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## Consultation on Early Years Foundation Stage reforms

1. The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs) under the provisions of the Children Act (2004). The DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education. We welcome the opportunity to respond to the Department for Education's (DfE) consultation on reforms to the statutory framework for the Early Years Foundation Stage (EYFS).
2. The consultation is focused on changes to the educational programmes under the seven areas of learning, the 17 early learning goals (ELGs), the assessment and moderation process for the EYFS Profile and changes to the safeguarding and welfare requirements to promote good oral health. ADCS welcomes the DfE's intention to improve teacher recruitment and retention and outcomes for all children, however, it is not clear how the proposed changes will achieve this.
3. One of the consultation's key objectives is to reduce teacher workload and therefore improve recruitment and retention in the early years sector, partly by encouraging teachers to use their own professional judgement and not rely on unnecessary evidence to justify their assessments. The consultation therefore proposes removing the statutory element of local authorities to moderate EYFS profile assessment judgements. However, there is a risk of undermining the validity of ELG assessments if not externally moderated. The external judgements also ensure that secure, valid and consistent data is available for the end of key stage outcomes and national comparators. It is also not clear whether this will in fact reduce workload. Local authority moderation is based predominantly on a professional dialogue and moderators do not require excessive amounts of evidence to ensure consistency of judgements. Further, it can provide valuable experience and development for teachers and practitioners, especially those who do not have access to CPD, to make accurate judgements. Indeed, headteachers who are non-early years specialists can receive valuable external feedback.
4. The British Association for Early Childhood Education published a literature review of recent evidence about early learning, pedagogy and curriculum content in years from birth to age five to explore how the EYFS remained congruent with the evidence and what changes may be needed. The evidence does not support giving literacy and mathematics greater emphasis than any other areas of learning within the EYFS, however, the consultation is proposing increasing the number of ELGs for literature from two to three. In fact current data suggests that the ELGs for literacy and mathematics are set too high as they are achieved by fewer children than in the other areas of learning. As a consequence, this work seems counter to the government's ambition to closing the attainment gap.

5. ADCS is clear that the early years provide the best opportunity to closing the attainment gap between the most and least disadvantaged families and while receiving a high quality education is important, this alone will not close the gap in terms of outcomes. The Social Mobility Commission's [State of the Nation report](#) (2019) emphasised the impact of poverty on children's life chances and noted that in 2018, 45% of children entitled to free school meals did not reach a good level of development aged five, compared to 26% of their more advantaged peers. A positive home learning environment and a qualified, high quality workforce are equally vital to reversing this trend and the government must also pay equal attention to improving these areas. However, funding is currently skewed towards the provision of 'free' childcare rather than funding early education. Although funding in the early years has increased significantly over the past 30 years, policy in this area is disjointed.
6. Indeed, last year the Education Select Committee concluded that there is a lack of direction in the government's approach towards early years policy. As such, the committee called for the government to focus its strategy in three key areas: reform its 30-hour free childcare policy, fully fund maintained nursery schools, and build on the success of children's centres and other similar provision. ADCS is concerned that the government's focus in this area does not target those children and families with the most need; only by targeting funding towards the most socially and economically disadvantaged can we effect generational change.
7. In order to truly improve social mobility, the government must refocus its attention towards developing a strategy for improving early years services as recommended by the Education Select Committee, yet it is not clear how the proposed changes to the EYFS will achieve this. The government's flagship 30-hours 'free' child care policy for working parents of three and four-year old children adversely affects those children with parents who are not working full-time or who are on a zero-hour contract, however, parents who earn up to £199,000 per annum can benefit from this policy. There is an obvious tension between this position and the government's stated drive to improve social mobility. Further, the funding formula that underpins the free childcare policy does not recognise the higher running costs associated with nursery schools because they employ specialist teachers, and this has led to a number of nursery schools having to close down as a direct result. In March 2019 ADCS published a position paper on the children's workforce and called for this policy to be reviewed so that vulnerable children and families benefit from the subsidy and the remaining investment be used to support the development of the early years workforce. This ask remains a priority for members of the Association.
8. ADCS would welcome the opportunity to discuss the points raised in this response further with representatives at the DfE via the Association's national policy committees. Please contact [matt.cunningham@adcs.org.uk](mailto:matt.cunningham@adcs.org.uk) in the first instance.