

The draft National Curriculum Framework for children from birth to four

Response from Wordworks (prepared by Rebecca Hickman and Shelley O'Carroll)

Wordworks was established in 2005 with the aim of strengthening early language and literacy learning among children from historically disadvantaged communities in South Africa. Our programmes are currently delivered in five South African provinces.

Wordworks has recently published two research-based reports relevant to this consultation:

- *Narrowing the Literacy Gap: Strengthening language and literacy development between birth and six years* (Dr Shelley O'Carroll and Rebecca Hickman, 2012)
- *Much more than counting: Supporting mathematics development between birth and five years* (Cally Kühne, Shelley O'Carroll, Brigid Comrie and Rebecca Hickman, 2013)

Structure and basis of this submission

We welcome the priority that the Department of Basic Education (DBE) are attaching to producing a National Curriculum Framework (NCF) that improves outcomes for children, and the recognition being given to the importance of *high quality* ECD programmes. Clearly, much thought and work has gone into the production of the draft NCF. We are aware of how difficult it is to produce a document as complex as this within the constraints of limited resources and without the support of a wider team.

Wordworks wishes to make a number of overarching points about the approach and content of the draft NCF. These are outlined in Part One of this submission. Part Two sets out specific issues relating to the different section headings of the draft NCF, as requested by DBE.

Wordworks' particular knowledge and expertise lies in the areas of early language and literacy learning, including how young children learn, and good pedagogic practice. As part of our ongoing policy and advocacy work, we have looked extensively at the most recent research on what works in language, literacy and mathematics teaching and learning in the years before school. We have also studied the early years curricula of fourteen countries and regions, and the recent reviews by the Organisation for Economic Cooperation Development on best practice in early years curriculum design and organisation. Wordworks would welcome the opportunity to work with DBE in the next stages of re-drafting the NCF.

Main Recommendation:

Wordworks urges the government to redefine the core purpose and uses of the NCF and refocus and reduce the content accordingly, in line with the evidence and best practice.

Part One – General issues and considerations

Clarifying status, purpose and uses

1. The success of the new NCF will largely depend on clarity about its practical purpose and uses. However, in this regard the draft NCF raises more questions than it answers. This is not the fault of the authors, but more likely the result of a lack of overall clarity about *why* the NCF is needed and *how* it will be used. There are two central questions that must be addressed by DBE and the Department for Social Development (DSD): Firstly, the statutory footing of the new NCF, and secondly, its relationship with the existing and emerging ECD policy framework.
2. It is our understanding that the NCF will be non-statutory (i.e. non-binding). If this is the case then it would be inappropriate for the NCF to determine core requirements of ECD programme registration, as has been suggested. If on the other hand, the NCF is put on a statutory footing, then the framework must be just that – a framework of broad standards and guidelines that allows for local flexibility and democracy in implementation (similar to the Norwegian, Swedish and Finnish models). This could be accompanied by more detailed non-binding good practice guidelines for implementation (similar to the UK model), which could potentially be produced at provincial level to allow proper account to be taken of the particular challenges and opportunities of different regions.
3. Further confusion is caused by lack of clarity about how the NCF will relate to the current and emerging ECD policy framework. In terms of the existing policy framework, it does not make sense for the NCF and NELDS to co-exist. This kind of duplication tends to come about when the exact goals, uses and audiences of different documents have not been identified and agreed from the outset. In the South African context, it will only serve to reduce the likelihood of either document being implemented effectively. This problem will be further compounded when the Guidelines for Programme Development (GPD), which are referred to as an accompanying document in the draft NCF, are published. Where these fit into the policy-practice matrix also remains unclear.
4. In terms of the emerging ECD policy framework, the new national ECD policy and comprehensive programme will be published by DSD next year. It is not clear how the NCF will relate to this new overarching framework, but it would seem to make sense for the two to be developed together rather than separately. The diagram on page 14 of the draft NCF unfortunately does not elucidate the key questions pertaining to the anticipated interaction and distinct policy goals and practical uses of NELDS, the draft NCF, the GPD and the new ECD comprehensive programme, but merely adds to the impression of a lack of joined-up thinking.
5. The draft NCF states that it is for adults working with pre-school children, including parents and caregivers, early childhood practitioners, practitioner educator and support staff, and monitoring personnel who visit the ECD programmes. This is an extremely diverse audience. They have vastly different levels of baseline knowledge, different skills and understanding, different resources available to them, and different levels of language competence. By trying to speak to all of them, the draft NCF speaks to none of them effectively.

In terms of content, language and presentation, what is appropriate to a preschool principal, an ECD service provider and a trained ECD practitioner, will not necessarily be either appropriate or understandable to a parent or carer or someone who runs an informal crèche in their home. We would suggest therefore that it is neither possible nor desirable to produce a NCF for all the target audiences listed in the draft. Such a framework would either be irrelevant or insensitive to many ECD settings, or so multi-layered and complex as to be impenetrable and unmanageable as a practical resource – or, as in the case of the current draft, suffer from both these problems.

Recommendations

- A. DBE and DSD must urgently clarify and rationalise the proposed policy framework for ECD. To achieve this the following core questions should be answered and agreed for each of NELDS, the NCF, the GPD and the ECD comprehensive programme:**
- policy goals (specific and measurable)
 - statutory footing
 - target audiences
 - practical uses
- B. The NCF should be developed in tandem with the new national ECD policy and comprehensive framework. Unless the NCF and NELDS have clearly different policy goals, audiences and uses, the NCF should supersede NELDS. Together the new raft of policies and guidelines should make a coherent whole that is easily understood by the sector.**
- C. We propose that the National Curriculum Framework should be just that – a framework. It should be a short narrative document in order to encourage and allow flexibility and innovation in local implementation, and aimed at provincial/district ECD planners and advisers, ECD service managers, ECD trainers, preschool principals and qualified ECD practitioners. We recommend the approach of Australia, Sweden, Finland, Norway, Ontario, and others, who target their curricula clearly and explicitly at ECD providers and practitioners.**
- D. The NCF should be placed on a statutory footing (through an amendment to the Children’s Act) to give it force, and accompanied by non-statutory 1) guidelines for implementation for early childhood practitioners, 2) information and tools for parents and carers, both of which could potentially be produced by provincial rather than national government to allow for local flexibility and sensitivity.**

Accessibility and usability

6. The NCF needs to relate directly to the day-to-day reality of ECD practitioners, including their resource levels and knowledge base. When they first pick up the document, they should feel that it was written for them, and are therefore motivated to read it and

implement it. It should use concepts and terminology that are familiar and easy to understand and a structure and lay-out that are engaging and straightforward to navigate.

7. The preamble to the draft NCF states that it should not be used as a checklist (which is in line with its non-statutory status) but the subsequent tables are extremely long and detailed and give the impression of seeking to be exhaustive rather than illustrative. This has a number of drawbacks:
 - the perceived prescriptiveness will disempower and even deskill ECD practitioners;
 - it effectively discourages flexibility in local implementation that would reflect differing social, cultural and linguistic contexts;
 - important points are lost among much less important points;
 - the sheer information overload is off-putting and will militate heavily against practical implementation.
8. In addition to significantly reducing the tables (or moving them to a guidelines document), the 30 pages of narrative at the start could be edited down extensively while still maintaining all the key information. Sweden's early years curriculum framework which is often held up as a model is 14 pages long. Australia, Finland, Norway, the UK, British Columbia are among those who have managed to produce curricula of between 25 and 50 pages. **It is our contention that the current draft NCF is unusable because of the density, volume and structure of the content. Unless the content is reviewed, reorganised and reduced, in practice it will simply not be used.**

Recommendation

E. Whatever the final purpose and status of the NCF, it should be as short and succinct as possible to ensure that it is used in practice, with content, tone and language carefully tailored to meet the needs of the identified audiences.

Definition of curriculum

9. A clear and tight definition of what a curriculum framework is (and therefore what it is not), will assist policy-makers in assigning it the correct status and role in the ECD policy-practice matrix. The OECD points out that how a curriculum (framework) is defined "raises important questions about aspects, such as the scope, relevance, focus and age-appropriateness of content; depth and length of descriptions; and input- or outcome-based descriptions."¹ In other words, the coherence and usefulness of the document in large part turn on getting right the initial definition of what it is. In this respect, we suggest that the very broad definition of curriculum on page 12 is not helpful. Furthermore, the consecutive sections on pages 12 and 13 explaining what a curriculum is and what a curriculum framework is, are confusing. It is unclear why the definition of a curriculum is needed if this is not what the draft NCF is.

¹ OECD, 2012

10. The OECD suggests that a curriculum should set out the goals, content and pedagogical practices that will assist children’s learning and development. Such a curriculum thereby enables “some structuring and orientation of children’s experience towards educational aims.”² The simplicity of this definition helps in turn to clearly signpost the appropriate level of detail and content for a curriculum.

Recommendation

F. The definition of what a curriculum framework is should be revised and tightened, as part of and in line with the policy rationalisation recommended in C. above. The two sections addressing this question in the draft should be synthesised.

The evidence base

11. Wordworks believes that a national curriculum framework can play a key role in improving the quality of early childhood development (ECD) programmes and services in South Africa. However, we do not believe that any curriculum framework is better than no curriculum framework. Indeed, recent research suggests that many early years curricula and learning programmes have no impact on child outcomes, and some even have a negative impact.³ The National Institute for Early Education Research states:

“An additional common theme is evidence of effectiveness. Decision-makers need to be skeptical of curriculum developers’ claims unless they are confirmed by researchers who are unaffiliated with the curriculum model.”⁴

12. Evidence is key to quality and improving outcomes for children. The brevity of the list of references at the end of the draft NCF is surprising. The literature on early years curricula is rich, and includes comparative analyses and impact studies.⁵ Some countries have thoroughly overhauled their own early years curriculum within a few years of implementation as a result of their experience and learning (see for instance the most recent UK curriculum,⁶ which has superseded the one referenced in the draft NCF.) South Africa is therefore in the fortunate position of being able to draw from and build on the extensive experiences and learning of other countries in implementing effective early years curricula, while tailoring the NCF to South Africa’s particular circumstances and challenges.

² OECD, 2012

³ Diamond, Justice, Siegler, & Snyder, 2013

⁴ NIEER, 2007

⁵ Preschool Curriculum Evaluation Research Consortium, 2008; NIEER, 2007; OECD, 2012

⁶ Department for Education (UK), 2012

Recommendations

- G. Each element of the new NCF should be consistent with international best practice and the most recent research. Where the DBE is proposing an untested or unsupported approach, the reasons for this departure should be clearly explained.**
- H. A wider literature review should be undertaken to inform the development of the new NCF. This should include the recent comparative analysis and recommendations of the OECD in their *Starting Strong III* series,⁷ and in particular the key lessons they have extracted from international experience.**

Consultation and participation

13. Consultation on the draft NCF has not been adequate. Most ECD stakeholders were not even aware the document was in development let alone given the opportunity to be involved. Furthermore, it is evident from the draft content that specialists in different fields have not been involved in decisions on content and methodologies in a meaningful way.
14. It is instructive to look at the highly participative processes that have been used by other countries in the development of their early years curricula. Finland had a steering group of 17 ECD professionals, which met 12 times over 10 months. In addition, experts were asked to contribute at different stages and reviewed early drafts, and a dedicated website was used throughout the process for the public to leave comments on.⁸ The development of early years curricula in Ontario, Virginia and British Columbia were all overseen by project teams of between 15 and 22 ECD experts, with additional critical reviews conducted by subject specialists at different stages.⁹ The OECD describes Sweden's and Ireland's experiences as follows:

"Sweden set up a reference group when revising the curriculum. The government learnt that having a reference group with broad and different competences is highly relevant to finding a suitable revised draft that reflects the needs of various professionals and children with different backgrounds. Sweden also believes it is important to involve researchers. Their input and consultation formed the essential basis of the revision."

"Ireland worked directly with practitioners in infant classes, their principals, parents and children. National and international research was also used for review as well as consultation processes with the wider education sector. Ireland found this to be very useful in gaining wider awareness of the curriculum and stakeholder buy-in to support implementation."¹⁰

⁷ OECD, 2012

⁸ Ministry of Social Affairs and Health (Finland), 2004

⁹ Best Start Expert Panel on Early Learning (Ontario), 2007; Office of Early Childhood Development Virginia Department of Social Services, 2008; Ministry of Health and the Ministry of Children and Family Development (British Columbia), 2008

¹⁰ OECD, 2012

15. We emphasise this point not only because of the importance of fulfilling principles of democracy, participation and accountability, but also for two highly practical reasons: Firstly, involving a wide range of experts is first and foremost the surest way of producing a document that is based on evidence and which therefore makes a real difference to improving outcomes for children. Secondly, the actual implementation of the NCF is likely to depend on the degree of ownership that ECD stakeholders feel over the final document, and the extent to which they feel charged and trusted with the responsibility of adapting it to their particular context:

“The wide range of cultures, communities and settings in which young children grow up makes it essential to engage different stakeholders in developing and refining curricula and to adapt curricula, when needed, to local or cultural circumstances. This is to ensure that curricula actually meet children’s needs and truly focus on the child and their development.”¹¹

Recommendation

- I. The development period for the NCF should be extended to allow for the proper and meaningful involvement of leading experts and all ECD stakeholders. A steering group that includes specialists in different fields as well as proper representation from the ECD sector should be set up to guide the completion of the NCF, and meet regularly to guide progress. Child health experts, cognitive/ neurological scientists, nutrition experts, child psychologists and early language and literacy experts should be among the specialists on the steering group and fully involved in defining and drafting content. The new ECD Inter-sectoral Forum should also be given a clear role in finalising the document.**

¹¹ OECD, 2012

Part Two – Section by section response

Section - Introduction

16. With reference to audiences, please see paragraph 5 and recommendation C above.
17. The NCF needs to reflect a better understanding of the very different contexts within which ECD programmes are delivered. A range of factors shape the particular challenges, resources and opportunities of the ECD practitioner, including i) location (urban/ rural), ii) cultural/ linguistic context, iii) socio-economic context, and iv) setting (home-based, centre-based or community-based). In order to ensure the interests of the child are always uppermost, the importance of adapting the NCF to local circumstances and needs should be emphasised from the outset.

Sections - Definition of curriculum and A curriculum framework

18. With reference to defining what a curriculum is, please see paragraphs 9 and 10 and recommendation F above.
19. Knowledge and skills are not the same as understanding. This is an important distinction to highlight to ECD practitioners.
20. The description of the draft NCF under 'A curriculum framework' does not fit with what the actual focus and content of the document is. Most of the draft NCF is devoted to setting out very detailed and specific indicators, activities and assessment guidelines, not simply 'aims'. If this section accurately describes the vision for the NCF, then the draft does not deliver it.
21. As discussed in Part One, the volume and detail of the draft NCF give the impression of seeking to be exhaustive and therefore work directly against the document being received and used as "a flexible tool". This is not mitigated by telling readers not to use the document in a prescriptive way but simply adds to the confusion. If the DBE does not wish the document to be prescriptive or perceived as such, the content needs to be significantly reduced. The UK, Australia and Norway all provide excellent examples of how exactly the same core themes and content can be covered in a much shorter and more accessible way.

Section - The links between the NCF with other curriculum initiatives/ frameworks

22. With reference to how the NCF fits in the existing and emerging policy framework, see paragraphs 3 and 4 and recommendations A and B above. The fit between NELDS, the NCF and the GPD is far from clear, and the ECD policy framework will become even more confused when the ECD comprehensive programme is published by DSD next year.
23. It is not clear why the GPD are for 0-5 years and the NCF for 0-4 years. We understand that both are supposed to cover the period before children enter Grade R, and we suggest that 0-5 years is the clearest description of this.

24. We would dispute the claim that the draft NCF “takes into account global ECD trends.” The bibliography suggests that some exemplar international curricula have not been looked at and that the analytical work of key global bodies and research organisations on early years curricula, in particular the OECD, has not been considered.
25. Specifically, the NCF does not reflect global ECD trends as they relate to early language and literacy learning and indeed goes against prevailing best practice (including in other multi-lingual, multicultural countries) in terms of both the theoretical framework and specific approaches and examples.

Section - *The purpose of the NCF*

26. This list confuses objectives, principles and benefits. Many of the bullet points represent secondary aims and benefits or would be better expressed as principles running through the NCF. The purpose statement of the NCF should explain in a clear and memorable way the reason for its existence in terms of what it will achieve on the ground.
27. Some examples of how other countries have expressed the purpose of their early years curriculum are:

“The primary purpose of this document is to support adults to create rich early learning experiences and environments that reflect the latest knowledge on how best to support young children’s early learning and development.”¹²

“The curriculum guidelines aim to promote the provision of ECEC on equal terms throughout the country, to guide the development of the content of activities, and to contribute to developing the quality of activities by introducing uniform principles for organising such activities.”¹³

“To assist educators to provide young children with opportunities to maximise their potential and develop a foundation for future success in learning.”¹⁴

Sections - *The NCF and the National Qualifications Framework* and *The NCF and the Critical Outcomes*

28. There is unnecessary detail in these sections. Every additional layer of information that is not directly relevant to the purpose or audiences of the draft NCF, inadvertently buries or obscures information that is.

¹² Ministry of Health and the Ministry of Children and Family Development (British Columbia), 2008

¹³ Ministry of Social Affairs and Health (Finland), 2004

¹⁴ Department of Education, Employment and Workplace Relations (Australia), 2009

Section - Principles informing the three themes which underpin the NCF

29. The structure of three themes, twelve principles and six early learning and development areas (ELDAs) does not easily fit together, is overly complex and omits some key strands. We are not clear what the three themes as currently defined add to the overall methodology, and we would suggest that the structure could be simplified by capturing the themes in the condensed principles.
30. Many of the principles are useful. However, there is some repetition and they could be synthesised in five or six core principles, which could be more easily remembered and applied on a practical basis. The UK statutory framework, Te Whariki (New Zealand), the Finnish guidelines and Australia's early years framework all include between four and six clear, specific and memorable principles.

Section - The Early Learning and Development Areas

31. In order to be respectful and sensitive to the many users of the NCF who will speak English as a second language, it is important to use plain and familiar terms to describe the ELDAs. Although there is not a consensus on how early learning areas in ECD should be defined, international curricula appear to follow one of two trends. Learning areas are *described* using illustrative terms, along the lines of Wellbeing, Belonging, Contribution, Communication, Exploration (e.g. New Zealand, Ireland, Australia). This can be contrasted with learning areas that are *named* in literal language, using terms such as Social, Emotional, Physical, Communication, language and literacy, Cognitive, Mathematics, Expressive Arts and Design (Korea, UK and Ontario). These terms have been used to describe developmental areas in documents such as NELDS, and it is likely that ECD practitioners and practitioner educators will have a shared understanding of what they refer to. It is not clear why there should be a departure from this approach in the NCF. We recommend therefore that consideration be given to re-naming the first two ELDAs so that it is more apparent exactly what they are referring to.
32. Given that raising literacy rates is a critical and urgent challenge in South Africa, it is essential that the NCF is clear and specific about the fact that early language and literacy is a distinct learning area. The title of 'Communicating' does not achieve this. Internationally, the terms language and literacy are commonly used in early years curricula. For example: Language and Literacy (USA, Virginia); Communication and Language (UK); The role of Language in ECEC (Finland); Communication, language and literacy (Ontario); Language and Communication (Sweden); Communication, Language and Text (Norway); Communication (Listening, Speaking, Reading and Writing) (Korea).
33. Using clear terms which have a single and commonly understood meaning is not only more respectful to the NCF's audiences, but also:
- signposts learning goals and outcomes more obviously;
 - helps ECD practitioners to make links with and own their existing knowledge and understanding;
 - allows for clearer articulation with the CAPS subject areas for Grade R.

34. We have further concerns that this section demonstrates that the central role of language in all early childhood development and learning is not properly understood (see diagram in Appendix). The table on page 21 should link ‘Communicating’ to all NELDS desired results and CAPS foundation phase skills, as none can be achieved without early language and literacy competence. In this sense, early language and literacy skills are part of *how* children learn as well as *what* children learn – a distinction that is not drawn out in the draft NCF.

Section - Arrangement of the curriculum

35. We think that the structure and content of the curriculum needs careful reconsideration (see paragraphs 6-8 and recommendation E above). We commend the approach taken by many other countries, which simply include a short narrative summary of each ELDA or a page of bullet points on learning outcomes and what adults can do.

36. We are concerned that including ‘broad assessment guidelines’ in the NCF will cause considerable confusion for ECD practitioners when at the same time they are told that the development guidelines should not be used as a checklist. ‘Watch points’ would be better.

37. The names for different age ranges are not needed and could indeed send unhelpful messages. ‘Moving on’ and ‘advancing further’ should describe children at all ages.

38. It is common practice to have overlap between the different age groups to highlight both fluidity and individuality. For example:

Birth – 22 months

18 – 36 months (1½ years to 3 years)

30 – 48 months (2½ years to 4 years)

42 – 60+ months (3½ years to 5+ years)

Section - Well Being is the key learning area for the development of babies, toddlers and young children

39. We would recommend that DBE scrutinises the evidence base for this section. There is a real risk that it creates false dichotomies and detracts from important messages around the inter-connectedness and interdependence of all development areas. The OECD makes the following point:

“It is argued that high-quality ECEC settings are related to curriculum practice in which cognitive and social development are viewed as complementary and of equal importance. Such integrated curriculum is believed to contribute to high-quality ECEC and improved social behaviour. As an example, Sweden is considered to have high-quality ECEC in part because its curriculum contents place the same value on social and cognitive learning (Sheridan et al., 2009, Pramling and Pramling Samuelsson, 2011).”¹⁵

40. Furthermore, the definition of well-being both here and later misses out some vital ingredients of children’s well-being, including close, nurturing relationships and competent

¹⁵ OECD, 2012

language to communicate effectively and express needs and emotions. This is presumably because an attempt is being made to describe well-being as a distinct area. This highlights the problem of using a vague term with a broad meaning to describe one of the ELDA's.

Section - Using the Early Learning and Development Areas

41. The purpose of this section should be clarified as it currently covers a range of only loosely related themes.
42. This is the only place in the entire document where the term 'pre-reading and pre-writing skills' is used. We are not confident that the definition of these terms and how such skills relate to *early* reading and writing skills is properly understood, particularly in light of the inappropriate reading and writing examples in the water and sand play illustration.

KEY OMISSIONS

43. It is of some concern that at no point in the introductory sections is there a proper discussion of or dedicated sections on:

- **How children learn and develop, and effective pedagogical practices**
- **Learning environments**
- **The role of the family**

44. These topics are given understandable prominence in international curricula. ECD practitioners' misunderstandings about how children learn can create barriers to effective learning and development, while some teaching practices are actively harmful. As well as a describing the different ways in which children learn (play, exploration, routines, talking and questioning, participation and doing, repetition, songs and games), the NCF should offer clearer guidance on the appropriate balance between teacher-led and child-led activities and the respective roles of each. A large research study into why some pre-school programmes are more effective than others found that:

"the most effective pedagogy combines both 'teaching' and providing freely chosen yet potentially instructive play activities. Effective pedagogy for young children is less formal than for primary school but its curricular aims can be both academic as well as social and emotional... Children's cognitive outcomes appear to be directly related to the quantity and quality of the teacher/ adult planned and initiated focused group work."¹⁶

The NCF needs to foreground the importance of *learning* during the pre-school years and how this relates to school readiness and subsequent academic success. It should describe how learning at this age is a continuous and integrated process which happens across activities and experiences, and the key role that developmentally appropriate practice can play in promoting it. Linked to this, it is necessary to help ECD practitioners understand the importance of particular attitudes and behaviours for children's learning and development – e.g. persistence, concentration, self-regulation, motivation, curiosity, cooperation – and how they can nurture these.

¹⁶ Sylva et al, 2004

45. The Italian curriculum, Reggio Emilia, describes the environment as “the third teacher”. An effective NCF must provide guidance on the types of physical environments that enable and support children’s development and learning. This goes beyond safety and security, and also considers how spaces can be structured to stimulate movement and exploration, play and games in small groups, and self-initiated activities. Furthermore, the question of age-appropriate resources and materials needs to be addressed and encouragement given to improvisation in resource-poor environments, where some ECD practitioners may believe that the absence of certain resources precludes some forms of learning.
46. The draft NCF mentions the role of parents and carers in various places but we would recommend that there is a much stronger recognition and explanation of the pivotal role of the family. There should also be more practical guidance on how ECD service providers can partner intentionally and respectfully with parents and carers.

Section – Tables: Aims, developmental guidelines, examples of activities for ELDAs

47. We would argue that from page 31 onwards, the draft NCF ceases to be a framework and becomes inappropriately detailed and prescriptive. The long tables would sit more comfortably in a ‘Guidelines for ECD practitioners’ document. See also the earlier discussion (paragraphs 6-8) of how these tables give the appearance of seeking to be exhaustive and therefore encourage practitioners to use them as such, stifling innovation and local adaptation.
48. The volume of content further suggests that non-specialists have drawn up particular sections and do not therefore have the expertise to determine focus and priorities.
49. **Many of the suggestions in the ‘Examples of activities’ column are not clear or specific enough to be helpful.** For instance, “Provide opportunities for experiment with positions for example, top, down” does not propose an activity. ECD practitioners may know they need to provide such opportunities but do not know how to.
50. **The examples for activities include suggestions that are not developmentally appropriate for children in specified age ranges.** For example, for babies and toddlers, booksharing should be used to point to and name pictures rather than to “point out separate words and their shapes”.
51. **Examples of activities also contradict curriculum content for Grade R as specified in CAPS.** For example, ECD practitioners should not be told to, “provide name and object labels and paper and pencils for copying names and words”. Even in Grade R, Curriculum Advisors advise against children doing pencil and paper copying tasks, as this is considered too formal for this age group. In the period before Grade R, children should be experimenting with writing using scribbles, letter-like forms and invented spelling in dramatic play activities (e.g. pretending to write a phone message or shopping list using scribbles or invented spelling).

Theoretical framework and evidence base

52. The overall approach and specific content of this section are not in line with international best practice and the most up-to-date evidence. There are contradictions in the messages given about the teaching of early literacy skills, and many of the developmental guidelines and examples of activities are not age appropriate or are no longer seen as good practice.
53. The description of language and literacy reflects a particular theoretical view that is a minority approach among early language experts. The NCF defines reading as helping children to “make meaning by ‘reading’ what they see, hear, feel, taste and touch”. It is not clear why the NCF would adopt an approach to early language and literacy learning that is not a mainstream one and for which there does not exist a robust evidence-base.
54. While we acknowledge the value of a theoretical perspective on language and literacy that includes multiple forms of communication and multiple literacies, there is a danger that this detracts from a focus on how children develop core language competencies and move towards learning to read and write. Definitions of literacy from this theoretical perspective may offer interesting discussion points around the question ‘what is literacy?’, but they are not able to answer questions about how language and literacy are learned. They do not therefore easily translate into specific learning goals and practical activities for supporting language and literacy acquisition. Consider for instance the definition used in Australia’s curriculum, which is one of the few international curricula to take this approach:

“Literacy is the capacity, confidence and disposition to use language in all its forms. Literacy incorporates a range of modes of communication including music, movement, dance, story telling, visual arts, media and drama, as well as talking, listening, viewing, reading and writing.”¹⁷

This is in contrast to the clear and specific definitions of literacy used in other international curricula; for example:

“reading, writing and oral language abilities consisting of the following components: acquiring vocabulary and language, phonological awareness, knowledge of print, knowledge of letters and words, comprehension of meaning, awareness of story-telling, books and other texts, and seeing literacy as a source of knowledge, information and pleasure.”¹⁸

55. The NCF states explicitly that it is, “not useful to teach children to read and write. This is usually only begun in Grade One. The role of the ECD practitioner is to promote communication in all its forms from birth.” However, while formal teaching of reading and writing is not appropriate in the early years, there is a vast body of evidence showing that learning to read and write is a process that begins long before children start school.¹⁹ What ECD practitioners and families do in the early years is as important for the process of becoming literate as what a Grade One teacher will do, and part of an emergent literacy process. Yet the draft NCF reinforces the myth that it is the Grade One teacher that will

¹⁷ Department of Education, Employment and Workplace Relations (Australia), 2009

¹⁸ Best Start Expert Panel on Early Learning (Ontario), 2007

¹⁹ See for example, IRA and NAEYC, 1998, and Snow et al, 1998

teach children to read and write, thereby diminishing the potential role of quality ECD programmes in breaking cycles of underachievement and disadvantage.

Language-rich home and pre-school environments and opportunities to engage with books and other forms of print provide children with the foundations that Grade One teachers will build upon. For instance, talking with and responding appropriately to infants helps to extend their language and this in turn supports later literacy development. The process of literacy learning also encompasses behaviours such as sharing books and repeating nursery rhymes, pointing out environmental print to a three-year-old, encouraging a four-year-old to notice the different sounds in words and playing 'I spy...', and helping five-year-olds to learn the names of letters and represent ideas through drawing and early writing. Literacy learning should therefore be viewed as a continuum of development over time, beginning at birth, rather than something that happens at a fixed point. To this end, the NCF needs to explain clearly that building language and developing early literacy skills in the years between birth and five, are vitally important parts of the process by which children learn to read and write successfully.

56. The guidance is further confused by the fact that the terms reading and writing are often put in inverted commas because they are not being used strictly accurately. This is both misleading for ECD practitioners and fraught with problems from a pedagogical perspective. These terms should be used in their literal and commonly understood sense.

Inappropriate guidelines and activities

57. Without a coherent theoretical framework to guide the choice of indicators and activities in the tables, the examples contain contradictions, reflect outdated ideas and practices for literacy teaching and learning, and are sometimes not age appropriate. Having asserted that children should not be taught to read and write until Grade One, the document goes on to suggest a range of activities in the 'towards Grade R' phase that are in fact reading and writing tasks that would be more appropriate for older learners, e.g. "read high frequency words seen in the environment, for example, door, cupboard" and "teachers should make labels for various objects in the environment and play 'match the label and object' games."
58. Copying of words to teach writing and a 'look and say' approach to teaching reading are no longer accepted as good practice. These are rote learning activities and are contrary to effective pedagogy for young children. A coherent theoretical framework would guide the choice of activities to ensure prioritisation of those skills that are fundamental for children to learn to read and write successfully.
59. Quite a large proportion of the reading content focuses on concepts about print such as text direction and features of a book. While this is one aspect of becoming familiar with print, other skills that are shown to be predictive of successful literacy acquisition are neglected. In the writing section for the 'towards Grade R' age band, there is a suggestion to "continue to promote ball games", but space is not made for activities that have been shown to have a direct link to literacy development. For instance, pretend play is thought to foster children's emerging literacy skills through the use of complex language and higher levels of narrative structure, which in turn are linked to later reading comprehension and fluency. Play settings can be further enhanced by embedding literacy materials within them, encouraging children to experiment with literacy acts (such as writing a pretend

shopping list or reading a book to their doll) which show that they are beginning to understand what print is for.²⁰

Supporting mother tongue language learning

60. South Africa is a multicultural, multilingual country, and this presents particular challenges and opportunities around early language learning. The draft NCF does not adequately address this crucial issue nor provide any practical guidance for ECD practitioners on how best to support language learning in multilingual contexts (see for instance, page 34 of the Finnish curriculum guidelines).

61. While flexibility is needed for practitioners to respond to the linguistic context in which they work, some clear overarching guidance should be provided in the NCF. The following quote is from a US curriculum briefing and indicates the types of questions that the NCF needs to address:

“Do the children and families served by the program speak more than one language and have different cultures? If so, is the goal of the program to provide dual language instruction? Or, is it to acknowledge and support the home language as much as possible, but primarily teach English? This goal would generally be the case where many languages are spoken and it is not possible to have teachers who speak all of them or where bilingual teachers are unavailable. Alternatively, is the goal to maximize acquisition of concepts and oral language in the home language and teach English as a Second Language? Also, are there specific content or teaching methods that are best suited to the cultural backgrounds of the children? Decision-makers should check that the curriculum is compatible with the chosen language approach and provides the necessary supports, such as lesson plans in both languages or suggested materials that reflect the culture and language of the children.”²¹

²⁰ Best Start Expert Panel on Early Learning (Ontario), 2007

²¹ NIEER, 2007

Recommendations on language and literacy

- J. This ELDA should be renamed 'Communication, Language and Literacy'.**
- K. The DBE should adopt a theoretical framework that is informed by an emergent literacy perspective and acknowledges the vital importance of early language development for later literacy learning. This theoretical framework is essential for consistent communication from DBE about how children learn to read and write.**
- L. The content of the tables should be reviewed and reduced to ensure that:**
 - **suggestions are developmentally appropriate and priority is given to the core areas of early language and literacy learning.**
 - **guidelines and suggestions that are not consistent with an emergent literacy perspective are removed**
- M. Early language and literacy experts should be involved in revising the draft NCF, to ensure that the final document accurately reflects the evidence-base and what we know about how children learn language and literacy skills.**
- N. The NCF should directly address the challenges around early language learning in multilingual settings and provide clear guidance on a) how ECD practitioners can support mother tongue language learning even when they do not speak the language themselves, and b) at what stage it may be appropriate to introduce and support second language learning. Language experts should be consulted about best practice with regard to supporting multilingualism in ECD settings.**

Section - ELDA 5 – Creativity

62. While this ELDA is called 'creativity' it is then defined in the spider diagram almost solely in terms of problem-solving. Problem-solving is usually treated as a cognitive skill and sits more clearly under the Communication (reasoning) and Mathematics sections. Very little of this table relates to music, drama, dance and art. More importantly, it is mistaken, particularly at this young age to reduce the creative and visual arts to 'problem-solving' functions rather than treat them as valuable competencies and experiences in their own right.
63. Too many different ideas are being conflated in this section and as a whole it makes little sense. We have not come across anything comparable to it in other international curricula. Most of the guidelines and activities in it should be re-distributed to other sections. If it is felt that an ELDA for creativity is still needed, it should reflect and describe the importance of the visual and creative arts in their own right.

Section - ELDA 6 – Knowledge and understanding of the world

64. Similar to the section on 'Creativity', this section seems again to point to a confusion about the distinction between *how* children learn and *what* children need to learn. Much of this content would be better placed in the mathematics table and in a new narrative section on how children learn and develop.

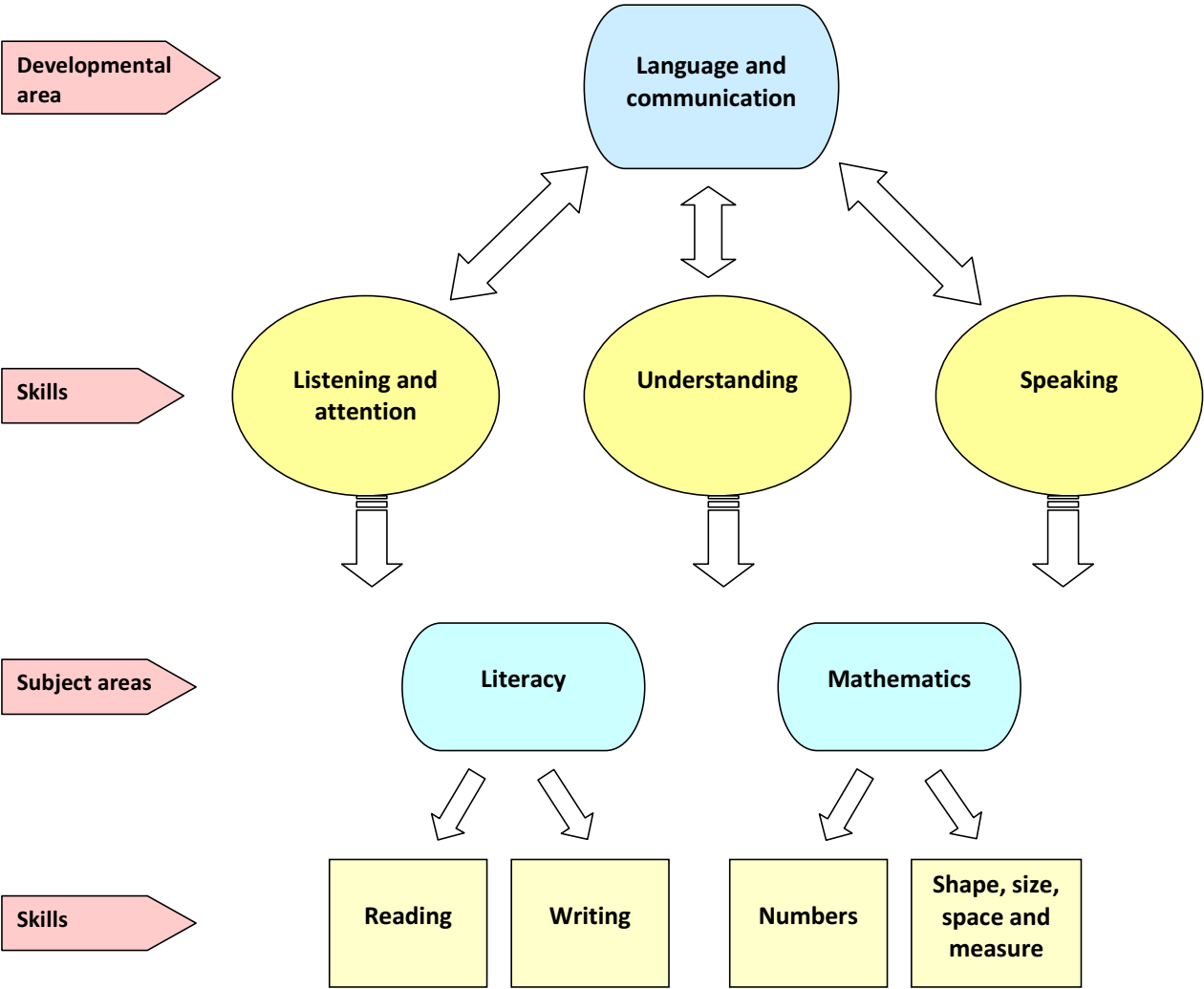
Section - Assessment of each child's developmental needs and learning interests

65. This section appears to contradict the earlier statements that the NCF is neither a checklist nor meant to be prescriptive. Furthermore, the guidelines on assessment do not recognise the realities around capacity, resources and skill levels of many ECD practitioners. This section should be re-written once the policy goals, practical uses and audiences of the NCF have been revisited and agreed.

Appendix

The essential role of language in early learning

Based on the conceptual framework for the UK's *Early Years Foundation Stage Framework* (Department for Education, 2012) and accompanying guidance for practitioners (British Association for Early Childhood Education, 2012).



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