

Draft 10-year plan for the early years, childcare and play workforce in Wales

Consultation response form

Your name: Elin Wyn

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

e-mail/telephone number: elin.wyn@ndcs.org.uk

02920 373474

Your address: NDCS Cymru, 2 Ty Nant Court, Morganstown, Cardiff CF15 8LW

Responses should be returned by **15 December 2014** to

Early Years Team
Department for Education and Skills and Department for Communities and Tackling
Poverty
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: earlyyears@wales.gsi.gov.uk

The questions below relate to proposals and recommendations set out in the *Draft 10-year plan for the early years, childcare and play workforce*. The page numbers indicated after each question refer to that document.

1. Leadership

Recommendation 4 of the Foundation Phase Stocktake stated that there should be:

compulsory training for leaders' across the sector including strategic leaders in the Country, consortia, primary head teachers, advisory staff, leaders of funded non-maintained settings and services to support their understanding of the principles and practices of the Foundation Phase. The training should be bespoke to the audience taking into account their history and previous experiences and include research showing how effective implementation of the Foundation Phase can support standards and impact on social and economic growth generally.

Question 1 – Do you agree that there should be compulsory training for leaders to support their understanding of the principles and practices of the Foundation Phase? (p.21)

Agree

Disagree

Neither agree nor disagree

Supporting comments

The National Deaf Children's Society (NDCS) Cymru is the national charity dedicated to creating a world without barriers for deaf children and young people.

We represent the interests and campaign for the rights of deaf children and their families.

Please note that in referring to "deaf" we refer to all levels of hearing loss, including mild, moderate, severe, profound, and temporary hearing loss.

NDCS Cymru supports the compulsory training for leaders to ensure their understanding of the principles and practice of the Foundation Stage for the reasons identified in the plan and the compelling research evidence cited on page 19 (Ainscow 2014) of the plan.

However, NDCS Cymru would ask that this compulsory training addresses the needs, at leadership level, of *all* children, i.e including children with additional learning needs and disabilities (and from our perspective, especially deaf children). While the Ministerial Foreword to the Plan identifies the ambition 'for *every* child to have a bright future' (our italics) and page 15 acknowledges the importance of early identification with subsequent effective intervention for children with special educational needs and disabilities, NDCS Cymru feels there is generally a lack of emphasis in the plan on the needs of children with additional learning needs and disabilities. Indeed, there is a feeling that children with ALN and disabilities are not altogether being included in the main plan with page 44 stating that 'training on supporting children with special educational needs is also being considered by

the Welsh Government.....’ and ‘we will look to introduce in 2015 SEN related training...’

This lack of emphasis on the needs of children with additional learning needs is surprising given the work that is happening elsewhere within the Welsh Government to reform assessment and support of children and young people with ALN. A White Paper was published in the spring of 2014 outlining the Welsh Government’s plans to introduce an ALN Reform Bill in 2015. It is surprising, therefore, that no mention is made of the new terminology proposed, i.e. the term additional learning needs to replace the term special educational needs. Another key element of the proposed ALN reform is to introduce an Individual Development Plan (IDP) for children and young people with ALN from birth to 25. Therefore many of the early years practitioners, who are the subject of this consultation, will be expected to be involved in preparing and implementing IDPs as part of their daily work. This is especially true in the case of deaf children, as half of all deaf children in Wales are diagnosed at Newborn Hearing Screening and will, therefore, have an IDP from a very early age.

The Ainscow research on page 19 of the plan highlights the importance of quality leadership in the setting in order to achieve good outcomes for the children and so it is important that their training includes and highlights the needs of children with the many different types of additional learning needs and disabilities. Children with additional learning needs and disabilities are not a homogenous group and so, in the case of deaf children, it is important that leaders understand that deafness is not, per se, a learning disability and that with high expectations, the right interventions and support, deaf children should be able to achieve as well as their hearing peers.

Indeed, for many years NDCS Cymru has been concerned about the educational attainment gap between deaf pupils and their hearing peers and that the gap increases as pupils progress through the education system. Since deafness is not a learning disability it should be expected that deaf pupils with no additional learning needs achieve similar educational outcomes to their hearing peers without additional learning needs. In 2013 there was a relative gap of 27% in attainment in the number achieving A*-C in English/Welsh, Maths and Science at GCSE.¹ There are several reasons to explain why this attainment gap exists. These include poor acoustics in classrooms, lack of suitably qualified support staff and not enough support for pupils who use British Sign Language. But one of the most significant barriers for deaf pupils to achieve as well as their hearing peers is lack of deaf awareness amongst staff and peers. It is of paramount importance for leaders to realise how crucial it is for ALL early years practitioners to have deaf awareness training.

Further, although deafness is a low incidence disability 80% of all children will experience temporary deafness before they are 10 years old. This is often as a result of glue ear. For some of these children the temporary deafness may be recurrent and last for several weeks or months. This temporary deafness can have a serious impact on the child’s development and communication at a crucial stage in their lives. It is vital that ALL early years practitioners can spot the signs when a child is experiencing hearing problems in order to adapt support and learning strategies and alert any other relevant people involved in the child’s care.

¹ http://www.ndcs.org.uk/about_us/campaign_with_us/wales/close_the_gap/attainment_data_2013.html

Question 2 – Do you agree that the learning hub model as set out in the draft 10-year plan would encourage greater collaboration in the early years, childcare and play sector and help to support a self-improving network? (p.24)

Agree



Disagree



Neither agree nor disagree



Supporting comments

NDCS Cymru can see value in the learning hub model, provided there is:

- a rigorous set of criteria for identifying the centres and their areas of excellence
- regular checks / monitoring to ensure the centres continue to function at a sufficiently high level in their areas of expertise
- training for the staff in the identified centres of excellence on how to impart their expertise and knowledge through mentoring, coaching or direct instruction
- a match between the training on offer from the centres of excellence and the identified needs of the individual settings within the hub (NDCS Cymru believes more emphasis should be given in the plan to the training needs / analysis cited as an input on Fig 3 on page 25 of the plan.)
- an acknowledgement that low incidence needs, such as deafness, may not give any centre the ability to build up a sufficiently high level of expertise to allow them to impart knowledge etc to others and therefore there would be a need to use external specialists such as Teachers of the Deaf and / or speech and language therapists specialising in deafness. NDCS Cymru would suggest adding the need for such external specialists to the final paragraph on page 23 of the Plan, where it states that practitioners linked to a hub ‘would benefit from the expertise of.....Flying Start and Foundation Stage Advisory teachers.’

Question 3 – Please consider Recommendations 15 and 16 of the Graham Review.

Recommendation 15: We recommend that Welsh Government ensures that regulations are revised to require appropriate Level 5 qualifications for leaders of all newly registered settings from 2018, and all settings from 2020.

Recommendation 16: We recommend that Welsh Government introduce regulations that require larger settings (registered for 20 children or more) to have a supernumerary manager should also require that manager to hold an appropriate Level 5 qualification (with specific leadership modules) by 2020 and a Level 6 qualification by 2024.

Do you agree with these recommendations? (p.26)

Agree Disagree Neither agree nor disagree

Supporting comments

NDCS (Cymru) supports the above recommendations as:

- the Foundation Stage is one of the most important stages in the education of children and therefore it is vital to have well qualified leaders.
- they are part of a clear career pathway which hitherto has not existed and so should encourage more well qualified people to consider this stage of education as a genuine career choice.

Question 4 – Do you agree that the proposed Level 6 qualification would equip practitioners with the necessary knowledge and skills to lead and deliver high-quality practice? (p.26)

Agree Disagree Neither agree nor disagree

Supporting comments

NDCS(Cymru) believes there is insufficient information to make a secure judgement on this.

2. Attracting high-quality new entrants

Question 5a – Do you agree that it would be beneficial for pre-entry information sessions to be extended to cover the requirements and opportunities of working in all types of settings in the early years, childcare and play sector? (p.32)

Agree Disagree Neither agree nor disagree

Supporting comments

NDCS (Cymru) believes it is important for all new and potential entrants to have as much information as possible regarding the range and requirements of all the opportunities available in the sector.

We also feel that pre-entry information sessions should include information about children with additional learning needs and disabilities. Many people enter the early years workforce

because of the job satisfaction that working with young children can provide. Working with children with ALN and disabilities can also prove to be very rewarding for early years practitioners. Information about working with children with ALN and disabilities should be presented in a positive way and as an opportunity for career progression.

Question 5b – If you agree, please provide information as to how these sessions could most effectively be extended and delivered. (p.33)

Supporting comments

NDCS does not have the expertise to offer suggestions on this point, but generally have found it effective if people currently employed in the different aspects act as ambassadors for their particular role.

Question 6 – Do you agree that a structured induction process should be the first stage in a personal development plan for all new entrants to the sector and that completion of this should be recorded in a continuous professional development (CPD) portfolio? (p.33)

Agree Disagree Neither agree nor disagree

Supporting comments

NDCS Cymru believes that a structured induction process must form the first stage in a personal development plan for new entrants if there is a serious intention to achieve increased competence in the early years work force. NDCS Cymru also believes that all existing practitioners should have a personal development plan.

Question 7 – Do you agree that any future Level 6 qualification should be complemented by a Graduate Level Certificate in Leadership in Childhood Practice to enable graduates to gain a competency qualification at an appropriate level and to practice in the sector on completion of their degree? (p.33)

Agree Disagree Neither agree nor disagree

Supporting comments

NDCS Cymru believes that this would make sense and also encourage those with degrees and with the right competencies to enter the profession.

Question 8a – Do you support the ambition to see Level 3 in a relevant qualification become the acceptable standard for all practitioners in the sector over time? (p.34)

Yes

No

Unsure

Supporting comments

NDCS Cymru strongly supports this ambition in order to raise the quality of input that the children receive and so ultimately improve the outcomes for the children. NDCS Cymru would want to ensure that the competencies covered the needs and interventions for children with additional learning needs and disabilities, particularly in our case the needs and interventions for deaf children.

Question 8b – Do you agree with the phased introduction of this requirement, in two stages over a 10-year period? (p.34)

Agree

Disagree

Neither agree nor disagree

Supporting comments

NDCS Cymru does not feel it has the knowledge or information to comment on this proposed timescale.

Question 9 – In your view, is it appropriate for childminders to achieve a relevant Level 3 qualification within three years of their initial registration? (p.34)

Yes

No

Unsure

Supporting comments

NDCS Cymru would welcome the proposal for childminders to achieve a relevant Level 3 qualification, but has not the knowledge or information to comment on the suggested timescale.

We would wish to see deaf awareness included in this qualification for the same reasons as outlined in the response to question 1.

3. Raising skills and standards across the existing workforce

Question 10 – Do you agree that the workforce would benefit from a set of overarching CPD principles and individual online portfolios to record learning and development? (p.41)

Agree



Disagree



Neither agree nor disagree



Supporting comments

NDCS Cymru believes that there should be overarching principles to ensure parity for all practitioners, while the individual online portfolios would provide good tracking and progression information both of which are essential if quality is to be achieved by having a work force that is motivated to improve their performance. If the level of information within these portfolios was sufficiently detailed, this would also allow ongoing monitoring and moderation which would be two important strands within this set up.

However, the most important element of all is to ensure appropriate learning and development activities and training focussed not only on skills but also underpinned by the **knowledge** required to be effective practitioners. NDCS Cymru would expect the framework to either include or reflect the standards to be achieved by the practitioners at the various levels. NDCS Cymru would further suggest that there should be a set of generic standards at all levels that all practitioners must achieve and also specific standards for those practitioners supporting children with additional needs and especially low incidence needs such as deafness.

Question 11a – In your view, should there be a system of professional registration for the non-maintained sector? (p.41)

Yes



No



Unsure



Supporting comments

NDCS Cymru would welcome a system of professional registration for the non-maintained sector as it would be another way of improving quality across the board provided common standards / criteria were agreed and applied.

Question 11b – If yes, how could this system be monitored? (p.41)

Supporting comments

NDCS does not have the expertise to provide advice on this aspect.

Question 12a – Please consider Recommendation 12 of the Foundation Phase Stocktake, which called the Welsh Government to:

Develop training that ensures all staff understand the research on the effects of disadvantage and poverty and the possible ways to close the achievement gap. Sharing good practice from those maintained schools and funded non-maintained settings where this is working well should be part of the training and so should research on supporting the home learning environment (HLE). Maintained schools could be asked to devote some of their Pupil Deprivation Grant (or similar) to support staff development here.

Would training on the effects of disadvantage be of benefit to practitioners and teachers in the Foundation Phase? (p.44)

Yes

No

Unsure

Supporting comments

NDCS Cymru believes that an understanding of the effects of disadvantage would aid the understanding of the practitioners; however, it would only have an impact if the training included practical information and strategies on how to close the achievement gap as cited in Recommendation 12 of The Foundation Phase Stocktake and quoted on page 43 of this plan.

NDCS Cymru appreciates that reducing the impact of poverty is one of the top three priorities for Welsh education (page 38 of the Consultation Document) with the other top two priorities being literacy and numeracy. NDCS Cymru would point out that there is a considerable gap in attainment between deaf children and their hearing peers in both literacy and numeracy (see information in question 1). The Early Years is a crucial time for establishing the basis for development of both numeracy and literacy and so we would also call for specific training in effective teaching strategies for those practitioners working with deaf children in the areas of literacy and numeracy as this would improve the outcomes of deaf children and also contribute to the general closing of the achievement gap.

Question 12b – Who would be best placed to develop and deliver this training? (p.44)

Supporting comments

NDCS Cymru is not in a position to comment on this in respect of the impact of poverty.

With reference to the particular needs of deaf children in literacy and numeracy Teachers of the Deaf have expertise in this area and have a duty to support practitioners in mainstream educational settings. This support includes suggesting strategies to support teaching deaf children and providing deaf awareness training in educational settings.

Question 13 – Do you agree that that the proposed ‘stepped approach’ to up-skilling could potentially help to address the appetite within the early years, childcare and play workforce to further learning and development? (p.44)

Agree

Disagree

Neither agree nor disagree

Supporting comments

NDCS Cymru believes that this appears to be a very clear, logical and planned approach to the up-skilling of the practitioners but is not in a position to comment on whether or not it will address the appetite for further learning and development.

Question 14 – Please consider Recommendation 18 of the Foundation Phase Stocktake, which stated that the Welsh Government should:

Review the current adult to child ratio in reception classes. Currently it is 1:8, primary schools’ staff, advisors and inspectors agreed that it could be increased to 1:10 without affecting quality. However, some schools may need to apply for an exception where, for example, they are situated in very rural areas or where they have a considerable number of children with additional needs such as SEN or E/WAL as it would not be practical to increase the ratio.

Do you agree with this recommendation to change adult to child ratios in reception classes in schools? (p.46)

Agree

Disagree

Neither agree nor disagree

Supporting comments

NDCS Cymru is not in a position to comment on whether or not there should be a change in child /adult ratios in reception classes, but if there was an increase, NDCS Cymru would want reassurance that the needs of any deaf child in a reception class would continue to be met on an individual level and any assistant allocated to that child would not be included in the general allocation to the class.

Question 15a – Do you agree that a Grade C GCSE, or equivalent, is the appropriate minimum level of essential skills for those working within the early years, childcare and play workforce? (p.47)

Agree

Disagree

Neither agree nor disagree

Supporting comments

We would agree in principle that there should be a minimum level of basic and essential skills for those working in the early years, childcare and play workforce.

Question 15b – Should these skill levels be a requirement on entry to the sector (rather than achieved while working, within a fixed time period)? (p.47)

Yes **No** **Unsure**

Supporting comments

NDCS would, ideally, like to see these skill levels being present on entry to the sector; however, if a candidate meets all other criteria for entry to the sector, a case could be made for achieving the skill levels within a given time.

Question 16 – Do you agree that the Welsh language support as set out in this draft plan would help to promote greater use of the Welsh language in schools/settings? (p.47)

Agree **Disagree** **Neither agree nor disagree**

Supporting comments

We welcome the aspiration outlined in the framework to increase practitioner confidence in the use of Welsh in English-medium early years and childcare settings. We are not confident that a six week course will achieve this aspiration.

In many areas of the country Welsh medium early years and childcare provision is sparse and it can be very difficult for parents to secure a place at a provider where Welsh is the main language spoken. This puts deaf children who are raised in a Welsh speaking home at a distinct disadvantage. Acquiring oral language is challenging for any deaf child, but for a Welsh speaking deaf child, who is in a setting where there is only minimal support in his or her mother tongue, it will be even more difficult.

We would wish to see a set ratio of fluent Welsh speaking staff in nurseries corresponding to the percentage of Welsh speakers in that particular area.

Question 17 – 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:

Please enter here:

Many deaf children will have difficulties communicating verbally in the early years. Some deaf children will not have any verbal communications skills. It is important that the early years workforce has knowledge of alternative communication methods, such as British Sign Language, Sign Supported English/Welsh and Cued Speech. If a deaf child is using any of these methods they will require an early years support worker trained in the specific method. We would further recommend that any early years practitioner working with a deaf child who communicates with BSL should have a minimum of level 3 BSL.

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: