

Response to the Department of Social Development's Draft National Policy on Early Childhood Development

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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 four South African provinces. 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 and literacy teaching and learning in the years before school. Our comments below are focused on those parts of the draft policy where we feel we can bring our experience and knowledge to bear.

Wordworks has produced a number of publications that are relevant to this consultation and that are available at www.wordworks.org.za:

- *Narrowing the Literacy Gap: Strengthening language and literacy development between birth and six years* (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)
- *Policy briefings: Early language and literacy learning* (three briefings on the why, what and how of early language and literacy learning) (Rebecca Hickman and Shelley O'Carroll, 2013)
- Early literacy poster (a new resource providing parents and ECD practitioners with key information and practical ideas on how to support early language and literacy learning) (Rebecca Hickman, Shelley O'Carroll and Brigid Comrie, 2015)

General comment

Wordworks welcomes the publication of the draft National Policy on Early Childhood Development. It is a thoughtful, comprehensive and rigorous document and, if implemented, will provide a strong framework and foundation for rapid progress towards improved outcomes for young children. We particularly welcome the strong emphasis throughout the Policy on providing comprehensive support for parents and caregivers. Following this consultation, we urge the Government to adopt the policy swiftly and allocate the necessary resources and capacity for early implementation.

(NB The page numbers below refer to the page numbers at the bottom of each page of the gazetted policy, which are not the same as the page numbers at the top.)

	DOCUMENT REFERENCE (Heading, paragraph, page number)	PROPOSAL <i>(Clearly state the comment, input or proposal that you propose)</i>	REASON FOR THE PROPOSAL <i>(Motivate why you made the proposal in the previous column)</i>
1	Definitions and Glossary of terms, pp 14-17	Add a definition for ‘... appropriate’ and ensure consistency throughout the Policy.	<p>The following terms are used largely interchangeably at different points in the draft Policy – ‘age- and stage-appropriate’, ‘developmentally appropriate’ ‘age and developmentally appropriate’, ‘age- and development-stage appropriate’. Other variations include ‘age-, stage- and needs-appropriate’ (p47) and ‘age-, stage- and context-appropriate’ (p61).</p> <p>We recommend that a standard term is agreed and used throughout and explained in the Glossary. The term ‘appropriate’ on its own may be sufficient and suggest a more balanced approach that a) does not rest on the developmentalist view of the early years, and b) reflects a wider understanding of the different personalities, preferences and needs of children who may ostensibly be at the same age or stage.</p>
2	Definitions and Glossary of terms pp 14-17	Add a definition of the term ‘early literacy’. This might be: ‘the skills, understanding and behaviours of young children that develop into conventional reading and writing’.	The notion of early literacy is largely absent from the draft Policy and should be explicitly included and explained (see further comments in point 33 below).
3	Definitions and Glossary of terms pp 14-17	Clarify definitions of parents, caregivers and primary caregivers.	The use of the terms ‘parents’ and ‘caregivers’ are not entirely consistent and this may cause some confusion (see also point 6 below).

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4	1.1 The purpose of the national ECD Policy p18	Include some explanation of who this policy is for and how it is anticipated it will be used.	Given the significant level of detail in the draft Policy, it would help to clarify at the start a) the extent to which as a practical planning/delivery tool the document is for policy-makers only or for a wider set of ECD stakeholders, b) who will 'hold' the Policy post-adoption and before the new institutional arrangements are in place.
5	1.2.2.3 ECD restores risk/protective balance p22	Include a clearer explanation of the importance of quality ECD services for individual wellbeing, social and emotional adjustment, and self-actualisation.	The list on p22 has a utilitarian focus. We would recommend that this is balanced by including a more explicit reference to the role of ECD services in ensuring individual wellbeing and self-actualisation. In other words, making the point that if none of the outcomes in points 1-6 were achieved, ECD services would still be a social good.
6	1.3.3.1 Parenting support and education p27	Use the term 'parents and caregivers' instead of 'parents' consistently throughout the draft Policy.	In a country where many children are orphaned and do not live with one or both of their birth parents, and there are many atypical child-rearing arrangements, it may be more inclusive and appropriate to use the term 'parents and caregivers' throughout. The draft Policy frequently refers to 'parents' where in practice a wider group of caregivers would be involved than those falling under the definition of 'parents' in the Glossary. To add to the confusion, at certain points in the document the terms 'parents and other caregivers' and 'parents and primary caregivers' are also used.
7	1.3.3.1 Parenting support and education p27	Include an explanation of the importance of healthy attachments for optimal child development.	Stable and nurturing relationships provide the anchor for early learning and development. Because healthy attachments with adults and other children are fundamental in the creation of brain architecture, they not only promote wellbeing, resilience and social success, but have also been shown to be linked to cognitive and language development and later academic achievement.

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8	1.3.3.7 Early learning support and services p29	Delete or amend the following sentence: 'Although attending preschool is, by and large, the most important variable explaining children's performance in their first year at primary school, education begins much earlier.'	This statement is only partially supported by the evidence. Various studies, including the large-scale, longitudinal EPPE study in the UK, have suggested that preschool provision must be <i>of high quality</i> in order for positive effects to be achieved and sustained, particularly for children from disadvantaged backgrounds (Sylva et al 2004). Studies have found that children in low quality preschool will show slower language development than children not in preschool (Melhuish 2004) and even suffer detrimental outcomes (OECD 2012). Furthermore, there is evidence that the home learning environment is a stronger predictor of primary school performance than preschool attendance (Sammons et al 2007) and that other background characteristics can have a greater impact on child outcomes than preschool factors (US NICHD 2002).
9	1.3.3.7 Early learning support and services p29	Use the term 'early learning' or 'early learning opportunities' rather than 'early education', here and elsewhere in the draft Policy (e.g. 5.1, p59).	We would suggest the terms 'early learning' and 'early learning opportunities' are preferred to 'early education' and 'early education services' (while recognising the specific usage of the term Early Child Care and Education (ECCE) services). Early education is more susceptible to being misunderstood as formal, didactic-style teaching and isolated skill development – or an extension downwards of school. It is also more likely to be taken to refer to discrete services or activities run for children. Early learning, on the other hand, is a broader concept, implying something that is continuous and embedded in children's everyday experiences and encounters – sometimes mediated by adults and sometimes child-led and spontaneous. Using one term, which is explained in the Glossary, will introduce further clarity and consistency to the draft Policy.

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10	1.3.3.7 Early learning support and services p29	Add an explicit reference to the importance of a play-based approach to early learning.	This is linked to the previous point and the importance of increasing understanding of how children learn in the early years. It is necessary to emphasise that play and learning are not separate activities, particularly in the eyes of a child. This will also help to reinforce the play-based approach advocated in the new 0-4 National Curriculum Framework (NCF).
11	1.3.3.7 Early learning support and services p29	Add an additional bullet point: 'Developing and ensuring wide access to a range of user-friendly, culturally appropriate programme guidelines and learning materials, which are meaningful and accessible to all ECD practitioners and capable of local adaptation.'	The absence of appropriate learning materials to aid learning, stimulation and language development in homes, preschools and community settings is noted elsewhere in the draft Policy. The provision of programmes (as outlined in the second bullet point in this section) does not necessarily imply that this gap is filled, and it is recommended that this point is made explicit.
12	1.3.3.9 Play and recreational facilities p29	Introduce and explain the idea of children's <i>need</i> to play (which goes beyond their right to play, and beyond play as an instrument of learning).	Playing is what children do naturally and happily, and how they make sense of their world. In this sense it is intrinsic not only to early learning, but also to children's wider wellbeing and emotional and social development.

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13	3.7 Early learning and care p45	Make less and careful use of the notion of school readiness, both here and elsewhere in the draft Policy (e.g. 3.10).	It is contentious and not universally accepted to suggest that the primary focus of early stimulation should be to support school readiness. There are three problems: Firstly, that this approach emphasises childhood as a preparation phase rather than a valuable period in its own right. In other words, facilitating early learning should not only be seen as a means of achieving other outcomes but also as something that children enjoy and have the right to benefit from. Secondly, that this approach assumes that it is right that pedagogy should change significantly once children start school (and that this is what children need to be 'ready' for). This is however increasingly being questioned (Hofkins and Northen 2009), while the value of continuing playful, child-led learning during the Foundation Phase in school is being argued for. Thirdly, there is a risk that a constant emphasis on school readiness shifts the focus from the importance and responsibility of primary schools to be 'ready' to support and teach all children, whatever their stage at entry.

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14	3.7 Early learning and care p45	<p>Include the following key points in this situational analysis:</p> <ul style="list-style-type: none"> - The problem of an under-trained, low status workforce. - The absence of user-friendly, culturally appropriate programme guidelines and learning materials, which are meaningful and accessible to low-skilled ECD practitioners and capable of local adaptation. 	<p>The central problem of the low skill levels of many ECD practitioners is noted elsewhere in the draft Policy and it would be useful to highlight it here as well.</p> <p>A major challenge in the current delivery of early learning programmes is the huge conceptual and implementation gaps between high-level documents, such as NELDS and the draft 0-4 NCF, and on the ground resources and realities. There are two urgent tasks in this respect: Firstly, to translate the high-level documents into simple, user-friendly guidelines and toolkits accessible to ECD practitioners of all skill levels. These should be non-prescriptive and capable of local adaptation. In the absence of these, ECD practitioners continue to receive either no accessible guidelines or fragmented messages from different sources which can result in misunderstanding and inappropriate practice (for instance, the emphasis on having a ‘daily programme’ resulting in children sitting doing nothing in an empty room rather than playing with toys during a part of the day that is not designated ‘play time’). This also means that ECD practitioners continue to have limited understanding about <i>how</i> children learn in the early years – that this is something continuous and integrated into every part of their day rather than a separate formal activity.</p> <p>Secondly, there is a need to increase access to a range of culturally and locally appropriate learning materials to support implementation. At present, the absence of these creates a significant barrier to effective practice.</p>

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15	3.7 Early learning and care p45	Explain more clearly the phenomenon of informal crèches and day-care.	<p>Large numbers of children in South Africa attend informal, unregistered day-care or crèches. These are often ‘hidden’, located in highly impoverished settings, with children squashed into small spaces that are sometimes rented for the specific purpose or sometimes double up as a home. They may or may not be known to any statutory services. This kind of ECD setting falls somewhere between the definitions of ‘centres’ and ‘child-minders’ in the draft Policy. They are indicated in the final paragraph of this section, but go beyond this description in that they are usually for children aged up to five years and are run as businesses (insofar as parents must pay). The imperative for parents and caregivers in placing children in these settings is often an economic one – they need somewhere affordable for their children to stay while they work.</p> <p>This type of ECD setting is ubiquitous in South Africa’s disadvantaged communities yet it is not properly described or addressed in the draft Policy, possibly because it does not neatly fit within any official definition and because it gives rise to difficult questions around compliance and enforcement. It presents a massive challenge because of the simultaneous poor quality of care often provided and urgent need for these day-care places.</p>

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16	3.9 ECD information and communication p46	Move the key messages on the role of early language to 5.4.3.	<p>The inclusion of these important messages around language for literacy is to be welcomed but they are oddly situated in this section. It would make more sense for them to be included in 5.4.3.</p> <p>There also appears to be conflation in this section between providing information to parents and caregivers on how they can support language development, and delivering communications activities that directly reach children to support language development through, for instance, stories and radio shows. These are quite separate issues and tasks and we would suggest that they are separated out. This would also help to bring this section into line with 5.2.5.</p>
17	3.10 Gaps in the current ECD system p47	<p>Clarify what difference, if any, there is between the first, fourth and fifth bullet points.</p> <p>Explain what is meant in terms of the development of ECD programmes (fourth bullet point).</p>	<p>These points seem to duplicate each other.</p> <p>In terms of ‘the development of ECD programmes’ (which is also referred to elsewhere in the draft Policy) it would be useful to understand better what is meant by this as it can be interpreted in a variety of ways. Does it mean developing curricula? Designing daily programmes? Developing overarching programme guidelines? Developing whole models that cover all structural and content considerations? Developing materials that can be used with a range of curricula? Does it mean providing something that is flexible and optional or prescriptive and compulsory?</p>

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18	3.10 Gaps in the current ECD system p47	Include in this list user-friendly, culturally appropriate programme guidelines and learning materials, which are meaningful and accessible to low-skilled ECD practitioners and capable of local adaptation.	The absence of appropriate learning materials to aid learning, stimulation and language development in homes, preschools and community settings is noted elsewhere in the draft Policy. The lack of these creates a significant barrier to effective practice.
19	3.10 Gaps in the current ECD system p47	Include in this list a reference to incremental measures that will improve the experiences and conditions of the many children in informal, often invisible, day-care settings, which are not seeking or are some distance from registration, including conditional registration.	While it is right for the ultimate goal to be the registration of all ECD facilities, the draft Policy should also embrace the principle of incrementalism – gradual steps that government can take to bridge the gap between the reality and the ideal. These steps are alluded to when conditional registration is discussed later in the document, but it is likely that many informal day-care settings are some way off even conditional registration (for instance, those with no running water or toilet facilities on site). It will be a significant gap in the draft Policy if it does not address what incremental support and improvement for these kinds of very basic ECD settings might look like. (See also point 15 above.)

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20	4.6 National ECD principles Point no.9 – Appreciative promotion of existing resources and knowledge p54	Expand on and strengthen point no.9.	<p>In a multi-cultural, multi-lingual country where there is a significant risk of displacing local assets, knowledge and practices with ‘imported’ ECD strategies and Euro-American understandings of childhood, the draft Policy needs a much stronger statement of how indigenous beliefs, knowledge and practices will be valued. In particular, the draft Policy should make clear that plurality rather than uniformity is likely to be key if we are to properly reflect and respect the heterogeneous communities and settings in which ECD interventions will be implemented. Failure to do this in a meaningful way will work against the development of ECD services and strategies that are owned by and integrated into communities and therefore sustained over time.</p> <p>The reference to ‘beneficial indigenous and local ECD practices’ gives rise to the fraught question, who decides what is beneficial?</p> <p>For further explanation of the importance of facilitating the development of indigenous ECD programmes and blending cultural beliefs and practices with evidence-based approaches, see <i>inter alia</i>, Marfo at al 2008, Nsameng 2008 and 2010, Pence and Marfo 2008, Pence 2004, Awopogba, Oduolowu and Nsameng 2013, Prochner and Kabiru 2008, OECD 2012, and Engle et al 2007.</p>

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21	5.2.3 Parent support programmes Objective 1 p60	Replace: To provide pregnant women and parents with the information and skills necessary to better parent their young children with: To provide parents and caregivers with the information, skills and understanding to support the optimal development of their children and to create healthy and stimulating home environments.	The phrase 'to better parent' should be made clearer and more specific, as the notion of good parenting can be understood and interpreted in different ways.
22	5.2.3 Parent support programmes Obj 1 and Ind 2 p60 and 5.4.1 Support for pregnant women and children under 2 years of age p65ff	Replace references to 'pregnant women' here and elsewhere in the draft Policy with 'expectant parents'.	The references to 'pregnant women' here and in other places in the draft Policy imply that mothers alone bear responsibility for ensuring a healthy pregnancy and preparing for parenthood during the pre-natal phase. While there is a significant problem with absent fathers in South Africa, the implicit gender bias in this kind of language arguably makes the problem worse. It is important to emphasise that both parents share responsibility for a successful pregnancy and for preparing for parenthood, both in the language used in official policies and in how interventions are designed and communicated. The word 'father' is used just four times in the entire draft Policy, while the word 'mother' is used 72 times. Section 5.4.1 does not mention fathers or other primary caregivers at all.

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23	5.2.4 Opportunities for learning p61	Include an explicit reference to a play-based approach.	An explicit reference to a play-based approach is needed for the reasons set out in points 10 and 12 above, including making links to the 0-4 NCF. We welcome the clear and specific references to language development in this section.
24	5.2.4 Opportunities for learning p61	Standardise ‘... appropriate’ terms.	In a short space, this section includes references to ‘age and developmental-stage appropriate’, ‘age-, stage- and context appropriate’, ‘age- and context-appropriate’, ‘age- and needs-specific’. We recommend that the language is standardised. (See also point 1 above.)
25	5.2.4 Opportunities for learning Obj 4 p61	Separate objective 4 into three distinct objectives – one around skills and training, one around physical infrastructure, one around materials and guidelines.	Skills and training, materials and guidelines, and physical infrastructure are three quite distinct areas, each with a different set of challenges and requiring different and targeted strategies emanating from different government ministries. It may be clearer therefore if they were separate objectives.
26	5.2.4 Opportunities for learning Indicators p62	Add indicators on: - availability of user-friendly, culturally appropriate programme guidelines and learning materials - numbers of qualified ECD practitioners	While training and materials are included in the ninth indicator, they are combined with other quality indicators to be measured <i>at the point of delivery</i> . Given that these are both such crucial issues and that there is a tendency for funding to follow indicators, it may be worth creating separate indicators that address both these areas <i>at the point of supply</i> . This would enable early progress towards wider availability of both appropriate materials and qualified practitioners to be measured, and in the longer-term to differentiate between the problems of lack of supply and lack of take-up.

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27	5.2.4 Opportunities for learning Indicators p62	Add indicator on incremental improvement of informal crèches and day-care settings.	See points 15 and 19 above on the importance of explicitly addressing the experiences and conditions of the many children in informal, often invisible, day-care settings, which are some distance from registration, including conditional registration. While to some extent, their situation could be addressed under the ninth indicator, assisting these facilities should be a sufficiently high priority to merit a separate indicator with the consequential focus and resources this will bring.
28	5.4.3 Provision of universal developmentally appropriate early learning opportunities p68	Amend: Every child enters Grade R primed to be able to learn well because the emotional, social, language, sensorimotor and cognitive building blocks are in place; to: Every child enters Grade R with the emotional, social, language, sensorimotor and cognitive building blocks in place to continue to learn successfully.	The use of the term 'primed' is not appropriate or clear. The current wording could also be misinterpreted as meaning that learning begins in Grade R.

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29	5.4.3 Provision of universal developmentally appropriate early learning opportunities List 1-7 p69	Include new point on measures to ensure the incremental improvement of informal crèches and day-care facilities.	See points 15, 19 and 27 above on the importance of explicitly addressing the experiences and conditions of the many children in informal, often invisible, day-care settings, which are some distance from registration, including conditional registration. This kind of ECD setting falls somewhere between the ‘early learning centres’ and ‘child-minding services’ referenced in this list. Unless their situation is explicitly addressed it is likely that the many children cared for in these settings will continue to experience poor outcomes.
30	5.4.3 Provision of universal developmentally appropriate early learning opportunities p70	Correct this sentence and clarify subsequent paragraph: ‘There is a worldwide trend to make one to two years of pre-primary education compulsory.’	This paragraph seems to confuse <i>universal availability of and entitlement to</i> pre-primary education with <i>compulsory</i> pre-primary education. The trend referred to is towards the former – universal availability. The example given of the UK is a case in point – neither of these pre-primary years is compulsory.
31	5.4.3 Provision of universal developmentally appropriate early learning opportunities p70	Include appropriate pedagogy in the list of principles.	Pedagogy refers to the interactions, opportunities and environments that facilitate children’s learning. In the early years, it includes considerations around the balance of child-initiated and teacher-led activities, plentiful opportunities for ‘sustained shared thinking’ (Sylva et al 2004), and the careful use of scaffolding to extend children’s understanding. There is much research on what constitutes effective pedagogy in the years before school and this would be an appropriate place in the draft Policy for this important area to be referenced.

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32	5.4.3 Provision of universal developmentally appropriate early learning opportunities p71	Update references to 0-4 NCF to include need for simple, accessible practice guidelines to accompany the final version.	We strongly agree with the points made here on the draft 0-4 NCF, and note that the final 0-4 NCF would have benefited from further reflection and refinement in the light of the draft Policy. We share concerns that in its current form, the 0-4 NCF is not an accessible or useful document for practitioners, and we hope that under the auspices of the new ECD Policy, DSD will work with DBE to ensure that much simplified practice guidelines are made available.

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33	5.4.3 Provision of universal developmentally appropriate early learning opportunities p72	Amend: ‘- Language development and storytelling; - Play, creativity, critical thinking and exploration; and - Development of the concepts of reading, writing and mathematics.’	<p>We suggest that the first bullet point is: ‘Language development and early literacy’</p> <p>Early literacy encompasses a number of different strands including vocabulary and comprehension, narrative skills, enjoyment of books and print, print awareness, drawing and emergent writing, awareness of sounds in words, and letter knowledge. It is potentially unhelpful to elevate ‘storytelling’ above the other early literacy strands and we are not aware of evidence that would support this.</p> <p>The notion and importance of early literacy deserves more focus in this section. We would also suggest therefore that the strands of early literacy listed above are outlined in the preceding narrative, perhaps alongside the language/literacy description from 3.9.</p> <p>The phrase ‘concepts of reading, writing and mathematics’ is unclear. Early language and literacy skills and understanding are the building blocks of reading, writing and mathematics, so this would imply some overlap with the first bullet point.</p> <p>The second bullet point should include a broader reference to the full range of self-regulation competencies, of which critical thinking is just one (for instance, concentration, mental flexibility and self-control).</p>

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34	5.4.3 Provision of universal developmentally appropriate early learning opportunities	Add references to the need for flexibility and for culturally and locally appropriate programmes.	In general, section 5.4.3 would be strengthened by reference to the fact that a ‘one size fits all’ approach to ECD programme design is unlikely to be successful and that flexibility and local adaptation are likely to be the key to creating programmes that are appropriate and effective. (See also point 20 above.)

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35	5.4.5 Public communication about the value of ECD and ways of improving children's Resourcefulness Points no4 and no1 p75	Clarify the references to storytelling and give greater prominence to the need to promote parental talk.	<p>It is unclear whether storytelling is being suggested as a method for communicating key messages to children, or whether the focus here is on promoting the importance of storytelling to adults. If the latter, we would question why storytelling is being elevated over parental talk – particularly in resource-poor contexts where parental talk is likely to be one of the most accessible and effective strategies for improving early language competence.</p> <p>Studies show that the quantity and quality of talk between adults and infants is key to early language development and learning (Hart and Risley 1999, NIEER 2006, Rosenkoetter and Barton 2002, Regalado et al 2001). It also contributes to a close, responsive bond between adult and child. Parent talk with infants and young children has therefore been the focus of national campaigns in countries like the UK and Tanzania.</p> <p>While storytelling supports early language and literacy development, it is one of many forms of talk. Giving babies and toddlers words and naming things that interest them, extending children's language by adding to what they say, asking and answering questions and giving explanations, are all aspects of 'talk' that are critical to language and literacy development.</p> <p>We recommend that if <i>methods and activities</i> for fostering early language are going to be referenced in the ECD Policy, encouraging talk should be highlighted as a key strategy, and attention given to the importance of information and communication around this.</p>

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36	5.5 The Essential Package of Services Point no3 p76	Amend reference to 'pre-literacy skills' to 'early literacy skills'.	'Pre-literacy skills' is an unclear term that is generally not preferred in the literature. It does not suggest the continuum between these skills and early reading and writing that 'early literacy skills' implies. There is also the risk that adults working with young children focus on developing 'skills' before children are allowed to experience real reading and writing. Behaviours of young children such as pretend reading, noticing letters in environmental print, scribbling and doing invented spelling, playing games with sounds in words, are all early literacy skills and part of an ongoing process of learning to read and write.
37	7.3 The establishment of an effective national multi-sectoral ECD coordination mechanism p93ff	<p>While we do not wish to make detailed comments on the proposal for a National ECD Agency, we would like to make the observation that there is a real risk that by creating a separate bureaucracy, crucial resources and skills will be invested here to the detriment of the urgent needs of DSD and DBE.</p> <p>We suggest that further serious consideration be given to locating the agency (perhaps as a unit) within DSD or DBE to ensure that resources and skills are not unintentionally diverted from these departments.</p>	<p>A new agency of the type proposed will have significant resource requirements. Not only will it mean focusing considerable energy and time on the creation of the agency, over time it is also likely to mean that it competes with DSD and DBE for ECD expertise and resources, in a country where there is a shortage of both. If provincial and district arms are created, the same detriment could be suffered at local level.</p> <p>It is not clear why national departments are more likely to co-operate with a separate agency than they are to co-operate with each other, particularly when all the major funding will still be channelled directly through the departments. This seems to be attempting to address an operational and cultural issue with a structural solution.</p>