



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	0141 354 7850
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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 Do not publish response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If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.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

Introduction

The National Deaf Children's Society is the leading charity in Scotland dedicated to creating a world without barriers for deaf children and young people. In Scotland, we have a dedicated team based in Glasgow, led by Angela Bonomy, Director.

We believe that all deaf children should have the best start in life and an equal opportunity to become successful learners and contribute to Scotland's economic future. We are working with the Scottish Government and partners to address the attainment gap that exists for deaf children. We consider the issue of acoustics as a vital element of this work.

Summary

The focus of our consultation response is on school acoustics as Scotland is the only part of the UK where Building Bulletin 93 (BB93) is not statutory, though it is considered best practice. It is therefore the only part of the UK where new build schools are not legally required to be tested acoustically to ensure that the requirements in BB93 have been met.

It is important to remember that, as the majority of deaf children are taught in mainstream schools, any classroom, in theory, could be one in which a deaf child is taught among their peers. We believe that, from the perspective of a deaf child, they should have the right to expect to be in a classroom with good acoustics.

For those who are deaf, have a temporary hearing loss or have additional support needs, good acoustics can have a hugely positive effect on their education. Therefore improving acoustics in schools will have a beneficial impact on the attainment gap between the best and worst performing groups of learners.

There is variable practice in acoustical infrastructure across local authorities in Scotland. Acoustics was recognised as a key issue affecting the attainment of deaf learners during the Scottish Parliament's Inquiry into the attainment of pupils with a sensory impairment.

CONSULTATION QUESTIONS

1. Regulation 11: Educational accommodation in schools providing both primary and secondary education

Do you agree that this Regulation should be retained?

Yes

No

If not, why not?

2. Regulation 13: Educational accommodation in special schools

Do you agree that this Regulation should be retained?

Yes

No

If not, why not?

3. Regulation 20: Outdoor education and recreational areas

Do you agree that this Regulation adequately covers the requirements for outdoor educational and recreational areas?

Yes

No

If not, why not?

4. Regulation 24: Acoustic Conditions

Do you agree that this Regulation adequately covers the requirements for acoustic conditions?

Yes

No

If not, why not?

Good listening environments in schools are critical to improving learning outcomes for every child. Most learners access the curriculum primarily by hearing and retaining what their teacher and peers say through conversations that take place in the classroom. Children can spend more than half their school day just listening, so good listening conditions are essential in ensuring everyone can access the curriculum and be fully included in school life. A substantial attainment gap exists between deaf children and their peers at school, we know that poor acoustics is a contributory factor to lower attainment for deaf children. In Scotland, acoustics was recognised as a major problem during the Scottish Parliament's Inquiry into the attainment of pupils with a sensory impairment.

Acoustics benefits all children, not just deaf children

- Recent research has demonstrated there is a strong link between attainment and good acoustics for all pupils. One study of 142 schools in England showed that there was a direct correlation between the level of classroom noise and pupils' Key Stage 2 (equivalent?) Maths results.
- Improved learning for pupils with additional support needs: There is increasing evidence that poor classroom acoustics can create a negative learning environment for many students, especially those with hearing impairments, learning difficulties, or where English is an additional language.
- Improved behaviour: a report by Alan Steer, Learning Behaviour , noted that the surroundings in which children work and learn have a major impact on behaviour. He stated that: "architects and contractors should pay special attention to acoustics and lighting in classrooms to support pupil participation in lessons".
- Reduced teacher absence: research shows that teachers have more throat problems than other professional groups. 80% of teachers reported vocal strain and throat problems, 86% reported that classroom noise has caused them problems.

Design compromises, conflicting objectives and an understanding of the importance of acoustics leads to variations on the ground in Scotland. Some authorities for example now have policies in place to ensure they no longer build open plan schools in recognition of the poor acoustics in these environments.

Last year the Scottish Parliament's Education and Culture Committee carried out an Inquiry into the attainment of pupils with a sensory impairment. Acoustics featured prominently in their deliberations and evidence sessions. Their report stated:

“We were told that poor classroom acoustics could severely limit hearing-impaired pupils’ ability to participate in lessons and discussions. Fife Council suggested that the Scottish Government should look at establishing consistent standards, and Clydeview Academy wanted educational audiologists to be consulted during the design stage of new school buildings. Others highlighted the need for teachers to be aware of any acoustic issues and to make use of technology, such as roaming microphones, where necessary.”

The report went on to recommend:

*“Appropriate acoustic standards are vital for pupils with a hearing impairment. **We do not understand why the relevant standards are not statutory in Scotland when this is the case in England and Wales.** We therefore call on the Scottish Government to work with local authorities and deaf people to examine how appropriate standards can be provided in all schools.”*

In September 2017 we asked deaf young people across Scotland what they thought about school acoustics, they told us:

“Poor acoustics mean I miss out on what people are saying and this doesn’t get repeated.”

Good acoustics “allow you to make the most out of your mainstream school.”

“There is a big difference between new and old parts of schools.”

“Lunch times were difficult as there were a lot of echoes, it was hard to hear everyone.”

“the open plan was like a warehouse, I couldn’t hear anything and felt left out.”

Better classroom acoustics could be ensured by:

- Having Building Bulletin 93 or other appropriate Scottish standards on a statutory footing would be a step towards this shift and help avoid disparity in the quality of acoustics in schools across local authorities.
- Improved monitoring of compliance of standards would also help share effective practice and support authorities to address local challenges. This could include pre-completion testing of newbuild school buildings.

Ultimately, we believe the cost to the Scottish Government in having deaf children, and other children, learn in sub-optimal acoustic environments, leading to poorer outcomes to be much greater than the cost of ensuring Scottish classrooms have good acoustics.

5. Regulation 25: Water supply

Do you agree that this Regulation adequately covers the requirements for water supply?

Yes

No

If not, why not?

6. Regulation 26: Grant-Aided Schools

Do you agree that the new Regulations should apply to grant-aided schools?

Yes

No

If not, why not?

7. Regulation 8: Sites for playing fields

Do you agree that if there is a mixture of grass pitches and SP then the area required in some circumstances can be less than that currently defined for grass pitches?

Yes

No

If not, why not?

8. Regulation 9 and 10: Educational accommodation in primary schools and secondary schools

Do you agree that accommodation metrics is an appropriate method to calculate the educational accommodation required?

Yes

No

If not, why not?

9. Regulation 15 and 16: Sanitary accommodation for pupils

Do you agree that this covers the requirements for toilet and washing facilities?

Yes

No

If not, why not?

10. Regulation 18: Medical inspection and rest room accommodation

Do you agree that this covers the requirements for medical inspection and rest room accommodation?

Yes

No

If not, why not?

11. Regulation 21: Lighting

Do you agree that this covers the requirements for lighting?

Yes

No

If not, why not?

12. Regulation 4: General requirements

Do you agree that this Regulation can be removed?

Yes

No

If not, why not?

13. Regulation 7: Sites for primary and secondary schools

Do you agree that this Regulation can be removed?

Yes

No

If not, why not?

14. Regulation 12: Playroom accommodation in nursery schools and classes

Do you agree that this Regulation and all other reference to ELC within the Regulations is no longer required and can be removed?

Yes

No

If not, why not?

We welcome the focus on acoustics in the recently released Scottish Government design guidance for early learning and childcare and out of school care settings which states:

“Settings should create a harmonious and pleasing acoustic environment and control, absorb or dissipate unwanted noise.”

However we would like to see acoustic standards in the early years put on a statutory footing. If Building Bulletin 93 or equivalent Scottish Standards were introduced to schools we would hope that these standards could also cover early years settings. It is important that deaf learners of all ages can listen and learn effectively.

Good acoustics are especially important during the early years when deaf children begin to develop their speech and language skills. It is important to note that children do not have the same attentive auditory perceptive skills for discriminating small differences in speech (an important aspect of language processing development) as adults. Also, children do not have the same auditory processing abilities for listening to speech in noise as adults. It is therefore especially vital that early year settings have good acoustics.

15. Regulation 14: Kitchen premises

Do you agree that this Regulation can be removed?

Yes

No

If not, why not?

16. Regulation 16: Washing accommodation for pupils

Do you agree that this Regulation is no longer required as it is met within the revised toilets and washing facilities Regulation?

- Yes
 No

If not, why not?

17. Regulation 17: Accommodation for staff

Do you agree that this Regulation can be removed?

- Yes
 No

If not, why not?

18. Regulation 19: Storage accommodation

Do you agree that this Regulation can be removed?

- Yes
 No

If not, why not?

19. Regulation 22: Ventilation

Do you agree that this Regulation can be removed?

Yes

No

If not, why not?

20. Regulation 23: Heating

Do you agree that this Regulation can be removed?

Yes

No

If not, why not?

21. Regulation 27: Self-Governing Schools

Do you agree that this Regulation can be removed?

Yes

No

If not, why not?

22. Application of the Regulations to Independent Schools

Do you agree that the new Regulations should apply to Independent Schools.

Yes

No

If not, why not?

We would like regulations that apply to independent schools that ensure these have good acoustics and lighting.

23. Business and Regulation

What are your views on the overall costs and savings identified in the Impact Assessment?

24. Equality

Please tell us about any potential equality impacts, either positive or negative, that you consider the proposals in this consultation may have, with reference to the 'protected characteristics' listed above. Please be as specific as possible.

25. Child Rights and Wellbeing Impact Assessment

Are there any aspects of a child's rights or wellbeing that you think might be affected either positively or negatively by the proposals covered in this consultation?