

**7 October 2015**

## **1. Context**

We welcome the Committee's Report, and we congratulate the Education and Culture Committee on thoroughly considering the educational experiences of pupils with a sensory impairment. We also commend the positive contributions of the Scottish Government, local and national agencies and other participants that took part in the Inquiry proceedings. The contributions ensured the Inquiry was focused on solutions and achieving our shared aspiration of closing the education attainment gap for every child in Scotland.

## **2. Summary**

- We agree that the main areas highlighted by the Committee are key to closing the attainment gap: limitations of attainment data; models of educational provision; workforce planning; adaptations; leaver destinations.
- We propose another key area, which has not been covered within the report, is the provision of early years support for deaf children and their families.
- We propose that a multi-sector implementation group could be set up to support action to be taken forward from the Committee's report.
- NDCS also recommends that children and young people with a sensory impairment are consulted on the Committee's findings and play a key role in shaping the next stage of implementing its recommendations. NDCS would be very committed to supporting deaf children and young people's participation in this process, whether through a young person's version of the report and/or a consultation process.

## **3. NDCS' views on Committee's Recommendations**

### *3.1. Limitations of attainment data*

- We agree that the limitation in data about deaf learners is twofold:
  - There is a lack of consistent and comparative attainment data across Scotland due to the different measures used by individual local authorities – meaning a lack of understanding of the outcomes of deaf learners
  - There is a lack of data about numbers of deaf learners due to inconsistent data collection – undermining the ability of local and national authorities to plan and commission services effectively
- We agree with the Committee's recommendations that improvements in data collection are required in order to improve our understanding of the level of need. We recommend this could involve:
  - Rolling out Local Record of Deaf Children Pilot nationally, following a successful trial at the local level in Tayside and key IT barriers now having been overcome;

- Exploring ways to make national data collection more robust including possibilities of surveying education authorities and expanding fields within the current Pupil Census.
- We fully agree that standardised assessments should be made fully accessible to pupils with a sensory impairment. NDCS agrees that in order to understand progress made towards closing the attainment gap consistent attainment measures are crucial. The translation and interpretation of assessments will be crucial for deaf learners, as will data collection that will allow the attainment outcomes of deaf learners to be effectively understood.

### *3.2. Models of education provision*

- We agree with the Committee that the decision about where a child attends school should be child-centred and based on their needs. We also agree that the resource base approach is often successful, and this message certainly came through from pupils talking about their own positive experiences at the Deaf Learners Conference. However, currently less than half of local authorities in Scotland have a resource base. In order for resource base provision to be a genuine option for more deaf learners, more resource bases would need to be established. To achieve at least one base per authority, investment and restructure would be required. NDCS understands that 10% of deaf pupils are in a resource base, compared with 80% who are in mainstream schools. As such it is also critical that peripatetic services and schools are supported to promote positive outcomes for the deaf pupils they work with.
- In relation to sharing effective practice, NDCS would welcome the opportunity to support Education Scotland in this function through communications with our professional membership (which includes teachers, early years workers, audiologists and many other professionals working with deaf children and their families). Particularly, in relation to the Learning Conversation that was held by Education Scotland in March 2015, we would welcome the opportunity to share any subsequent report that was produced.

### *3.3. Number of qualified teachers*

- NDCS agrees that work should be carried out to ascertain whether there are sufficient numbers of Teachers of the Deaf (ToDs). We note that this area of work will need to go hand in hand in with the work referred to earlier with regards to number of deaf learners and their attainment outcomes. It will not be possible to determine if there are sufficient ToDs through consideration of their numbers in isolation. NDCS would like to ensure that the Committee and other agencies are fully aware of the work already being carried out by the Consortium for Research into Deaf Education in this regard. An annual survey has been carried out in Scotland into numbers of ToDs in 2010, 2012, 2013 and 2014. We would welcome the opportunity to share these reports and suggest future work may want to build on this existing framework.

### *3.4. Qualifications of teachers*

- We agree with the Committee that it is not acceptable that some deaf learners currently have a higher level of British Sign Language than some of the professionals who teach them. We also agree that in more complex subjects it is particularly important that professionals working with deaf pupils have an appropriate level of sign language. A Level 3 qualification is far better than Level 1 in terms of addressing these issues. Looking ahead to the future of British Sign Language in Scotland, ensuring there are appropriately qualified teachers is crucial to gaining equal status of British Sign Language and ensuring deaf children have a real choice to use British Sign Language in school.
- However, NDCS is aware of the possible implications that raising the minimum qualification could have for the current cohort of ToDs. Unless education authorities fund the costs of the course and training time for teachers, the new minimum could deter practitioners from training to become a ToD. It is currently the case that some ToDs are not funded by their authority to meet the current minimum of Level 1, therefore self-funding until Level 3 would be a financial commitment many would be unable to make. In addition, in rural authorities where there are only one or two ToDs, the time needed to put those individuals through Level 3 may have significant implications for the service.
- There are of course ways these challenges could be overcome and the aspirations of closing the education attainment gap and the British Sign Language (Scotland) Bill can be achieved. For example ensuring that all ToDs in the first instance meet the current minimum of Level 1 is an important starting point. As is ensuring all services have a ToD with Level 3 (or access to this via reciprocal agreements with other authorities), this is currently not the case for 71% of peripatetic services. A phased, and fully funded introduction of a new minimum Level 3 qualification would be essential to ensure the policy did not have unintended consequences on the current specialist workforce.
- We also need to fully understand the numbers of deaf learners required support BSL, current data suggests 3% of deaf children solely use British Sign Language (BSL), around 12% use sign language in combination with another language and 0.6% use a sign system other than BSL. Further investigation is required to ensure we have an accurate picture of the language preferences and need of deaf learners. Workforce planning will then be required to ensure the limited resources of education authorities are employed in a way that effectively meets this need.
- We agree with the Committee that teaching standards for ToDs should be routinely assessed. The registration of ToDs with General Teaching Council for Scotland would be an important step to help deliver this.
- In addition, the inspection of peripatetic services for deaf learners is also crucial to observing practice and experiences directly, focusing on outcomes and impact. We understand that while Education Scotland has inspected peripatetic services in the past this does not routinely happen and there is therefore scope to develop this. Over the last two years, we have identified two inspection reports which look specifically at the issue of peripatetic services for deaf learners. However we would welcome further information if this assessment is inaccurate.

- The absence of any national standards or expectations around delivering peripatetic service can also lead to local disparity. NDCS recommends that refreshing the [Count Us In: achieving success for deaf pupils guide](#) (produced in partnership between NDCS and HMIE in 2007) could help provide a relevant, consistent framework which would support Education Scotland to achieve the assessment of teaching standards. NDCS recommends that this framework would also establish expectations around self-evaluation and peer review among peripatetic services to help assess teaching standards.
- An example of inconsistent practice in Scotland that NDCS is aware of is around eligibility criteria for support from peripatetic services. Some services directly support all levels of hearing loss, while some services do not support children with unilateral or mild hearing loss.
- An example of effective practice in Scotland that NDCS is aware of is regional commissioning across three authorities which allows the peripatetic service to ensure an even spread of support across a very rural region. This service is able to provide direct support to very high proportion of deaf children who belong to that area.

### 3.5. Adaptations

- NDCS welcomes the Committee's recommendation that the possibility of "distance learning" is piloted to establish whether this approach would have benefits for pupils required high quality teaching in BSL.
- NDCS also welcomes the Committee's reflections about acoustics standards. While we understand that school builds are complex, we strongly feel that acoustics should be considered as a fundamental aspect of any school build. Good acoustic environments support the learning of all children, not just those who are deaf. Making the appropriate adjustments at the earliest stage of a school build also prevents more costly and disruptive adaptations from being required later on. We would urge the Minister to consider following best practice in other parts of the UK by making the Buildings Bulletin statutory in Scotland so that future schools in Scotland will have sound acoustic environments for all children to learn.
- In addition, we would like to ensure the Committee and other agencies are aware of the resources NDCS have to offer in relation to acoustics:
  - Resources for education professionals: including tips on how to create good listening environments, and a powerpoint presentation for ToDs to use with mainstream professionals
  - Advice for Headteachers, property managers and local authorities
  - Quality Marks self-accreditation scheme
  - Information for parents
  - Surveys for schools to use with pupils to collect their views on their listening environment
  - Video resources, including sound simulation so that teachers can hear what a classroom with poor acoustics sounds like for deaf children, and understand the difference good acoustics can make.

- All resources available here:  
[http://www.ndcs.org.uk/professional\\_support/our\\_resources/acoustics.html](http://www.ndcs.org.uk/professional_support/our_resources/acoustics.html)

### 3.6. *Leaver Destinations*

- We agree with the Committee that confidence building lessons should be included in the curriculum for sensory impaired pupils. This is easier to deliver in resource bases or clusters of schools where a number of deaf children are based. However, in mainstream settings, where there deaf learners are spread across lots of schools getting a group together to deliver tailored confidence building lessons is challenging. NDCS currently trains teachers to deliver our Healthy Minds programme, which focuses on building confidence, resilience and self-esteem among deaf children and young people. We have much learning available from the practitioners who have overcome barriers to successfully deliver the training to deaf children and we would welcome the opportunity to share this information with appropriate agencies.
- Further, we agree with the Committee's recommendation that more data is required about the experiences of deaf learners after they leave school. We welcome the announcement that SDS will be looking at expanding data collection in this regard.

## 4. **Omission from Committee's Report**

### 4.1. *Early years provision*

- We have noted that early years provision for deaf children and their families and carers is not directly addressed within the Committee's Report, although this was discussed at some length during the Inquiry proceedings. In particular we welcomed the discussion which outlined the importance of early intervention and multi-agency working in the early in order to promote positive outcomes. We identified strong agreement from panellists and Committee members that the early years was a key area for improvement. For example, in relation to the absence of guidance around early years support and provision expected following diagnosis of a hearing loss at universal newborn hearing screening, the Scottish Government stated: "such guidance has not been published. In conjunction with health colleagues, we will look into why that is the case but, as the minister has indicated, work is being done on that issue." NDCS would welcome a further recommendation on this issue.

*For further information:*

*Katie.Rafferty@ndcs.org.uk*  
*Policy & Campaigns officer*  
*0141 354 7852*