



Scotland's Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

National Deaf Children's Society

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
 No

Consultation questions

Scotland's Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-20206 aims to support improved outcomes for children and young people with complex additional support needs through strategic commissioning of national services; with particular focus on the provision of education. While this strategy also recognises the critical role played by social services and health in supporting educational outcomes, the strategy is set within the context of The Additional Support for Learning Act 2004.

STRUCTURE

- 1) Is this structure correct? Does the content of the document flow in a logical order?
- Yes
- No
- Don't know

Please explain your response:

The document flows in a logical order.

- 2) Does the structure help the reader to follow the strategy effectively
- Yes
- No
- Don't know

Please explain your response:

The document is brief and easy to understand.

CONTENT

Section 1. Our Vision, Aim and Objectives

Section 1 provides information on the vision, aim and objectives of the strategy.

- 3) Do you think the aims of this Strategy and the four objectives are the right ones to achieve the Scottish Government's purpose of improving outcomes for children and young people with complex additional support needs through strategic commissioning of services?

- Yes
 No
 Don't know

Please explain your response and provide any relevant evidence.

We are content with the objectives and the aims of the strategy. The Strategy correctly identifies the importance of ensuring every child has the same opportunity to succeed. Deafness is not a learning disability and with the right support, there is no reason why deaf young people should be achieving any less than their hearing peers. Scottish Government data shows a large attainment gap between deaf school leavers and their hearing peers. This was explored last year by the previous Education and Culture Committee during their Inquiry into the attainment of pupils with a sensory impairment. The latest Scottish Government data shows that last year 10.3% of deaf learners left school with no qualifications (compared with 2.5% of all pupils) and 44.2% obtained Highers or Advanced Highers (compared with 69.1% of all pupils). This gap in achievement at school goes on to affect deaf young people's life chances, with 36.1% going onto university compared with 45.9% of those with no additional support needs. It is positive that the Strategy identifies the importance of ensuring every child has the same opportunity to succeed and should work to address this unacceptable attainment gap.

The implementation of this strategy should be research and evidence led, we therefore welcome objective four. Investment in high quality research into the needs of Scottish children with complex ASN should take place in parallel with a greater focus on using evidence / research to drive service improvement.

Section 2. Why we need Strategic Commissioning for Learners with Complex Additional Support Needs?

- 4) Within the context of The Doran Review recommendations – do you agree with the explanation of why we need Strategic Commissioning for national provision/services for learners with complex additional support needs?
- Yes
 No
 Don't know

Please explain your response:

The rationale for strategic commissioning should include supporting the delivery of recommendation 14 in the Doran Review-

The Scottish Government should take action to address the concern that all authorities are held to account for implementing national policies and legislation and thereby ensure that all parents, carers and children and young people can expect similar responses to meeting their needs regardless of where they live in the country.

Improving consistency of provision across Scotland should be a priority and strategic commissioning arrangements can play a role in this. Consistency needs to improve, both across local authority boundaries, and within local authorities. At present, in some local authority areas, skilled specialist professionals with expertise in childhood deafness and linguistic and emotional development are leading on comprehensive assessment, placement, monitoring and review of deaf pupils. In other areas, the same level of specialism across agencies is simply not available.

Childhood deafness is a low incidence need and where appropriate specialism is not available within a local authority there is a risk of erroneous decision making when assessing how a child would be best supported in education.

Case study – support from a Communication Support Worker:

“My daughter is profoundly deaf, and is a BSL user. She has no speech, and has further additional needs. She currently attends a mainstream primary school with a specialist Hearing Impaired Unit attached. Since Primary 2, she has had access to a Communication Support Worker who was fluent in BSL (ready to take BSL Level 4 exam). That CSW has now been moved to the associated secondary school to support older deaf pupils in the local area. The school proposed to remove the support of a CSW from my daughter’s CSP, without asking us! We opposed this, making the case that, in addition to accessing the curriculum, given that she has no speech, it would be very difficult for her to communicate her needs in a mainstream class. The local authority has now agreed to retain communication support within her CSP. However, there is now no CSW working within the primary school. There is an Additional Support for Learning Assistant who has BSL to level 1, who has been supporting our daughter as best she can, but there are still occasions where she is in a mainstream class with no communication support. The ToD at the school has BSL to Level 1. The local authority advises that this is sufficient BSL fluency.”

There is an urgent requirement to introduce an element of impartiality and speciality to the assessment process as routine, and perhaps an element of peer support and review with systematic involvement of specialist staff from other local authority areas and/or national providers. This would not replace the input from local professionals working with the child and family on a regular basis, but may help to encourage reflective practice through the assessment process and the sharing of best practice.

NDCS suggests that there could be a national list/panel of specialist scrutinisers whose services could be called upon to support the mediation process between parents and authorities where necessary, and who could also perhaps guide the function of a peer support and review element in the assessment process.

It is the opinion of NDCS that this would significantly improve parental trust in the assessment process, as would the provision of more access to specialist training in childhood deafness for some of the other professionals regularly involved in the assessment process, such as social workers and educational psychologists.

Ensuring there is accurate research on supporting Scottish learners with complex ASN needs will underpin this strategy and will ensure resources are used in the most effective manner. Strategic Commissioning should support the use of research in the training of professionals who work with learners who have complex ASN. It is important to have a Scotland wide approach to enhancing the skills and specialism of education staff working with these learners. For example, the research that is undertaken by the Scottish Sensory Centre at the University of Edinburgh can be invaluable in supporting educators working with deaf children. It is important that this type of research is supported and the best possible use is made of it across Scotland.

- 5) The 'Scope of Services to be commissioned' on page 8 relate to education, care and health, research and training and is informed by the Doran Review recommendations and the National Needs Analysis, which was completed in 2015. Can you please comment on any services within those headings which you would particularly wish to see featured here? Please tell us if you think it should exclude any aspects or include any others?

Comments:

Education:

The National Deaf Children's Society Scotland strongly believes that there will always be deaf children and young people who require intensive specialist educational support, and that a specialist national provision which meets the needs of deaf children should be pursued. In addition, consideration must be given to the expansion of already existing national specialist resources. For instance Scottish Sensory Centre research could be important in driving improvement in educational support for deaf children in Scotland.

We would hope to see this provision develop into a more flexible and accessible resource, following a hub of excellence model which can provide outreach support in a variety of settings. NDCS believes deaf children should have the opportunity to access placements in such establishments when it is becoming clear that there is a complexity of need that cannot be catered for locally. Conversely, when the complexity of need reduces as a result of intensive specialist support, NDCS would like to see local specialist establishments working in partnership with national support services to support reintegration of a deaf child to their local provision, and hand over support to the local team.

Deaf children's access to specialist support at local level can be patchy, and their outcomes are equally patchy. Any national provision going forward must therefore also be directed to improve inclusion and educational outcomes for all deaf children in Scotland, in any setting. National provision must have a role in the ongoing quality improvement of local provision.

NDCS believes that national specialist resource centres could have three functions –

Strategic, Capacity Building and Operational/Resource provision.

- 1) Strategic: Overall planning and commissioning framework of specialist services for deaf children, providing guidance to local authorities on standardising ratio of support, skill set of staff supporting deaf children, guidance on minimum acoustic standards for new school builds and refurbishments, holding a record of those working with deaf children throughout Scotland (and their qualifications held in order to monitor workforce planning); and collecting information about deaf pupil attainment in order to monitor impact and quality of support.
- 2) Capacity Building: to build on and complement the specialist skill set of staff employed within a national specialist residential setting to provide CPD for mainstream teachers, have input into Initial Teacher Education, to provide ongoing CPD, networking and information sharing opportunities for a variety of multidisciplinary staff, to link with the course providers of the Mandatory Specialist Qualification for ToDs in Scotland, and to have responsibility for centrally collecting and storing information about deaf children, birth rates, and specialist workforce operating in Scotland to support a national planning framework for meeting the needs of deaf children in a variety of settings.
- 3) Operational/Resource: In addition, NDCS Scotland believes that there is potential for national specialist provision to also offer practical support in terms of procurement, training and advice to local services on the provision of auxiliary aids and curriculum adaptations which deaf children will require to achieve progress in the classroom.

Care:

Health:

Research:

The importance of high quality, specialist research to inform service delivery is paramount. There is a need to protect and expand research in Higher Education facilities in Scotland, as well as ensuring this research is put to effective use through staff training and development opportunities.

Training:

Section 3. 10 Year Strategy

This provides detail on the strategy for the first 10 years on the proposed approach to strategic commissioning of national provision/services for children and young people with complex additional support needs.

- 6) What are your views on the National Commissioning Groups proposal that the first phase of strategic commissioning will focus on pathfinder (testing) activity on training, development and research? Are there any particular areas of training which should be focussed on?

Comments:

Ensuring deaf learners have access to the additional support they require is critical to ensuring they reach their full potential and closing the attainment gap. The diverse needs of deaf learners are predominantly met within mainstream settings, with implications for the capacity and skill set required by mainstream practitioners.

Alongside the universal offer of schools, deaf children may require Teachers of the Deaf (ToDs), Communication Support Workers (CSWs), Educational Interpreters, Classroom Assistants, equipment such as radio aids and SoundField systems, Educational Audiologists, good acoustical conditions and trained practitioners in deaf and British Sign Language awareness. Specialist support within these settings is therefore crucial. In terms of deaf education provision, the number of specialist teaching staff has continued to fall in recent years. We are extremely concerned at the reduction to specialist teaching staff for deaf learners in Scotland, with data suggesting a fall in numbers of Teachers of the Deaf working in education authorities between 2014 and 2015.¹ Teachers of the Deaf provide a service to deaf children to assist them achieve their best. The service includes meeting classroom teachers and teaching assistants to advise on curriculum supports, making classrooms deaf friendly, advising teachers on communications strategies and checking hearing aids and radio aids. They will also carry out direct face to face work with children, assisting a deaf child to catch up on classroom vocabulary, spelling and mathematics. This is an absolutely vital service in supporting deaf children to have the same opportunity to achieve as their peers.

We recommend the creation of more promoted posts within CASN education services. This would help increase strategic thinking in relation to service delivery as well as incentivise a younger workforce to enter these specialist fields. Linking in with the current education governance review in Scotland, there could be collaboration at

¹ Consortium for Research Into Deaf Education, 2015, CRIDE report on educational provision for deaf children in Scotland

Education Region level to ensure parity across the country. Continued shortages in specialist practitioners will make it more difficult for deaf learners to achieve positive outcomes and ensure accessibility and inclusion for deaf children in mainstream education.

The Scottish Government have recognised the unacceptable attainment gap that exists for deaf learners. We welcomed the Scottish Government [Inquiry into the attainment of pupils with a sensory impairment](#) which examined the varied factors contributing to this attainment gap and the challenges facing deaf education and encourage the work of the Short Life Working Group on Attainment to continue to implement the inquiry recommendations.

- 7) For the purposes of this document the National Improvement Framework drivers have been adapted and therefore reflect particular concerns related to children with complex additional support needs? Do you have any suggestions for additions or alternative wording which should be included? Please set it out against the relevant heading below.

Comments:

Service Leadership:

The Teacher of the Deaf (ToD) workforce in Scotland is an ageing one with most due to retire within the next 10 years (CRIDE 2015). This means that many of the staff in leadership and management roles within the service will also be retiring. Significant planning and analysis of training needs will need to be undertaken to address this change in the workforce. It is vital that the service continues to have effective leadership as a key support for many deaf learners.

Furthermore, the push towards joint sensory services, has in some areas meant that HI service managers have no background in HI service delivery. We would suggest that in such cases, one person within the HI team should have the professional lead role for deaf education. This is vital if the CPD, appraisals, development of the service and response to new initiatives is to be maintained in a quality service.

Education Services:

Education authorities to be equipped in making such decisions, they will need to know the nature of the population across their authority area. There are currently no complete national data sets on numbers of deaf children and young people across Scotland. Without a basic understanding of the numbers of deaf children and their needs it will be difficult for education authorities to make effective decisions and plan service delivery.

While deaf children and young people make up a small incidence group, the potential impact of meeting their unique needs is significant. A lack of deaf awareness at a strategic level is likely to result in an insufficient budget to meet the needs of this group of learners who are already subject to gaps in attainment outcomes. Each local authority will require a qualified and highly experienced educationalist with the ability to make such effective strategic decisions.

Practitioner Professionalism:

Currently there are no minimum standards for delivering support to deaf learners. We are currently working with the Scottish Government following the recommendations from the Inquiry report on this issue and the resulting disparity it causes amongst local authorities in terms of how they deliver education support to deaf learners. Areas raised in the report include the routine inspection of peripatetic hearing impairment education services and the number and qualifications of ToDs and professionals working with deaf learners. We are concerned at the number of ToDs who do not hold the mandatory qualification to work with deaf children under the Requirements for Teachers (Scotland) Regulations 2005. This indicates both a lack of monitoring of regulation of teaching qualifications at a local and national level and pressure on Continuing Professional Development budgets which are critical to ensuring learners with additional support needs are supported appropriately.

We recommend that a quality framework is established for teachers working with deaf learners and that this is overseen by an external independent body.

Parental Engagement:

Inclusive communication will need to be at the heart of the National Framework both in terms of engagement with learners and their parents and carers. NDCS is committed to supporting the accessibility of the National Improvement Framework for deaf children and young people and their families.

Support and information for parents and carers will be critical to them taking up an

active and engaged role in raising their child's attainment. In the case of parents of deaf children they require targeted specialist support to understand how their child learns, the approaches that work best for deaf children, and the challenges and barriers that exist for their deaf child in learning environments. We would welcome the opportunity to work in partnership to achieve this.

Assessment of Children's Progress:

The National Improvement Framework is welcomed and there are clear benefits to its implementation which will hopefully allow for consistent measures to be used across Scotland to understand the progress that is being made towards closing the attainment gap for disadvantaged groups. NDCS sees the framework as an opportunity to further embed the principles of inclusion into the Scottish education system. A National Improvement Framework will allow for comparable data to be collected from across Scotland. Interrogation of this data would be particularly valuable for disadvantaged groups of pupils and allow their outcomes to be tracked more consistently. NDCS recommends that the data obtained from the implementation of the framework is publicly reported on and made available for particular groups, including those who are deaf or who have a hearing impairment. This is crucial to understanding if the principles of inclusion are being achieved for every child. It will also help all partners take ownership of the role they play in closing the attainment gap for all groups, this includes parents/carers, schools, and services in the community and third sector.

League tables are potentially disadvantageous to Additional Support Needs groups and without the current imbalance in data sets being redressed, the emphasis on academic attainment and exam qualifications is likely to remain for these groups. It must be made clear from the outset that every learner is expected to participate in these assessments and that they are fully accessible and inclusive as a result.

Given the landmark passage of the British Sign Language (Scotland) Act 2015 consideration will need to be given to those learners (and their parents or carers) who have British Sign Language as their first or preferred language. Pupils who are BSL users will require to have assessment materials in BSL, be able to carry out assessments in BSL and those translating or marking assessments will need to be appropriately qualified to do so. NDCS would welcome further information about the work Scottish Government and the Scottish Qualifications Authority have carried out so far in this regard and we would welcome the opportunity to support this work in any way we can. We recommend the Scottish Government seek feedback from forums such as the Heads of Sensory Services Forum and the British Association of Teachers of the Deaf in Scotland on how assessments can be made fully accessible to deaf learners.

Service Improvement:

Improving collaboration between services is vital in improving outcomes. For the 90% of hearing parents of deaf children with no experience of deafness, they rely on professionals to offer the most appropriate advice based on impartial assessment of their deaf child's needs. NDCS advocates the principles of empowered parents and skilled professionals working together within an informed choice context.

The right support can significantly reduce the complexity of need for deaf children, however, too little support can develop complexity of need for deaf children, often resulting in additional support for learning needs which are preventable with effective early interventions through good quality ongoing and regular assessment.

An element of flexibility and reflective practice from statutory service providers, as well as thorough knowledge of local and national specialist provision, is therefore critical to ensuring successful progress at all stages to meet the changing needs of the deaf child. This must be related to regular review and interrogation at each review about the currency of the evidence on which the professionals are making decisions, and whether a re-assessment in some or all areas of the child's development is required.

Performance Information:

8) Do you agree that the Governance arrangements detailed on page 14 are appropriate? If not, what else should be included?

- Yes
- No
- Don't know

Please explain your response:

The governance arrangements are reasonable, it will be important that there is transparency throughout the process of implementing this strategy.

General

9) In relation to the overall 10 Year Strategy - are there any areas missing, requiring strengthening, or which are not required and could be removed?

- Yes
- No
- Don't know

Please explain your response:

As we have detailed in our response to question four there should be a strong focus in this strategy on addressing disparities in the quality of specialist support for children with complex ASN depending on where they live. The strategy should ensure a co-ordinated national approach to providing standardised and effective support for deaf children in every part of Scotland.

10) Are there any general comments you would wish to make about '**Scotland's Strategy for the Learning Provision for Children and Young People with Complex Additional Support Needs 2017-2026**'

Thank you. Please send with your respondent information sheet to:

Email address:

or

Scotland's Strategy for the Learning Provision for Children and Young People with
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