Introduction
The National Deaf Children’s Society (NDCS) is the national charity dedicated to creating a world without barriers for deaf children and young people. NDCS Scotland estimates there are 3500 deaf children and young people in Scotland, 90% of whom have hearing parents or carers.

We use the term deaf to refer to all levels of childhood deafness including hearing loss in one ear, temporary hearing loss such as glue ear and also to refer to all types of communication methods, including British Sign Language.

Context
Given the range of additional support that deaf children and young people often require from education services, transitions to post school education, training or employment are particularly challenging for this group.

While it is clear that with the right information and support deaf people can achieve equally to their hearing peers, unfortunately this is too often lacking for young deaf people during these transition periods, meaning many fail to go on to positive destinations. Data from the Deaf Achievement Scotland project shows that in 2010 the unemployment rate of young deaf people aged 16 – 24 was 49% compared to 19% for all young people.

Widening Access
NDCS Scotland welcomes the Bill’s commitment to widening access to post 16 education in Scotland. However we would like to strongly agree with the view put forward by other organisations representing disabled people, that solely using levels of socio-economic deprivation to define the most under-represented groups in post 16 education is both misleading and dangerous.

The sole use of this indicator does not allow for a rich understanding of the student population and their needs and vulnerabilities as learners. It doesn’t take into account the other barriers individuals experience, which in many cases they may find more difficult to overcome than their socio-economic status.

It would be very much a missed opportunity to not include other under represented groups particularly disabled and deaf people within the scope of how widening access is both defined and measured within the proposed changes. NDCS Scotland has also noted the lack of explicit detail outlined in FEI and HEI Outcome Agreements regards local plans to ensure widening access to disabled and deaf students. Again, NDCS Scotland is concerned about what seems to the omission of this issue and would welcome a thorough inclusion of this in future Agreements.

Data sharing
The proposed changes in data collection and sharing offers some opportunities with regards to students with additional support needs, in particular deafness. According to Scottish Government statistics for 2009/10 there were 850 students in Scottish FEIs and
HEIs who receive Disabled Students Allowance. This data is unlikely to be fully representative as many deaf students will not be in receipt of this Allowance.

Similarly, there are gaps in our knowledge with regards to attainment and destinations of deaf young people. NDCS Scotland has commissioned research from the University of Edinburgh around this issue, but nationally held and shared data with regards to deaf students would be a significant step forward in terms of ensuring appropriate strategies and support are delivered across post 16 education. NDCS Scotland would welcome further consultation around appropriate data fields to utilise in this respect.

**Review of fundable further and higher education**

NDCS Scotland would welcome further clarity around how non-recognised qualifications will be defined and offered to students. Clearly, to provide students with flexible and appropriate learner journeys it is essential to fully meet the needs of a diverse student population with a similarly diverse qualifications framework.

NDCS Scotland is particularly concerned, with the previous cuts to courses for those with learning disabilities, that NRQs will be squeezed out of the selection of courses on offer to students. NDCS Scotland would welcome steps to ensure that colleges are encouraged to maintain courses that can or cannot be credit rated but which provide invaluable pathways into post 16 education for vulnerable groups and may lead to opportunities for further articulation for these individuals.

In addition, NDCS Scotland would welcome further information on how the SFC will be making their review of fundable further and higher education and particularly the definition of “recognised qualification”. We would also welcome information on whether disabled people or organisations representing disabled people have been consulted in this process.

**Regionalisation**

With regards to regionalisation, which we note is already in varying stages of progress across Scotland, NDCS Scotland raises the concern around extensive staff changes and the impact this will have on the provision of specialised additional support.

In a specialised area such as deafness for example, staff often develop the skills needed to support students over a long period of time through training opportunities and experience. This makes deaf-aware staff rare and difficult to replace.

In the proposed changes, of which staff reduction and restructure is an intended consequence, NDCS Scotland would recommend due consideration being given to how the expertise of college staff is mapped throughout the regionalisation process, and how colleges have planned to ensure that the impact of regionalisation will not leave them short of staff with this kind of specialised skills and expertise for deafness, and other low-incidence disabilities such as visual impairment.

**Other comments**

**Additional Support for Learning**

The proposed changes to post 16 education presents opportunities to revisit the Additional Support for Learning Act. In particular NDCS Scotland is concerned that the current time scale of 12 months of transitional planning can still mean significant challenges in addressing all social care, health, education and wellbeing needs of a deaf young person to support the right transitions for them.
In addition, NDCS Scotland is concerned that the ASL Act allows actions to be taken to tribunal if a transition plan is not prepared but it currently leaves no route of redress if actions required by that transition plan are not completed post school.

16 to 19 guarantee
NDCS Scotland welcomes the significant commitment to guarantee all 16 to 19 year olds a place in education, employment and training. However we hope that full consideration has been given to those young people with additional support needs, or disabilities such as deafness, which by their nature mean some individuals may not be prepared to move into these opportunities within this age profile. NDCS Scotland would not like to see young deaf people, and those with other disabilities, disadvantaged by this guarantee.