Summary: Reasonable adjustments and mitigating steps

Education settings have a direct responsibility to take the necessary reasonable adjustments to ensure access to learning and continuity of support for deaf learners. Possible reasonable adjustments and mitigating steps that can be taken might include:

1. Where face coverings are being worn/are required, clear face masks, coverings or shields are clearly preferable to fabric or opaque masks/coverings in terms of making it easier to lipread. However, clear face masks, coverings or shields do not mitigate the need to take other reasonable adjustments to ensure deaf children are not disadvantaged.

2. The provision and effective use of radio aids. Radio aids transmit the teacher’s voice directly to the child’s hearing aid or cochlear implant. Research suggests that the use of a lapel microphone can be effective in improving verbal communication when the speaker is wearing a mask. In light of wider changes to the learning environment, many deaf children may now require a radio aid in the classroom for the first time. Steps should be taken to ensure radio aids are cleaned when passed between the child and teacher. Cleaning should be done with care to avoid potential damage to the device.

3. An increased focus on the listening environment, minimising all unnecessary background noise. Steps should be taken so that deaf children are taught in classrooms with the best possible listening conditions.

4. Funding additional communication support, including remote speech-to-text reporters and sign language interpreters.

5. Separate one-to-one teaching and support, without the use of face masks and in rooms where social distancing can be achieved and/or through a Perspex panel.

Qualified Teachers of the Deaf have a key role to play in advising on reasonable adjustments and mitigating steps. Along with parents and deaf learners, they should be involved in any discussions around risk assessments.

General principles of making education work for deaf children during the pandemic

1. There should be no blanket policies (for example, a ban on all external visitors). Instead, we believe that any policies should take into account the individual needs of deaf children, and, as set out earlier, balance the risks to public health against the risks to individual children not getting the support they need.

2. Teachers of the Deaf should be involved in any decisions on how support will be provided.

3. Parents and deaf children should also be involved in any such decisions and kept fully informed. Parents and deaf children may have their own suggestions for how support could be provided, which should be taken seriously.

4. There should be a can-do approach. We encourage professionals to continue to be creative, pragmatic and flexible in ensuring that individual deaf children receive the support they need, as much as possible.
5. Any reduction in specialist support should be a last-resort and with a full awareness of the impact that it will have on individual deaf children. Putting deaf children in a situation where they cannot understand their teachers or their peers should be seen as both unacceptable and untenable. Where a decision has been made there is no other alternative but to temporarily reduce some specialist support, we expect there to be a clear audit trail in place that sets out what mitigating actions are being put into place. Action planning should be SMART. We also expect there to be a plan in place to ensure support is provided to enable deaf children catch up. This might involve additional catch-up support or one-to-one tuition that is tailored to their individual needs.

Enhanced hygiene and environmental cleaning

We are concerned that without specific guidance for teachers and deaf pupils there will be reduced access to specialist equipment that needs to be passed between individuals (such as radio aids). Furthermore if there are any changes to the classroom acoustics and/or in light of social distancing requirements, the use of radio aids are likely to become more important for deaf pupils, including among those who may not have previously used radio aids.

Suggested mitigating actions:

- Emphasising usual hygiene requirements – i.e. regular handwashing.
- Providing hand gel with a radio aid so that a teacher can easily clean their hands each time they handle the radio aid.
- Providing wipes so that a radio aid can be cleaned before and after it is used. Note that this must be done carefully, following guidance provided by manufacturers, to avoid damage to the device. You should seek advice and support from your local specialist education service for deaf children on this. In addition, the British Association of Teachers of the Deaf (BATOD) have also provided guidance.
- Where practical, arranging for an adult, usually the teacher, to take responsibility for handling the radio aid and holding it towards another person if/when others are speaking.
- Some radio aids have a conference or ‘pointing’ functionality enabled. For older children, asking them to take responsibility for positioning any radio aids that have this functionality device in a way that it can pick up the teacher’s voice clearly, as well as peers in any group discussions, without the teacher having to handle it may be an option. However:
  - This relies on the teacher staying close to where the radio aid is
  - It also assumes that the deaf young person is a confident user of the radio aid who can be relied on to move the radio aid to where it needs to be.
- Reminding teachers of the importance to revoice or paraphrase what other pupils have said in any classroom discussions, or allowing deaf pupils time to turn around and face the pupil speaking.

Face coverings

The recent update to Scottish Government guidance on face masks in schools stipulates that for local authority areas under Scotland Covid Protection Levels 3 and 4 all staff and pupils should wear a face covering in classrooms during lessons in the senior phase (S4 to S6). This is in addition to all pupils aged over 12 wearing face coverings when moving around the school
(such as in corridors) and in communal areas and when using school transport (if aged over 5). They should also be worn by parents when drop-off or picking-up children at any school.

Apart from S4 to S6 pupils in level 3 or 4 areas, the Government has advised that face coverings are not necessary when in the classroom. At the same time, teachers and pupils can wear face masks or coverings if they wish to. Guidance states that specific consideration should be given to the impact of using face coverings with deaf children and reasonable adjustments should be explored when these present a barrier to learning.

We acknowledge the public health considerations underpinning this issue. It is important that teachers, other education staff and children all feel safe at school.

Teaching is based on being able to communicate clearly to pupils and clear communication is especially important for deaf children and young people. The use of face masks or coverings would have a very significant impact on the ability of deaf children and young people to communicate, to the extent that attendance at school or college may be redundant. This situation would clearly would not be consistent with the Education Continuity (No5) direction from Scottish Government to education authorities asking them to have regard for continuity of education in the reopening of schools. It’s clear therefore that many deaf learners will require reasonable adjustments to allow full access to the curriculum in classrooms where face coverings are being worn.

Teachers need to be supported to ensure that if they themselves are wearing a face covering, that in considering the impact on learning they are able to put in place the right mitigating steps they that allow for full access to the curriculum. A discussion should take place with the student, family and a Teacher of the Deaf to identify the risks to deaf children’s access to learning and emotional wellbeing and identify alternative arrangements that still allow deaf students full access to education. Our position paper on facemasks in education sets out mitigating steps that can be considered.

Clear face masks and shields

We welcome the inclusion of our facemasks blog within the guidance. However the provision for clear face masks will require to be significantly increased and actively made available to schools given the mandatory guidance that applies to senior phases and staff on face coverings in Level 3 and 4 areas. Clear masks or face shields can be explored as an alternative to fabric masks. Current guidance from the World Health Organisation states:

The wearing of masks by children with hearing loss or auditory problems may present learning barriers and further challenges, exacerbated by the need to adhere to the recommended physical distancing. These children may miss learning opportunities because of the degraded speech signal stemming from mask wearing, the elimination of lipreading and speaker expressions and physical distancing. Adapted masks to allow lipreading (e.g. clear masks) or use of face shields (see below) may be explored as an alternative to fabric masks.¹

However, whilst these may work well for some children, it should be emphasised that this may not be effective for all. We are aware that the Scotland Excel can supply clear face masks in education for PPE purposes. However, face coverings that can be worn at a teacher or pupil’s discretion within the classroom (and are recommended in Tier 3+4 senior classrooms) are much more prevalent, clear face coverings also need to be available in these cases.

**Suggested mitigating actions:**

- Clear face masks, coverings and shields are not a panacea. Education settings should also explore the alternatives to these and other mitigations that are possible, emphasising the importance of social distancing and hand hygiene.
- Where face coverings are being worn/are required, clear face masks, coverings or shields are clearly preferable to fabric or opaque masks/coverings in terms of making it easier to lipread. However, clear face masks, coverings or shields do not mitigate the need to take other reasonable adjustments to ensure deaf children are not disadvantaged.

**Recommendations:**

- Scottish Government guidance or advice on face coverings in education emphasises the impact these have on deaf children, and the need to take reasonable adjustments to ensure continuity of learning.
- The Scottish Government should take steps to ensure clear face masks, coverings and shields are widely and readily available to use across education settings. Whilst they are not a panacea, they are still preferable to opaque face masks/coverings. A clear action plan on how this will be achieved is needed.

**Physical distancing and minimising contact for adults**

Due to Covid-19 and the social distancing measures, the usual appointments or visits that deaf learners have with specialist education professionals (including Teachers of the Deaf, communication support workers and speech and language therapists) have not been possible. Some deaf learners in Scotland have been able to take their hearing technology home from school at this time, but not all due to divergence in local policy. We are concerned that this group are missing out on vital support and the attainment gap that already exists for deaf learners will widen significantly.

We have strong concerns around how deaf children are receiving specialist support in the classroom (such as from teaching assistants or from visiting Teachers of the Deaf) in light of current Scottish Government guidance which discourages movement of peripatetic staffing between settings. Our recent survey of parents showed that in Scotland 44% of parents reported that a Teacher of the Deaf is still visiting their child’s school. Over half of parents (56%) reported that Teachers of the Deaf are not currently visiting their child’s school –
whereas in normal circumstances they would be visiting to provide support to the child and/or the teachers.

There is a need to consider how public health risks are balanced against the risk to individual deaf children if they do not receive the specialist support they need — clearer guidance is needed which sets out how these risks can be balanced and mitigating actions that can be taken.

We believe that the Scottish Government should publish guidance on how all deaf children and those with Additional Support needs can still be supported and have their needs met at the current time. This should include clear instructions around support for pre-school deaf children, access to equipment, and provision of specialist support as education settings re-open.

**Suggested mitigating actions:**

- To carry out any meetings in the school in a well-ventilated room that can be easily cleaned afterwards. It should be noted that meetings outside may be problematic for deaf children unless the level of background noise is very low.
- To ask visitors to confirm they will follow social distancing requirements and provide records for any test and trace efforts that may be needed.
- To conduct meetings, including one-to-ones with pupils, virtually. This assumes that the child or school staff will be provided with the necessary IT equipment and time to be able to do this effectively. Any safeguarding policies should be followed but should be proportionate to the situation and balanced against the risk to individual children if they do not receive the specialist support they need. Safeguarding precautions that could be followed might include, for example, ensuring children are in a ‘shared space’ for any virtual meetings.
- Where social distancing isn’t possible as they enter the school, asking Teachers of the Deaf or other external specialist staff to wear a face covering as they enter and move through the school. The face covering should be removed when engaging with the deaf child.

**Recommendations:**

- **Clearer guidance for local authorities around avoiding blanket policies and looking at the individual needs of deaf children and young people is required**
- **Clearer guidance from Scottish Government is required on early years support for deaf children and how Teacher of the Deaf catch-up is being facilitated**
- **Catch up plans should be in place for any learning missed by deaf pupils via specialist support services**
- **Clearer guidance setting out how deaf pupils will be able to access learning, including allowing access to peripatetic Teachers of the Deaf support. Guidance needs to allow for this support either through mitigating actions or setting out how support will be provided remotely. We have outlined some mitigating actions on the movement of peripatetic teaching staff in our guidance. It should be clear for local authorities that deaf children should still be accessing support from specialist services.**

**Supporting the wellbeing of children and young people**
Deaf children are already known to be at risk of lower emotional wellbeing. Lockdown is likely to have had a negative impact on many children’s emotional wellbeing. Deaf children may have felt particularly isolated and lonely during this time.

**Suggested mitigating actions:**

- Establish peer support programme for deaf children, as appropriate and in line with social distancing requirements
- Where classes are broken up into smaller groups or ‘bubbles’, ensuring that a deaf child is in a group as one or two friends who the child can easily understand or who can provide peer support.
- Ensuring that any pastoral/support programmes or interventions take into account the needs of deaf children. Similarly, ensuring that any school counsellors are deaf aware and are able to meet the needs of deaf children. Some interventions such as ‘virtual circle time’ may be inaccessible to deaf children and risk causing distress. Advice from the child’s Teacher of the Deaf should be sought.
- Considering if the school or service needs to make a referral to further support.

**Parents of children with a disability**

It is vital that parents are included in a wider discussion involving the deaf pupil classroom teacher and a Teacher of the Deaf to identify the risks to deaf children’s access to learning and emotional wellbeing and identify alternative arrangements that still allow deaf students full access to education.

**Language and Communication**

Face-to-face home visits from professionals, such as Teachers of the Deaf, can be an important source of support for many families, particularly in the early years. We have concerns around support for deaf children and their families at this time given home visits may not be possible in some areas. We expect this will have a particular impact on newly identified families of deaf babies who would benefit from more support and advice around language and communicating with their deaf child.

Where government guidance permit home visits, professionals will already be carrying out risk assessments to decide whether to provide support remotely or face-to-face. We encourage professionals to balance the risks around coronavirus against the risk to the family and the deaf child if support is not provided face-to-face.

Professionals should obviously seek the agreement of the family before carrying out any visit and establish that any face-to-face visit can be carried out in line with the relevant social distancing and hygiene requirements for your nation (e.g. confirming that nobody in the family has any coronavirus symptoms, there is sufficient space to sit 2 metres apart and that the professional will not be able to consume any cups of tea, etc.).

We acknowledge that, in some cases, there may be no alternative but to provide support remotely (for example, because of a local lockdown or if someone in the household has
coronavirus symptoms). Professionals ensure that support can still be provided remotely, or in more ‘covid-secure’ settings such as nurseries as much as possible.

As far as we can see, government guidance does not include specific advice on the different scenarios in which deaf children may receive support in the home (for example, from a peripatetic Teacher of the Deaf). However, Scottish Government guidance around social care visits may provide a helpful guide.

1 www.batod.org.uk/resource/uk-assistive-listening-technology-working-group-and-batod-joint-advice/