

NDCS Cymru response to Ministerial comments on *Close the Gap* Petition



Petition P-04-481, June 2013

NDCS Cymru is grateful for the opportunity to comment on the Minister's response. Whilst NDCS Cymru is pleased that the Welsh Government will be conducting a workforce planning exercise to include support services for deaf children, we are disappointed that other points raised in our petition are not addressed in the Ministerial response.

We are disappointed to read the Minister's comment that it is the responsibility of local authorities to ensure that deaf learners receive suitable education. Although we agree that local authorities do have responsibilities, it is clear that deaf children across Wales are facing barriers. As statistics show a significant and persistent attainment gap between deaf pupils and their peers at every Key Stage, we believe the Welsh Government has a duty to step in and take action to *Close the Gap!* This is supported by the fact that 55 Assembly Members have pledged to take action on this point.

Our *Close the Gap!* petition highlighted a number of factors which we consider to be contributing to the attainment gap. We call for a **national strategy** to address each of these factors in a cohesive way and, having read the Minister's response, we still feel that such a strategy is required.

We would like to take this opportunity to comment on each of the points highlighted within the Minister's response. For ease of reference, we have used the same titles as the Minister's letter.

Sufficient numbers of trained professionals to support the needs of Wales' young deaf population

NDCS Cymru is aware of the Welsh Government initiative between 2006 and 2009 to provide additional funding to help enrol teachers on the University of South Wales course for the mandatory qualification for Teachers of the Deaf. However, as the Minister points out, difficulties in sustaining this workforce remain. NDCS Cymru has concerns that in many areas, Teachers of the Deaf are experiencing capacity issues. We are, therefore, pleased to read that specialist services for deaf children will form part of a workforce planning exercise.

We would seek assurances that such an exercise includes consideration not just of Teachers of the Deaf, but also of the numbers and skill sets of other key professionals working with deaf children, such as communication support workers, specialist speech and language therapists and teaching assistants. As identified in our initial campaign report, accessing these specialists, especially those with an appropriate level of training can be difficult. We also seek assurances that such a workforce planning exercise will be combined with a plan of action for addressing manpower, training and development issues.

The Ministerial response highlights that the Welsh Government is developing a Masters in Educational Practice, which will be made available to Newly Qualified Teachers. Whilst the Minister identifies that this programme will include a module on Additional Learning Needs (ALN), we are disappointed that deafness is not specifically covered within this. NDCS Cymru is concerned that a general module on ALN will not improve levels of deaf awareness. Indeed, as identified in our petition, a lack of deaf awareness among teachers presents a difficult barrier for deaf pupils. It appears that many teachers are unaware when they are teaching a child with hearing difficulties due to their misconceptions around assistive listening devices. Although such technology can provide improved access to sound, it does not restore typical levels of hearing. There is also a general lack of awareness that 80% of all children will experience a temporary hearing loss. Ensuring that teachers are aware of some simple, but effective deaf awareness tips could go a long way to improving deaf young people's access at school. As identified elsewhere within this paper, NDCS Cymru believes that it is also important to raise deaf awareness among other school staff, including SENCOs.

Our petition also highlights the role of Estyn in ensuring that schools with deaf pupils on roll and local authority specialist support services are appropriately meeting the needs of deaf pupils. This point has not been addressed within the Minister's response. We would welcome further discussion and consideration of how inspections of services for deaf children might be improved.

The impact of the Additional Learning Needs (ALN) Reforms

NDCS Cymru has reservations regarding the ongoing ALN Reforms and developments in funding for post-16 learners with ALN. Whilst we appreciate that it may not be possible to address many of these concerns within a Deaf Strategy, we would welcome this opportunity to seek assurances that the Welsh Government will work with us to address these concerns and ensure that these reforms work effectively for deaf children and young people.

NDCS Cymru is currently discussing our concerns about proposals for ALN Reforms with civil servants. We are particularly concerned that the Individual Development Plan (IDP) we have seen is not sufficiently robust and may not necessarily include clear information on key points. For example, key information such as a child's level of hearing loss, the agreed placement for the child, and information on ongoing support is not clearly identified within the structure of the IDP.

The Minister's response refers to the development of Provision Pathways as part of the ALN Reforms. Whilst initial discussions with civil servants included the development of disability-specific provision pathways, we have recently been informed that the intention is now to develop one universal pathway. Under the proposed new system, frontline school staff may be asked to co-ordinate support plans. Therefore, disability-specific information is required to ensure that these staff members are aware of the specialist professionals who must contribute to a child's assessment of need. We consider that clear disability-specific provision pathways would also help to reduce any post-code lottery in eligibility for specialist support.

We have a number of other concerns regarding the proposals identified in the consultation paper on ALN Reform. Of particular concern is that the proposals outlined

in that paper would result in reduced rights of appeal for many families. It is imperative that families have the right to appeal a decision not to provide specialist support.

In relation to the devolution of funding to support post-16 students with special educational needs, NDCS Cymru has attended one Development and Implementation Group and is pleased to note in the Minister's response that we will be invited to attend this group again. We remain concerned that the devolution of these funds is imminent, yet we still have little information on how local authorities and further education institutions will be held to account and monitored on their new funding responsibilities.

Ensuring that educational establishments comply with acoustic standards

As identified in our initial campaign report, NDCS Cymru is pleased to have worked with the Welsh Government to ensure that capital projects built through the 21st Century Schools Programme are contractually obliged to meet acoustic standards.

However, the Minister's response fails to acknowledge that our petition calls on the Welsh Government to take this commitment to good acoustics an important step further. NDCS Cymru is urging the Welsh Government to utilise its new powers over Building Regulations to strengthen acoustic standards. This would ensure that all new school, college and nursery buildings in Wales will *Sound Good* – regardless of how they are funded. This is an important step forward as it would secure good acoustics for the future, beyond the lifespan of the 21st Century Schools programme. These new powers were devolved to the Welsh Government on New Year's Eve 2011, and 39 Assembly Members from across all four political parties signed a new year's resolution with us in support of good acoustics.

As identified in our initial campaign report, NDCS Cymru is also aware that many existing school buildings with a poor acoustic environment may not be refurbished in the near future. As such, we would urge the Welsh Government to promote measures that head teachers can take to assess and improve acoustics in existing school buildings.

NDCS Cymru is keen to ensure that school, college and nursery buildings in Wales have good acoustics as this is important for deaf children and to children with a temporary hearing loss. However, it should also be acknowledged that acoustics are important for other vulnerable groups of learners as well. Indeed, our work in this area has been supported by a number of organisations representing other disabilities, such as RNIB Cymru, SENSE Cymru, Autism Cymru, NAS Cymru, Downs Syndrome Association and AFASIC Cymru. There is also evidence that good acoustic environments can improve the learning environment and behaviour of pupils more generally.

The encouragement and accessibility of BSL classes

NDCS Cymru believes it is imperative that the workforce planning exercise identified in the Minister's letter considers the availability and skill set of specialist professionals who support pupils who use British Sign Language (BSL). We are concerned that without the appropriate skills, communication support workers can neither adequately support these

pupils to access the curriculum, nor further enhance their linguistic skills and vocabulary in BSL.

NDCS Cymru also calls for the workforce planning exercise to be accompanied by a plan to overcome any identified issues within manpower and training/development for staff supporting deaf pupils who use sign language. For example, the introduction of national standards could be considered.

In addition to our concerns around the availability of BSL support for deaf pupils, our petition also highlights that deaf young people recommend that more mainstream teachers and their hearing peers learn to sign. The vast majority of deaf pupils in Wales attend mainstream schools and, for those who use sign language, ensuring that other people in the school can sign helps these pupils to feel more included in school life. We would, therefore, also urge the Welsh Government to consider how more teachers and pupils can be encouraged to learn to sign.

In his response, the Minister acknowledges that sign language courses are available. However, many families tell us that they find it difficult to access such courses. Our *It Starts Here* project has helped to provide families of young deaf children with the opportunity to learn signs based around day-to-day family life. We feel that strong family communication during the early years of a child's life is crucial to the child's educational development. This project is funded by the Big Lottery Fund and is due to end next year. We call upon the Welsh Government to review the availability of BSL classes in Wales and to encourage local authorities to ensure that families in the future are able to access support to communicate with their deaf child.

Improving deaf awareness with both teachers and pupils

The majority of the deaf young people who took part in our video petition told us that improving deaf awareness was the most important part of the petition to them. We are, therefore, extremely disappointed with the Minister's response to this aspect of our petition.

NDCS Cymru is aware of the development of training for Special Educational Needs Co-ordinators (SENCOs). However, it is our understanding that this course is not intended to cover deaf awareness. Since SENCOs are regarded within schools as the key point of contact for enquiries regarding children with support needs, NDCS Cymru believes it is imperative that these individuals have a basic level of deaf awareness and of the specialist professionals and information resources that can be accessed for further information/advice. As SENCOs are likely to play an even greater role in the development of support plans under the proposed ALN Reforms, this level of awareness will become even more important. For these reasons, we are extremely disappointed to have been told that the SENCO training will not cover deafness specifically and would urge the Welsh Government to reconsider.

As identified earlier, NDCS Cymru is similarly disappointed that teachers do not receive any deaf awareness training. The vast majority of deaf pupils in Wales (99%) attend mainstream schools. Furthermore, some 80% of all children will experience a temporary hearing loss that can continue for a sustained period of time and, without appropriate support, can have an impact on their learning development. This, coupled with the

statistics showing that deaf pupils are failing to reach their full potential, demonstrates the need for teachers to receive basic deaf awareness training. NDCS Cymru urges the Welsh Government to reconsider including deaf awareness either within the ITT, NQT or the Masters in Educational Practice.

NDCS has a number of resources, which could be used to improve deaf awareness among teachers and school staff generally. We have also previously worked with Bridgend County Borough Council to develop some basic resources for NQTs and feel that these resources could be further utilised by a cost-effective roll out across Wales.

Deaf young people throughout Wales tell us that, not only is it important that their teachers are deaf aware, but also that they need more pupils to understand deafness. As highlighted within our initial campaign report, the NDCS “Look Smile Chat” resources aim to help schools teach their pupils about deaf awareness and could be utilised within the PSE curriculum. We call on the Welsh Government to consider this point.

Summary

In 2012, deaf pupils were **41% less likely** to achieve higher grade passes in core subjects English, Maths and Science – this is the widest gap since records began.

As identified at the start of our response, NDCS Cymru is concerned that there are a multitude of factors contributing to this substantial gap in attainment. Our petition report identifies some of the key factors which need to be addressed. Although the Minister’s response outlines a couple of positive steps forward, **many of the key issues within our petition remain unaddressed**. In particular, the Minister’s response does not address our call for a national strategy to *Close the Gap* in educational attainment for deaf pupils. NDCS Cymru believes it is appropriate to develop a **national strategy** to present a cohesive approach to the numerous barriers deaf children face. In particular, we would urge that such a strategy consider the following points:

- Deaf awareness training among key professionals, including teachers and SENCOs.
- Issues in manpower or training and development identified through the proposed workforce planning exercise.
- Consideration of how Estyn’s role of inspecting the services local authorities and schools provide to deaf pupils could be strengthened.
- A clear provision pathway for deaf children and young people.
- Amendment of building regulations to ensure that all new school, college and nursery buildings are required to demonstrate compliance with minimum acoustic standards.
- Encouraging local authorities and head teachers to improve acoustics in existing school buildings.
- Encouraging schools to raise deaf awareness among hearing pupils.
- Improved access to BSL classes for families of deaf children.
- Increased opportunities for pupils and teachers learn BSL.

In addition to our calls for a national strategy, NDCS Cymru hopes to work with the Welsh Government to ensure that the ongoing ALN Reforms and the devolution of Post-16 funding is effective for deaf children and young people.

Further information

Should the Committee require any further information or evidence, please do not hesitate to contact us at Campaigns.Wales@ndcs.org.uk

Thank you.

Annex

Attainment Gap statistics

Key Stage 4

Data on the attainment levels of deaf pupils is available from 2005. It demonstrates that the gap in attainment between deaf pupils and their peers is relatively consistent. Although, the gap dropped significantly in 2011, we are disappointed that this gap has again widened. In 2012, deaf pupils were 26% less likely to achieve 5 GCSEs at grades A*-C than other children.

We are even more concerned that the gap in attainment for higher grade passes in core subjects English/Welsh, Maths and Science has widened to 41%. This is the highest it has been since records began.

Year	Attainment gap for achieving 5 GCSEs at grades A*-C (%)	Attainment gap for achieving A*-C grades in English/Welsh, Maths and Science (%)
2012	26	41
2011	12	19
2010	29	33
2009	15	13
2008	30	27
2007	27	27
2006	26	38
2005	29	36

Key Stages 1- 3

We are pleased to have seen some improvement over the past few years in the attainment of deaf pupils at Key Stages 1-3. However, we remain concerned that the gap in attainment is still unacceptably high for deaf pupils at every Key Stage level.

In 2012:

- Deaf pupils at Key Stage 1 were 15% less likely to achieve the Foundation Phase Indicator
- Deaf pupils at Key Stage 2 were 15% less likely to achieve the Core Subject Indicator
- Deaf pupils at Key Stage 3 were 19% less likely to achieve the Core Subject Indicator.

* Please Note:

All figures show how much less likely it is (as a percentage) that deaf children will achieve as well as their hearing peers.

The data specifically excludes special educational need (SEN) types other than deafness in order to draw the simplest comparison. It compares the attainment of deaf pupils who have no other additional SEN with the attainment levels of pupils who have no registered SEN.

The "Foundation Phase Indicator" refers to reaching the expected level or above in English/Welsh, Personal and Social Development and Maths.

The "Core Subject Indicator" refers to achieving the expected level or above in English or Welsh (first language), Mathematics and Science in combination. The expected level of the majority of pupils is level 4 at Key Stage 2 and level 5 at Key Stage 3.

More detailed information on this attainment data is available at www.ndcs.org.uk/ClosetheGapWales