1. Background

The National Deaf Children’s Society (NDCS) is the leading charity in Scotland dedicated to creating a world without barriers for deaf children and young people. In Scotland, we have a dedicated team based in Glasgow led by Heather Gray, Director. The team has a strong focus on addressing the attainment gap that exists for deaf learners. This includes the work we do with our Young Campaigners who are a group of deaf young people aged 14-20 years old. They call for better services and campaign on issues affecting deaf children in Scotland.

Please refer to our submission to the Committee dated 27 February for further background information about NDCS.

Please note that NDCS uses the term “deaf” to mean all types and levels of deafness.

2. Summary of NDCS suggestions for raising attainment:

- Robust and complete data sets on numbers of deaf children and young people
  
  - Raising attainment - deaf children in the early years:
    - Developing early years guidance
    - Providing national Funding for Family Sign Language (FSL)
    - Improved training for professionals
    - Meeting needs of deaf children within early years provision
  
  - Raising attainment - school-age deaf children:
    - Targeted funding through the Scottish Attainment Challenge
    - Improved Quality assurance of services for deaf children
    - High quality deaf awareness in educational settings
    - Addressing needs of learners with a mild hearing losses
    - Better acoustics in schools
    - A qualifications framework for communication support staff
    - Considering regional commissioning of specialist staff
    - Including British Sign Language (BSL) within the modern language curriculum
    - Regulation of specialist teacher qualifications

- Raising attainment – post school transitions and destinations:
  - Implementing the NDCS Statement of Intent
  - Improved support within Further and Higher Education
  - Improved deaf awareness among employers

- Promoting positive emotional health and wellbeing
- Evaluating the **impact of changes to service delivery**
- **National and regional commissioning and procurement** of specialist services and technology

### 3. Attainment

Scottish Government data shows that there is a significant attainment gap for hearing impaired school leavers, and the attainment of this group is among the lowest of all pupils in Scotland.

In the 2012/13 year, the average tariff score of deaf school leavers was 289, while the average score for leavers with no additional support needs was 439. In the same year, almost 10% of deaf school leavers left with no school qualifications compared with 2% of all pupils¹.

Over the past 3 years the average tariff score for deaf learners has improved, which is positive. However it is important to note that on a number of indicators such as numbers leaving school with no qualifications, and those qualifying to enter Higher Education, this group had a worsening attainment profile in 2012/13². NDCS has welcomed the formal acknowledgement of this gap by the Scottish Government and their commitment to closing it.

### 4. Robust and complete data sets on numbers of deaf children and young people

There is currently no complete national data set on numbers of deaf children and young people in Scotland. While information collected through the Pupil Census has improved over the years, this only records information about school-age children and there are still gaps in this means of data collection. (For example, for children with mild hearing loss and those with no formal education plan in place). Without a basic understanding of the numbers of deaf children and their needs, it is difficult for national and local government to effectively plan service delivery.

While the advent of Universal Newborn Hearing Screening (UNHS) in Scotland since 2005 has allowed for earlier diagnosis of childhood deafness, the improvement of data collection and sharing has not necessarily followed. NDCS has been involved in two pilot Local Records of Deaf Children projects. These projects have seen positive outcomes with regards to sharing basic information from UNHS with appropriate local agencies in order to plan services effectively. The recommendation from these pilot projects has been a national roll out in order to ensure public services are able to plan services effectively. NDCS would welcome the opportunity to provide more information on these pilot projects.

### 5. Raising attainment – deaf children in the early years:

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¹ Scottish Government, 2014, *Attainment and Leaver Destinations Supplementary Data*
² Scottish Government, 2014, *Attainment and Leaver Destinations Supplementary Data*
Deafness in childhood has a major impact on the learning of spoken language. Language is usually acquired through hearing and vision together and deafness has the potential to delay language development. For example in England, Early Years Foundation data shows that nearly three quarters of deaf children arrive at primary school having not achieved a good level of development in the early years. Deaf children are less likely to achieve the communication and language early learning goals of listening and attention (50%), understanding (46%) and speaking (42%) compared to children with no ‘special education need’ or equivalent. This delay can then impact more broadly on a deaf child’s life as language is essential for successful cognitive, emotional and social development.

With 90% of deaf children being born to hearing parents or carers, it is crucial then that families receive timely early interventions of support and information, as highlighted in the Scottish Government’s See Hear sensory impairment strategy. NDCS believes it is essential that families are provided with information and access to the full range of support options and communication methods available to them. Information about these options should be presented to families in their own terms, taking into account their cultural and social background in such a way that enhances a family’s ability to make informed decisions which meet the needs of their child.

5.1. Developing early years guidance

Despite the introduction of UNHS the Scottish Government has not published any guidance in terms of post-diagnostic and subsequent early years support and information which should be made available for these children and their families or carers. As such provision for this group in the early years varies across Scotland, with considerable implications for the longer term education and wellbeing outcomes of deaf children and young people.

5.2. Providing national funding for Family Sign Language

There is currently no nationally funded provision for parents of deaf children to access appropriate training to learn how to communicate with their child through sign language. Research shows that language outcomes improve when deaf children have early access to a visual language, such as sign language.

In its 2011 election manifesto, the SNP stated that it would “take forward plans to support the provision of British Sign Language lessons to parents of new-born deaf children.” NDCS recommends this manifesto commitment is taken forward. We would welcome the opportunity to share learning from the delivery of our early years project, Your Child Your Choices. According to its independent evaluation report, the delivery of its Family Sign Language course contributes strongly to deaf children having improved vocabulary and positive family relationships as a result of their parents having better communication skills.

5.3. Improving training for professionals

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3 Source for data on all children and children with no identified SEN: https://www.gov.uk/government/publications/eyfsp-attainment-by-pupil-characteristics-2013 Data for deaf children was not published but was made available by the Department for Education on request. Please contact NDCS at professionals@ndcs.org.uk for a copy of this.
For the aspirations of the Children and Young People (Scotland) Act 2014 and Getting It Right For Every Child (GIRFEC) to be achieved, the role of the Named Person in identifying and assessing wellbeing needs is fundamental. It is critical that practitioners who will be involved in the Named Person Service have knowledge of the specific needs of deaf young people and are able to make effective use of the SHANARRI indicators for deaf children and young people. For example, the training of health visitors on deaf awareness will be essential to ensuring the right support is in place in terms of language development of deaf children and in providing support for parents in the early years.

5.4. Meeting the needs of deaf children within early years provision

There is currently very little provision in place in early years and childcare settings for deaf children. NDCS recommends that the development of early years guidance includes minimum expectations relating to early years provision in local authorities. Investment into shaping of a fit for purpose workforce in early learning and childcare for deaf children and young people settings is also essential.

Some further suggestions to improve the provision of support in the early years for deaf children include:
- Targets on number of early years workers with BSL qualifications
- National pool of specialist workers
- Every hearing impairment service to have specialist early years workers/TODs with BSL skills
- A BSL qualification aimed at working with young deaf children

Case in point: Family D
Child D uses hearing aids and was recently offered a pre-3 place at their local mainstream nursery. Child D’s parents are Deaf BSL users, who use BSL as their primary communication method with Child D. No staff at the local nursery have BSL skills appropriate for use with a young child and Family D have also experienced communication difficulties with them, e.g. interpreters not being booked, letters continually sent to the family home requesting that Family D phone the nursery despite the family being unable to do this.

The Local Authority has not provided any training for nursery staff to learn BSL. NDCS has delivered a short three-session course for Child Development Workers at the nursery. Six months later, Family D reported that the nursery are still not using sign language to support Child D, who is becoming isolated within his nursery group as he is not able to participate in activities in the same way as his hearing peers can.

6. Raising attainment - school-age deaf children

According to the 2013 Consortium for Research into Deaf Education (CRIDE) survey, around 80% of deaf learners are educated in mainstream settings, around 10% are in mainstream schools with attached hearing impairment resource bases, and around another 10% are within specialist schools. The support available in each of these settings varies considerably, with the majority of deaf learners in mainstream settings
relying on peripatetic Hearing Impairment Services whose Teachers of the Deaf (ToD), or other specialist staff visit mainstream schools to support their learning.

The presumption of inclusion of children with additional support needs in mainstream settings is welcome and has enriched the lives of many children both with and without additional support needs. To achieve inclusion however it is critical that the needs of a deaf child within a mainstream school are effectively identified and addressed. On a national level there is a need to understand how best to achieve inclusion and how mainstream and specialist practitioners should work together, drawing on the examples of best practice that we know exist across Scotland.

NDCS would welcome the opportunity to provide further information on a range of support and resources we have produced around supporting the achievement of deaf children in educational settings. These resources include Quality Standards for deaf children and young people in both resource provision, and specialist teaching and support services.

6.1. Targeted funding through the Scottish Attainment Challenge

NDCS welcomes the Scottish Government’s Attainment Scotland Challenge initiative. NDCS recommends that by broadening the scope of the initiative beyond the lowest levels of socioeconomic deprivation we have an opportunity to understand and tackle the attainment gap experienced by learners with ASN, many of whom make up some of the lowest attaining groups in Scotland. For example, a pilot attainment challenge initiative targeting learners with a sensory impairment could produce valuable learning and be transferable across to other ASN groups.

6.2. Improved quality assurance of services for deaf children

Currently there are no minimum standards for delivering support to deaf learners, and while Education Scotland can inspect peripatetic hearing impairment services, this does not happen routinely. There is often much disparity across local authorities in terms of how they deliver education support to deaf learners. With current provision proving patchy and inconsistent there is a need for consistent criteria for education services, robust guidance and/or peer review and inspection to establish best practice.

In 2007, NDCS and HMIE developed the Count us In resource and in 2010, Education Scotland published a best practice guide for professionals working with deaf children. There is scope to update and extend guidance available to schools and education practitioners in this area with particular focus on early years.

6.3. High quality deaf awareness training in educational settings

At the recent Deaf Learners Conference, an event held in partnership between Education Scotland and NDCS, over 70 deaf young people from across Scotland came together to discuss their experiences. Lack of deaf awareness from teachers was identified as a top challenge for deaf young people; “teacher keeps facing away from the class and facing the board while talking.”

4 For further information on the role of a ToD see NDCS' previous submission to the Committee dated 2/2/15: http://www.scottish.parliament.uk/S4_EducationandCultureCommittee/BSL%20Bill/NationalDeafChildrensSociety.pdf
5 NDCS Quality Standards: Resource Provision for deaf children and young people in mainstream schools
6 NDCS Quality Standards: Specialist teaching and support services
A lack of deaf awareness also created challenges with the supportive technology, with pupils describing experiences of teachers being unable to use the FM systems/radio aids either consistently or at all; “If the teacher doesn’t wear the microphone properly it can be very noisy”; “new or supply teachers don’t know how to use it.”

High quality deaf awareness training for mainstream teachers is fundamental to improving deaf pupils’ education experiences. NDCS would welcome the opportunity to provide support and resources on deaf awareness training for professionals.

6.4. Addressing needs of learners with mild hearing losses

Recent research from the Deaf Achievement Scotland Project has found that pupils with any degree of deafness were below the average academic score for the general population, particularly in examinations for English. This research also highlighted that because children with only mild hearing have better speech skills than profoundly deaf students, serious learning issues can be overlooked.

There is currently no national data available on the numbers of children in Scotland with mild hearing loss. NDCS recommends additional hearing screening, such as at school entry age could allow more children with a mild loss to be identified and their education needs to be addressed. NDCS would also welcome further consideration of the British Association for Teacher’s of the Deaf’s (BATOD’s) recommendation to ensure children and young people with all levels of deafness have access to a qualified ToD throughout their education.

6.5. Better acoustics in schools

The optimal range of hearing that hearing technologies can typically offer a deaf child is approximately three metres in a good listening environment. This both reduces their ability to access spoken language beyond this range and limits their access to incidental learning, naturally accessed by their peers, that would enable them to acquire and absorb new language and information from listening to the world around them.

It is therefore of concern to NDCS that there is no statutory requirement for local authorities to adhere to the recognised best practice guidance in acoustics, Buildings Bulletin 93. In both England and Wales all new builds and extensions must adhere to these guidelines while in Scotland this is recognised as best practice only and there is no monitoring of compliance.

We would encourage further exploration of BATOD’s suggestion to ensure an acoustician is employed to check compliance and to advise on new builds. NDCS would also welcome the opportunity to supply the Committee with further information on this point, based on our Acoustics Toolkit.

6.6. A qualifications framework for communication support staff

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7 Nuffield Foundation, 2014, *Achievement and Opportunities for deaf students in the United Kingdom: from research to practice*
The CRIDE 2013 data on preferred communication methods of deaf children in Scotland suggests 3% of deaf children solely use BSL, around 12% use sign language in combination with another language and 0.6% use a sign system other than BSL.\(^8\)

Deaf young people who use BSL as their preferred method of communication require high quality of fluency of support which, given the lack of qualification framework for support staff, is not always available. Ensuring CSWs in schools and colleges have a minimum level of BSL qualification so that they can effectively fulfil this role is fundamental. Some deaf learners have expressed concerns about the quality of the communication support they have received at school. For example, some have felt that support staff have not had the signing proficiency in particular subjects such as science or maths.

NDCS recommends that a qualifications framework set within a strong regulatory framework should exist for all practitioners supporting the communication of deaf children in BSL. This should also allow these practitioners to access quality assurance procedures and review and development opportunities.

6.7. Considering regional commissioning of specialist staff

There is a statutory requirement for ToDs to hold a Level 1 BSL qualification. A Level 3 qualification would be equivalent to a Higher. According to the CRIDE 2014 Scotland Report, 71% of peripatetic hearing impairment services in Scotland do not have staff who are qualified to BSL Level 3 or beyond\(^9\). There were 6 services with a member of staff with no BSL qualification. These statistics show a need improve the consistency of support across the country and ensure all services are able to meet their service users’ needs by having appropriately qualified staff members.

However given the small number of deaf learners using BSL, it is critical that services address the issue of BSL qualifications creatively, meeting demand of their service users while effectively using available resources. NDCS recommends local authorities consider possibilities of national and regional commissioning of communication support and other specialist staff required for small numbers of pupils as a way to improve the quality and consistency of provision.

6.8. Including BSL within the modern language curriculum

All children, including those who are deaf should have the option to develop BSL skills. Currently, a very small number of children have the opportunity to study BSL at school, and none have the opportunity to develop their BSL skills right through secondary school due to lack of qualifying routes in senior years through SQA.

NDCS recommends that BSL becomes an accredited school qualification within the full Scottish Credit and Qualifications Framework, and has the same status as other languages. It is hoped this can be achieved through Education Scotland’s 1 + 2 language initiative. In the meantime however more opportunities should be provided for local authorities to deliver sign language and lipreading classes to facilitate deaf pupils’ language and communication preferences.

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\(^8\) Consortium for Research into Deaf Education, 2013, Scotland Report
\(^9\) Consortium for Research into Deaf Education, 2014, Scotland Report
6.9. Regulation of specialist teacher qualifications

According to the CRIDE 2013 survey, a third of ToDs in Scotland are not qualified, and the numbers of qualified ToDs has declined by 16% since 2011\textsuperscript{10}. This suggests that the statutory duty to provide minimum levels of teachers qualified to work with visually impaired and deaf children is not being fully implemented under the Requirements for Teachers (Scotland) Regulations 2005. These outline that teachers working wholly or mainly with deaf pupils must achieve a mandatory post graduate qualification within five years. There are also concerns around the ageing profile of this specialist workforce with figures from CRIDE 2014 suggesting that over half all of all ToDs are due to retire within 15 years\textsuperscript{11}.

There is currently no system in place for the qualifications of ToDs to be monitored on a national level. NDCS recommends that a quality framework is established for teachers working with deaf learners and that this is overseen by an external independent body.

7. Raising attainment – post school transitions and destinations

Our research has indicated that currently, deaf young people do not consistently experience transitional planning, despite this being a statutory duty on local authorities under the Education (Additional Support for Learning) (Scotland) Act (2004).\textsuperscript{12} For example, of the 30 young deaf people who took part in our research project who were aged between 18 and 24, only 4 said they had had a transitional plan. This research indicates that the existing statutory frameworks around transitional planning are not being implemented effectively meaning many miss out on effective transitional planning.

7.1. Implementing the NDCS Statement of Intent

NDCS recommends that the Scottish Government supports our Statement of Intent approach. This involves local authorities committing to carry out initiatives to promote positive post-school transitions for deaf young people locally. This involves working in partnership with NDCS in three strands of work:

- Promoting positive **emotional health and wellbeing** for deaf young people. This is achieved by delivering the Healthy Minds programme for deaf young people and offer young people an opportunity to develop deaf peers and networks through attendance at targeted events.

- Supporting **effective transitional planning** and ensuring both professionals are confident in working with deaf young people and young people actively participate in these process. This is achieved by embedding the Template for Success document across sectors. This resource was developed by NDCS in partnership with Skills Development Scotland and Donaldson’s School and is a toolkit for professionals across sectors who are supporting deaf young people at the stage of their post school transition.

- Developing effective **local professional networks** which support deaf young people’s post school transitions. This is achieved by setting up a local transitions forum where professionals from across sectors can regularly come together to identify and address issues in relation to deaf young people.

\textsuperscript{10} Consortium for Research into Deaf Education, 2013, Scotland Report
\textsuperscript{11} Consortium for Research into Deaf Education, 2014, Scotland Report
\textsuperscript{12} University of Edinburgh, 2013, Post School Destinations of people who are deaf and hard of hearing
NDCS recommends that the structured approach of the Statement of Intent would be beneficial to schools in improving transitional practices in their local areas and would improve post school outcomes of young people. NDCS would welcome the opportunity to share more information about the Statement of Intent approach and the positive impact it has had so far in Ayrshire where it is being piloted.

7.2. Improved support within Further & Higher Education

NDCS has concerns about the consistency of support in college settings and how deaf young people are succeeding in their transition out of college into sustainable employment. During the University of Edinburgh research, interviews with 30 deaf young people aged 18 to 24 years old in 2013 revealed that support was inconsistent for deaf students at college and a number had dropped out of their programmes due to this.13

A recent research project commissioned by NDCS from the University of Manchester found that from 2011 in England:

- Although the vast majority of deaf young people complete their FE course, nearly one quarter do not achieve any qualification at any level.
- The drop out rate for deaf students in FE is twice that of the general population of students in FE

While these findings relate to experiences in England, NDCS believes the picture for deaf college students would be similar in Scotland. As such, robust inspection of education provision for deaf learners in FE is essential and it is unclear the extent to which this is currently happening in Scotland. NDCS would encourage further exploration of BATOD’s recommendation to introduce input from ToDs for deaf young people 16-18 years old in college.

7.3. Improved deaf awareness among employers

UK wide employment estimates have shown that approximately 58% of working age deaf people are employed compared to 80% of the non-disabled working age population. In Scotland, this gap is evident among school leavers, with 19.1% moving into employment after school compared with 25.5% of school leavers with additional support needs.14

Our research shows that deaf young people perceive a number of barriers preventing them from gaining employment. Some young people felt that their hearing loss was met with negative views from employers and some felt that disclosing their deafness on job applications limited the likelihood of them being invited to interview.15 While some employers are well informed about deafness and how to support deaf colleagues there is much work to be done in sharing this good practice and dispelling negative attitudes about deafness among employers.

NDCS has delivered bespoke deaf awareness training for organisations taking deaf young people on for work experiences and would welcome the opportunity to roll this

13 University of Edinburgh, 2013, Post School Destinations of people who are deaf and hard of hearing
14 Scottish Government, 2014, Attainment and Leaver Destinations Supplementary Data
15 University of Edinburgh, 2013, Post School Destinations of people who are deaf and hard of hearing
out more consistently. In addition, NDCS has a number of video resources with tips on how to support deaf young people on work placement which we would welcome the opportunity to share.16

8. Promoting emotional health and wellbeing

Deafness itself does not cause mental health problems however the communication barriers and language delays that deaf children and young people may experience increases how likely they are to be affected by mental ill health. According to NHS statistics, 40% of deaf children and young people will experience mental ill health compared with 25% of hearing children17. At the recent Deaf Learners Conference, bullying and social isolation was identified as the top challenge for deaf young people, with many saying these experiences affected their confidence and self-esteem.

NDCS offers teachers and practitioners a range of resources and training opportunities to help better support deaf learners. Included in this is our Healthy Minds training programme which aims to encourage young deaf people to use positive strategies for managing their deafness and develop their self-esteem and confidence. NDCS recommends that more opportunities are provided for deaf learners to access these kinds of programmes.

Developing peer support and mentoring opportunities for deaf young people would be another important way to promote positive wellbeing. This is an area where third sector organisations and schools could work more closely together to support young people and help explore their deaf identity and offer young people a rare opportunity to develop a deaf peer group. This is particularly valuable given that many experience a level of social isolation within their own schools and communities where they may be the only deaf young person.

There are currently no specialist mental health services for deaf children in Scotland despite such services being well established in other parts of the UK. NDCS recommends a nationally funded Deaf Child and Adolescent Mental Health Service is set up and we have been working with national and local partners towards this.

9. Evaluating the impact of changes to service delivery

NDCS is aware of a number of changes that have affected Hearing Impairment Services across Scotland. A number of local authority peripatetic services have moved towards a consultancy model, providing information and advice to staff rather than delivering direct support to deaf learners. This is a significant shift which has the potential to seriously affect the learning support available to deaf learners. NDCS would welcome further consideration of BATOD’s recommendation to increase the number of ToDs to allow an increase in contact time deaf children have with the teacher.

10. National and regional commissioning and procurement

Delivering specialist support through CSWs and ToDs can be expensive and, particularly for smaller authorities, can be a pressure on education budgets. This type of support however is high impact, as it can help remove significant barriers to the

16 For an example of NDCS resources see: [http://www.ndcs.org.uk/document.rm?id=9325](http://www.ndcs.org.uk/document.rm?id=9325)

17 NHS, 2005, Towards Equity and Access
curriculum for deaf learners. NDCS would welcome further consideration of BATOD’s recommendation to increase the number of resource bases in schools for those who require a high level of support and/or alternative communication and peer support from other deaf learners.

As previously mentioned, given the demanding financial environment facing national and local government, there is a need to look creatively at this issue and consider possibilities of national and regional commissioning of specialist services. For example in the three Ayrshire authorities delivery of a joint pan-Ayrshire Hearing Impairment Service is better able to meet the needs of its deaf learners than if each authority attempted to do this individually in this very rural region.

Similarly, procuring and maintaining appropriate technology and equipment for deaf learners is a challenge for local authorities. This technology is ever-evolving and can be expensive to procure for the low number of learners who require it. If equipment could be procured nationally, or if locally authorities could work in partnership to meet their technology requirements, this could generate savings and ensure deaf learners have access to effective technology that meets their needs. In addition to technology, NDCS would also encourage further consideration of BATOD’s recommendation the use of electronic note takers in schools.

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