

---

**Ymateb i Ymgynghoriad / Consultation Response**

---

<b>Enw / Name:</b>	Meilyr Rowlands
<b>Rôl / Role:</b>	Her Majesty's Chief Inspector of Education and Training in Wales
<b>E-bost / Email:</b>	<a href="mailto:ChiefInspector@estyn.gov.uk">ChiefInspector@estyn.gov.uk</a>
<b>Rhif Ffôn / Tel No:</b>	029 2044 6446
<b>Dyddiad / Date:</b>	29.03.21
<b>Pwnc / Subject:</b>	Curriculum for Wales guidance: British sign language

**Background information about Estyn**

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

We may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

## Response

### Introduction

Overall the educational outcomes for deaf and hearing impaired learners are significantly lower than those of learners with no hearing impairment. However, deaf and hearing impaired learners do not necessarily have a learning disability.

We support efforts to improve the learning experience, educational outcomes and life chances of all learners in Wales. We recognise that there are other groups of learners, with special educational needs but not necessarily a learning disability, whose educational outcomes are equally poor. We would be grateful to know what steps are being taken with regards to consultations/guidance documents that consider equally the needs of other groups of learners with special educational needs for example, those with a hearing impairment and those with autism. While we recognise the important steps being taken in the guidance being consulted upon, the prime consideration is in the acceptance of British Sign Language [BSL], as a language. This consultation document successfully articulates this and provides useful examples of how BSL should be considered in design, delivery and implementation of the curriculum. The guidance therefore highlights the need to consider the needs of deaf and hearing impaired children. However, it is important to recognise that all learners, irrespective of their needs, should have opportunities to develop their knowledge, skills and understanding across all areas of learning and experience.

### Consultation questions

**Question 1** – Do you work in or support the delivery of education?

<b>Yes</b>	✓	<b>No</b>	<input type="checkbox"/>
------------	---	-----------	--------------------------

i) If yes, what is your organisation? (If no, continue to iii below.)

Welsh-medium school (primary)		Higher education institution	
Welsh-medium school (secondary)		Diocesan authorities	
Welsh-medium school (special)		Regional consortia	
English-medium school (primary)		Local authority	
English-medium school (secondary)		Private training provider	
English-medium school (special)		Third sector	
Bilingual school (primary)		Government	

Bilingual school (secondary)		Adult community learning	
Welsh-medium middle school		Awarding organisation	
English-medium middle school		Teaching union	
Pupil referral unit (PRU)		Regulatory body (includes Inspectorate)	
Special school		Governing body	
Funded non-maintained setting		Other (please specify): Her Majesty's Inspectorate of Education and Training in Wales	x
Further education college			

ii) What is your primary role?

Headteacher		Chancellor/vice-chancellor	
Teacher		Lecturer	
Practitioner		Pioneer	
Newly qualified teacher		Governor	
Teaching assistant		Challenge advisor	
Senior leader		School improvement officer	
Supply teacher		Chief Inspector	x
Principal/vice-principal		Other (please specify):	

iii) If you do not work in or support the delivery of education, in what capacity would you like to provide feedback?

Parent or carer		Employer	
Adult 18-plus (not a parent or carer)		Apprentice	
Child or young person (under 18)		Other (please specify):	
Student/academic			

iv) Are you providing feedback on behalf of an organisation or group?

<b>Yes</b>	✓	<b>No</b>	<input type="checkbox"/>
------------	---	-----------	--------------------------

v) If 'yes', please specify.

Her Majesty's Inspectorate of Education and Training in Wales

**Question 2** – Is the published Curriculum for Wales guidance and this draft Curriculum for Wales guidance for British Sign Language clearly aligned?

<b>Yes</b> ✓	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
--------------	--------------------------	-----------	--------------------------	-----------------	--------------------------

**Please explain your answer**

The guidance provides a clear rationale for the recognition of British Sign Language (BSL) as a language and highlights clearly the need to consider it as such in the design, delivery and implementation of a curriculum for all deaf and hearing impaired learners. This is evidenced, for example, in the exemplifications provided in the four purposes. However, there is scope to strengthen the links.

When considering how cross-curricular skills should be developed, it may be helpful to link to the curriculum guidance on these skills. These skills should be developed for all learners across all aspects of curriculum.

It is important to recognise that deaf and hearing impaired learners should have opportunities to develop their knowledge, skills and understanding across all areas of learning and experience.

Deaf and hearing impaired learners do not necessarily have a learning disability and, as such, expectations for deaf and hearing impaired children should be no different from that of other learners.

**Question 3** – Is the guidance for the Languages, Literacy and Communication Area of Learning and Experience and this draft Curriculum for Wales guidance for British Sign Language clearly aligned?

<b>Yes</b>	✓	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

**Please explain your answer**

The introduction clearly references that the guidance is to be considered as part of the languages, literacy and communication (LLC) area of learning experience.

The clear links to language, literacy and communication are helpful to guide schools and other settings in designing this aspect of their curriculum. However, it is likely that schools and other settings will need practical support and guidance. Other than hyperlinks to external resources it is not clear what practical support or guidance will be offered to schools.

**Question 4** – Does this draft Curriculum for Wales guidance for British Sign Language balance both the needs of deaf and hard of hearing learners learning and using British Sign Language as a first/predominant language and the needs of other learners for whom British Sign Language is a third or subsequent language (like French or German)?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input checked="" type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------	-------------------------------------

**Please explain your answer**

When designing the curriculum for LLC, it is important that settings and schools plan to ensure that all learners make appropriate progress in Welsh, in English and in international languages which include BSL when appropriate. The BSL guidance makes reference to the fact that descriptions of learning for BSL as a third or subsequent language are currently being developed. We welcome this intention as these will show progression from progression step 3 to progression step 5, in line with descriptions of learning for international languages in the Curriculum for Wales.

We understand that the BSL descriptions of learning will be available alongside the descriptions of learning for Welsh, English and other international languages in the LLC guidance from autumn 2021. Clearly, the early steps will need careful consideration. However, it is difficult at this stage to evaluate to what extent the guidance for BSL supports pupils using BSL as a third language.

The guidance would be strengthened further by considering clear guidance on how schools and settings should develop effective approaches to sign bilingualism. Specifically, to improve the learning experience, educational outcomes and curriculum offer for deaf pupils, this should include clear guidance on supporting mainstream educational settings with resourced provision, where both the staff and other pupils at the school can sign. Although most deaf children come from hearing families, they will be taught about and experience deaf culture. A curriculum that offers 'bilingual' approach to education, provides the opportunity for deaf pupils to experience the 'hearing culture' of their home (if that is the case) and the 'deaf culture' of the deaf community.

**Question 5** – In your opinion, will the references in the human rights and diversity section of this guidance to specific articles from the UNCRC support schools and settings in planning, designing and implementing their curriculum?

<b>Yes</b>	✓	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
------------	---	-----------	--------------------------	-----------------	--------------------------

**Please explain your answer**

Schools, settings and local authorities should already be aware of, for example, the UNCRC and United Nation Convention on the Rights of Persons with Disabilities articles and also duties arising from the Equality Act. While it is useful to remind bodies of these, this area could be strengthened in the guidance. It may more appropriate to reference these in the overarching foreword provided in the Curriculum for Wales publication. References could also be made to the Welsh Government publication: Inclusion and Pupil Support, and their alignment to National Mission Priority Three: equity, excellence and wellbeing.

**Question 6** – Some example descriptions of learning are provided in the draft British Sign Language guidance. In your opinion, are there are any specific aspects of progression in British Sign Language that should be reflected in the descriptions of learning that will be included in the Curriculum for Wales?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	✓
------------	--------------------------	-----------	--------------------------	-----------------	---

**Please explain your answer**

The aspects of progression and assessment are helpful and align clearly to curriculum guidance. It is helpful that clear links have been made to the language, literacy and communication Area of Learning and Experience. However the use of BSL is relevant to all areas of learning. The “key links between BSL and other areas of learning and experience” section of the guidance, shifts between providing examples of how areas of learning could be used to develop an improved awareness and understanding of deaf culture to articulating opportunities for deaf and hearing impaired learners to develop skills. As a result, it is not entirely clear what this section is trying to achieve.

The over-riding principle should focus on ensuring a broad and balanced curriculum offer that is appropriate to the need of the child. In this regard the question appears to be predicated on the basis that all deaf and hearing impaired children are a homogenous group. The curriculum offer needs to be accessible to all, irrespective of their needs. While it is useful to indicate what progression might

look like, the use of BSL should be integrated into all aspects of the curriculum and aligned to the individual needs of learners and take into account fully any special educational need and reasonable adjustment.

**Question 7** – Are there any aspects of this guidance that you feel are too prescriptive?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------	--------------------------

**Please explain your answer**

The guidance provides useful examples of how BSL can be integrated into curriculum design, delivery and implementation. However, significant co-ordinated support and resource is likely to be needed to achieve references provided. There is no mention in the consultation about how this will be achieved.

The “considerations for provision” could provide schools and other settings with useful points of reflection and self-assessment. However, as noted earlier significant co-ordinated support and resource is likely to be needed.

There are other groups of learners with special educational needs that could benefit from the attention and specific focus that is being given to deaf and hearing impaired learners.

**Question 8** – Are there any aspects of this guidance that you feel are not detailed enough?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------	--------------------------

**Please explain your answer**

It is unclear what strategy is being put into place to realise the ambitions contained in the document.

**Question 9** – Is there any additional information you think should be included in this guidance?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	-----------------	--------------------------

**Please explain your answer**

We would welcome further information on the strategy needed to support the ambitions contained in the document. For example, the consultation does not provide sufficient assurance around how the skills, confidence and capability of the workforce will be developed. In addition, the document does not make reference to the Additional Learning Needs and Education Tribunal Wales [Act] or the transformation programme to support its implementation, specifically in relation to the workforce development.

**Question 10** – We would like to know your views on the effects that the Curriculum for Wales guidance for British Sign Language would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

**Supporting comments**

Deaf and hearing impaired children should have full and equal access to the curriculum. Schools and other settings are duty bound to ensure that appropriate reasonable adjustments are in place.

**Question 11** – Please also explain how you believe the proposed Curriculum for Wales guidance for British Sign Language could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

**Supporting comments**

That deaf and hearing impaired learners are able to access education in the language of their choosing.

The staff are able to deliver provision for deaf and hearing impaired learners through the medium of Welsh.



**Question 12** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Overall, the educational outcomes for deaf and hearing impaired learners are significantly lower than those of learners with no hearing impairment. However, deaf and hearing impaired learners do not necessarily have a learning disability.

We support efforts to improve the learning experience, educational outcomes and life chances of all learners in Wales. We recognise that there are other groups of learners with special educational needs, but not necessarily a learning disability, whose educational outcomes are equally poor. We would be grateful to know what steps are being taken with regards to consultations/guidance documents that consider equally the needs of other groups of learners with special educational needs.

In 2018 we published [supplementary guidance on hearing impairment](#). The resource was developed in consultation with the National Deaf Children's Society. Inspectors find the guidance useful when responding to specific emerging questions and providers find the guidance helpful in evaluating specific aspects of their own provision.

In the 2019-2020 [Annual Report](#), Her Majesty's Chief Inspector noted that in schools where standard are good or better, most pupils, including those with special educational needs (SEN) make at least good progress during their time in school. Where teaching needs improvement, it is often the result of low expectations and poor planning. Shortcomings include not building well enough on pupils' prior learning, nor providing an appropriate level of challenge, including for those with SEN.

In our inspection of local government education services we identified that in Wrexham for example, officers work well with the local health board to ensure that children with speech and language difficulties and those with a visual or hearing impairment are able to access specialist advice, support and guidance. Partnerships provide valuable support to help learners overcome a range of barriers to their learning and personal development. In a recent adult learning in the community inspection, we noted that many tutors support learners' specific needs well, including those with social anxiety, literacy difficulties and hearing impairments.

In January 2020, we published [a good practice report on pupils with SEN in mainstream schools](#). We used recent inspection evidence and visits to 24 schools across the country to determine that good practice centred on: the provision of effective support for pupils with SEN; engaging with others to support pupils with SEN; and effective leadership of SEN. Our report highlighted a number case studies.

In relation to deaf and hearing impaired learners the thematic report noted that, for example, at Cogan Primary School in the Vale of Glamorgan detailed consideration had been given to the physical environment. Most areas of the local authority specialist class and mainstream school have specialist flooring, such as acoustic tiles and carpeted areas. The school's commitment to the full inclusion of pupils with a hearing impairment is evident in the daily life of the school. There are high profile, whole school events, such as the annual deaf awareness week. There is always a "sign of the week", which all pupils learn and use with their peers. Strong communication and partnership working is evident also. At Ysgol Gynradd Parcyrhun in Carmarthenshire for example, senior leaders and teachers at the resource base and mainstream school work very closely to plan learning experiences that are appropriate to the needs of learners. This collaborative working helps all staff to develop their skills to support the needs of learners with hearing impairments.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: