

NDCS Cymru

4 Cathedral Road

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11th December 2013

William Powell AM

Chair, Petitions Committee

National Assembly for Wales

CF99 1NA

Petition P-04-481

Dear Chair,

Thank you for your letter dated 6th December. We welcome the opportunity to further clarify our response to the correspondence you have received in relation to our *Close the Gap* petition.

We welcome the support given by the Chair of the All Party Group of Deaf Issues and Action on Hearing Loss Cymru to the petition. We also welcome the opportunity offered by Governors Wales to display relevant information on their website and at conferences.

We were particularly pleased to see that the WLGA acknowledges the importance of training in ALN for all teachers and the importance of a good acoustic environment in all schools. We are also encouraged by the WLGA's commitment to joint working to meet the needs of hearing impaired children based on the example of the Gwent Hearing Impaired Service.

However we are disappointed by the response of the Minister for Education and Skills to the petition. We believe that a National Strategy to address each of the points raised in the petition is still required.

We welcome the Welsh Government's Workforce Planning Exercise in relation to supporting pupils with ALN and that provision of specialist services for deaf children will form part of the exercise. We wish to have assurances that such an exercise includes consideration not just of Teachers of the Deaf, but also of the numbers and skill sets of other key professionals working with deaf children, such as communication support workers, specialist speech and language therapists and teaching assistants. As identified in our initial campaign report, accessing these specialists, especially those with an appropriate level of training can be difficult. We also seek assurances that such a workforce planning exercise will be combined with a plan of action for addressing manpower, training and development issues.

A recent development in the field of Educational Psychology is of great concern to us. Educational Psychologists have a vital role in supporting children's development and helping them to reach their full potential. They also provide professional advice on children's emotional and educational development and help raise standards in our schools. In October 2013 Cardiff University decided it would no longer support the Doctorate in Educational Psychology therefore there will no longer be any training in Educational Psychology in Wales. This decision will lead to a drastic reduction in the supply of trained graduate educational psychologists in Wales, meaning there will not be enough educational psychologists to support local authorities and schools. This will deny deaf children and others with additional needs their chance to have their needs assessed appropriately.

We note that in its letter to the Petitions Committee the WLGA does not mention the Workforce Planning Exercise that is being undertaken by the Welsh Government. Local authorities will have a crucial role in ensuring that any staffing and development issues identified by the planning exercise are addressed.

The availability of BSL support for deaf pupils should be a vital element of the Workforce Planning exercise. We are concerned that without the appropriate skills communication support workers can neither adequately support these pupils to access the curriculum nor further enhance their linguistic skills and vocabulary in BSL. We would encourage the workforce planning exercise to consider introducing national standards for BSL support workers in schools and colleges.

The deaf young people who created the petition have also highlighted the need for more of their hearing peers and teachers to learn to sign. The vast majority of deaf pupils attend mainstream schools and for those who use sign language ensuring that other people in their schools can sign help them feel more included in school life. We would urge the Welsh Government to consider how more teachers and pupils can be encouraged to learn to sign.

The Minister in his response acknowledges that sign language classes are available. However many families find it difficult to access such courses. NDCS Cymru has a Big Lottery funded project called "It Starts Here" which provides families of young deaf children the opportunity to learn signs based on day to day family life. The funding for the project ends next year and we call on the Welsh Government to review the availability of BSL classes across Wales.

Lack of deaf awareness was one of the most significant barriers faced by the deaf young people who presented this petition. We are extremely disappointed with the Minister's response to this aspect of the petition. The present Minister for Education and Skills, Huw Lewis AM, has assured NDCS Cymru that the ALN module in the new Master in Educational Practice will include a reference to sensory impairment. We welcome this development but fear that it does not go far enough to address the lack of deaf awareness amongst teachers and support staff in schools.

We understand that the training that is being developed for Special Educational Needs Coordinators (SENCOs) does not cover deaf awareness. Under the proposed ALN reforms the SENCOs will play an even greater role in developing support plans for pupils with additional needs. It is imperative that the training includes a basic level of deaf awareness and knowledge of which specialist professionals and resources can be accessed to support deaf children and young people.

99% of deaf children in Wales attend mainstream schools. Many teachers are unaware they are teaching a child with hearing difficulties due to their misconceptions around assistive listening devices. Although such technology can provide improved access to sound, it does not restore typical levels of hearing. There is also a general lack of awareness that 80% of all children will experience a temporary hearing loss that can continue for a sustained period and without appropriate support

can have a severe impact on their learning development. Ensuring that teachers and support staff are aware of some simple, but effective deaf awareness tips could go a long way to improving deaf young people's access at school. NDCS Cymru urges the Welsh Government to include deaf awareness within training courses for teachers and LSAs.

Deaf young people tell us that it is important that their peers understand deafness. NDCS has produced resources that can be used to help schools teach their pupils about deaf awareness. We would also call on the Welsh Government to include deaf awareness within the PSE curriculum.

In his response the Minister does not address the role of Estyn in ensuring that schools with deaf pupils and local authority specialist support services are meeting the needs of deaf pupils. We believe that there is scope for Estyn to provide deaf awareness training for its inspectors in order to address this issue.

We are still concerned about the impact of ALN Reforms on deaf children and young people, including post-16 provision. Last week the Minister for Education rejected the recommendation of the Children and Young People's Committee to take post-16 SEN Reform out of the Education Bill to be included in a single piece of legislation. We understand the Minister's concerns about delaying the SEN reform for post-16 students but do feel that a single piece of legislation would be more coherent and better serve the needs of deaf children and young people.

We understand that the White Paper on ALN Reform is now due to be published in the spring of 2014. We still have significant concerns about the proposals. Our concerns include the intention to develop a universal provision pathway rather than disability specific pathways. We feel that in the case of low incidence disability, such as deafness, a specific pathway is of paramount importance to ensure that staff are aware of the specialist professionals who must contribute to a child's assessment of need and to supporting the education of that child.

We are also concerned that the Individual Development Plans (IDP) will not be robust enough and may not include clear information on key points. In the case of deaf children the proposed IDP does not include key information such as the child's level of hearing loss, the agreed placement for the child and information on ongoing support.

One of our particular concerns with the proposed ALN reforms is the reduced right of appeal to the Special Educational Needs Tribunal Wales (SENTW). Only children deemed to have severe or complex needs will have the right to appeal under the present proposals. It is imperative that families of children with all levels of need retain the right of appeal to SENTW with regard to the specialist support they need.

We are disappointed that the Minister's response fails to acknowledge that the Welsh Government could do a great deal more to improve acoustic standards in schools. The Welsh Government now has powers over Building Regulations and could use these powers to strengthen acoustic standards in new schools, colleges and nurseries. These powers over Building Regulations were devolved on New Year's Eve 2011 and 39 Assembly Members from all four political parties supported our call for good acoustics in schools. In the present financial climate many existing school, colleges and nurseries with a poor acoustic environment may not be refurbished in the near future. We would urge the Welsh Government to promote measures that head teachers can take to assess and improve acoustics in existing buildings.

Good acoustics are important for deaf children and for the 80% of primary aged children who experience a temporary hearing loss. Acoustics are also important for other vulnerable children and

several organisations representing other disabilities support our campaign, including RNIB Cymru, SENSE Cymru, Autism Cymru, NAS Cymru, Downs Syndrome Association and AFASIC Cymru. There is also evidence that a good acoustic environment can improve the learning and behaviour of pupils in general.

To summarise, in 2012 deaf pupils were 41% less likely to achieve higher grade passes in core subjects – the widest gap since records began. NDCS Cymru is concerned that there are a multitude of factors which need to be addressed. Although the Minister's response and subsequent developments outline a few positive steps many of the key issues in our petition remain unaddressed. In particular the Minister does not address our call for a National Strategy to Close the Gap in educational attainment for deaf pupils. We believe that a national strategy will present a cohesive approach to the numerous barriers that deaf pupils face. We would want the strategy to include the following points:

- Deaf awareness training for key professionals, including teachers, SENCOs and LSAs.
- Issues in staffing or training and development identified through the workforce planning exercise
- Consideration to strengthening Estyn's role in inspecting the services local authorities and schools provide to deaf pupils.
- Raising deaf awareness amongst hearing pupils
- Improved access to BSL classes for families of deaf children
- More opportunities for pupils and teachers to learn BSL.
- A clear provision pathway for deaf children and young people.
- Building regulations to be amended to ensure all new school, college and nursery buildings are required to demonstrate compliance with minimum acoustic standards
- Improving acoustics in existing school, college and nursery buildings.

We note than in your meeting on 11th November 2013 you discussed the possibility of commissioning a piece of work in relation to this petition. We hope that this letter clarifies our position that we feel that the Welsh Government could do a great deal more to address the issues raised by the deaf young people in the petition. We would welcome the opportunity to work with you if you do commission work on this petition.

Yours sincerely

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