

Consultation Response Form

Your name: Martin McLean, Post-14 Policy Advisor for the National Deaf Children's Society

Organisation (if applicable): National Deaf Children's Society Cymru

Email address: campaigns.wales@ndcs.org.uk

Telephone number: 029 20373474

Address: 2 Ty Nant Court, Morganstown
Cardiff, CF15 8LW

General questions on both sets of regulations

Please note: Our response does not respond to all of the questions, focusing instead on the points most pertinent to the National Deaf Children's Society Cymru.

Q1. Do you agree that the policy underlying both sets of regulations is appropriate?

Yes

If you have answered no, please explain why:

Q2. Do you think there are any equality impacts arising from the policy underlying both sets of regulations?

Yes

If you have answered yes, please explain what you think these are:

We believe there is the potential for a positive impact as better data sharing could improve the availability of data on the destinations of young people with disabilities and additional learning needs.

As type of disability or special educational need is currently recorded by schools, colleges and other providers in Wales, it will enable breakdowns of datasets by type of disability. This would enable better monitoring of the progress that different groups of young people are making and of the impact of the forthcoming Additional Learning Needs and Education Tribunal (Wales) Bill.

Specific questions on The Education (Student Information) (Wales) Draft Regulations 2017

Q3. Do you agree with the circumstances in which student information can be shared as set out in paragraph [1619](#) above?

Yes/No (please delete as appropriate)

If you have answered no, please explain why:

Prescribed persons and categories of persons

Named organisations listed in the draft regulations (either as ‘prescribed persons’ or ‘persons’ falling within a prescribed category’) are limited to those that require the data for purposes that go beyond research, information, advice and guidance. Examples include learning providers and government bodies working in the field of education. These bodies generally require student-level data for operational aims such as monitoring, inspection, minimising the burden of administration and quality assurance of information. All these organisations are subject to the Data Protection Act.

Q4. Do you agree with the named organisations that –persons may provide student information to as set out in paragraph [1720](#) above?

Yes/No (please delete as appropriate)

If you have answered no, please explain why:

Q5. If your organisation has not been named as a ‘prescribed person’ or ‘person falling within a prescribed category’ but you think you require access to student level information for purposes that go beyond research, analysis and provision of information, advice and guidance, please explain why?

Specific questions on The Education (Destination Information) (Prescribed Activities) (Wales) Draft Regulations 2017

Q6. Do you agree with the prescribed activities set out in paragraph [1943](#)

above?

No

If you have answered no, please explain why:

We agree with the activities listed but we would like assurances that data about young people who have dropped out of education is included. Currently, we do not have data on deaf students who drop out of education altogether.

Additionally, data about the type of employment young people move into e.g. part-time, skilled, self-employed, etc would allow for a more detailed understanding of young people's destinations.

We believe all data published should be available with a breakdown by ALN type. Current Welsh Government data demonstrates significant attainment gaps between deaf learners and their hearing peers in schools at every Key Stage. Deafness is not a learning disability and, with appropriate support, a deaf learner can achieve on a par with their hearing peers. Continued monitoring of this issue into the latter years of education is essential, particularly given the forthcoming ALN reforms which span the 0-25 age range.

Q7. Do you agree that we should look at the destination of the student in the academic year following them leaving the relevant institution as set out in paragraph [1943](#) above?

Yes/No (please delete as appropriate)

If you have answered no, please explain why and what period you think would be better:

Q8. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

National data is imperative to understand the progress deaf children and young people make through all stages of education. There is currently a dearth of data available to us on the destinations of deaf young people in Wales. This data is crucial to be able determine whether deaf young people are receiving the support required to achieve their long-term aspirations and make successful transitions to adulthood.

We believe that the proposed changes to the regulations are welcome if they enable the Government to publish data on the destinations of all young people, regardless of setting, at the ages of 16, 19 and beyond with a breakdown by type of disability/ALN.

We also wish to take this opportunity to highlight that national data on the attainment of deaf learners in FE and training is not robust or comprehensive. In particular, we urge the Welsh Government to consider ways in which the following information could be achieved by disability/ALN type:

- Student drop-out rates
- Apprenticeship and traineeship completion rates
- Rates of attainment of qualification levels (i.e. Level 2 or 3) by age 19
- Rates of attainment of essential skills

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: