About Us

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

We support deaf children and young people with all levels of hearing loss from mild through to profound, including those with a unilateral (a hearing loss in one ear only) and a temporary hearing loss.

Deaf children and young people may use a range of different communication techniques. Some may use assistive technology such as hearing aids and cochlear implants, others may not. Some may use oral communication and lip-reading, some may sign and others may use a mixture of both.

Response

Welsh Government statistics demonstrate consistent and significant attainment gaps between deaf learners and their hearing peers. Deafness is not a learning disability and, with appropriate support, deaf learners should achieve on a par with their hearing peers. The curriculum reforms present the ideal opportunity to ensure that, moving forward, the curriculum is accessible to and inclusive of deaf young people. Throughout this response, we have highlighted how further consideration of accessibility for deaf learners could be given within the AOLE statutory Guidance documents.

However, we also wanted to take this opportunity to highlight the following overarching risks that the reforms present to vulnerable ALN learners, including deaf children and young people. The National Deaf Children’s Society Cymru believes it is imperative that these points are addressed as a matter of urgency.

1. Given the consistent attainment gaps and the particular vulnerability of deaf and other ALN learners, it is imperative that we continue to monitor attainment by ALN type. Proposals to change the way in which data on attainment is collated as random samples jeopardises the availability of data on low incidence needs groups, including deaf learners. While the National Deaf Children’s Society Cymru and others have been raising this issue since the proposal was first outlined in the Donaldson report, we have yet to receive any firm assurances in this regard.

**Recommendation:** That the Welsh Government provides firm assurances that collation and publication of attainment data by ALN type will be retained.
2. Deaf young people tell us that one of the biggest barriers they face is a lack of deaf awareness from mainstream teachers. The new curriculum seeks to provide teachers with greater flexibility to adapt the curriculum to suit local needs and, as such, heightens the vital need for teachers to receive basic deaf awareness training. We are concerned that firm reassurance has not yet been given that the new National Approach to Professional Learning and INSET days will hold a specific focus on raising awareness of ALN types, including deafness.

The need to raise ALN awareness among teaching staff is also crucial given the emphasis on cross-curricular learning of literacy, languages and numeracy. Although deaf learners are able to achieve in these areas of learning, they are likely to have specific access and support requirements. Consideration must be given to how this support is to be replicated across lessons where cross-curricular teaching is in place to ensure accessibility. In reading each of the draft statutory AOLE guidance, the National Deaf Children’s Society Cymru believes this issue needs further consideration.

**Recommendation:** That the Welsh Government commits to providing teachers with training on specific ALN types, including deaf awareness. We would particularly welcome assurances on featuring awareness of ALN types within the new National Approach to Professional Learning and the ITE offer.

**Recommendation:** That the cross-curricular sections within the statutory guidance for the AOLEs are improved to emphasise the need to ensure that some ALN learners may have particular access needs in these strands of the curricular. In undertaking a cross-curricular approach, it is important to ensure that such access requirements are also met across the curriculum.

3. While the National Deaf Children’s Society Cymru understands the rationale behind moving towards a progression step model, this approach does present a risk for our most vulnerable ALN learners. Without appropriate monitoring mechanisms in place, the progression step model could exacerbate a culture of low expectations for deaf learners. It is important that learners are truly being supported to reach their full potential and that it is not complacently accepted that they are simply working on a different progression step. While we are not suggesting that this is the way professionals generally operate, it is nevertheless a risk that must be safeguarded against.

**Recommendation:** That the Welsh Government puts in place clear monitoring mechanisms to ensure progression steps do not exacerbate a culture of low expectations for vulnerable ALN learners. In particular, the National Deaf Children’s Society Cymru would welcome discussions around how the new Estyn inspection framework could assist with this.

4. Deaf young people frequently tell us they feel isolated and excluded at school because their hearing peers do not understand how best to communicate with them. This, in turn, leaves deaf young people more vulnerable to experience bullying and difficulties with emotional wellbeing.
Given the Welsh Government’s emphasis on teaching ALN learners within mainstream settings, it is particularly important that steps are taken to improve awareness of specific ALN types among the general pupil population. While the draft statutory guidance documents frequently reference the importance of the curriculum in developing our learners to become “ethical citizens,” there is no reference made to disability equality in the same way other protected characteristics are referenced.

The lack of emphasis or specific encouragement for schools to teach disability awareness within the reformed curriculum is a very disappointing missed opportunity which appears to be at odds with the Welsh Government’s ethos of mainstream schools that are inclusive of disabled learners. Such an area of learning should be specifically covered within the Health and Wellbeing AOLE and the Humanities AOLE.

**Recommendation:** That the statutory guidance for Health and Wellbeing and Humanities make specific reference to learning about disability equality and disability awareness.

5. Given the significant role that teachers will play in adapting the curriculum, we feel additional guidance on how the new curriculum applies to ALN learners would be beneficial. This guidance would need to be easily accessible for teachers and regarded as a crucial companion to the curriculum itself. We understand that there has been some discussion within the Welsh Government around producing ALN guidance, but we would welcome further information and the opportunity to be involved in these discussions.

**Recommendation:** That the Welsh Government takes forward discussions around ALN guidance to sit alongside the curriculum. The National Deaf Children’s Society would welcome the opportunity to be involved in such discussions.

6. We are pleased to see within each of the draft AOLE statutory guidance documents a clear reference to careers and work placements. Our Youth Advisory Board has told us that deaf young people need access to improved and specialised career advice. There are difficulties with widespread misunderstanding about deafness presenting perceived barriers to particular career choices and, as such, some deaf young people have been unnecessarily discouraged from certain career paths. In the same way that the statutory guidance documents specifically highlight the need to address gender stereotyping within careers, we would welcome specific reference to addressing disability stereotyping.

We would also welcome a specific reference to considering the needs of ALN and disabled learners within career choices and in making these learners aware of their employee rights/ rights as disabled learners (i.e. Disability Confident schemes, Access to Work and Disabled Students Allowance). Since we know that a lack of information in these areas is currently a problem, a direct reference to this would be highly beneficial.

The encouragement of identifying positive disabled role models in the work place would also be beneficial within this context.
In the near future, the National Deaf Children’s Society will be producing a number of free resources to help dispel myths around perceived barriers to employment for deaf young people. We would be happy to share these with the Welsh Government and with schools in Wales.

**Recommendation:** That statutory guidance documents make specific reference to the needs of deaf and disabled learners in the sections around careers and work placements. It is important to ensure deaf and disabled learners are provided with appropriate careers advice that makes them aware of their rights as a disabled job seeker/employee. It is also important to ensure disabled young people are not dissuaded from pursuing careers without considering how perceived barriers could be overcome.

7. Fundamentally, some of the language used throughout the curriculum documents is inaccessible for deaf learners. For example, “listening” and “speaking” may need to look different for certain ALN groups.

In previous discussions with the Welsh Government, we recognised the specific difficulty of ensuring that the progression steps within the language, literacy and communication AOLE were accessible to learners whose first language is BSL. There was discussion around writing a version of the AOLE for this group of learners.

**Recommendation:** That the Welsh Government review wording of the statutory guidance documents to ensure that it is accessible to deaf learners.

**Recommendation:** The National Deaf Children’s Society Cymru would welcome further discussion with the Welsh Government around the accessibility of the language, literacy and communication AOLE in relation to BSL.

**Health and Well-being**

The National Deaf Children’s Society Cymru welcomes the emphasis placed on emotional wellbeing within the new curriculum. Being deaf in a hearing-orientated society presents deaf young people with particular barriers and can lead to feelings of isolation. Indeed, research demonstrates that deaf children are 60% more likely to experience mental health difficulties than other children (See Department of Health and National Institute of Mental Health, 2005. *Towards Equity and Access*).

Research also suggests that deaf children can be vulnerable to lacking the vocabulary they need to talk about their full range of emotions.

In light of this, we would welcome a specific reference within the statutory guidance for the Health and Well-being AOLE to the particular vulnerabilities that deaf and disabled young people can face and the importance of considering their specific needs in this area of the curriculum. The National Deaf Children Society Cymru offers free resources and information to assist professionals in this regard.
**Recommendation:** That the Statutory Guidance for the Health and Well-being AOLE specifically reference the particular vulnerabilities of deaf and disabled learners to experience difficulties with isolation, bullying and emotional wellbeing and the need to pay particular attention to this vulnerable group of learners.

The National Deaf Children’s Society Cymru also notes the emphasis on healthy relationships. We would, again welcome a mention of the fact that deaf young people and those with communication difficulties can be particularly vulnerable to experience abuse.

**Recommendation:** That the Statutory Guidance for the Health and Well-being AOLE highlights the particular vulnerability of deaf young people to experience abuse.

**Expressive Arts**

The National Deaf Children’s Society Cymru is pleased to note that the statutory guidance for this AOLE emphasises the need for an “accessible for all” and “inclusive approach” to the creative arts (see page 3). However, we believe that more work is needed to ensure that the guidance helps to deliver such an approach. With regards to deaf learners, the following points should be considered:

- References to “oracy” and “verbal” may need adapting for learners that communicate through British Sign Language.
- Depending on their type of hearing loss, some deaf young people may struggle with accents, pitch and tone. Others may be unable to hear certain frequencies within music or some sounds within rhyming words. It is important to understand the individual learner’s needs and adapt the curriculum accordingly.
- The group work nature of drama means that it is particularly important that participants are deaf aware. Awareness of key communication tips is imperative to ensuring that deaf learners are included in group discussions and work.
- Deaf children and young people can participate meaningfully in music lessons, but are likely to require adaptions. Teachers of the Deaf are best placed to advise on how to ensure lessons are accessible to deaf learners.
- Video materials should be subtitled.
- As the guidance for this AOLE indicates, creative arts can be used to explore human rights. Within this, the National Deaf Children’s Society Cymru would welcome a reference to the importance to exploring issues around disability rights and inclusivity.

**Humanities**

Deaf children and young people often tell us that the biggest barrier they face is a lack of deaf awareness from both their teachers and their peers. The emphasis within the Humanities AOLE of the new curriculum presents a great opportunity to teach young people about the social model of disability and to ensure that they are inclusive. This should form a vital part of the
objective for learners to be “informed, self-aware citizens engage with the challenges and opportunities that face humanity, and are able to take considered, ethical and sustainable action” (page 38). It is disappointing, therefore, that disability is not listed alongside other areas of protected characteristics to be covered within learning. For example on page 67, 77 and 79.

Many deaf people have a strong connection to Deaf culture and the Deaf community. Where relevant, the humanities AOLE could present a good opportunity to cover Deaf culture within the curriculum. The National Deaf Children’s Society Cymru would welcome reference to this suggestion within the statutory guidance.

As highlighted elsewhere within this response, references within this document are made to points of learning that may require adaptations for deaf learners. For example, the reference to “oral sources” on page 22 and “music” on page 36. Deaf learners may require adaptations to access these areas of learning and it is important that teachers across all areas of learning are aware of this.

**Mathematics**

As highlighted at the start of this response, the statutory guidance for the Mathematics AOLE, as with the other guides, highlights points where teachers should be mindful that these elements of learning may require adaptations to be accessible for deaf learners. For example, the reference to rhymes and songs on page 11 and the reference to a “multisensory approach” on page 35.

Generally, deaf children and young people can face particular barriers in mathematics due to the abstract nature of mathematical language and the reliance on working memory. A deaf learners approach to learning language may mean that these are difficult areas.

**Science and Technology**

As identified above, the draft statutory guidance for Science and Technology also makes references to learning approaches that may require adaptations for deaf learners. For example, the references to oracy and listening on page 11 may not be appropriate to a BSL learner. Adaptations may also be required to experiments using sound (see page 64).

**Languages, Literacy and Communication**

The National Deaf Children’s Society was pleased that the Education Minister confirmed the new curriculum would enable schools to teach a BSL GCSE (discussions on its development are ongoing) as a modern language. This is an issue that is frequently raised by many young people – both deaf and hearing – and is to be welcomed. However, we are concerned that this message is not clearly communicated within the current draft of the statutory guidance for the languages, literacy and communication AOLE. While the glossary of this document does include BSL, there is no clear reference within the guidance to the teaching of BSL as a modern language. In addition, the references to “writing” within the progression steps for “international languages” may hinder schools from offering BSL as an international language.
Proactively encouraging schools to teach BSL by specifically mentioning it within this guidance would be particularly helpful in assisting with recognising “how languages are a key to social inclusion” (page 18).

**Recommendation:** That the statutory guidance for Language, Literacy and Communication clearly states that schools can teach BSL as a language and encourages schools to do so.

The Languages, Literacy and Communication AOLE emphasises a multilingual approach to learning. While we know that many deaf learners can achieve in this area with appropriate support, it is important to acknowledge that a multilingual approach to learning can be particularly challenging for deaf learners. This may be especially the case where a deaf learner has not been accessing support to develop a complete first/home language. This is because children with a complete first language are more likely to be able to transfer some of the understanding of this language into learning a second language.

It is important to acknowledge the need for greater emphasis on monitoring and developing the child’s home language, especially in the early years. Whether this language is English/Welsh/BSL or another language, ensuring that the child receives good models of that language at home and, where possible, in the education setting can be crucial to their wider linguistic development. The National Deaf Children’s Society Cymru urges that this point is reflected in the statutory guidance for this AOLE. For example, within progression step 2 (page 20), we would advise that the phrase “where applicable” is removed, so instead the progression step becomes “I can communicate in different languages including Welsh, English and home/community languages.”

For deaf children who may have lacked specialist support in developing language in the early years, an incomplete first language can present difficulties in multilingualism and translanguaging. It is important that teachers are aware of the need to work with professionals such as Teachers of the Deaf to ensure that an approach appropriate to the individual is taken.

As identified in other aspects of this response, particular focus also needs to be given to ensure that adopting a multilingual approach does not present barriers for young people who struggle with this type of learning in accessing other parts of the curriculum.

For deaf children who use BSL as their first language, it is worth noting that moving on to learning Welsh/English will present different learning approaches as BSL is not a written language.

Other areas of this AOLE that require specific consideration for deaf learners include:

- Listening and reading. There seems to be an assumption that listening is a pre-requisite of learning to read. This may need adapting for BSL learners.
- The progression steps reference understanding a variety of dialects and accents. This can be particularly difficult for deaf learners.
- There is also an emphasis on speaking “clearly” and with clarity. Deaf learners may struggle with this area. The emphasis on copying accurate pronunciation can be difficult where learners are unable to hear certain sounds or frequencies. Similarly exploring tone and volume may be an area where a deaf learner could feel less confident.
- The phonics approach to literacy and languages can require careful adaptation for deaf learners.
“Audio encounters and exchanges” (page 25) may require adaptations to be accessible to deaf learners.
- The references to understanding “extended speech” can be difficult for deaf learners who rely on lip-reading. Lip-reading for extended periods can be particularly exhausting. Often words can look similar and the lip-reader is required to consider lip-patterns carefully within the wider context of the conversation in order to follow what is being said.

This AOLE references the need for multilingual environments and using languages across the curriculum. As highlighted elsewhere in this response, the National Deaf Children’s Society Cymru wishes to emphasise the importance of meeting access requirements where cross-curricular teaching is in place.

**Recommendation:** Given the particular barriers that deaf learners face in developing literacy, language and communication, we recommend that the statutory guidance for this AOLE pays particular attention to access needs and adaptations that deaf learners may require.

**Assessment**

As highlighted earlier in this response, the National Deaf Children’s Society Cymru understands the rationale behind moving towards progression steps. However, it must be acknowledged that this presents a potential risk that learners may be vulnerable to low expectations. This may be a particular risk for deaf learners who should be able to achieve on a par with their peers, but are likely to require specific support. It is particularly important, therefore to ensure that assessment of these learners is appropriately monitored.

**Recommendation:** That schools, ALNCos, Estyn and others are encouraged through the curriculum guidance to pay particular attention to the progress of vulnerable learners including deaf learners.

The National Deaf Children’s Society Cymru is keen to work with the Welsh Government to ensure that baseline assessments and online assessments are accessible for deaf learners. We would welcome further discussion in this regard.

We are pleased that the current *National Reading and Numeracy Tests – Test administration handbook 2018/19* guidance highlights the importance of acoustic conditions when assessing hearing impaired learners. It is also positive to see this guidance specifically highlighting BSL users. However, references within this document to reading aloud could do with further consideration to the access needs of deaf learners. We would welcome the opportunity to work with the Welsh Government when this guidance is renewed for the next academic year.

**Recommendation:** That the Welsh Government works with the National Deaf Children’s Society Cymru to ensure assessments are accessible for deaf learners.

The role of the family can be crucial in supporting learning. We would welcome a strengthening within the guidance on the role that parents and carers can play in inputting into reporting on a learner’s progress.
While it is positive to note the reference to the importance of the IDP in monitoring a learner’s progress, it is also important that the guidance acknowledges the importance of including specialist professionals such as Teachers of the Deaf.

**Recommendation:** That the guidance places an expectation on the school to actively engage with parents/carers when considering a learner’s progress. On page 15, parents/carers “must” be given the opportunity to contribute as opposed to “should.” We would also welcome reference to the importance of involving relevant specialist professionals such as Teachers of the Deaf in assessing a learner’s progress.

The National Deaf Children’s Society Cymru welcomes the emphasis on transition planning within this guidance document. Transition can be a particularly difficult time for ALN learners and requires careful consideration.

**Further Information**

We would welcome further discussion on any of the points raised within this consultation. For more information, please contact [Campaigns.Wales@ndcs.org.uk](mailto:Campaigns.Wales@ndcs.org.uk).