

Our National Mission: A Transformational Curriculum

National Deaf Children's Society Cymru

March 2019



About Us

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

In referring to deafness, we refer to all levels of hearing loss, from mild to profound, unilateral and bilateral, permanent and temporary hearing loss.

Response

Summary

The National Deaf Children's Society has chosen to respond to a selection of questions which are of most relevance to deaf learners. However, the key points we wish to be considered as the Welsh Government moves forward with curriculum reform are as follows:

- **Protection of data by ALN type**
The National Deaf Children's Society Cymru is concerned by proposals to move to a random sampling method of data collation. We are concerned about the impact this could have on the viability of publishing attainment data by ALN type. This data is essential in monitoring the attainment gap for vulnerable learners, including deaf pupils.
- **Accessibility of the curriculum**
It is imperative that the new curriculum is accessible to deaf learners, particularly given that the vast majority of deaf learners in Wales attend mainstream schools. The National Deaf Children's Society Cymru has welcomed the opportunity to comment on draft papers for the LLC AoLE. Through this process, we have identified a number of suggested changes to make the draft AoLE more accessible for deaf learners and those who use BSL. We hope that these comments will be taken on board and that we will continue to be consulted as developments progress. However, while the LLC AoLE clearly presents the need for due consideration for the access requirements of deaf young people, we also believe that the same is true for other areas of the new curriculum. We would welcome the opportunity to work with the Welsh Government on guidance on ALN accessibility to the curriculum.
- **ALN Guidance**
As outlined above, the National Deaf Children's Society Cymru believes that ALN guidance could assist with accessibility to the curriculum. We would welcome the opportunity to work with the Welsh Government from a deaf perspective.

- **Learning BSL**
There is much appetite for a BSL GCSE in Wales and we are pleased that the Minister has outlined her support for this, stating that the new curriculum will enable schools to opt to teach BSL. Having been recognised as an official language in Wales in 2004, we would welcome any moves to proactively encourage schools to teach BSL and would be willing to work with the Welsh Government in this regard.
- **ALN specific awareness raising in ITE**
Given the emphasis on teachers using their expertise to develop the curriculum locally, it is essential that ITE includes a focus on raising basic awareness of key ALN types, including deafness.
- **Deaf and Disability awareness for all pupils**
The National Deaf Children’s Society Cymru welcomes that one of the four purposes of the new curriculum is to create “ethical learners”. We consider that including deaf and disability awareness on the school curriculum would assist with this aim. Many deaf learners tell us that they feel isolated and that they need other pupils in their schools to be more deaf aware. With the Welsh Government’s emphasis on placing the vast majority of ALN learners in mainstream settings, raising disability awareness in schools is particularly important.
- **Specific consideration of ALN within inspection and quality assurance frameworks**
In moving towards progression steps, it is important that safeguards are in place to ensure any tendencies to hold lower expectations for ALN learners is not exacerbated. As such, we recommend a specific ALN focus in self assessments and inspections. We would welcome further discussion on this point.
- **Ensuring learning around careers encompasses the needs of disabled learners**
The young deaf people on our Youth Advisory Board tell us that more support is needed in schools around careers advice. As such, we welcome the emphasis in the white paper on careers. We strongly urge that this approach takes account of the specific needs of disabled learners and adopts a disability positive image around career aspirations.

White Paper

2. Do you agree we should impose a duty on schools and Funded Nursery Settings to provide a curriculum to help most learners to reach, or go beyond the Achievement Outcomes set by the school and to progress children along the continuum for the Progression Steps in accordance with their educational development?

3. What actions should the head teacher and governing body take to satisfy this duty?

4. What support would be required to enable schools to take those actions?

Although the National Deaf Children’s Society Cymru is not necessarily opposed to the progression step approach, we are concerned that this approach has the potential to exacerbate any culture of low expectations for learners with ALN. Although we do not suggest that a great number of professionals would regard progression steps as a way to justify slower progress for more vulnerable learners, it is nevertheless a potential which must be safeguarded against. It is imperative that checks and balances are in place to ensure ALN learners are moving along their progression steps at an appropriate pace. The National Deaf Children’s Society Cymru suggests the Welsh Government utilises the reforms around inspection and self-

assessment to emphasise and address this point. We would recommend that self-assessment frameworks hold a specific section on ALN to ensure it is placed firmly on the agenda.

The National Deaf Children's Society Cymru has also called for specific ALN guidance to sit alongside the new curriculum. While we are pleased to read in the impact assessment that the Welsh Government is "developing resources to support learners to progress from 'Routes for Learning' to Progression Step 1", this resource is intended for those with very complex needs. Guidance is required more broadly and generally around accessibility to the curriculum.

With the emphasis being placed on teachers having the freedom to adapt the new curriculum, it is essential that they are able to do so in a way that meets the needs of all of their learners – including those with ALN. The National Deaf Children's Society Cymru has long called for teacher training to include awareness of specific ALN types, including basic deaf awareness. We feel that the curriculum reforms increase the need for such training and would urge the Welsh Government to take this point on board.

5. Do you agree that age appropriate careers education and work related education should cover the age range 3-16, in line with the AoLEs?

Our Youth Advisory Board at the National Deaf Children's Society tell us that more support is needed in schools around careers advice. Specifically, they tell us that there is insufficient tailored support for deaf learners and that many are unaware of their rights as a disabled job seeker/employee. They are calling for greater awareness within school careers advice of key support packages such as Access to Work and Disabled Students Allowance.

They are also calling for raised expectations for the career aspirations of deaf learners and to "myth-bust" misconceptions that their deafness creates barriers to employment in certain fields such as building work and medical work. It is imperative that those teaching our young deaf people do not misinform them about what career avenues are open to them. In order to achieve this, our teaching staff need to have a certain level of awareness of deafness and disability.

In light of this and the acknowledgement within the Welsh Government's Employability Plan that disabled people in Wales are facing particular barriers in accessing employment, we would urge that the Welsh Government gives particular consideration and emphasis to this vulnerable group of learners when considering careers education across the curriculum.

14. What are your views on the proposed approach for ensuring that the teaching and learning of Welsh is an integral component of the curriculum for Wales?

Deaf children and young people can face particular barriers in accessing language and developing language skills. We recommend that particular consideration is given to these needs when developing the curriculum and would welcome further discussion with the Welsh Government on this point.

In taking a cross-curricular and more emphasised approach to learning languages, it is particularly important to consider those with communication difficulties and ensure that their access requirements are met accordingly.

It is vital to review the progress of these learners and make sure that cross curricular teaching in this way is not preventing them from reaching their full potential in other subject areas.

This also reiterates the need for ALN to form a core part of a schools self-assessment and for ALN guidance to accompany the curriculum.

15. What are your views on the legislative proposals to enable the new assessment arrangements?

The National Deaf Children's Society Cymru would welcome further discussions with the Welsh Government around accessibility to assessments and ensuring that these are accessible for deaf learners.

In setting Achievement Outcomes, head teachers will need to pay particular regard to the needs of ALN learners and will need to liaise with appropriate specialist professionals, such as Teachers of the Deaf.

We would also welcome further discussions around the publication of assessment results. We are concerned about proposals within the Donaldson report to move towards a sampling basis for the collation of assessment results. We feel that such an approach would threaten the availability of attainment data based on ALN type. It is imperative that such data is retained on a national basis so that the attainment gaps for these vulnerable groups of learners can be appropriately monitored.

16. Do you agree with the proposed approach outlined for evaluating the effectiveness of curriculum and assessment arrangements?

17. What are your views on the proposed approach to the publication of learner assessment data and any risks you foresee?

As outlined earlier in this response, we believe there is a particular need to monitor and evaluate the effectiveness of the curriculum from an ALN perspective given the vulnerability of this group of learners. The National Deaf Children's Society Cymru would suggest:

- Ensuring that data collation techniques maintain national annual data on attainment by ALN type, including deafness. The availability of this data has been crucial in monitoring the attainment gap for deaf (and other groups) of learners and it is imperative that this is retained.

- Ensuring that self-assessments and inspections have a particular emphasis on ALN. Both in terms of ensuring that the new ALNET Act is operating effectively, but also in ensuring that the curriculum is working effectively for this group of vulnerable learners. Given the significant attainment gap between deaf (and other ALN groups) learners and those with no ALN, it is important to ensure this focus within quality assurance. **We would strongly recommend that ALN forms one of the "key principles" or "national priorities" underpinning evaluation, as outlined in paragraph 3.150 of the paper.**

- Peer evaluation and validation of assessments should involve specialist professionals as appropriate.

19. Do you agree with our approach for the Impact Assessments? We would particularly value your view on the proposed impacts on groups with protected characteristics.

A more detailed answer to this question can be found in our below response to the equalities question. However, generally we feel that the equalities aspect of the impact assessment does not fully take account of many of the issues we have raised within this response and the summary at the start of this response.

Question 22 – 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.

We note the reference to the new ITE programme and wish to take this opportunity to reiterate the importance of raising basic awareness of specific ALN types, including deafness, among teaching staff. With the additional responsibilities that teachers will have under both the curriculum reforms and the ALN reforms, it is imperative that they have a basic level of deaf awareness.

We welcome that one of the four purposes of the new curriculum is to support our children and young people to be “ethical, informed citizens of Wales and the world.” We consider that a key part of this is to be understanding and inclusive of those with a disability. If we truly want to adopt a future society that takes the social model of disability, it is important that everyone is disability aware. The National Deaf Children’s Society Cymru believes that teaching children about deafness and disability as part of the new curriculum would be beneficial in this regard. We strongly recommend that the Welsh Government seeks to do so.

Furthermore, in light of the Welsh Government’s approach to provide mainstream education for the vast majority of learners with ALN, it is essential that our schools are inclusive of these learners. Ensuring that disability awareness is on the curriculum will lend to more inclusive environments for ALN learners.

Impact Assessment

Equalities Questions

- 1. To help inform our assessment of the possible impact of these proposals, can you foresee any particular impact on those with protected characteristics (within the meaning of the Equality Act 2010) and how they might be particularly affected by these proposals that have not been included in the draft impact assessment?**
- 2. What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?**

The disability section of the impact assessment states that “the curriculum must allow professionals the flexibility to deliver the specific content and experiences which meet the needs of their learners in their specific context; and to have a positive impact on learners with disabilities.” In order to be able to achieve this, it is important that teachers have a basic level of awareness of specific ALN types, including deafness; ALN guidance on accessibility to the curriculum; and an awareness of when other specialist professionals (such as Teachers of the Deaf) need to be involved in adapting the curriculum for disabled learners. In order to achieve this, the National Deaf Children’s Society Cymru recommends that specific ALN types are

covered within ITE and the production of ALN accessibility guidance to sit alongside the curriculum. We note that the impact assessment highlights that “the ALN sub-group is supporting this by developing resources to support learners to progress from ‘Routes for Learning’ to Progression Step 1.” However, this is focused on those with complex needs. We feel that more broad guidance is required around the accessibility of the curriculum generally.

We should also be mindful that a cross-curricular approach to learning requires careful consideration from an ALN perspective. It is imperative that learners who face particular barriers in one of the areas identified for cross-curricular learning do not then face barriers to learning other subjects as a result.

Also, as outlined elsewhere within this response, while we recognise the positives of a progression step approach, there is a danger that it could exacerbate any disposition towards low expectations for learners with ALN. As such, we strongly recommend that there is a key principle focus on ALN within inspection, self-evaluation and general quality assurance of the new curriculum.

We are pleased that schools with hearing impaired resources were included within the Pioneer Schools for developing the curriculum. We would welcome further information and assurances that the opinions of the specialists within these bases are being fully utilised to explore the accessibility of the proposals.

Further Information

Thank you for taking the time to read this response. If you have any queries regarding the points raised within this response, please do not hesitate to get in touch at Campaigns.Wales@ndcs.org.uk.