## **Consultation on the Curriculum for Wales British** sign language (BSL) guidance



## National Deaf Children's Society Cymru Response

## March 2021

### Question 1 – Do you work in or support the delivery of education?

- <sup>©</sup> Yes
- 🖲 No

### i) If yes, what is your organisation? (If no, continue to iii below.)

- <sup>O</sup> Welsh-medium school (primary)
- O Welsh-medium school (secondary)
- <sup>©</sup> Welsh-medium school (special)
- C English-medium school (primary)
- C English-medium school (secondary)
- C English-medium school (special)
- <sup>©</sup> Bilingual school (primary)
- <sup>C</sup> Bilingual school (secondary)
- <sup>O</sup> Welsh-medium middle school
- <sup>C</sup> English-medium middle school
- <sup>©</sup> Pupil referral unit (PRU)
- <sup>O</sup> Special school
- C Funded non-maintained setting
- <sup>©</sup> Further education college
- <sup>©</sup> Higher education institution
- Diocesan authorities
- C Regional consortia
- <sup>C</sup> Local authority
- <sup>©</sup> Private training provider
- <sup>O</sup> Third sector
- Government
- C Adult community learning
- <sup>©</sup> Awarding organisation
- <sup>C</sup> Teaching union

- C Regulatory body (includes Inspectorate)
- <sup>O</sup> Governing body
- <sup>O</sup> Other (please specify):

#### ii) What is your primary role?

- C Headteacher
- C Teacher
- <sup>©</sup> Practitioner
- <sup>©</sup> Newly qualified teacher
- <sup>©</sup> Teaching assistant
- <sup>O</sup> Senior leader
- <sup>O</sup> Supply teacher
- <sup>O</sup> Principal/vice-principal
- Chancellor/vice-chancellor
- C Lecturer
- <sup>©</sup> Pioneer
- <sup>©</sup> Governor
- Challenge advisor
- <sup>C</sup> School improvement officer
- C Inspector
- <sup>©</sup> Other

#### iv) Are you providing feedback on behalf of an organisation or group?

- 🖲 Yes
- <sup>©</sup> No
  - v) If 'yes', please specify.

This response is provided on behalf of the National Deaf Children's Society Cymru. The National Deaf Children's Society seeks to create a world without barriers for deaf children, young people and their families. We support children and young people with all levels of deafness, from mild through to profound, including those with temporary hearing loss and a unilateral loss. We use the term deafness to refer to all levels of hearing loss.

The National Deaf Children's Society Cymru welcomes the Welsh Government's commitment in developing this document to both consider the needs of BSL users under the new curriculum and facilitate the ability to teach BSL as a second language on the curriculum. However, as we will outline within our responses to the questions, we do feel that improvements are required to ensure that this guidance effectively meets these aims. We would welcome the opportunity to work further with the Welsh Government in order to achieve this.

### Question 2 – Is the published Curriculum for Wales guidance and this draft Curriculum for Wales guidance for British Sign Language clearly aligned?

- <sup>©</sup> Yes
- <sup>©</sup> No
- Not sure
  Please explain your answer

The National Deaf Children's Society Cymru understands the need for this guidance to sit alongside and complement the existing suite of curriculum guidance.

However, we do have reservations that in attempting to meet with the style of the other guides, some key information that would have been helpful in this guide has been missed – particularly for those audiences who have limited previous knowledge of BSL. For example, inclusion of the following would be helpful:

- An overview of sign language and the different ways in which it is used, including clarity on the difference between BSL, Sign Supported English/Welsh and Makaton so as to draw important distinctions and help to avoid common misconceptions.
- The guidance seeks to cover three very different groups of learners (those who use BSL as a first language; those who use BSL alongside other communication approaches; and those who are learning BSL as a second or third language). Greater clarity and distinction within the guidance for these very different groups of learners would be beneficial.

The National Deaf Children's Society understands from the consultation document that the guidance will be redrafted to take on board reflections from the consultation responses. We would welcome the opportunity to assist with this.

Question 3 – Is the guidance for the Languages, Literacy and Communication Area of Learning and Experience and this draft Curriculum for Wales guidance for British Sign Language clearly aligned?

While there is alignment between the two documents, some of the key features of the Languages, Literacy and Communication Area of Learning and Experience are not replicated within this guidance. In addition, more detail (e.g. on other aspects of the progression steps) would be helpful, as is outlined in our response to question 8.

Question 4 – Does this draft Curriculum for Wales guidance for British Sign Language balance both the needs of deaf and hard of hearing learners learning and using British Sign Language as a first/predominant language and the needs of other learners for whom British Sign Language is a third or subsequent language (like French or German)?

- <sup>O</sup> Yes
- 🖲 No
- O Not sure

Please explain your answer

As outlined above, the National Deaf Children's Society Cymru welcomes and applauds the Welsh Government for seeking to ensure that the new curriculum is both accessible to learners who use BSL as a first language and those who are learning as a second language. However, we believe balancing the BSL needs for deaf learners and hearing learners are separate issues that requires more distinctly separate guidance/sections of guidance. This document seeks to provide guidance for three groups of learners; deaf children who use BSL as a first language, deaf children who use sign to support their first spoken language (Sign Supported English/Sign Supported Welsh), and learners who choose to learn BSL as a second/third language. These three groups have very different requirements from the guidance. We feel that this should be improved upon in the final draft of the guidance.

Question 5 – In your opinion, will the references in the human rights and diversity section of this guidance to specific articles from the UNCRC support schools and settings in planning, designing and implementing their curriculum?

- <sup>O</sup> Yes
- <sup>©</sup> No

### O Not sure

The National Deaf Children's Society believes that this aspect of the guidance could be improved – particularly from the perspective of highlighting that teaching BSL as a second language can help to improve awareness and encourage all pupils to develop an understanding of Deafness and Deaf culture.

Question 6 – Some example descriptions of learning are provided in the draft British Sign Language guidance. In your opinion, are there are any specific aspects of progression in British Sign Language that should be reflected in the descriptions of learning that will be included in the Curriculum for Wales?

- <sup>O</sup> Yes
- <sup>©</sup> No
- O Not sure

It will be helpful to have more information on how the other progression steps relate to BSL – both from a first language user perspective and from the perspective of teaching BSL as a second language. Such progression steps would need to allow for individual needs and challenges. The National Deaf Children's Society would welcome further discussion on this.

# Question 7 – Are there any aspects of this guidance that you feel are too prescriptive?

- <sup>©</sup> Yes
- <sup>©</sup> No
- • Not sure

# Question 8 – Are there any aspects of this guidance that you feel are not detailed enough?

- • Yes
- <sup>©</sup> No
- <sup>O</sup> Not sure

As outlined earlier, we feel that the guidance requires more detail on the background of BSL and its usage both as a first language as well as its connections to the Deaf community. We also think it would be helpful to outline the differences between BSL and other forms of sign language.

In places, the guidance appears to stray into making seeming position statements. At the National Deaf Children's Society we believe in families have the right to choose the communication approach that works best for them and their own needs. Some aspects of the guidance could benefit from more careful wording so that this message is reinforced – particularly given that many practitioners reading the resource will have little or even no prior knowledge of deafness. For example the information in the below section is presented in a potentially misleading and problematic way:

"Deaf children often have late exposure to sign language. This is not surprising given that most of them are born to hearing parents who are, initially at least, unlikely to be sign language users themselves. This can have long-term effects on a child's language and cognitive development. Hearing technologies such as cochlear implants are not provided until after one year of age and the rehabilitation process after the implant is activated takes an extended period of time. BSL allows children to be surrounded by an accessible language at all times, whether or not they go on to develop good skills in spoken language."

We feel that the guidance would benefit from greater clarity between the different types of BSL learning as outlined earlier in the response. In places, the guidance places emphasis on first language BSL learners and does not provide information of those learning BSL as a second or third language. It is important that there is clear and distinct information on each of the groups of BSL learners.

While the questions within the guidance at page 9 are helpful in provoking thought, more guidance to accompany these questions would be helpful. In the absence of further detail, we believe this presents difficulty for practitioners with a limited understanding of deafness and BSL. It is important to emphasise the importance of working with specialist professionals, such as Teachers of the Deaf

In addition, it would be helpful to see more reference to resources to assist schools.

# Question 9 – Is there any additional information you think should be included in this guidance?

- 🍳 Yes
- <sup>©</sup> No
- <sup>©</sup> Not sure As outlined above.

Question 10 – We would like to know your views on the effects that the Curriculum for Wales guidance for British Sign Language would have on the Welsh language, specifically on:

i) opportunities for people to use Welsh

ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

Question 11 – Please also explain how you believe the proposed Curriculum for Wales guidance for British Sign Language could be formulated or changed so as to have:

i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language

ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Question 12 – 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.

As outlined at the start of this response, the National Deaf Children's Society Cymru welcomes the development of this guidance. Ahead of the redrafting of this guidance, we would welcome the opportunity to discuss improvements with the Welsh Government in order to help the guidance meet its aims.

The National Deaf Children's Society regards the development of such guidance as a positive step towards improving access to BSL in education. In addition to having effective guidance in place, there will also be other important steps including: -Ensuring that Wales follows through on plans to adopt the BSL GCSE currently being developed in England, as is outlined in the current Qualifications Wales consultation.

-Securing the availability of tutors with the relevant knowledge levels to provide BSL teaching in schools.

-Considering the BSL skillset of key professionals supporting deaf learners who communicate through sign. In particular Communication Support Workers.

The below section of the draft guidance could be misleading. This is because the majority of deaf children will use phonics (albeit with adaptations) using their residual hearing/the access to sound that their hearing technology provides. While these children may not have "typical hearing levels," they may still use phonics in some way:

"BSL is a visual language and does not have a written form: filmed sign language is used rather than text. When deaf children learn the orthography of Welsh, English or another spoken language, they do so without the auditory clues that hearing children use. "

We believe that some of the links and resources provided should be reviewed. In particular, the link on page 5 to our *Success from the Start developmental resource*. This resource was written to describe the typical development of a 0-3 year old and is not intended to assess the progress of school aged children learning BSL. A different resource will be needed to assess this.

A link is also provided on page 3 to a National Deaf Children's Society document on phonics. The guidance seems to suggest that this document can be used to support deaf learners using BSL as a first language to bridge to literacy. This is not the case. To learn English literacy, BSL users have to learn what spoken English looks like on the page, how it is structured and enough vocabulary in order to read. This requires intervention and support from qualified professionals.

The document uses the term "deaf and hard of hearing." Different people choose to identify with different terms when describing their deafness. Other Welsh Government documents have previously referred to "D/deaf and/or living with a hearing loss" in order to encapsulate the range of definitions used.

It would be helpful for the guidance to outline that terms used is down to personal choice.

#### Do you live in Wales?

- <sup>O</sup> Yes
- <sup>©</sup> No
- No answer

#### Do you have a business interest in Wales?

- 🖲 Yes
- <sup>©</sup> No
- <sup>©</sup> No answer

# If you want to receive a receipt of your response, please provide an email address.

#### Email address

Campaigns.Wales@ndcs.org.uk

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