



Consultation Response Form

**Consultation closing date: 22 April 2013
Your comments must reach us by that date.**

**Consultation on the criteria for Early Years
Educator qualifications (Level 3)
Consultation Response Form**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

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

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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

Reason for confidentiality:

Name	Dr. Jane Payler
Organisation (if applicable)	TACTYC: Association for the Professional Development of Early Years Educators
Address:	Faculty of Education, Health and Social Care, University of Winchester West Hill Winchester SO22 4NR

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Public Communications Unit by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

The Government's publication '[More great childcare](#)' (January 2013) sets out the vision for quality in early education and childcare and includes the Government's response to Professor Cathy Nutbrown's report '[Foundations for Quality](#)' published in June 2012.

The Government wants make sure there is more great childcare available for parents and children. The introduction of Early Years Teachers (Graduate) and Early Years Educators (Level 3) will support early years providers in ensuring that those they employ to work with babies and young children become increasingly skilled and professional.

The Parliamentary Under-Secretary of State (Education & Childcare) has asked the Teaching Agency (TA) to consult on new, tougher 'full and relevant criteria' to ensure the Early Years Educator qualifications build on the richer content and standards as recommended by Professor Nutbrown.

Please mark an 'x' in the box that best describes you as a respondent.

<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Maintained school	<input type="checkbox"/> Training provider
<input type="checkbox"/> Childminder	<input type="checkbox"/> Independent school	<input type="checkbox"/> Academy/Free School
<input type="checkbox"/> Nursery and other pre-school provider	<input type="checkbox"/> Play/Activity provider	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Representative of childcare or early years intermediary organisation	<input type="checkbox"/> SEN provider	<input type="checkbox"/> Awarding Organisation
<input type="checkbox"/> Teacher	<input checked="" type="checkbox"/> Other	

Please Specify:

TACTYC: Association for the Professional Development of Early Years Educators, has over 480 members, including academics, local authority officers and practitioners in both maintained and non-maintained sectors. Our aim is to promote the highest quality professional development for all UK early years educators in order to enhance the educational well-being of youngest children.

Our activities include:

- **advocacy and lobbying** - providing a voice for all those engaged with the professional development of practitioners through responding to early years policy initiatives and contributing to the debate on the education and training of the UK early years workforce;
- **informing** – developing the knowledge-base of all those concerned with early years education and care by disseminating research findings through our international [Early Years Journal](#), annual conference, website and occasional publications;
- **supporting** – encouraging informed and constructive discussion and debate and supporting practitioner reflection, the use of evidence-based practice and practitioner-research through, for example, our [Newsletter](#) and Website (www.tactyc.org.uk).

SECTION A: Early Years Educator Criteria

To enable you to answer questions 1 – 6 please read the draft ‘full and relevant’ criteria for new Level 3 qualifications that will qualify individuals to become Early Years Educators.

The criteria lays out the minimum for what an Early Years Educator should know, understand and be able to do to be considered qualified at Level 3 to deliver the [Early Years Foundation Stage](#).

The criteria are for use by Awarding Organisations to develop Early Years Educator qualifications for introduction from September 2014.

1 Do the criteria set appropriate expectations for what an Early Years Educator must demonstrate in order to be fully qualified at Level 3? Please explain your answer in the comments box below using the relevant number(s) where referring to a particular part of the criteria.

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

Comments:

Throughout the document the use of the word ‘deliver’ in relation to children’s early education and development is inappropriate and betrays a perspective on teaching and learning in the early years which is at odds with the most effective practice in supporting young children’s successful learning. Children are and must remain lifelong active agents of their own development and learning; development cannot be ‘delivered’ and children cannot have learning delivered to them. Children develop in individual ways and at their own pace under various influences. Rather than use the word ‘deliver’, it would be more helpful to describe the need to ‘implement’ learning and teaching with young children in a variety of ways, especially through self-initiated play and with the guidance, support and interaction of adults.

The criteria consistently give insufficient recognition to the importance of play and child-initiated learning, either in their roles in children’s development and learning or in their uses as pedagogic strategies to engage babies, toddlers and young children in activities that promote learning, understanding and development.

There is also no emphasis on young children’s need for movement and kinaesthetic activity, not only in relation to health and welfare, but also because of the relationship

between movement and brain stimulation.

Early Years Educators should have knowledge and understanding of the crucial role of play in children's development. They should be able to support children's learning through self-initiated and child-led play and be able to plan and implement playful activities to extend children's learning and development.

Section 1 is mistaken in listing disadvantage as a developmental pattern. Disadvantage is a risk factor in development, which can be at least partially ameliorated by the environments and relationships a child experiences. It is more appropriately listed in Section 1.3 as a factor which can affect development. This item should also make reference to the influences of cultural differences on children's development, including language diversity.

Section 1.4 and 2.5: Practitioners cannot 'direct' development in communication and language, group learning and socialisation. They can instead 'support and enhance' development in these areas.

Section 2 completely omits the characteristics of effective teaching and learning which, alongside the areas of learning and development, are a statutory requirement which must be reflected in practice. (Statutory Framework 1.10). Understanding how children learn is essential in developing appropriate pedagogy, and practitioners need to understand their own role in supporting or hindering children's development as confident, curious, motivated, self-regulated learners.

Sections 2.1 and 2.3 refer to educators implementing the EYFS as they 'plan activities and educational programmes', and 'lead activities and educational experiences'. This construction implies a very directive approach to teaching and learning, which is at odds with effective early years pedagogy and ignores the key principles of the EYFS. These principles highlight the adult role in providing rich and challenging opportunities and experiences within **enabling environments** and warm, contingent responses and effective interactions within **positive relationships**.

The emphasis on school readiness creates a misplaced focus on one aspect of transition and risks marginalising the appropriate care and education of babies and toddlers. We suggest replacing this statement, e.g. at 2, with 'make good progress and develop as successful learners'. The section listing transitions (1.5) should include transitions between rooms or groups within a setting, since such changes of environment and relationship can have profound impact on babies and toddlers.

Section 2 should also make reference to the role of consistent, responsive care routines in the education and development of babies and toddlers. Care routines form part of the pedagogy for such young children and should not be seen exclusively as separate 'health and welfare' tasks.

The language of 2.6 ('structured and freely chosen activities') is not in keeping with

current terminology, which uses the terms adult- or child-led learning experiences (or adult-/child-initiated). This section is also unhelpful in reviving the outdated idea of a 50-50 time split between structured and free flow (child-initiated) activity. The EYFS makes clear that, while recognising that play is essential to children's development, the balance of child-led to adult-led activity will depend on many factors such as children's ages, development, and the pattern of a child's day as a whole. There is also a more subtle blend of adults judging when and how to bring their own purposes alongside those of children, and this interplay cannot be broken down into a time ratio. The EYFS leaves this balance and interplay to the professional judgement of practitioners with no guideline being specified and this criteria should not suggest a particular numerical ratio.

We question the focus in 2.7 on teaching reading and mathematics. Supporting learning and development should be equally important across all areas of EYFS. At the very least, we suggest it should be 'support the foundations of the prime and specific areas of learning and development', with particular focus on supporting the prime areas which underpin learning and development across all areas.

2.9 The criteria should not be to manage children's behaviour, but to provide support for children to learn to manage their own behaviour. Self-regulation of behaviour, as well as of emotions and attention, must be the goal in order to support children who will go on to be effective learners and citizens.

4.3 We fail to see why these particular skills and subject knowledge have been highlighted. Although advanced knowledge of English and mathematics are vital to securing quality practitioners, what is the purpose of emphasising music, history or modern foreign languages at the expense of science or other arts-based subjects, for example.

5.4: To take account of children's individual developmental patterns, particularly for children with additional needs, we suggest altering this statement to: 'Carry out physical care routines suitable to the child's individual stage of development responsively, consistently and with kindness, according to national guidance.'

2 Is there anything missing from the criteria which you feel is vital for an Early Years Educator (Level 3) to demonstrate? Please explain your answer in the comments box below using the relevant number(s) where referring to a particular part of the criteria.

Yes

No

Not Sure

Comments:

In addition to the items noted above, we feel that the assessment criteria for this qualification lack the depth and rigour that would enable early years educators to develop the analytic and extended writing skills necessary for progression to university study. Instead, they imply a competency-based approach. While not all early years educators will wish to progress, clear progression routes to enhance career development are essential if we are to encourage high quality applicants and to raise the status of the sector.

There is no mention of knowledge of theories of child development, which is a crucial underpinning of the ability to observe, reflect, interpret, plan, and offer effective responses to support learning and development.

Children develop in the context of home and environment as well as settings: the document fails to mention anything about children's cultures of home or, indeed, of anything to do with a good and effective childhood.

In 5.3, records and reports should also include information about children's play and learning development. The use of records should also be emphasised in relation to being powerful tools for facilitating learning and growth in children – using observational assessment at both formative and summative levels – and for developing professional skills amongst practitioners.

3 Are any of the criteria unclear? Please explain your answer in the comments box below using the relevant number(s) where referring to a particular part of the criteria.

Yes

No

Not Sure

Comments:

See comments above in relation to 'deliver' development and learning.
See comments on reading and mathematics.

The emphasis in 2.7 on 'teaching' the foundations of reading such as 'decoding and comprehension' again implies a narrow directive teaching style, and is at the expense of highlighting the importance of supporting children to developing a love and enjoyment of books, language and reading, and taking delight in pictures and words. Similarly the mention of 'basic maths' is inappropriate. This statement would be better left open, given that whatever is specified will probably become the main focus of any EYE assessment.

4 Within the criteria, is there any duplication in your opinion? Please explain your answer in the comments box below using the relevant number(s) where referring to a particular part of the criteria.

Yes

No

Not Sure

Comments:

2.1 and 2.3 are repetitive. If 2.3 is about leadership, that should be made clearer, particularly with regard to the scope of the early years educators' leadership role. If not, then 2.1 could instead say 'Plan, implement and support children in...'

2.7 duplicates the literacy and mathematics parts of 2.1 and 2.3 and are inappropriately worded.

5 Would the requirements of the criteria disadvantage any particular group or groups? Please explain your answer in the comments box below using the relevant number(s) where referring to a particular part of the criteria.

Yes No Partly Not Sure

Comments:

All children, but in particular babies and toddlers, would be disadvantaged by an approach that focuses narrowly on structured, directive approaches to play and learning experiences and an emphasis on 'school readiness'. Greater importance should be given to supporting children's innate play capabilities, natural curiosity, exploration, creativity and problem-solving to enhance their learning and development. Further, warm, close, interactive and consistent relationships with individual babies and toddlers form the basis for successful learning and development. These should be more strongly represented in the criteria.

To be counted within staff: child ratios set out in the Statutory Framework for the Early Years Foundation Stage practitioners must hold a Level 3 qualification that is defined as 'full and relevant'. From September 2014, all Level 3 qualifications deemed 'full and relevant' must meet the Early Years Educator criteria.

6 Should early education and childcare qualifications above Level 3 be automatically considered as meeting the Early Years Educator criteria for the purposes of the Early Years Foundation Stage ratios? Please explain your answer in the comments box below.

 Yes No Not Sure

Comments:

It would not be safe to automatically assume that a practitioner qualified above Level 3 would meet the requirements for EYE and therefore would be qualified to meet children's needs. This would only be sensible if clearly defined parameters were set around what constitutes an 'early education and childcare qualification' above Level 3. For example, some qualifications in managing early years settings do not have sufficient child development, early years pedagogy, or practical skills in observation, assessment and activity planning, and high quality care. Equally, teaching qualifications which only include the Reception phase would not be adequate.

7 If the questions we have asked here have not given you opportunity to make all your views known please add any further comments you would like to draw to our attention.

Comments:

While we welcome the introduction of a potentially stronger early years educator qualification, the criteria here offer an inadequately narrow view of early years learning and development. The focus on school readiness and directive approaches without an emphasis on play and exploration is inappropriate.

There is little here to reflect the qualification requirements to support the care and education of babies and toddlers. Toddlers, for example, are at a distinct stage of development but omitted from the phrasing in the document. They are not babies or preschool children. Their needs should be reflected in the criteria.

8 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:

The 'Yes', 'No', 'Partly' and 'Unsure' categorisations are not helpful and should be removed. They do not give a picture of the response in the same way that that written comments do, and any reported numerical presentation of the results of the consultation in this way could not capture the content of responses.

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 X

E-mail address for acknowledgement: Jane.payler@winchester.ac.uk

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?

X
Yes

No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected

- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / 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 22 April 2013

Send by post to:
Department of Education
PCU Area 1C
East Lane
RUNCORN
Cheshire
WA7 2GJ

Send by e-mail to: Fullandrelevantcriteria.CONULTATION@education.gsi.gov.uk