



Unite the Union response to the Department for Education consultation on the criteria for Early Years Educator qualifications (Level 3)

This response is submitted by Unite. Unite is the UK's largest trade union with 1.5 million members across the private and public sectors. The union's members work in a range of industries including manufacturing, financial services, print, media, construction, transport, local government, education, health and not for profit sectors.

Unite represents approximately 100,000 health sector workers. This includes eight professional associations - British Veterinary Union (BVU), College of Health Care Chaplains (CHCC), Community Practitioners and Health Visitors' Association (CPHVA), Guild of Healthcare Pharmacists (GHP), Hospital Physicians Association (HPA), Medical Practitioners Union (MPU), Mental Health Nurses Association (MNHA), Society of Sexual Health Advisors (SSHA).

Unite also represents members in occupations such as allied health professions, healthcare science, applied psychology, counselling and psychotherapy, dental professions, audiology, optometry, building trades, estates, craft and maintenance, administration, ICT, support services and ambulance services.

Consultation Response

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.

No:

We are concerned that in **Section i:C: Accreditation**, it identifies that the quality assurance and accreditation is at the Qualifications and Credit Framework level. We believe this does not allow the correct level of academic rigour or flexibility to demonstrate that the learner has understood or used reason to inform their actions. We are concerned that this will lead to learners 'just' carrying out tasks to demonstrate competence rather than being able to demonstrate the wider reasoning behind their actions which is what should be required.

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:

Professor Nutbrown was clear in her report that Early Years ‘Educators’ should be given training to cover birth to seven years. However, in her critical response¹ to the government’s response she highlighted that the government were focusing their training on birth to five.

In **Section ii.1.1 (Deliver children’s early education and development from birth to the age of five)** it states that individuals should “know and understand the expected pattern of children’s development from birth to 5 years, and have an understanding of further development from age 5 to 7”.

We do not find this clear. What is the proposal for the difference in the level of knowledge between children’s development between 1 and 5 and the subsequent 6 to 7 age range?

We also believe that the content leaves open the risk of wide interpretation and variation which will result in qualified staff having a wide range of level of knowledge on what are such important issues to this role (and profession). This has a risk of perpetuating a concern that our members in Unite/Community Practitioners’ & Health Visitors’ Association members have raised previously and over an extended period of time. In their document *Determinants of a good Community Nursery Nurse (CNN)*² our Community Nursery Nurse members highlighted that there were well over 200 different qualifications being awarded. This not only caused confusion for the professionals themselves and employers but more importantly to members of the public. We acknowledge with the move to the ‘full and relevant’ and the ability to check individual qualifications on the Department for Education website (Early Years Qualification Finder: <https://www.education.gov.uk/eypqd/qualification-search>) that this should be minimised but it is unfortunate that the proposed qualifications criteria does not seem to strengthen this.

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:

We believe that the **Assessment criteria (Section iB)** is not robust enough and it is insufficient to state that this will be addressed through other work. The assessment criteria should be a key part of the qualifications criteria document.

Our members report that this is an area that often weakens the intention to both maintain and improve standards. Assessors should not only be “professional competent and knowledgeable” but also should hold or exceed the qualifications that they are assessing. We also support Professor Nutbrown’s recommendation that settings can only be used for educating new staff that are at least rated good (recommendation 11).

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.

No.

¹ NUTBROWN, C (2013) *Shaking the foundations of quality? Why ‘childcare’ policy must not lead to poor-quality early education and care.*

² Unite/CPHVA (2012) *Determinants of a good Community Nursery Nurse (CNN).*

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:

We, like Professor Nutbrown, are concerned that the government's response does not provide professionals in early years settings the same careers frameworks that are available to their colleagues who work in primary and secondary education. We would suggest that this may have wider implications in relation to equality and diversity. We note in the government's response that this consultation question was supposed to address some of Professor Nutbrown's recommendation (13), however we believe that the government should go further to identify any equality issues. This should also not just focus on BME but all protected characteristics.

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.

Not sure:

We are not clear on the question being asked. We are however very concerned about the whole proposal from the government on a relaxing of the childcare ratios. We believe the whole premise that the government is operating on is seriously flawed. As we see with the burgeoning growth in knowledge around early child development, brain functioning and attachment, it is distressing to see that on the one hand the government accepts the importance of this 'new knowledge' but on the other contradicts it with this change in ratios.

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.

We support the move to assessments based on candidates being required to produce a majority of their evidence of performance from observation of practice, with children, in a real work (world) environment. When discussing members concerns about the current situation, a focus of their concerns is on how in assessment it shouldn't "just be about portfolios" and that ensuring that any theory is properly applied and assessed as such is key.

Our members continue to raise concerns that there is too much confusion for professionals, employers and members of the public in relation to the complex number of qualifications available. They report that although NNEB was never seen as perfect, it did not cause the level of confusion that now persists. To support the governments work, we have included a copy of the Unite/CPHVA report (Determinants of a good Community Nursery Nurse (CNN)).

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.)

No comment.

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