

# Response to Welsh Government Consultation: “Relaxation of school reporting requirements”

July 2020

Response by the National Deaf Children’s Society Cymru



## 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.

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

## Our Response

Deaf children and young people already face significant social and educational barriers in life. The effects of the Covid-19 situation and ‘lockdown’ are presenting additional significant barriers to all, including some specific and unique barriers for deaf children and young people.

We know that the Welsh Government, public bodies and local authorities are having to make swift decisions in response to unprecedented circumstances. However, we strongly believe that some decisions made at this unique point in time could risk problems for children with Additional learning Needs (ALN) both in the immediate and the long-term. Whilst we understand the rationale behind suspending certain school reporting measures, there are aspects of the proposals where we are keen to seek assurances.

## Concerns

The Consultation proposes that, in light of the corona virus pandemic, school governing bodies will not be required to provide pupil performance data for the 2019/2020 academic year:

### ***The School Governors’ Annual Reports (Wales) Regulations 2011 (“the Annual Report Regulations”)***

- *10. The Annual Report Regulations require school governing bodies to produce an annual report, including information about school performance against published targets. Whilst governing bodies will be still be able to produce a report, it would be inappropriate for reports produced in respect of pupils registered at schools in the 2019/20 school year to include performance and attendance data, as it will not be comparable to previous years. It is proposed that the Annual Report Regulations are amended to modify the content of reports produced in relation to the 2019/20 academic year so that information may not be included in any school*

*governors' report. The statutory duty for governing bodies to produce a report will remain (p.7)<sup>1</sup>.*

and

***The School Performance Information (Wales) Regulations 2011 (“the Performance Regulations”)***

*There has been disruption to the undertaking of foundation phase and key stage teacher assessments during the 2019/20 summer term, due to school closures, and the associated Welsh Government statutory data collection was cancelled. It is, therefore, proposed that amendments are made to remove the duties on governing bodies and local authorities to provide data to local authorities and Welsh Ministers, respectively, on teacher assessment outcomes and authorised or unauthorised absence for the pupils registered at schools in the 2019/20 school year. The Welsh Government will not be reporting on 2019/20 school performance measures, including them in All Wales Core Data Sets (‘data packs’), or publishing them on the My Local School website. We will, however, need to retain provision that allows Welsh Government receive results of approved qualifications, for other purposes not related to school performance or accountability.<sup>2</sup>*

While we appreciate that schools and local authorities have been operating under unprecedented circumstances, we have particular concerns around not collating and publishing data on Key Stage 4 for 2020.

We are well aware that GCSE examinations have been cancelled for this year, with learners instead being awarded grades from assessments made by their centre. The National Deaf Children’s Society Cymru (and we are aware other organisations too), have raised concerns about the lack of a clear route for learners to challenge their grades should they feel their final grade has drawn on evidence where accessibility was an issue. We are also anxious that there may be an unconscious bias towards learners with ALN and deaf learners in making these assessments.

Particularly in light of the above concerns, ensuring that performance data for Key Stage 4 is published for 2020 by SEN type (as has been the case for a number of years), is an important quality assurance measure. Not doing so would present a further lack of transparency and accountability. It also presents a potential conflict against the Welsh Government’s own commitment to open data publication<sup>3</sup>.

Not only is the publication of attainment data important as a quality assurance of how learners with additional needs have been impacted by the grading arrangements this year,

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<sup>1</sup> The Relaxation of School Reporting Requirements (Wales) (Coronavirus) Regulations 2020, p.7. Available at:

<https://gov.wales/sites/default/files/consultations/2020-06/consultation-document-relaxation-of-school-reporting-requirements.pdf>

<sup>2</sup> The Relaxation of School Reporting Requirements (Wales) (Coronavirus) Regulations 2020, p.7. Available at:

<https://gov.wales/sites/default/files/consultations/2020-06/consultation-document-relaxation-of-school-reporting-requirements.pdf>

<sup>3</sup> UK Open Government National Action Plan 2019-21: Welsh Government Commitments Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/803677/Office\\_of\\_the\\_Chief\\_Digital\\_Officer\\_-\\_UK\\_Open\\_Government\\_National\\_Action\\_Plan\\_2019\\_-\\_2021\\_-\\_Welsh\\_Government\\_Commitments.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/803677/Office_of_the_Chief_Digital_Officer_-_UK_Open_Government_National_Action_Plan_2019_-_2021_-_Welsh_Government_Commitments.pdf)

but it is important in light of the upcoming ALN reforms. Maintaining clear benchmark data has a key role to play in reviewing the progress of these reforms too.

With regards to the annual reporting process more generally, we would urge that schools be encouraged to report on how their response to the pandemic sought to accommodate the needs of ALN learners. It would also be helpful to report on how they are seeking specifically to meet the needs of ALN learners in planning for the “new normal” in September. We are aware that ALN learners, including those who are deaf, have faced a number of unique educational barriers within the pandemic. Without appropriate support these learners can be vulnerable to underachievement and feelings of isolation under usual circumstances, so ensuring that this group is well supported within the challenging context of the pandemic is imperative.

### **More information**

Thank you for taking the time to read this response. If you would like any further information, please do not hesitate to contact us at [campaigns.wales@ndcs.org.uk](mailto:campaigns.wales@ndcs.org.uk).