Q1. Do you agree that there is a need to change the existing performance measures for sixth forms and FE colleges? Please explain your reasons.

Yes. The National Deaf Children’s Society Cymru relies heavily on national data to understand the progress deaf* children and young people make through all stages of education. The Welsh Government currently provides us with A-level data for deaf school 6th formers. However, a much higher proportion of deaf young people enter further education at 16 compared with hearing students. Very little data is available on outcomes for this group eg type or level of qualification achieved and attrition rate at college.

Additionally, A-level data provided, does not identify the number of deaf students taking A-levels or an equivalent qualification such as a BTEC. Making a distinction between the different types of qualifications would be helpful.

Destinations data is almost non-existent for all students after leaving school or further education eg. at age 16 or 18 it is not known how many deaf young people in Wales find themselves not in education, employment or training (NEET).

*We use the term deaf to describe all levels of hearing loss from mild to profound.

Q2. Do you agree with the overall principle of having a consistent set of measures, where possible, where learners are undertaking similar learning programmes in different settings? If not, please say why.

Yes. We believe it would be useful to have a measure of progress made across the whole cohort of deaf young people regardless of setting. In England, attainment of deaf students is currently published for attainment at level 2 and level 3 by the age of 19 which is a helpful measure: https://www.gov.uk/government/statistics/level-2-and-3-attainment-by-young-people-aged-19-in-2016
**Q3.** Do you agree that the measures are appropriate? Are there any other measures that we should consider?

Yes, we agree with the suite of measures proposed, but seek confirmation that the measures will enable reports on outcomes for specific groups of the population on a national level (i.e. deaf young people) which we regard as essential.

**Q4.** Do you agree with the proposal to remove the current age restriction in place for sixth form learners (those learners aged 17 at the start of the academic year) to include all learners undertaking full-time level 3 general education programmes in sixth forms and colleges?

No - We believe that performance measures for adult learners (19+) should be reported on separately to those aged 16-19. As the majority of deaf learners in FE are over 25 outcomes data for all deaf students in further education regardless of age is not useful.

**Q5.** Do you agree with the principle that we should measure level 3 general education outcomes over a two year period?

It should be noted that deaf young people often spend an additional year or more in further education beyond the age of 18 to ‘catch up’. If these young people were left out of performance measures we would not be able to make an assessment of whether they had caught up to achieve level 2 or 3 qualifications.

**Q6.** What are your views on our proposed approach to the introduction of a national model for measuring value added? If you are a learning provider and already use a value added model, please let us know what features are particularly valuable and should be included in our future approach.

We agree with the use of a value-added measure particularly as many deaf students will start post-16 education further behind their non-disabled peers. A value-added measure would allow us to make an assessment of how well supported they are in post-16 education depending on whether they make greater or less progress compared with their non-disabled peers.

We welcome the proposal to provide a break-down of results by learner characteristics, one of which should be deafness.

**Q7.** Do you have any views on what should be defined as ‘positive destinations’ for post-16 learners?
Our aim is a future where deaf young people are supported to achieve/access the same opportunities/outcomes as their hearing peers, including destinations. To determine that this is occurring, we need information on the types of employment that deaf young people are moving into, including employment status (i.e. self-employed, part-time, etc) and income level.

Q8. Do you agree that performance data should be widely available to the general public via an online portal?

Yes, particularly if detailed by characteristics such as type of disability – deafness being one.

Q9. Do you have any views on the proposed timetable or any issues that may impact on our ability to achieve it?

Q10. Do you agree that in calculating the outcomes of general education programmes, we should include A/AS level equivalents (qualifications of a comparable size and points value such as the Welsh Baccalaureate Skills Challenge Certificate and BTECs)? Do you have any comments on specific qualifications or types of qualification that should or should not be treated as equivalents? If so please state why.

As stated within our answer to Q1, it would be useful to understand the types of general qualifications being taken by deaf young people and how this compares with hearing peers. It’s our experience that some higher education providers value A/AS-level qualifications above other general qualifications which can therefore restrict the options of deaf young people with non A/AS-level qualifications.

This would require the availability of break-downs of general qualifications (non A/AS-Levells.) Provided these breakdowns are available, we have no issue with these other qualifications such as BTECs being treated as equivalent for overall performance measures.

Q11. Do you agree that it would be helpful to publish breakdowns of grades achieved for A levels, to show outcomes for individual subjects where there are sufficient numbers of entrants?

Yes – due to small numbers, it would be helpful to have a measure of grades
achieved by deaf students on a national level across all subjects.

**Q12.** Should we include grade outcomes for vocational programmes? Should this be at level 3 only?

| Yes. Many deaf students leave education with level 2 qualifications only — it’s important to understand what grades have been achieved by those students too. |

**Q13.** 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:

| As the draft Additional Learning Needs and Education Tribunal Bill extends the responsibilities of local authorities to meet the needs of disabled young people in further education, it will be essential that the Welsh Government has reliable data on which to impact of the reforms. Therefore, we call for national statistics on post-16 outcomes to be available by type of additional learning need or disability — deafness being one. |

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: