We note that the Revised EYFS has very little mention about how the needs of disabled children be met within the seven areas of learning. We recommend that this section clarifies providers’ obligations to disabled children within the seven areas of learning.

### **Assessment**

The Revised EYFS proposes two assessment points: between 24 and 36 months and at the end of the EYFS (the EYFS Profile). The latter will remain national assessment, using the proposed 17 learning goals of the EYFS. However, for the 24-36 month development check the Revised EYFS suggests a ‘light touch’ assessment. Many children will also receive a development check from a health visitor in the 24-36 month period. We understand that over time the Government intends to move towards an integrated assessment by 2015, once the planned extra 4,200 health visitors have been appointed.

Daycare Trust greatly welcomes the proposal to slim down the EYFS early learning goals from 69 to 17 goals. We also like the way the revised EYFS profile uses the three ‘emerging’, ‘expected’ and ‘exceeding’ bands. However, we believe that some of the early learning goals for literacy are set too high. We recommend that the Department for Education revise the early learning goals for reading and writing.

Daycare Trust initially viewed the 24-36 month check as a positive development, as we have called for greater information to be available for parents, in order to encourage involvement in their child’s development. We believed that a parent-focused report could improve understanding of high quality early years practice and encourage ongoing parental engagement.

However we do have some concerns that the present proposals for a 24-36 development check in the Revised EYFS lack coherence, and, if implemented, could be a burden to providers without promoting early intervention to support vulnerable children. The Revised EYFS implies that settings will have discretion in the type and timing of this 24-36 month development check. Daycare Trust is concerned that the lack of guidance for the 24-36 month development check will lead to inconsistencies in the way that this assessment is undertaken between settings and between local authorities. Not only will this lead to confusion for parents, but early years staff may miss problems, or, conversely, over-identify special needs. There is a risk that if the check is not conducted and communicated in an appropriate way, it could damage relations with

parents or put them off future engagement. Moreover, if children move between different settings, a new provider may find it difficult to interpret a development check carried out in another setting.

The Revised EYFS proposes that the 24-36 month development check is carried out by early years providers, with this check focussing on children's learning. However, a significant proportion of children aged between 24 and 36 months do not receive any formal childcare and will miss out on this learning-focussed development check, even after the implementation of the two year old offer. Those children most likely to miss out on this development check may be the ones most likely to need it. We would welcome an explanation about how this proposed check fits with the Government's stated focus on the most disadvantaged children, and the extra investment it is making in places for these disadvantaged two year olds.

Given the potential inconsistency of the 24-36 month development check and that it may miss some of the most vulnerable children, Daycare Trust recommends that Government introduces a standard national learning *and* development assessment for 24-36 year olds. We recommend that this assessment be delivered by health visitors with input from early education professionals. This will help ensure that it is a universal check, and also will help identify children who may be eligible for a free early education place but may not have yet taken it up.

Daycare Trust is also concerned that the proposed 24-36 month development check will not support the multi-agency support of the most vulnerable families. The Revised EYFS states that *'practitioners should encourage parents to share the summary of progress with other relevant professionals'* and *'providers should seek the consent of parent to share the information directly with health visitors.'* We believe that this obligation is far too weak and that the most chaotic, inarticulate and vulnerable families – those most needing support – are the ones least likely to share information voluntarily. Daycare Trust recommends that the sharing of this information between early years settings and health visitors is automatic and that a Data Protection Act 1998 non-disclosure exemption is secured, if needed.

### **Safeguarding and welfare requirements**

Daycare Trust welcomes the clear articulation of the safeguarding and welfare requirements in the Revised EYFS. We have some specific comments about particular sections and some more substantial comments in relation to the requirements about staffing ratios and qualifications, outdoor play and nutritional standards.

Our specific comments are:

*Paragraph 3.9* We recommend inserting ‘persistent low level neglect’ into this paragraph, to read:

*any reason to suspect neglect, including persistent low level neglect, or abuse outside the setting, for example in the children’s home.*

*Paragraph 3.12* The last sentence should be a separate paragraph for clarity, and to give greater stress to the role of Ofsted.

*Paragraph 3.19* We would like to see an addition to this paragraph as we believe that supervision should also be used to encourage professional development and further study.

*Paragraph 3.24* We recommend this paragraph read ‘providers must ensure that staff have sufficient grasp of *written and spoken* English to ensure the well-being of children in their care. Many providers tell Daycare Trust of staff who speak fluent English, but whose poor written English impacts on the learning and welfare of children.

*Paragraph 3.50* We recommend that there is an obligation to **communicate behaviour management policies** to parents. If settings do provide parents with written and verbal information about behaviour management policy, it can promote greater consistency between the home and the setting. Information for parents on behaviour management can also encourage more effective discipline in the home.

*Paragraph 3.66* We recommend changing the present sentence about promoting and valuing diversity and difference to:

*Information about how the provision will promote and value diversity and difference, as well as stressing commonalities between people and communities.*

Such a change would bring the Revised EYFS more into line with current good practice on community relations, which stresses that children should be helped see things that we share, as well as valuing differences between people.

*Paragraph 3.69* We recommend that the last sentence in this paragraph read:

*Any other information the provider considers necessary, for example, home language and parents’ competency in written and spoken English.*

## **Staff qualifications and staffing ratios**

Daycare Trust believes that improving the level of qualifications held by early years staff is a policy priority, given the expansion of the free early education offer to the most disadvantaged two years olds. Much research, including the Effective Provision of Pre-School Education project, shows that only the highest quality childcare will deliver improved educational and psycho-social outcomes for disadvantaged children, and that the quality of childcare is strongly positively correlated with the qualifications level of staff<sup>1</sup>. While there have been steady improvements in the levels of qualifications held by the early years workforce since 2000, Department for Education survey data for 2009 indicates that 20 per cent of non-supervisory childcare staff have no qualifications at all and just 44 per cent have higher level qualifications.

Daycare Trust is, therefore, disappointed the Department for Education has not used the opportunity of the Revised EYFS to improve the qualifications profile of early years staff. The EYFS target of 50 per cent of staff to be qualified at Level Two is lowering the overall bar, rather than raising it. We would like to see this target amended to ensure that by 2014 90 per cent of staff hold qualifications at Level Two or above and 100 per cent by 2016. We would also like to see a specific legal requirement for staff who hold no qualifications or are qualified below Level Two, to show they are taking steps to improve their level of qualifications in both childcare and literacy and numeracy. Additionally, we would like to see the Revised EYFS give greater explicit support the acquisition of higher level qualifications by all staff.

In relation to supervision levels Daycare Trust believes that the adult-to-child ratios for children over three (1:13) in nurseries is unworkable, unsafe and compromise the quality of early years education. While reception classes in schools have a higher ratio (1:30) our experience is that schools usually have support extra staff in addition to the qualified teacher, this is not always so in private and voluntary sector nurseries. A 1:13 level does not allow for emergencies, meetings and staff breaks and at some times of the day staff will be supervising many more than 13 children. Daycare Trust recommends a 1:8 adult child ratio for three year olds.

### **Outdoor play**

Daycare Trust welcomes the commitment to daily outdoor play in the Revised EYFS and feels that such as commitment enhances children's physical and cognitive development, as well as aiding behaviour management. However, we feel that wording of paragraph 3.58 needs to be strengthened (presently it states that outdoor play should take place on a daily basis unless circumstances make this inappropriate, for example, poor weather). We recommend that *poor weather* be replaced with *dangerous weather conditions*, to encourage greater outdoor play in those parts of England with high

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<sup>1</sup> Sylva K and Roberts F (2009) 'Quality in early childhood education: evidence for long-term effects' in Pugh G and Duffy B (eds) *Contemporary Issues in the Early Years*, London: Sage Publications

rainfall. We would also like to see a separate paragraph on the outdoor environment within the EYFS, to emphasise the importance of outdoor play.

## **Food**

It is essential that healthy eating habits are established in a child's early years. However, our work with both parents and providers suggests that the quality food in early years settings is still quite variable. Interviews with parents suggest that there is widespread parental support for some short and simple nutritional standards in the EYFS. We would urge the Government to consider this recommendation and think about other ways that it can support healthy eating thought the EYFS.

## **Working in partnership with parents**

For all children differences in the quality of their home learning environment has the largest impact on their life chances. For example, young children whose parents frequently read to them achieve better educational outcomes than children whose parents rarely read with them.<sup>2</sup> Early years providers have many opportunities to improve the quality of children's home learning environments, for example, by talking to parents about helping their children. While there is much good practice undertaken by providers that aims to improve the home learning environment, there are many providers that have little learning-focussed engagement with parents. In order to improve home learning we believe that this support needs to be included within the EYFS framework.

Over the years Daycare Trust has carried out much research on parents views about quality in early years provision which we fed into the Tickell Review. This research shows that most parents have clear ideas about what comprises 'quality' and safety. They also want early years settings to be regulated generally support a single national quality framework and oppose too much provider autonomy as might result in lower standards of care. However, most parents lack accurate information about the EYFS. Although the Revised EYFS is a much clearer document than the present EYFS, it still runs to more than 40 pages. It is still a difficult document for less-educated parents. In order to promote greater parental understanding of EYFS, Daycare Trust suggests that the Department for Education produce a short parent-friendly summary of the EYFS. Such a guide would help parents choose early years provision as it would provide a summary of what high quality looks like, as well as supporting parents' understanding of how early years settings support child development.

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<sup>2</sup> Smith, R., Speight, S. and La Valle, I. (2009) *Fitting it All Together: How Families Arrange their Childcare and the Influence on Children's Home Learning*, London: Department for Children, Schools and Families

## **Training material**

Childminders are a major consumer of the EYFS in that the registration and inspection process requires that they understand and implement the EYFS. In Daycare Trust's response to the Tickell review we noted our concerns that there is little accessible training material on the EYFS targeted at providers who have lower level qualifications or none at all. A very small proportion of childminders have higher level qualifications. (The 2009 Childcare and Early Years Survey of Parents suggested that 51 per cent of childminders had lower level qualifications and 31 per cent had no qualification at all). And unlike nursery staff, childminders often work alone and cannot rely on the support of more senior and better qualified staff to help them understand the requirements of the EYFS. For this reason we believe it is essential that the Department for Education produces accessible training material about the EYFS.

## **Conclusion**

In conclusion, Daycare Trust welcomes the continued support for EYFS as a quality framework. We believe the recommendations made above are fiscally neutral and that our proposals for the 24-36 month development check will save money and make the check more effective.

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