1. Introduction
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 Angela Bonomy, Director (Scotland & Northern Ireland).

We acknowledge that this call for views does not specifically ask for comments on specialised teachers, however, think it is important that the workforce supporting deaf children in education is considered as part of the workforce planning exercise.

2. Background
The Scottish Government have recognised the unacceptable attainment gap that exists for deaf learners. We welcomed the Inquiry into the attainment of pupils with a sensory impairment which examined the varied factors contributing to this attainment gap and the challenges facing deaf education.

We also welcomed the historic passage of the British Sign Language (Scotland) Act 2015. While the Act does not include explicit provisions around education, the first British Sign Language (BSL) National Plan provides opportunities to make improvements to the educational outcomes for deaf learners by strengthening the specialist workforce that many deaf learners rely on.

3. Context
- There are as many as 3850 deaf children in Scotland;
- The impact of childhood deafness on a child’s ability to reach their developmental and educational potential is significant;
- Nine out of ten deaf children have hearing parents, many of whom have no previous experience of deafness;
- Around 80% of deaf children are educated in mainstream schools, making additional specialist support crucial to ensuring these learners reach their full potential;
- In Scotland, the challenges deaf children face manifest in a significant attainment gap which starts early and affects deaf learners through their school career and beyond;
- Particular challenges face the peripatetic specialist workforce and services which support this group: around a third of Teachers of the Deaf are not qualified.¹ Over 50% of Teachers of the Deaf are due to retire within 15 years.

4. Attainment
Deafness is not a learning disability and with the right support, there is no reason why deaf young people should be achieving any less than their hearing peers. However Scottish Government data shows that there is a wide attainment gap for hearing impaired school leavers, and the attainment of this group is among the lowest of all pupils in Scotland.

¹ Consortium for Research Into Deaf Education in Scotland, 2013
The latest Scottish Government data shows that last year 11.8% of deaf learners left school with no qualifications (compared with 2.6% of all pupils) and 38.7% obtained Highers or Advanced Highers (compared with 59.3% of all pupils). This gap in achievement at school goes on to affect deaf young people’s life chances, with 24.7% going onto university compared with 41.3% of those with no additional support needs.

5. Support for deaf learners
Every deaf child is different, some may prefer using spoken language such as English, others may use British Sign Language and some may use a combination of both. The support required by deaf children therefore varies.

Ensuring deaf learners have access to the additional support they require is critical to ensuring they reach their full potential and closing the attainment gap. The diverse needs of deaf learners are predominantly met within mainstream settings, with implications for the capacity and skill set required by mainstream practitioners.

Alongside the universal offer of schools, deaf children may require Teachers of the Deaf (ToDs), Communication Support Workers (CSWs), Educational Interpreters, Classroom Assistants, equipment such as radio aids and SoundField systems, Educational Audiologists, good acoustical conditions and trained practitioners in deaf and British Sign Language awareness. Specialist support within these settings is therefore crucial.

6. Regulation in specialist teacher qualifications
Currently there are no minimum standards for delivering support to deaf learners. We are currently working with the Scottish Government following the recommendations from the Inquiry report on this issue and the resulting disparity it causes amongst local authorities in terms of how they deliver education support to deaf learners. Areas raised in the report include the routine inspection of peripatetic hearing impairment education services and the number and qualifications of ToDs and professionals working with deaf learners. We are concerned at the number of ToDs who do not hold the mandatory qualification to work with deaf children under the Requirements for Teachers (Scotland) Regulations 2005. This indicates both a lack of monitoring of regulation of teaching qualifications at a local and national level and pressure on Continuing Professional Development budgets which are critical to ensuring learners with additional support needs are supported appropriately.

In 2015 the Scottish Government carried out a survey on numbers of Teachers of the Deaf and their qualifications. We look forward to seeing the official Scottish Government report of findings from this survey which is yet to be published.

We recommend that a quality framework is established for teachers working with deaf learners and that this is overseen by an external independent body.

7. Reduction in specialist staff
With the current squeeze being experienced by local authorities on spending budgets, the provision of staff is likely to be a continuing pressure. In terms of deaf education provision, the number of specialist teaching staff has continued to fall in recent years. We are extremely concerned at the extent of cuts to specialist teaching staff for deaf
learners in Scotland, with data suggesting overall reductions in numbers of Teachers of the Deaf in education authorities between 2014 and 2015.²

Another example of where specialist support in mainstream schools has been reduced is around Educational Audiology. Educational Audiologists are highly skilled teachers of deaf children with additional training in audiology. They are able to work closely between health and education, ensuring parents get the information they need from Audiology services, and that the child has a well-functioning FM or Soundfield system in the classroom. There is a significant impact on ToDs who often need to pick up additional work load to fill the gap of Education Audiologist. There are now only 5 Educational Audiologists in Scotland, 4 of which are working in local authorities.

We are becoming increasingly aware that services are being affected by restructure, and proposed redesign and/or budget reduction. As far as NDCS is aware, there has been little in the way of local or national impact assessments to determine what the impact of these changes in support structures might mean for deaf learners. We feel this is an urgent issue which should be addressed.

More promoted posts within Additional Support Need (ASN) education services would help increase strategic thinking in relation to service delivery as well as incentivise a younger workforce to enter these specialist fields. Linking in with the current education governance review in Scotland, these could be delivered at an Education Region level to ensure parity across the country. Continued shortages in specialist practitioners will make it more difficult for deaf learners to achieve positive outcomes and ensure accessibility and inclusion for deaf children in mainstream education.

While we appreciate the significant challenges facing local authorities, we believe these changes are of urgent concern, and will undermine the Scottish Government’s ambition to close the attainment gap and ensure every learner reaches their fullest potential. We would welcome the Scottish Government’s consideration of how education authorities can continue to ensure that the additional support needs of learners are fully addressed and the outcomes of the Curriculum for Excellence are being achieved for every learner.

8. British Sign Language (Scotland) Act 2015
The new legislation under the British Sign Language (Scotland) Act 2015 marks an opportunity to strengthen educational provision for deaf learners.

We believe that the first BSL National Plan for Scotland is an opportunity to strengthen the consistency of qualifications for those working with deaf learners across Scotland, and address issues such as minimum qualifications for ToDs and CSWs, as well as the regulatory framework they work within.

Given the low number of deaf young people who use BSL, it is critical that services address the issue of BSL qualifications creatively, meeting demand of their service users and effectively using available resources. We recommend that more strategic investment is required from the Scottish Government. This investment should support the recruitment and shaping of a fit for purpose workforce, particularly around specialist education support and professionals working with deaf children having

² Consortium for Research Into Deaf Education, 2015, CRIDE report on educational provision for deaf children in Scotland
reduced access to continuing professionals development opportunities. This will include the upskilling of staff or recruitment of new staff with the appropriate skill set to communicate with fluency in BSL.

Given the financial demands on national and local government, considering possibilities such as national and regional commissioning of communication support and other ways to improve the quality and consistency of provision across Scotland is also recommended.

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