Response by the National Deaf Children's Society Cymru

About Us
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.

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

Background
Deafness in childhood is relatively low incidence students. Deaf children can do anything other children can do, given the right support from the start. However, this requires the curriculum and examinations system to be accessible to deaf young people. Deafness is not a learning disability and deaf pupils have the potential to attain and achieve the same as any other pupil, given the appropriate support and access to the curriculum.

Deafness is not a learning difficulty and, with appropriate support, deaf learners should achieve on a par with their hearing peers. Currently, deaf pupils are around 26% less likely to attain an A*-C grade in English/Welsh language, Mathematics and Science than their hearing peers. Deafness is not a learning disability and deaf pupils have the potential to attain and achieve the same as any other pupil, given the appropriate support and access to the curriculum.

The National Deaf Children’s Society is keen to ensure any changes made to the assessment process does not have a negative impact on deaf pupils and their ability to reach their full potential in the core subjects. It is crucial that examinations remain accessible to them.

A number of the proposals within this consultation seek to increase the size of GCSEs for statutory subjects. It is important to consider the impact increasing the size of these GCSEs will have on a learner’s ability to pursue qualifications in other subject areas of individual interest to them. This consideration may be particularly important for learners that struggle with languages and mathematics. Indeed, this may be a concern for some deaf learners, who can face particular barriers in these subject areas.

British Sign Language is used as a first language by a number of deaf young people to communicate with their friends, family and teachers. It is a language in its own right and was recognised by the Welsh Government as such in 2004. Our members have told us that
they want a BSL GCSE and a National Deaf Children's Society survey found four out of five young people in Wales, both deaf and hearing, would want a BSL GCSE. As such, we strongly support Qualification Wales’ intention to ensure there are opportunities to learn BSL and to introduce the BSL GCSE currently being developed in England to Wales.

The National Deaf Children’s Society is also keen to ensure that accessibility is at the heart of any new qualification design.

Response

Language and Communication

6. How far do you agree or disagree with our proposal to make sure learners and schools can continue to access a range of British Sign Language qualifications, including any new GCSE developed for learners in England?

National Deaf Children’s Society Cymru welcomes proposals for schools to have access to a range of British Sign Language qualifications and the introduction of a British Sign Language GCSE in Wales. We know that deaf young people and our members have long called for this GCSE, citing it as an important subject they would like to see introduced to the curriculum. The Welsh Government recognised BSL as a language in 2004 and we would like to see a continuation of this positive support for the language by seeing it implemented within the new curriculum.

In Wales, four out of five young people, both deaf and hearing, want to learn BSL in school. In our survey, 92% of young people, both deaf and hearing, believe BSL should be a GCSE (National Deaf Children’s Society survey on Right to Sign, 2017). The implementation of a BSL GCSE would be supported by the National Deaf Children’s Society’s ‘Right to Sign’ campaign.

We want to see this GCSE in place as soon as possible and would be keen to be involved in the process of drafting up plans for its delivery. We know that any new BSL GCSE being drafted by the Department for Education in England will not be implemented until September 2023 at the earliest. We urge Qualifications Wales and the Welsh Government to ensure the infrastructure of teachers with the appropriate BSL skillset is in place prior to this date so Wales can implement its BSL GCSE at the same time it is rolled out in England.

It should be noted that BSL used in Wales and England is the same language. However, in Wales it can contain regional variations, akin to accents, which may have to be considered in any adapted GCSE.

A BSL GCSE will fit into the new Curriculum for Wales coming into force from September 2021 as it will help achieve the four core purposes of learning. A BSL curriculum will help students become ethical, informed citizens of Wales and the world by helping students communicate with their deaf peers and ensure they become informed and aware of Deaf culture.
1. How far do you agree or disagree with our proposal to create new combined language and literature GCSEs in English and Welsh to replace the existing separate GCSE qualifications? These new combined GCSEs would each be roughly the size of 1½ GCSEs.

Any newly developed GCSE must consider accessibility for deaf young people. We know that language acquisition can be difficult for deaf learners without specialist support and there is an attainment gap between deaf and hearing children.

As such, we have some reservations that the merging of English Language and Literature into a single GCSE could potentially impact on the grades of deaf children who struggle with language acquisition. Increasing the size of the statutory English exam may restrict a deaf student’s ability to take part in other ‘non-language’ subjects they wish to take up.

Any statutory subject must be deaf accessible. It must consider how the subject works for student’s whose first language is British Sign Language. For example, exams that use videos with audio would need to consider subtitles and BSL interpretation.

2. How far do you agree or disagree with our proposal to discontinue GCSE Welsh Second Language and create a new, bigger GCSE designed for learners in English-medium contexts? The new qualification would be roughly the size of 1½ GCSEs.

Without appropriate support, languages can present barriers and difficulties for deaf learners. We are keen to emphasise that the risk of increasing the size of a Welsh Language GCSE is similar to increasing the size of the statutory English subject, as mentioned in the answer above. As above, we also suggest that such a GCSE is designed with accessibility issues in mind. The National Deaf Children’s Society Cymru would be happy to provide further assistance in this regard.

3. How far do you agree or disagree with our proposal to create a set of small Welsh language skills qualifications that can be taken in addition to a GCSE to support progression along the Welsh language continuum?

Deaf young learners can struggle with language acquisition, especially without the appropriate support. We would be keen to ensure have that this small set of qualifications does not detract from or risk lowering a deaf student’s grade in statutory Welsh Language by drawing resources and time away from this subject. There is potential for the smaller qualifications to present an opportunity for students that would struggle with a larger qualification to still achieve in the subject. However, if this is the case, the reputation of such qualifications should be safeguarded.

Any new on-screen assessment method would need to be deaf accessible. For example, the on-screen assessment would need to have an easy read option, captions, British Sign Language video and facilitate Teacher of the Deaf support. This is support that deaf students receive under ‘reasonable adjustments’. Teachers of the Deaf must be able to assist deaf students during the on-screen assessment process.
When increasing the size of GCSEs for statutory subjects, it is important to consider the impact this will have on a learner’s ability to pursue qualifications in other subject areas of individual interest to them. This consideration may be particularly important for learners that struggle with languages and mathematics.

**Integral Skills**

1. How far do you agree or disagree with our proposal to reform the SCC to make it simpler and more manageable, with a focus on assessing the Integral Skills of: Creativity and innovation, critical thinking and problem solving, personal effectiveness, planning and organising.

We would be keen to ensure the detailed proposals work for deaf young people.

We have been pleased to work with WJEC on the Welsh Baccalaureate SCC community challenge on finger spelling. Young people in secondary school have been able to learn finger spelling and deliver coaching sessions to primary school children in their local area. We would wish to maintain a similar module within any revised version of the Welsh Baccalaureate SCC.

There are around 250,000 British Sign Language users in the UK, around as many people use sign supported English/Welsh. Deaf young people and sign users have often told National Deaf Children’s Society that they want more people to learn to sign so that they feel more included. The fingerspelling alphabet forms a crucial part of communication for all sign language users and is a great introduction to sign language. This foundational knowledge that students acquire can help deaf young people feel more included.

**Mathematics**

1. How far do you agree or disagree with our proposal to create a new combined GCSE Mathematics and Numeracy qualification to replace the two existing GCSEs in Mathematics and Mathematics-Numeracy? The new GCSE would be roughly the size of 1½ GCSEs.

We are mindful that some deaf young people can face specific barriers in mathematics, particularly around the conceptual language and use of working memory. As such, similarly to our responses on the languages GCSEs, we have reservations about the potential impact this change could have for deaf learners who struggle with these subjects. We would be keen to work with officials to ensure deaf young people are not negatively impacted by such changes.

2. How far do you agree or disagree with our proposal to create a new small qualification that can be taken in addition to the GCSE to assess a learner’s numerical proficiency, using an on-screen assessment method?
As outlined in our previous responses, we are keen to ensure smaller sets of qualifications do not detract from or risk lowering a student’s grade by drawing resources and time away from the statutory subject. Care must be taken not to demotivate learners already struggling with mathematics by placing more pressure upon them. There is potential for students to benefit from the smaller qualification if they struggle to achieve in the statutory subject. However, if the intention is to use the smaller qualifications in this way, the reputation of this qualification would need to be safeguarded so they are not dismissed by schools, learners and employers.

Primarily, a new small qualification must not detract from or risk lowering a deaf student’s grade in statutory Mathematics by drawing resources and time away from this subject. Any new on-screen assessment method would need to be deaf accessible. For example, the on-screen assessment would need to have an easy read option, captions, British Sign Language video and facilitate Teacher of the Deaf support. This is support that deaf students receive under ‘reasonable adjustments’. Teachers of the Deaf must be able to assist deaf students during the on-screen assessment process.

More information

We really welcome the proposal on British Sign Language as this is really positive and many of our members will see this as a huge step forward. We really encourage its implementation into the GCSE curriculum.

As highlighted throughout this response, the National Deaf Children’s Society Cymru would welcome the opportunity to discuss these points further and to feed into the discussions around these developments. Please do not hesitate to contact us at campaigns.wales@ndcs.org.uk for further information. Many thanks for taking the time to read our response.