

Qualified for the future

About you

Q1. 1. Which of the following best describes you? (Please select the option that best describes the capacity in which you are responding to this consultation.)

Other (please state):
Third Sector

Your age

Q2. Please select the category that best describes how old you are.

No Response

About you

Q3. 2. If you are responding on behalf of an organisation, please state the name of the organisation in the box below.

National Deaf Children's Society Cymru

Q4. The summary report provided by Arad Research will not identify any individuals or organisations. However, as we are a public body, all the written material we hold, including any correspondence you send to us, may be considered for release following a request under the Freedom of Information Act 2000. This could include publishing your, or your organisation's, name alongside your response. The law allows us to withhold information under some circumstances. If we receive a request for the information that you have provided in your response to this consultation, we will take account of any requests for confidentiality, but we cannot guarantee that it can be maintained in all circumstances. 3. Do you wish any part of your response to remain confidential?

No

Confidentiality

Q5. Please state clearly what information you would like to be kept confidential and explain your reasons why.

No Response

Guiding principles to help shape the qualification offer

Q6. 4. Qualifications Wales should take steps to ensure that publicly funded qualifications taken at 16 relate to, and support, the new curriculum for Wales. To what extent do you agree with this proposal?

Strongly agree

Please explain your answer in the space below. (In your response you may want to consider a) The benefits and challenges for you or your organisation and b) Any specific circumstances when this principle should not be applied.)

We agree that qualifications should support the new curriculum. We do, however, have a number of concerns we would like to see addressed: 1) Relationship between qualification uptake rate and need/demand- We would like to highlight that a low uptake of a qualification does not correlate to the qualification being redundant/ unnecessary. Any cuts to courses and qualifications offered should not disproportionately impact D/deaf young people or those with additional learning needs. Whilst assumptions should never be made about academic capability based on a child's disability or ALN and all children should have access to and be supported to take the same qualifications, there are occasions when deaf children, particularly those with more complex ALN, are entered into alternative qualifications that are better suited to their individual particular needs. The suitability and usefulness that such qualifications offer should not be discounted due to low numbers of enrolment. It is important, therefore, that information is gathered regarding the demographics and characteristics of those taking low-uptake qualifications. 2) Ensuring Accessibility standards- If the number of qualifications being offered are to be scaled back, there must be robust measures in place to ensure that accessibility standards are met. For example, where a recording is used in the 'listening element' of language exams, D/deaf young people should be offered the assessment through means suited to their particular communications needs- for example, having the text spoken in person so they can make use of communication skills such as lip-reading or delivered through BSL. 3) The Welsh Government has indicated that it is keen to ensure that descriptions of learning are appropriate both for those who are first language BSL users and for accommodating use of a BSL GCSE. With this in mind, we would urge Qualifications Wales to ensure that new qualifications bear in mind the needs of first language BSL users. 4) We would also urge that the willingness Qualifications Wales has demonstrated in the past to use a BSL GCSE created in England in Wales does indeed transpire, or that, if GCSEs are changed, an equivalent is introduced. There is great appetite for such a qualification among both deaf and hearing learners and has support across the political spectrum.

Guiding principles to help shape the qualification offer

Q7. 5. Qualifications Wales should require awarding bodies to make all publicly funded qualifications taken at 16 available in both Welsh and English. To what extent do you agree with this proposal?

Please explain your answer in the space below. (In your response you may want to consider a) The benefits and challenges for you or your organisation and b) Any specific circumstances when this principle should not be applied.)

In 2004, the Welsh Government recognised BSL as a language in its own right. It is, therefore, imperative that students who are BSL first language users can access qualifications, both course content and assessment, through their preferred medium. Qualifications Wales must consider how the qualifications offered meet this requirement. If all qualifications are required to be made available in both English and Welsh, then it must be structured so that all children who wish to sit their exams in either language can undertake this opportunity. Welsh speaking BSL users, for example, must also have access to the qualification and provisions will need to be in place to ensure that Welsh speaking BSL interpreters are available.

Guiding principles to help shape the qualification offer

Q8. 6. Qualifications Wales should more closely manage the range of publicly funded qualifications that centres can offer to 16-year-olds to make sure it is equitable and coherent. To what extent do you agree with this proposal?

Strongly agree

Please explain your answer in the space below. (In your response you may want to consider a) The benefits and challenges for you or your organisation and b) Any specific circumstances when this principle should not be applied.)

We agree that equability is essential, as outlined in Section 4.29. In order to ensure this, it is essential that D/deaf children and those with Addition Learning Needs should be offered the same access to qualifications as their hearing peers. They must not be offered alternative qualifications as a default position or 'easy' alternative due to lack of suitable resources- for with regards to both course delivery and assessment means. In keeping with the need for assessments and qualifications to be equitable, we wish to reiterate the importance of ensuring learners are not marked down on their English/Welsh/ written skills when the qualification relates to another subject- i.e. Music theory, history etc. as this is particularly problematic for children with Addition Learning Needs. We would be happy to work with Qualifications Wales on the development of systems and structures for managing equity and would welcome the opportunity to do so.

Guiding principles to help shape the qualification offer

Q9. 7. Are there any other principles you think we should consider when deciding which qualifications to make eligible for public funding for 16-year-olds in Wales? Please explain your answer in the space below.

Accessibility- Qualifications, by design, should not inadvertently put in place barriers for D/deaf children. Both the exam and the course content offered must be fully accessible to deaf young people. There must be a regulatory process in place to ensure that the competencies being assessed are not unnecessarily rigid- for example, communication skills being assessed by use of a telephone. If, for example, the qualification requires outdoor or industry placement elements then implementable and enforceable structures must be in place to ensure that the settings and placements offered are suitable and can meet the learning and wellbeing needs for all who participate. This is particularly relevant under the new curriculum where external organisations and business are being encouraged to offer placements to children. It is essential that these organisations are thoroughly vetted to ensure that they can provide a suitable learning environment for all children- for example, any materials distributed must be fully accessible, acoustics and set up of rooms must support children with additional auditory requirements.

GCSEs fit for the future

Q10. 8. On balance, we think that the GCSE name should be retained for the redesigned qualifications that will form a central part of the qualification offer for 16-year-olds in Wales. To what extent do you agree with this proposal?

No Response

Q11. 9. Do you have any specific suggestions for how GCSE qualifications could change to meet our vision and to support the aims and purposes of the new curriculum? Please explain your answer in the space below.

With reference to point 5.11
Within the guidance document, it is proposed that centres can tailor qualifications to match the resources

Q11. 9. Do you have any specific suggestions for how GCSE qualifications could change to meet our vision and to support the aims and purposes of the new curriculum? Please explain your answer in the space below.

of their own locality- as demonstrated in the example of the Built Environment GCSE. If centres are to have greater flexibility, then there must be checks in place to ensure the resources being drawn upon are suitable and supportive of the needs of D/deaf children. For example, if businesses or organisations are providing placements, then schools/ colleges must ensure that the business/organisation can fully meet the needs of D/deaf children, through both teaching/ provision of resources and the suitability of the physical environment. It is imperative that children with ALN and/or disabilities are not prevented from taking certain qualifications due to insufficient or inadequate resources: either at the centres or local organisations who offer placement/ learning opportunities for children.

Qualification assessments- We note reference to qualifications being assessed through both written and on screen methods. If this is the case, then all on screen materials must be fully accessible to D/deaf children. Measures to support this would include subtitled and BSL translation of video content. There must also be suitable measures in place to support students during listening exams including lip-speakers.

A qualification to assess wider skills

Q12. 10. On balance, we think that a specific qualification that supports the development and assessment of the wider skills (as defined in the new curriculum) should be part of the qualification offer for 16-year-olds in Wales. To what extent do you agree with this proposal?

Strongly agree

Please explain your answer in the space below.

We believe that a 'wider skills qualification' would provide D/deaf young people with the opportunity to develop skills that they may have missed out on due to limited access to wider social opportunities such as youth clubs, volunteering etc. Although deafness in itself is not a learning disability, statistics demonstrate that many deaf learners are falling behind their hearing peers. As a result of not receiving appropriate support earlier in their lives, deaf learners may be working on a lower a lower starting point in the development of wider/soft skills. This must be considered during curriculum design and sufficient flexibility demonstrated with respect to the types of activities that young people must complete and are assessed on as part of the skills qualification- for example, group projects that require the demonstration of team working can present unique challenges to deaf young people due to communication barriers. D/deaf children are also at higher risk of not possessing general knowledge developed through incidental learning. The qualification should not, therefore, assume a base level of knowledge- for example, discussions of world issues must provide contextual information and accessible explanations of definitions.

Q13. 11. Do you have any specific suggestions for how the Skills Challenge Certificate at key stage 4 could change to meet our vision and support the aims and purposes of the new curriculum? Please explain your answer in the space below.

The new curriculum places strong emphasis on ensuring young people become ethical, informed citizens of Wales and the world and healthy, confident individuals, ready to lead fulfilling lives as valued members of society. The skills challenge certificate could provide all young people to achieve this through the delivery of course content that supports disability awareness. Young people will be entering into the world of work where they will encounter a diverse workforce. They will also go on to become employers themselves. The skills certificate would, alongside the mainstream curriculum, provide an additional opportunity for disability awareness to be delivered to all children.

In the past, we have worked with the WJEC exam board to produce a fingerspelling module (see <https://www.ndcs.org.uk/icanfingerspell>). We would welcome the opportunity for the module to be retained or a similar module developed for the benefit of all students.

Impact assessments - Regulatory impacts

Q14. 12 a) Are there any further regulatory impacts that may arise from any of our proposals? If so, please explain your answer in the space below.

No Response

Q15. 12 b) Are there any additional steps we could take to reduce the regulatory impact of any of our proposals? If so, please explain your answer in the space below.

No Response

Q16. 12 c) Do you have any other comments on the regulatory impact of these proposals? If so, please explain your answer in the space below.

As previously discussed, we would urge Qualifications Wales not to remove qualifications that have a low take up without due diligence being paid to the demographic of learners who undertake said qualifications.
Once again, we reiterate the importance of ensuring that any qualifications that are chosen for public funding are fully accessible to all learners through robust checks and measures of assessment methods and curriculum content.

Impact assessments - Welsh Language and Equalities

Q17. 13 a) Would any of our proposals result in any other positive or negative impacts (intended or unintended) on opportunities for people to use the Welsh language?

No Response

Q18. 13 b) Would any of our proposals result in any other positive or negative impacts (intended or unintended) in relation to treating the Welsh Language no less favourably than the English Language?

No Response

Q19. 13 c) Would any of our proposals result in any other positive or negative impacts (intended or unintended) for individuals or groups who share protected characteristics outlined within the Equality Act 2010?

Please explain your answer in the space below.

1)References to bilingualism- we note that the document makes specific reference to bilingualism. As BSL is a recognised language, as such, we would like to see it included alongside English and Welsh. 2) There must be robust quality assurance measures in place to ensure that any qualifications that are publicly funded are fully accessible to young people with disabilities and/ or ALN. 3) Digital technology- given the emphasis on the role of digital technology in delivering qualifications, it is essential that accessibility remains at the forefront of qualification design and delivery- for example, qualifications relying on video content must ensure they are transcribed and available in BSL. 4) Low qualification take up does not equate to lack of need- as previously discussed, if certain qualifications are more heavily undertaken by

Q19. 13 c) Would any of our proposals result in any other positive or negative impacts (intended or unintended) for individuals or groups who share protected characteristics outlined within the Equality Act 2010?

groups with protected characteristics, they should not be removed on the basis of low take up. 5)Ensuring Accessibility standards- If the number of qualifications being offered are to be scaled back, there must be robust measures in place to ensure that accessibility standards are met. For example, where a recording is used in the 'listening element' of language exams, D/deaf young people should be offered the assessment through means suited to their particular communications needs- for example, having the text spoken in person so they can make use of communication skills such as lip-reading or delivered through BSL.

Closing questions

Q20. 14. If you have anything else you would like to say about the information outlined in this consultation document, please use the space below.

No Response

Q21. 15. We may wish to contact you to discuss your response further. If you are happy for us to do so, please provide your contact details below.

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