

Welsh Government

Consultation – summary of responses to BSL guidance

Analysis of consultation responses on additional guidance for the Curriculum for Wales

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Analysis of Consultation Responses on Additional Guidance for the CfW:
BSL

Analysis of Consultation Responses on Additional Guidance for the Curriculum for Wales: BSL

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Glossary

Acronym/Key word	Definition
ALN	Additional Learning Needs
BATOD	British Association of Teachers of the Deaf
BSL	British Sign Language
HEI	Higher Education Institution
NEU Cymru	National Education Union Cymru
UNCRC	United Nations Convention on the Rights of the Child

1. Introduction/Background

- 1.1 The Curriculum for Wales Framework was published on 28 January 2020. Before its publication, the Framework was subject to broad and extensive consultation. Feedback received signaled what specific additional guidance schools and other educational settings would require in order to successfully design and realise their curriculum. The feedback and consultation phase provides a vital opportunity for all practitioners and other stakeholders to provide input supporting the development of the guidance.
- 1.2 Miller Research, in conjunction with Old Bell 3, was commissioned to undertake an independent consultation analysis, consisting of workshop consultations with stakeholders, and the dissemination of written responses to the additional guidance.
- 1.3 This element of the consultation analysis focuses on the draft additional guidance for British Sign Language (BSL) in the Curriculum for Wales. The Curriculum for Wales guidance is for schools, settings and other practitioners involved in designing a curriculum which features BSL. This includes BSL as a first or second language for deaf and hard of hearing learners, and others learning BSL as a third or subsequent language. It forms part of the Languages, Literacy and Communication Area of Learning and Experience and builds on the guidance for this Area.

2. Overview of responses

- 2.1 The consultation survey achieved 48 full responses in total, with a language breakdown of 47 English responses and 1 response in Welsh. In addition to this, further written responses were submitted on behalf of the following key stakeholders: NEU Cymru, the Children's Commissioner for Wales, the National Deaf Children's Society Cymru, and the Children's Legal Centre Wales.
- 2.2 Almost all survey respondents had an occupational role within the education sector, with only three respondents falling outside of that category, and two respondents unspecified. Of those working within education, 28 respondents were teachers, including three teachers of the deaf, one BSL qualified teacher and one ALN teacher. Other educational occupation responses consisted of 5 teaching assistants (including one specialist in BSL), 3 in the HEI sector, and 1 BSL Communicator.
- 2.3 Whilst the responses reflected a number of positive observations on the recognition of BSL as a language in its own right, the most common questions highlighted the need for clarity in the guidance so that the ambitions laid out can be realised in full.

3. Additional Curriculum Guidance for BSL: Consultation Questions 1-10

- 3.1 The survey questions sought to gain comprehensive feedback on all aspects of the draft guidance. This spanned from its alignment with the overall Curriculum for Wales guidance, to its ability to balance the needs of BSL first language learners and third language learners, to its potential impact on the Welsh language. Additionally, it also provided a vital opportunity for respondents to highlight areas that require more detail.

Question 1

- 3.2 *Are the published Curriculum for Wales guidance and this draft curriculum for Wales guidance for British Sign Language clearly aligned?*
- 3.3 Participants were asked if both documents were aligned, with the response options of yes, no, and unsure. The respondents were given a further option to expand on their answer with comments. Of the substantive responses to Question 1, 38 agreed that the documents are clearly aligned, 2 did not agree, and 1 was unsure. Overall, responses reflected that the explanation was clear and aligned well with the four purposes of the curriculum guidance.
- 3.4 Positive feedback on the alignment and clarity of the document included, '*Fully aligned to the vision of the new curriculum, and clearly aligned to the four purposes, WMS and progression steps,*' and '*There are clear examples of how the two documents map onto one another*'.
- 3.5 It was well received that the BSL guidance provides opportunities for all learners, and that deaf learners should have the same opportunities as hearing learners. Additionally, the recognition that deaf learners do not necessarily have a learning disability was welcomed by respondents.

- 3.6 One participant living and working in Scotland took the opportunity to compare the curriculum designs between countries, praising the Curriculum for Wales for its 'child-centred' approach *'while giving power to schools to design their own curriculum'*. Specifically, the participant commended the focus on multilingualism, drawing attention to the fact that deaf children often are not given the opportunity to be introduced to other languages at school.
- 3.7 Both respondents that selected 'no' to this question, suggested in their comments that the document was lacking clarity on the integration of Welsh language considerations for BSL learners. One of the participants highlighted that the context in North Wales is 'extremely complicated'. The second 'no' response expanded that the document lacks instruction on how to learn regional Welsh BSL *'e.g., keep the Welsh sign regional. It doesn't say about English and Welsh fingerspelled letters?'* The comments suggest that further expansion may be needed to clearly acknowledge the differentiation as well as guidance for how both can be implemented.

Question 2

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?

- 3.8 Of the responses, 37 agreed that it is aligned with the Languages, Literacy and Communication Area of Learning and Experience, 6 did not agree, and one participant was unsure. Many of the comments echoed those of the first question, with some having referenced this area already and re-affirming statements that the alignment is clear and well-matched.
- 3.9 Some respondents commented that the links help to emphasise that BSL meets all the requirements of a language in its own right, with the only difference being that it is a visual language. For example, one participant working in a special school noted that it is beneficial for

learners using BSL to have their language recognised academically. Others noted that it provides clear progression steps for learners using BSL as their first or second language, and even as a third language.

- 3.10 At this stage, three participants commented on concerns regarding a lack of guidance and support in terms of planning for the curriculum. This seemed to be a recurring theme throughout the responses, and is elaborated in further questions addressed below.
- 3.11 One respondent stated that whilst language and communication are aligned, the document is not clear on how literacy at a lower primary level fits into the proposal. The participant acknowledged that it may be challenging to incorporate BSL within the demands of the curriculum, but echoing others, they welcomed its ongoing development.

Question 3

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

- 3.12 Of the completed responses, 32 agreed that the guidance does balance the needs of both groups of learners, 9 did not, and 2 were not sure.
- 3.13 Among participants who agreed, there were positive comments made regarding inclusivity and the benefits of multilingualism. There was support for placing BSL on an equal platform with other modern languages.
- 3.14 Some participants felt that both contexts had been taken into consideration, and that there was potential for BSL as an additional language to provide opportunities for hearing people to learn - and for increased awareness of BSL in general across schools. There was a

strong emphasis placed in the responses on the importance of deaf culture, and the potential of creating an environment where learners from outside the deaf community can start to understand this and 'break down barriers' that have traditionally prevented communication.

- 3.15 It was clearly communicated through respondent comments that the concept of BSL as a first/primary language vs. additional language is itself, an extremely complex notion. One respondent answered in detail, drawing attention to the number of practical elements which determine whether BSL is likely to be a first language for deaf children.
- 3.16 The participant explains that the situation often relies upon the capacity within a set area – with choices made by local authorities and the individual teachers of deaf children. As such it can be difficult to assess the 'predominant' language for a deaf child who may not have been exposed to either BSL or Welsh in their early years. The participant highlights that BSL could therefore be a subsequent language for deaf children too, particularly for those who are partially deaf or deaf in one ear. The comment raises questions about the challenges of defining BSL as a first or subsequent language, and furthermore, how to adequately support learners across all potential contexts.
- 3.17 In addition to this, some questions were raised over whether significant consultation had been arranged with deaf people and with those who are deaf with additional needs. This was suggested due to the level of complexity surrounding their requirements. It may be of importance to make the level of consultation that has been made with deaf people explicitly known within the guidance so that there is transparency for future users.
- 3.18 Common themes in responses for this section reflected the challenges of balancing the needs of both groups within one single document, and further questions surrounding the lack of resources for implementing the guidance. Participants requested clearer examples

of how the guidance can be applied across different educational settings and for the two contexts, and requested more detail to be included to guide the provision of trained staff for both contexts, and the standards that they should meet in terms of qualifications and competency.

Question 4

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?

- 3.19 The total responses to this question demonstrated a clearer consensus, with 40 'yes' responses, and just 3 participants answering 'no'.
- 3.20 Overall, contributors expressed generally positive feedback on the reference to the UNCRC within the guidance. A number of 'yes' respondents expanded on the importance of the UNCRC, the following comments present some of the key points made:
- *"Promotes equal status and respects culture"*
 - *"The rights and needs of all children are paramount to learning and ethos within schools."*
 - *"It [the guidance] clearly supports the appreciation of diversity and the appreciation of cultural differences."*
 - *"I think hearing people sometimes forget about Deaf learners needs. Hopefully they will look at these reference links."*
- 3.21 Respondents generally felt that the references to the UNCRC aligned well with the curriculum guidance, as it supports the ethos of an inclusive for all education. The guidance is also seen as making a direct contribution to children's rights as set out in the UNCRC, through improving their access to language, communication, and culture.

- 3.22 A number of participants explained that this section of the guidance was regarded as important as it helps to reinforce the rights of deaf children and raise awareness of their needs across settings.
- 3.23 One respondent noted that the referenced section of the UNCRC within the guidance '*needs to be the basis of designing an inclusive curriculum for all children with additional needs.*' Lack of understanding and 'ignorance' surrounding deaf culture and children with additional needs has been reflected repeatedly throughout the consultation responses – demonstrating the importance of reinforcing principles such as the child's right to use their own language, even if it is not shared by most people in the country where they live, and the child's right to share freely with others what they learn.
- 3.24 The participant noted that if those designing the curriculum in each school use these references as their foundation, it will assist with overcoming the lack of understanding that exists at present. This sentiment was echoed by another contributor who referenced the UNCRC directly, emphasising the child's rights to at least one fluent language by the start of school, without which educational attainment can be constrained. The respondent clearly linked how this specific right could demonstrate the need for a focus on early years provision and further support at home.
- 3.25 Conversely, some participants highlighted the fact that education providers and those working with young people should already have a strong awareness of the UNCRC, for example one of the 'no' respondents stated: '*this shouldn't be new to the target audience*'.
- 3.26 Of the remaining two 'no' responses, one participant did not elaborate. The remaining participant explained that the UNCRC references and their ability to support the curriculum guidance would be dependent on the skills of those involved in actually designing and implementing the curriculum. The comment reinforces concerns raised elsewhere, that whilst there is support for the ambition of the

guidance, its ability to be delivered will still rest upon those involved and the resources they have.

Question 5

Some example descriptions of learning are provided on page 6 of the draft British Sign Language guidance. In your opinion, are there any specific aspects of progression in British Sign Language that should be reflected in the descriptions of learning that will be included in the final version of this guidance?

- 3.27 The responses for this question presented less of a general consensus. Of those who answered, 25 responded 'yes', 15 responded 'no', and 3 were not sure.
- 3.28 A few contributors commented that the progression steps laid out in the guidance are clear, and that the existing document presents the progression steps well. One respondent highlighted the inclusion of aspects such as body and hand position in communicating through BSL, and the importance of consideration for factors such as these in using BSL effectively.
- 3.29 Others describe the progression steps as 'adequate' and 'helpful', aligning with the wider curriculum guidance.
- 3.30 The majority of participants felt that the progression steps needed to be expanded upon, raising a number of points:
- *"I feel it needs to be more detailed to give staff clearer areas in which to focus on in each progression step."*
 - *"Adequate but I would expect more detailed examples would be useful for teachers."*
 - *"I think the current descriptions are quite vague."*
 - *"It must be ensured that practitioners are able to support the children's linguistic development adequately and accurately."*
 - *"Social aspect of BSL needs to be considered."*

- *“Progression needs to take into account the underlying ability of the learner and the school’s environment so in essence this can vary.”*

3.31 Beyond further detail and instruction, participants also noted a number of useful additions that they would like to see included in progression steps, within the final document. These included;

- an understanding of deaf history and culture,
- awareness of other signed languages,
- understanding of digital communications and accessibility, and
- presenting other examples of careers such as speech and language therapists and health-care professions to demonstrate the long-term and wider applications of BSL.

3.32 On the whole, the main message throughout the elaborated responses called for increased guidance on the aspects of progression through the provision of more examples, whilst being mindful that progression may be understood differently across different types of learners.

Question 6

Are there any aspects of this guidance that you feel are too prescriptive?

3.33 The general consensus in response to this question was ‘no’ the guidance is not too prescriptive, with 37 no responses, and 6 respondents answering ‘yes’.

3.34 On the whole, being more prescriptive was seen as largely beneficial due to the complexity of BSL. One of the key reasons for participants preferring more detail was explained in light of the guidance being new, therefore having more information is perceived as better than not having enough.

3.35 Responses of this nature included:

- *“If anything I don’t feel is it prescriptive enough.”*

- *“I think that in this guidance, being a little more prescriptive is beneficial.”*
- *“It needs to equally match the guidance of any other curriculum document.”*

- 3.36 This sentiment was further emphasised by respondents that commented on the necessity of BSL being taught and delivered properly, not *‘poorly done/watered down.’* Throughout the responses, a number of contributors comment on the importance of treating BSL as a language in its own right, to be implemented like any other language – and the importance of this to the deaf community.
- 3.37 Of those who answered ‘yes’ and expanded with an explanation, the recurring focus was on the question of resources and support. One participant commented that significant coordinated support and resource is likely to be needed to achieve the aims of the guidance, whilst another raised the issue that there is no information at present on how learning can be continued at home.

Question 7

Are there any aspects of the guidance that are not detailed enough?

- 3.38 In response to this question, 17 respondents answered yes, 24 answered no, and 1 was unsure.
- 3.39 Of the ‘no’ responses, a number of contributors expanded with positive feedback on the guidance, praising it for its *‘good in-depth explanations’*, and for making substantial progress on raising awareness of BSL in general.
- 3.40 Conversely however, others expressed an expectation of further emphasis placed on the logistics of the delivery itself. As one participant explained, there was an expectation for more detail on the *‘actual BSL curriculum rather than ‘why’ they are doing it?’*
- 3.41 Some participants posed questions for consideration which could be taken into account when shaping the final document. A participant

from BATOD Cymru stated the organization believes further information is needed on the following:

- *“progression,*
- *who delivers the curriculum,*
- *qualifications of those delivering the curriculum,*
- *the role of training bodies in introducing teachers to the BSL curriculum,*
- *and the role of foundation phase and initial introduction to BSL.”*

3.42 All of these issues have been echoed by other participants throughout the consultation written responses, particularly the questions on delivery and support for introducing BSL in early years education.

3.43 Points were also reinforced here on the differentiation between BSL as a first language and BSL as a third/additional language – and that the difference in expectations across both of those contexts should be *‘made obvious’*.

In terms of adding detail, contributors also reported that steps of progression need to be more detailed linguistically, and that there should be a greater acknowledgement of regional Welsh variations.

Question 8

3.44 *Is there any additional information you think should be included in this guidance?*

3.45 Of the completed responses, 21 contributors answered ‘no’, with 20 responding ‘yes’.

3.46 Of the responses that felt additional information was needed, participants strongly conveyed the importance of deaf culture and identity, emphasising that they need to be presented in detail and thoroughly explained within the guidance. The comments suggest that participants do not feel this has been reinforced to a sufficient level within the document, stating for example *‘the case needs to be made in a strong way’*, *‘the risks of not doing this are not explained’*.

- 3.47 At this stage contributors also emphasised the importance of the deaf community being included in the creation of the guidance. It was seen as essential in ensuring that deaf people's needs and views were being accurately represented. One respondent commented that it would be unethical if the content itself was drafted and created by hearing people only.
- 3.48 Another individual made reference to the guidance in the context of additional languages, stating that a separate, example document should be provided for delivering BSL as a third language.

By far, the most common request was for a greater inclusion of practical information to assist with the delivery of the guidance itself. Participants were primarily concerned whether appropriate training would be provided for staff in order to implement the curriculum guidance successfully.

Question 9

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:

- *Opportunities for people to use Welsh*
- *Treating the Welsh language no less favourably than the English language.*

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

- 3.49 The reception to this question was generally positive. One participant outlined how the BSL guidance could contribute to better understanding of language learning overall, by linking evidenced conclusions that '*movement can be an effective cognitive strategy to strengthen learning, improve memory and retrieval, and enhance learner motivation and morale. This suggests that it would be possible to combine Welsh language learning with BSL in schools.*'

- 3.50 The notion that BSL learning could have a positive overall on language acquisition was also supported by an example shared by a participant of using BSL signs when saying prayers and singing songs both in Welsh and English, the participant stated: *'I believe that all three languages can be supported by one another'*.
- 3.51 Similarities were also reported by respondents in terms of aspects of language structure between Welsh and BSL. Even culturally, BSL and Welsh has been observed by one participant as having common features as both are languages which have historically been suppressed.
- 3.52 Despite signs and hand movements often being the same, it was highlighted that the key difference between Welsh sign language users is within the lip pattern – which is different. The structural similarities were cited as a factor which may make learning BSL more accessible for Welsh speakers.
- 3.53 The key issues that were seen to pose a negative potential impact were described as potential lack of choice for learners, and provision of accessible information to learners. Some participants suggested a pilot scheme which could be established to mitigate negative impacts – which would enable a phased and gradual approach to the implementation.

Question 10

Please explain how the proposed curriculum for BSL could be changed to have positive effects on Welsh language use/ no adverse effects on Welsh language use.

- 3.54 Twenty-one contributors responded to this question in total, with the majority commenting that the introduction of BSL should have no adverse effects on Welsh language learning. On the whole, participants were also very positive on the opportunities that the BSL guidance may present for bilingualism and multilingualism.

- 3.55 One participant highlighted the progressive change in attitudes that this new approach presents, given that deaf children were traditionally encouraged to communicate only through English, as opposed to other languages used in the home.
- 3.56 At present, the main inhibiting factor to the development of Welsh language use is perceived by participants to be the lack of Welsh language professionals with an ability to provide BSL, or within the deaf teaching community. Again, the key concern raised was in relation to practicality. Some participants had questions regarding how many teachers of the deaf in Wales have fluency in Welsh, framing capacity as a central area of consideration.
- 3.57 The one response written in Welsh did suggest that there may be an adverse effect, commenting that *‘without adequate financial investment, it will be difficult to ensure that the Welsh language is treated no less favourably than the English language’*. Within the response, the individual described their own experience of trying to source a BSL interpreter with the appropriate qualifications as well as fluency and the ability to translate Welsh. This echoed other respondents’ perceptions that there is a lack of qualified individuals in the field.
- 3.58 In order to overcome these barriers and create positive effects on Welsh language use, contributors made a number of suggestions. These were primarily: increased funding, an intensive training scheme for teachers, assistants, and practitioners, scholarships for speech and language therapists and teachers of the deaf to grow the number of specialists, and a standard delivery package for all education settings to maintain consistency across the field.
- 3.59 Beyond resource-based suggestions, further general comments were made on encouraging the use of Welsh and BSL through promoting multilingualism as a significant asset for boosting communication skills, general development, and employability in later years.

- 3.60 The other principal message from respondents was to ensure that freedom of choice is clearly conveyed, to establish that education can be accessed in the language of the learner's choosing, rather than this being pre-determined based on the resources available.

Additional Comments

- 3.61 The final question offered participants a chance to raise any issues that had not already been covered throughout the course of the survey.
- 3.62 A number of contributors praised the ethos and inclusivity of the overall guidance. This is reflected through comments such as, 'we feel that it is very positive that the guidance has opened a discussion and awareness of a BSL Curriculum in Wales and look forward to seeing more detail in time.'
- 3.63 Some participants used this opportunity to raise wider considerations that had not been explicitly incorporated with the guidance, these could be summarized as follows:
- Significant work is needed to close the attainment gap between hearing impaired and hearing learners
 - Steps should be taken to ensure that parents (who may also be BSL users) are supported and able to engage with the school too
 - Highlight the fact that incidental signing also has benefit for communicating in noisy environments
 - BSL is the first language for many Welsh citizens and should be considered equally as important as Modern Foreign Languages
- 3.64 There were also a number of outstanding questions which respondents suggest they would like to see answered within the finished document, these included:
- What steps are being taken to equally support SEN learners?
 - Will BSL be taught by deaf people?

- Will the guidance ensure that parents (who may also be BSL users) are supported and able to engage with the school too?
- Would there be funding available to upskill staff with an interest in BSL provision?
- Will there be a bank of resources for schools to draw upon?

3.65 There were also two more complex concerns to note surrounding education and development for learners. The first concern surrounds assessment practices for BSL learners, and the ability to properly monitor progression. One respondent described the lack of statutory assessments for BSL in Wales as ‘worrying’, as the lack of consistency across health boards and local authorities can pose difficulties in tracking and assessing the progress of learners. Additionally, it was suggested by another participant that a focus on assessment in BSL for curriculum subjects could be beneficial, alongside further consideration of student’s rights to be assessed in BSL.

3.66 The second more complex concern surrounds the impact that Covid-19 measures and restrictions have had on young learners. With specific relevance for deaf children, education providers have commented on the increased barriers to communication which have been introduced by mask wearing and the increased difficulty this poses for lip-reading. In a more general sense, lockdown and isolation measures have also prevented deaf children from social and educational activities which would normally enhance communication skills and assist with development.

Additional Responses

The National Deaf Children's Society Cymru

- 3.67 The National Deaf Children's Society welcomes the Welsh Government's commitment to the development of the guidance and praises its ambition in striving to make BSL accessible to both first and second/third language learners.
- 3.68 Building on this, the Society's response raised some concerns over sufficiently catering for these groups which may have very different needs. The response emphasises the importance of providing sufficient detail for three groups; deaf children using BSL as a first language, deaf children who use sign to support their first spoken language (sign supported English/sign supported Welsh), and learners who choose to learn BSL as a second/third language.
- 3.69 Key recommendations set out by the Society for improving the guidance includes:
- An overview of sign language and the different ways in which it is used, including clarity on the difference between BSL, Sign Supported English/Welsh and Makaton so as to draw important distinctions and help to avoid common misconceptions.
 - In addition, more detail (e.g., on other aspects of the progression steps)
 - More attention given to careful wording and avoiding position statements within the guidance
 - Making changes to the resources and links (particularly on pages 5 & 3) and providing more appropriate examples
- 3.70 In addition to the changes in guidance, the response also details some additional steps that should be taken to ensure delivery of the curriculum including: securing the availability of tutors with the relevant knowledge to provide BSL in schools, considering the BSL skillset of professionals supporting deaf learners, and ensuring that Wales follows through on plans to adopt the BSL GCSE currently

being developed.

The Children's Legal Centre Wales

- 3.71 The Children's Legal Centre Wales provided a written statement which emphasised the importance of young people's access to BSL provision, in alignment with the UNCRC Articles detailing rights to expression, communication, education, and language.
- 3.72 The statement also evidenced research findings from the projects, 'Little Voices Being Heard', and 'Children as Researchers'.
- 3.73 The Children's Legal Centre gives their full support to efforts to increase BSL into the curriculum and wider communities, and welcomes the guidance as a starting point for achieving this. The Children's Legal Centre highlights the links between the BSL guidance and the national priorities, as well as the aspirations of the new curriculum. In the statement, the progression steps are described as providing a 'clear roadmap' from introduction to understanding.
- 3.74 The statement cites limitations within the considerations for provision however, including engagement with families, role models, partner organisations and wider communities.

NEU Cymru Response

- 3.75 NEU Cymru strongly welcomes the Welsh Government's consideration of a BSL curriculum, and have provided a written statement to give further attention to areas beyond the limitations of the survey.
- 3.76 The key areas of concern echo many of the comments made by survey respondents. They cite three core areas with a need for additional detail, these are: clarity on 1st/3rd language provision, training, and assessment arrangements.
- 3.77 The statement suggests that clarity should be provided for BSL first language learners, particularly in explaining whether there is an

expectation that these learners will also complete English and Welsh language requirements.

- 3.78 In terms of training, the statement emphasises that a significant level of funding would be required to ensure that there are sign language professionals and to ensure that support staff have sufficient understanding.
- 3.79 Regarding assessment arrangements, the statement cites the need for BSL learners to be provided with assessment criteria which is accessible to them.

Children's Commissioner for Wales

- 3.80 The Children's Commissioner for Wales reviews the draft guidance with specific consideration given to its alignment with the UNCRC.
- 3.81 One of the core concerns highlighted in the Commissioner's response is in relation to Article 12, the right for young people to express their views and have them taken seriously in matters that affect them. The lack of an available and accessible children's version of the consultation materials has been cited as a missed opportunity to afford children this right and to gain their valuable insight.
- 3.82 The response also questions whether there has been any involvement of children and young people in the process of drafting this guidance to date. The Commissioner stresses the importance of young people contributing their views before the guidance is finalised.
- 3.83 In addition, the Commissioner expects the participation of Deaf children, their families, and those suitably qualified in BSL to participate in the consultation of the full development of the descriptions of learning.
- 3.84 In terms of structure and the level of detail within the guidance, the response recommends that UNCRC references are placed earlier on in the document, to ensure that children's rights are at the forefront of their curriculum design.

- 3.85 Finally, the response stresses that equal access to the curriculum for BSL users spans beyond curriculum design. The availability of staff able to fluently communicate in BSL within schools is fundamental to overcoming barriers to access and learning. The Commissioner summarises the findings of a roundtable session held in February 2021, wherein attendees confirmed that the lack of BSL standards and progression for communication support workers and Teachers of the Deaf is an ongoing problem.

4. Consultation Workshops

Introduction

4.1 This chapter sets out the findings of six workshops held between the 9th and 25th of March 2021. The workshops were attended by 40 stakeholders from across Wales and facilitated by Miller Research. A qualified BSL interpreter attended the workshops to ensure the inclusion of participants who were deaf or hard of hearing.

4.2 Of the 40 contributors:

- Six were teachers of the Deaf
- Four were teaching assistants or BSL interpreters supporting deaf pupils in school
- One was a communication support worker in a further education college.
- Ten were representatives of organisations supporting the Deaf community, including:
 - Talking Hands
 - Cardiff Deaf Centre
 - British Deaf Association
 - British Association of Teachers of the Deaf (BATOD)
 - Centre of Sign-Sight-Sound
 - National Deaf Children's Society
 - Deaf Hub Wales
- Two were adult BSL users
- One was a parent of a deaf child
- One was a teacher in a mainstream school
- One was a deaf pupil in a mainstream comprehensive
- One was a representative from the Office of the Children's Commissioner
- Thirteen were pupils in a Special school that uses BSL for communication.

Question 1

What were your first impressions of the Curriculum for Wales guidance for BSL?

- 4.3 Most respondents reported a positive first impression of the Curriculum for Wales guidance for BSL. It was noted that the document “*reads well*”, provides “*clear first steps*” in terms of introducing BSL into the curriculum and was “*thorough but not overly prescriptive*”. A number of stakeholders, particularly those from the Deaf community, felt the guidance and what it represented created excitement around opportunities being proposed.
- 4.4 Several participants noted that from the very outset, the guidance “*importantly*” defines the difference between those learning BSL as a first/second language and those for whom it is third or subsequent language.
- 4.5 Conversely, however, others reported (in response to question 5, later in the workshop discussions) that they had not been aware initially of the focus on hearing pupils learning BSL as a third or subsequent language, in addition to those who are deaf or hard of hearing.
- 4.6 Whilst first impressions of the guidance were generally positive, many participants caveated this by commenting that the document was very generic; several stated that they assumed further guidance – for schools and other interested stakeholders – would be provided, for example around professional standards required to deliver BSL within the new curriculum.
- 4.7 Stakeholders suggested that the guidance described the rationale for *why* teach BSL, for example in the description of how BSL fits in with the four purposes¹, but did not focus on *how* it could be brought into the curriculum, particularly given what stakeholders reported to be a low baseline in terms of current BSL provision in schools.

¹ Pages 2-3 of the draft Curriculum for Wales guidance for BSL.

- 4.8 In describing their first impressions, several workshop participants stated that the guidance needs to be more prescriptive, and not just *“here’s the guidance, you go off and work to meet the needs of your school.”* This point was expanded upon in subsequent stages of most of the workshops.
- 4.9 A number of stakeholders expressed doubt about the viability of implementing the guidance without further and more directive detail on how it should happen: *“without more detail and more resource, I would struggle to see things changing [with this guidance]”*
- 4.10 A few participants were critical of the guidance for not appearing to have been written from the perspective of the Deaf community. Two stakeholders commented that the document *“reads like it’s been written from a medical model perspective”*. When asked to expand, it was suggested that the guidance failed to convey the idea that BSL and signing could complement speech and therefore the document perpetuates a reportedly common perception that deaf children and their parents must choose between signing and speech.
- 4.11 Another participant was critical of the layout and language of the document, which they felt was *“typical of a hearing author”*, for example in the use of bullet points, acronyms, and brackets. It was suggested that this would risk disengaging the Deaf community who would assume that the introduction of BSL into the curriculum would *“be run specifically by hearing people”*.

Question 2

Was the Curriculum for Wales guidance for BSL what you had expected?

- 4.12 When asked about the extent to which the guidance aligned with expectations, several participants acknowledged uncertainty about what to expect.

- 4.13 Others felt the guidance went further than they had anticipated and that it exceeds the status quo in terms of the current provision of BSL for the Deaf community
- 4.14 Several reiterated concerns that the guidance was very generic and that they had expected more detail around implementation, particularly in terms of staffing and funding.
- 4.15 A minority of stakeholders stated that the guidance was in line with what they had expected and had offered no surprises.

Question 3

To what extent are the published Curriculum for Wales guidance and this draft Curriculum for Wales guidance for British Sign Language clearly aligned? Is the relationship between them clear?

- 4.16 A lot of the contributors were unable to respond to this question, which is perhaps unsurprising given that many of them came from a non-teaching background and were unfamiliar with the published guidance or other documentation relating to the wider Curriculum for Wales.
- 4.17 Amongst the minority of stakeholders who were in a position to respond to this question, the general consensus was that the two guidance documents were well aligned. It was noted that the draft guidance for BSL outlines how BSL fits in with each of the four purposes of the wider Curriculum for Wales in detail.
- 4.18 One participant felt that the BSL guidance seems very much in line with published Curriculum for Wales guidance, albeit both being quite general and lacking in detail: *“they are [both] quite brief, woolly, a bare skeleton ... the next few years will show how it is rolled out.”*

Question 4

To what extent are 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? Is the relationship between them clear?

- 4.19 Again, most workshop participants were unable to express an opinion on alignment between the draft BSL guidance and the guidance for the Languages, Literacy and Communication Area of Learning and Experience, given a lack of knowledge of the latter.
- 4.20 Those who did respond to this question felt the two guidance documents were well aligned, in particular the references and links to the statements of what matters and what these statements mean in the context of BSL. It was also suggested that the descriptions of learning were also an example of alignment with the guidance for the Languages, Literacy and Communication Area of Learning and Experience.
- 4.21 One participant noted that the “*parallels*” between the Languages, Literacy and Communication Area of Learning and Experience guidance and the draft BSL guidance emphasised the parallels between BSL and modern foreign languages like French or German: *“[the draft BSL guidance is] very much aligned with how they envisage developing international languages.”*
- 4.22 As with the wider Curriculum for Wales guidance, one stakeholder referred to similarities between the BSL guidance and the guidance for the Languages, Literacy and Communication Area of Learning and Experience in terms of their brevity: *“[the BSL guidance and the guidance for the Languages, Literacy and Communication Area of Learning and Experience] do seem clear ... clearly written from the same source, for the same purpose BUT both are very brief ... needs more detail.”*

Question 5

We are interested in exploring differences between BSL learners who are learning BSL as a first/second language, and learners who are approaching BSL as a third or fourth language, as they would with German or French. Does this draft Curriculum for Wales guidance for British Sign Language balance the needs of those approaching BSL in both of these contexts?

- 4.23 Many workshop participants had not appreciated the relevance of the guidance to hearing learners and there was a common perception that the guidance does not clearly seem to be about those learning BSL as a third or subsequent language.
- 4.24 There was a general consensus in many of the workshops that priority and investment should be on BSL provision for deaf children, at least initially, for the following reasons:
- Concerns that deaf learners *“are already far behind hearing children.”*
 - The perceived risk of a discrepancy in skill levels: *“Is there a danger that hearing children end up with better BSL than deaf children?”*
 - The more fundamental need for BSL skills amongst deaf learners: *“there is a big difference between someone using [BSL] at home and someone learning it as another language ... need to meet the needs of [the former] first.”*
 - The need for a greater emphasis on deaf learners learning BSL as a first or second language because of the *“need to develop their own language to then develop their learning in other subjects.”*
- 4.25 Other stakeholders understood that the guidance relates to deaf and hearing learners of BSL: *“through the four purposes, it talks about how BSL is relevant to all.”* In one workshop, it was suggested that the BSL guidance ‘is reminiscent of Curriculum Cymraeg and trying to get English medium schools immersed in Welsh.

- 4.26 One stakeholder believed that the guidance placed more emphasis on those learning BSL as a third or subsequent language and cited the reference to assessment as an example of this focus: “[the guidance] definitely needs more depth in terms of learning BSL as a first language.”
- 4.27 In a couple of workshops, there was a discussion about the practicalities of teaching BSL to both deaf and hearing learners and it was agreed amongst both groups that a general lack of capacity to teach BSL means that meeting the needs of both cohorts will be challenging.
- 4.28 Workshop participants also expressed concerns about discrepancies in the teaching standards and qualification requirements for practitioners teaching BSL to these two different groups; the general consensus was that standards should be higher for those teaching BSL to deaf learners, for whom it is their first or second language. One contributor suggested that the guidance specify the standards in terms of delivery for both cohorts, suggesting that while the BSL teacher for those learning BSL as a third or subsequent language should be qualified to a level 2 or 3 minimum, there was a greater need for a specialist for learners using BSL as a first or second language.
- 4.29 It was also suggested by a number of contributors that those teaching BSL as a third or subsequent language need to be familiar with Deaf culture and the wider context around BSL as a language.
- 4.30 In addition to these discussions about professional standards, in several workshops participants referred to the expectations of progression amongst the two cohorts². Some participants felt that there needs to be greater differentiation between expected levels of progress for learners for whom BSL is a first or second language and those for whom it is third or subsequent language.

² I.e.: those learning BSL as a first or second language and those learning BSL as a third or subsequent language.

- 4.31 One participant commented that deaf learners tend to finish school with very few qualifications and opportunities for progression into a career or further education: *“this new curriculum has capacity to change that – as long as it is sufficiently aspirational, which is not what is suggested by the [draft] progression steps.”*
- 4.32 One stakeholder questioned how easy it would be to motivate learners to engage with BSL as a third or subsequent language, whilst another expressed doubt about the feasibility of introducing BSL as another third of subsequent language option in mainstream schools: *“Can schools cope with an extra language?”*

Question 6

The Curriculum for Wales Draft Guidance for BSL includes references to specific articles in the UN Convention on the Rights of the Child, such as children’s right to use their own language and culture even if these are not shared by most people in the country where they live, and the right to get information from the internet, radio, television, newspapers, books and other sources.

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?

- 4.33 The general consensus across the groups was that the reference to the UNCRC was a positive addition to the guidance, although its inclusion raised several issues, including:
- The frequently cited concern about **teachers of BSL being insufficiently au fait with the language and culture of BSL** in order to deliver on the rights and enable deaf learners to reach their full potential in a mainstream environment: *“Need to employ the right people – BSL qualified and cognizant of the Deaf culture.”*

- The need to **take young people's perspectives into account** when developing and implementing this guidance for BSL in the curriculum
- The need to **take into consideration informal learning of BSL (outside school, for example in youth groups)**, given the reference to children's rights to obtain information from a range of different sources.
- The **challenge of ensuring that deaf learners are not excluded from the mainstream education system whilst also ensuring they can maintain their Deaf identity and culture**: *"How do we [meet the UNCRC requirements] if there is only one deaf child the school? How can they access their own culture?"*
- Concerns that **the UNCRC has not sufficiently protected the rights of disabled people**: *"so [the guidance] must look at the rights of disabled people [sic]³ in conjunction with rights of the child."*
- The **need to include a reference to the Equalities Act 2010**.

4.34 Stakeholders identified some advantages of the reference to the UNCRC, which included:

- It helps to give authority to the guidance by linking it with an internationally respected pledge: *"there will be legal consequences and implications if this [guidance] is ignored ... it is imperative to respond to a child's needs."*
- It gives emphasis to the vision for supporting and enabling deaf children to leave mainstream school better equipped and more highly qualified than is typically the case currently.

³ The guidance does have a reference and link to the UN Convention on the Rights of Persons with Disabilities; however, it was suggested this was not as prominent in the guidance as the UNCRC.

Question 7

Some example descriptions of learning were provided in draft British Sign Language guidance, on page 6. In your opinion, are there any specific aspects of progression in BSL that should be reflected in the descriptions of learning for the guidance?

- 4.35 Stakeholders welcomed the inclusion of the descriptions of learning, particularly for deaf children who would, typically, be learning BSL as a first or second language. It was felt that providing *“a clear progression route for deaf children is important ... aspirations have previously been low ... [the guidance] is focused on what a deaf child could and should achieve.”*
- 4.36 Another stakeholder referred to the lack of realistic goals for deaf pupils in the past: *“I like the progression steps ... it’s good to have something for the children to aim for that is different to just “gain a GCSE”, which is beyond some of them.”*
- 4.37 Other stakeholders, however, whilst approving of the idea of including the descriptions of learning, felt that they were insufficiently challenging for those learning BSL as a first or second language:
- “Progression step 1 does not read like someone who has existing knowledge of BSL.”*
- “Progression in school has to accommodate – and stretch – first language BSL users in same way as Welsh as first language ... [the descriptions of learning do] not seem very advanced. Wouldn’t give them the opportunity to grow in school in the same way other children.”*
- 4.38 It was suggested that there there needs to be greater differentiation between expectations on first/second and third/subsequent language learners within the progression steps; some felt that the progression steps for those learning BSL as a third or subsequent language were too challenging.

- 4.39 Several contributors felt that the descriptions of learning needed to be defined more explicitly. Referring to the first description of learning in Progression Step 1 for deaf learners, one contributor with experience of teaching and using BSL commented: *“Is this ‘basic concepts’ just the alphabet? I can teach this in 20 minutes.”*
- 4.40 It was suggested by another participant that the vagueness in the descriptions of learning meant that it was possible to interpret those for deaf learners as quite similar to the descriptions of learning for those learning BSL as a third or subsequent language – particularly at Progression Step 5: *“They don’t make sense. You’d think from reading them without any context that at progression step five both cohorts would broadly be at the roughly the same level – a native BSL child should be much more advanced.”*
- 4.41 A couple of stakeholders referred to the fact that few deaf children start learning BSL from birth and commended the reference in the guidance to the fact that deaf children often have late exposure to BSL. It was suggested that when children begin to learn BSL would have a bearing on their ability to achieve the descriptions of learning, particularly at the lower-level Progression Steps: *“90 per of deaf kids have hearing parents and would be dependent on parents being proactive in learning BSL ... so could start school with no BSL.”*
- 4.42 Whilst the descriptions of learning generated a lot of wider discussion amongst workshop participants, only one participant pointed to a specific aspect of progression in BSL that should be reflected in the descriptions of learning for the guidance: *“natural communication should be there – like incidental Welsh, that’s the one thing deaf children miss out on is incidental learning.”* Although the same stakeholder acknowledged the difficulties of introducing incidental BSL in schools where few teachers understand the language, it was suggested that it was important to consider it.

- 4.43 Finally, a minority of participants felt that the guidance was insufficiently clear why the descriptions of learning for BSL as a third or subsequent language start at Level 3.

Question 8

Are there any aspects of this guidance that you feel are too prescriptive?

- 4.44 Across all groups, there was no one who thought the guidance was too prescriptive: *“No [it’s not too prescriptive] – like the idea of it and is a good starting point.”*

Question 9

Are there any aspects of this guidance that you feel are not detailed enough?

- 4.45 Workshop participants identified a number of areas where they felt the guidance required more detail or further clarity, including:
- The descriptions of learning and what these will involve in the context of BSL.
 - Assessment and what this will actually involve, i.e.: who will conduct these assessments? How will assessment of deaf learners differ from assessment of those learning BSL as a third or subsequent language, clarity around the skills being assessed, for example *“what does ‘Test of Child Speech reading’ mean?”*
 - More detail on Deaf culture and identity, which *“needs to be at the centre of it ... more than just the one comment in the guidance.”*
 - More clarity on the purpose of learning BSL as additional language: *“Are they [those learning BSL as a third or subsequent language] looking to get a BSL qualification?”*
 - Further, definitive guidance on implementation of BSL in the new curriculum, particularly around professional standards: *“[The guidance is] definitely not detailed or prescriptive enough ... it’s*

guidance on what they are HOPING we will do but needs more clarity before people with no knowledge or experience of BSL will take it on – needs more scaffolding.”

- Details on where stakeholders can access more information about BSL in the new curriculum.

Question 10

Is there any additional information you think should be included in this guidance?

4.46 Stakeholder suggested that the following information could be added to the draft guidance for BSL:

- **Requirements for professional standards** – this was a frequently cited issue throughout the workshops. Stakeholders felt that there needs to be minimum standards for professional qualifications; the general consensus was that this should be BSL Level 4, in addition to regular teaching qualifications – as well as experience of working with deaf people. Some stakeholders expressed concerns that schools may use people with limited knowledge of BSL and no formal teaching qualifications without clear stipulations on minimum standards: *“You need the teacher in schools to be like a French or German teacher – properly qualified in the same way to teach a whole class of children.”* A minority of participants felt that BSL should be compulsory in initial teacher training, to ensure all teachers have a minimum knowledge of the language.
- **Guidance on ongoing professional development** to ensure teachers can upskill / reskill (e.g.: through INSET days), given that *“teachers may have completed their BSL training many years ago.”*
- **Details on what minimum standards will be in place in terms of teaching and learning** (e.g.: number of lessons per week etc) and how standards will be upheld.
- **Guidance on Deaf awareness** and how to behave around deaf children (for example being aware of noise levels in classrooms)

and the detrimental impact this has on hearing, even for those with cochlear implants).

- More information and guidance on **how to introduce Deaf culture and identity into the teaching of BSL**.
- **Examples of best practice** – *“the guidance is not enough”*
- Information on next steps *“what happens to this guidance? If this is what’s given to schools, what happens next?”*

Other comments⁴

4.47 Additional comments that were made during the workshop included:

- **Concerns about the timeframe for introducing BSL into the new curriculum**, given the lack of an existing (qualified and experienced) workforce to teach BSL as both a first/second and third/subsequent language: *“when you read [the draft BSL guidance] it reads like it’s actually in place, but there’s a long way to go for this document to be realistic ... timescale is too ambitious in terms of getting schools up to standard. Needs to be steps and a better timeframe otherwise it will fail within that time.”*
- The need for **more financial investment in training BSL teachers** *“teachers should not be self-funding [BSL training].”*
- Concern that **the introduction of BSL into the curriculum is not given due importance**: *“Could lead to schools just appointing people at random just because they happen to know a bit of BSL.”*
- The need to do more to **remove the dichotomy between BSL and speech / cochlear implants** that many deaf children and their parents face. BSL should be seen as a normal aspect of communication for those who (also) use speech: *“Children need equal access to BSL and speech – there is nothing in the guidance to either refute or support this, so perhaps there could be more to support both approaches.”*

⁴ This section lists issues or concerns that workshop participants raised during the discussions that did not relate directly to any of the specific questions.

- The importance of **developing BSL/Deaf awareness from early years** (e.g.: hearing children in nursery settings learning to tap Deaf children on the shoulder).
- Concern that capacity pressures may lead to professionals accessing BSL virtual training: *“online learning for BSL is NOT the way forward.”*
- The need to **enable/encourage deaf people to train as BSL teachers** to create role models for deaf learners of BSL and ensure those teaching BSL understand Deaf culture
- The need to ensure consistency of BSL being taught – whilst also retaining regional (North/South Wales) variations in signs.
- Concern about a **lack of clarity over WHY hearing children are to be taught BSL**: *“[there is a] real difference between learning to do a bit of sign as a fun activity for a primary school group and embedding BSL with an aim to have children communicating with a purpose, and that comes back to the why, what the motivation is of the school or the class or individual members of staff.”*
- The **greater opportunity to engage hearing pupils in learning BSL where there is a deaf child in their class/school**.
- Recognition that we are in a **unique position in Wales because we already have the Welsh language and a focus on bi/multilingualism**; introducing BSL to hearing pupils within mainstream schools was seen as comparable with pupils from English-medium families attending Welsh-medium schools.
- The need for **those teaching BSL to be qualified before they are appointed**: *“You wouldn’t [recruit for] Welsh language teachers with adverts saying you must be willing to learn Welsh.”*
- The opportunity this new curriculum development offers in terms **preventing deaf children from having to be sent off to a residential school for the Deaf**.