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Independent Review of BSL Provision for Adults in Wales

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Independent Review of BSL Provision for Adults in Wales

Authors: Rhodri Bowen and Dr Duncan Holtom



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Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

For further information please contact:

Claire Maxwell

Post-16 Education and Skills

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

Tel: 0300 062 5597

Email: Post16PlanningandFunding@gov.wales

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Glossary of acronyms

ABSLTA	Association of British Sign Language Teachers and Assessors
ACL	Adult Community Learning
BSL	British Sign Language
BDA	British Deaf Association
BATOD	The British Association of Teachers of the Deaf
CAVC	Cardiff and the Vale College
CLG	Community Learning Grant
CRIDE	Consortium for Research Into Deaf Education
DWP	Department for Work and Pensions
FSL	Family Sign Language
FEI	Further Education Institution
GIRFEC	Getting it Right for Every Child
GP	General Practitioner
LA	Local Authority
LLWR	Lifelong Learning Wales Record
NDCS	National Deaf Children's Society
NHS	National Health Service
NPT	Neath Port Talbot
SLA	Service Level Agreements
UNCRC	United Nations Convention on the Rights of the Child
UK	United Kingdom
WEFO	Welsh European Funding Office
WG	Welsh Government

Note on the language used

In line with the Scottish Government British Sign Language National Plan (Scottish Government, 2017), wherever we refer to “BSL users” we mean D/deaf and/or Deafblind people (those who receive the language in a tactile form due to sight loss) whose first or preferred language is British Sign Language (BSL).

Deaf - with a capital "D" is used to refer to people who identify themselves as part of the Deaf Community and who usually actively use BSL. We use the term “D/deaf and Deafblind” as an inclusive description of deaf people who may use and/or wish to learn BSL.

1. Introduction

British Sign Language

- 1.1. British Sign Language (BSL) is the first or preferred language of many D/deaf and Deafblind people in the UK. It is a language of space and movement using the hands, body, face and head. Many BSL users are Deaf¹ people whose first language and language of choice, is sign language.

BSL users in Wales

- 1.2. In total, there are reported to be around 7,500 people who use BSL in Wales, of whom around 4,000 are D/deaf (British Deaf Association, n.d). It is not possible to produce a definitive figure as the data from different sources are not consistent; for example:
- 1,138 people in Wales reported that BSL was the “main language spoken at home” in the 2011 Census. However, it was reported that this has been criticised by the Deaf community, and is therefore thought to be an underestimate.
 - Rather than asking which was the main language spoken at home, the Scottish census asked about languages spoken at home other than English, and it identified a considerably higher proportion of BSL users (approximately 0.23 percent of the population compared to 0.03 percent in England and Wales).
 - The (English) Department of Health’s GP Patient Survey (NHS England, 2016) estimated that there are 122,000 D/deaf people in the UK (approximately 0.18 percent of the population) (BDA, 2014).
- 1.3. Estimates based upon the Scottish Census and England GP Patient Survey data would mean that the Welsh BSL population would be around 5,600-7,300 people (assuming that 0.18-0.23 percent of the Welsh population are BSL users).

¹ Deaf - with a capital "D" is used to refer to people who identify themselves as part of the Deaf Community and who usually actively use BSL.

Post 19 BSL learning provision

- 1.4. The National Deaf Children's Society (NDCS) identifies that 90 percent of deaf children are born to hearing parents with no previous experience of deafness² (CRIDE, 2018). As such, learning that their child is deaf can be an emotional and confusing time for parents and carers of deaf children. Some of these children may choose to learn BSL as their main form of communication, and for their families to be able to communicate effectively with them, they will need to learn and use BSL themselves. It is reasonable to assume that very few of these hearing parents will be fluent in BSL, or indeed have any understanding of BSL, and **if** parents and siblings cannot use BSL, children are isolated and families struggle with communication. Language acquisition in the first five years of life is essential, and this is therefore often the most important period in a child's life for their parents or carers to learn BSL (Cormier et al., 2012; Kuhl, 2010).
- 1.5. The focus of this review is therefore upon provision for adults, defined for the purpose of this study as those aged 19 years and over (in line with post 19 adult learning funding), wishing to learn BSL in order to communicate with a Deaf child or, for example, an adult partner or relative.

Policy context

- 1.6. The Equality Act (2010)³ protects people against unfair treatment (discrimination) because of their disability. People who are Deaf and use BSL are protected from unfair treatment by the Act. The Act places legal responsibilities on public and private services that carry out public functions, to protect those with a disability from discrimination, harassment and victimisation, which includes the right to use BSL/English interpreters and to receive equal access to services in Wales.
- 1.7. The Welsh Government formally adopted the United Nations Convention on the Rights of the Child (UNCRC) to provide a foundation of principle for dealing with children, in a plenary debate on 14 January 2004. In 2011 Wales became the first country in the UK to make the UNCRC part of its domestic law (Rights of Children and Young Persons (Wales) Measure 2011). The UNCRC provides for supporting families with D/deaf children to learn sign language as a right of children with

² This statistic is widely referred to in the literature, although it is difficult to identify how it is calculated.

³ [The Equality Act \(2010\)](#)

disabilities, “so that parents and siblings can communicate with family members with disabilities.” (UNCRC, 2007, p.11).

Post 19 learning funding and planning

1.8. The Welsh Government provides local authorities (LAs) with funding for adult and community learning (ACL) provision, like BSL, for adults aged 19 and over. Providers are expected to “identify and address the needs of their local communities” and “in doing soprioritise the following key areas of national importance”:

- Essential skills to help people “access work opportunities or progress while in employment” - “essential communication skills and essential application of number skills”, which are free to all learners “up to the level of functionality”.
- Digital skills.
- Employability skills.
- Provision for “older learners and social engagement”.
- “Engagement activity and ‘hook’ courses”.⁴
- Welsh medium provision (WG, 2017).

1.9. ACL provision is planned and delivered by 15 ACL Partnerships⁵ operating a range of different delivery models including:

- Delivery by LAs through the Community Learning Grant (CLG).
- Delivery by further education institutions (FEIs).
- Delivery by LAs via a franchise agreement with colleges.
- Delivery by colleges through Service Level Agreements (SLAs) and Commissioning Frameworks with LAs.

1.10. Public services face significant challenges as a result of austerity.

Notwithstanding additional budgetary allocations to FEIs to help mitigate pressures upon the sector, they face a very challenging financial settlement; for example, funding for part-time FE provision in Wales fell by over 70 percent in real terms between 2013/14 and 2016/17 (Champion, 2018).

⁴ This supports “the provision of softer engagement activity as a means of attracting learners who might otherwise hesitate to get involved” (Welsh Government, 2017a, p.7).

⁵ The partnerships bring together LAs, FEIs, the Workers’ Education Association (WEA), YMCA Community College Cymru, and other third sector voluntary organisations.

Access to BSL provision for families in the UK

- 1.11. In 2017, the Children’s Commissioner for Wales identified that while the Welsh Government recognises BSL as a language in its own right, there is insufficient resource available to ensure that family members can learn to use BSL (Children’s Commissioner for Wales, 2017).
- 1.12. In England, the Department for Work and Pensions’ market review of BSL and communications provision in the UK found support provided by LAs in England is often inconsistent, with clear gaps. A 2011 NDCS survey of a random sample of 80 LAs, to investigate provision of sign language support for families, found that over half the 70 LAs (56 percent) that responded, provided no support or services for parents of deaf children wanting to learn sign language (DWP, 2017).
- 1.13. In Scotland, the BSL National Plan (2017-23) (Scottish Government, 2017) sets out actions to help D/deaf/Deafblind BSL users. This includes the long-term goal, that the “Getting it Right for Every Child” (GIRFEC) approach will be fully embedded, with a D/deaf or Deafblind child and their family “offered the right information and support at the right time to engage with BSL” (ibid, p.10). The GIRFEC approach is outlined further in the boxed text below.

The Scottish Getting it Right for Every Child approach

In support of the GIRFEC approach, “by 2020 Scottish Ministers will:

Improve access to early years’ services for parents whose child is diagnosed as D/deaf or Deafblind by developing information about BSL and Deaf culture for service providers who support parents, such as health visitors.

Assist families of D/deaf and Deafblind children by ensuring that they have access to BSL resources as early as possible in their child’s life. This will include consulting with BSL users and other stakeholders to assess the most appropriate digital platforms for signposting and disseminating information.

Develop BSL resources and advice within key programmes, such as “BookBug”, so that parents can be supported to interact with their child during this critical developmental phase.

Work with partners to determine the best way of enabling families and carers to learn BSL so that they can communicate effectively with their D/deaf or Deafblind child in the crucial early years (0-8 years).

Test out a new approach to supporting older D/deaf and Deafblind children (8 years +) and young people, and their families to learn BSL.

Ensure that children and/or parents/ carers who use BSL can benefit from the new £2m Inclusion Fund, as part of the increase in early learning and childcare provision.”

Adapted from Scottish Government, 2017, p.11

Notable pilot projects to improve families’ access to BSL

- 1.14. Batterbury et al. (2010) were commissioned by the (then) Department for Children, Schools and Families in England to evaluate the I-Sign pilot. The aim of the I-Sign pilot was to improve BSL provision and status for families of D/deaf and hearing impaired children and young people. The pilot was made up of a

consortium of seven organisations⁶ and two regional hubs⁷; and its first work stream focused upon increasing “awareness of British Sign Language and choice for families with deaf and hearing impaired children to learn and communicate using BSL”. As part of this, the NDCS developed the Family Sign Language Curriculum (FSLC), which focuses on families and teaches relevant themes and vocabulary. Its holistic approach caters to families through timing, venues, online resources, crèche facilities, and at no cost.

- 1.15. Batterbury et al.’s (2010) evaluation of the pilot showed that parents taking part in I-Sign improved in their signing ability compared to those learning in level 1 courses. In addition, they reported increased confidence and less communication breakdown. Total spending for Workstream 1 across the three years for all organisations involved came to £276,998. The authors provided a detailed breakdown of the expenditure by dividing cost per activity and calculated a total cost estimate per family using FSLC across three years, of £1,847. They stated that this could be lowered to £396 if, for instance, the cost of the DVD and website is factored out; however, realistically the true cost is likely to be between the two estimates. They also noted that courses in the pilot were too short, limited to a small number of geographical regions, and did not offer follow-up courses. The evaluation concluded that the courses were well-received and should be extended across the UK but that more funding was needed to back a higher number of qualified tutors and ensure that courses were free for all. Due to the lack of comparable programmes (and the lack of evaluations of programmes), it is not possible to say whether the costs and outcomes of the pilot would be replicated if it were rolled out in, for example, Wales.

NDCS’ Family Sign Language curriculum

- 1.16. NDCS offers a unique curriculum of family sign language (FSL) that teaches BSL in a child-centred way (language appropriate and relevant to children’s daily life). Their service Your Child, Your Choices, provides family sign language in specific areas. In 2014, NDCS piloted a 1:1 model for “seldom-heard” families and found it had a significant impact on those unable to attend a group course due to being

⁶ The five partners included Royal National Institute for Deaf People (RNID), National Deaf Children’s Society (NDCS), Council for the Advancement of Communication with Deaf People (SIGNATURE), British Deaf Association (BDA), University of Central Lancashire (UCLAN),

⁷ Exeter Royal Academy for Deaf Education (ERADE) and Merseyside Deaf Peoples’ Society (MDPS).

isolated geographically and/or restricted by older family members' views (Scottish Parliament, 2015).

Aim and research questions for this review and report structure

1.17. Given this context, the aim of this review is:

“...to provide independent evidence on existing provision and demand for adult BSL learning as delivered by local authorities and FE institutions in Wales. This research will inform future decision making, including specifically whether BSL ought to be considered an Essential Communication Skill (in line with Literacy and English for Speakers of Other Languages).”

1.18. Given this aim, a number of areas were identified as out of scope of this review (and were therefore not considered):

- BSL provision in schools and 6th forms (as noted above, the focus was upon “adult”, i.e. post 19 learning).
- Post 19 BSL provision for D/deaf people (as the focus of the review was upon BSL for people who need to communicate with D/deaf people).
- Training for interpreters and support staff, such as teaching assistants.
- Access to services, service delivery, and services' responsibilities to train their own staff.

1.19. Following this introductory section, section 2 outlines the review's approach and methodology.

1.20. Section 3 of the report addresses the review's seven questions about existing BSL provision:

- What levels of BSL are currently being delivered to adults in Wales?
- How is BSL delivered (classes or on-line or both)?
- How much does it cost to deliver BSL in Wales?
- How much BSL learning provision is currently being funded (in whole or in part) by the Welsh Government?
- How much is being funded through full cost recovery, and how much is it costing the learner to attend?
- Who are the learners, and what are their motivations for learning?

- What funding support do BSL learners currently have access to; and from whom?
- 1.21. Sections 4 and 5 of the report address the review’s five questions about potential provision, including the feasibility of designating BSL as an “essential skill”:
- What demand is there for BSL provision for adults in Wales, whether this is accredited or not?
 - What factors facilitate or act as a barrier to demand?
 - If the Welsh Government considered BSL an essential communication skill and as such, funded provision up to Level 1 (in line with other essential skills funding), how much would this potentially cost annually?
 - What eligibility criteria would need to be introduced (if any) to ensure only those adults who had an identified essential need for BSL were entitled to free provision?
 - Are there sufficient tutors in Wales to be able to support such a commitment if it were for in-person classes?

2. Approach, methods and data collection

2.1. A mixed methods approach including surveys, interviews and desk-based research was used to collect qualitative and quantitative data.

Desk-based literature search

2.2. The purpose of the desk- based literature search was to identify and review existing research and information on demand and supply of BSL provision for adults (age 19+) in the UK. It also included mapping out the legal framework such as the Equality Act 2010, Well-being of Future Generations (Wales) Act 2015, and the UNCRC, and exploring any parallels to the Welsh language. The review included a systematic search of academic and “grey” (unpublished) sources.

2.3. A search protocol was developed outlining:

- The inclusion and exclusion criteria.
- The sources that will be searched, such as journals, websites and electronic databases.
- How sources will be searched including, for example, the search terms to be used, and any limits on searches.
- The review process, including details on how items (such as journal articles or reports) identified through searches will be sifted and then, if applicable, reviewed.

2.4. The inclusion criteria were:

- Relevance: the item must include research or information about existing and potential demand and supply of BSL post 16 learning provision in the UK.
- Timeliness: only items published in the last fifteen years (2003-2018) were included.
- Languages: only items published in the English language were included.

2.5. The sources searched were:

- JSTOR and Google scholar to identify academic literature.
- Google, to identify unpublished “grey” material, such as evaluations of BSL provision.

2.6. The search terms were strings of search terms: Research OR data OR information AND “post 16 education” OR college OR “further education” OR “adult

learning” OR “adult education” OR “community learning” AND Deaf OR BSL OR “British Sign Language”.

- 2.7. A two stage sift was used to identify items that met the inclusion criteria and which were included in the review. Table 2.1. outlines the results of the searches and sift.

Table 2.1. Result of searches and sift

Source	# of items identified by searchers	# of items include post sift
Google	149	31
Google Scholar	999	6
JSTOR	369	1

- 2.8. Little relevant material was identified on the demand and/or supply for post 19 BSL learning provision and the legal framework. Of the 38 articles included (i.e. that met the inclusion criteria outlined above), 19 were judged relevant but not a direct match, and only 14 had sufficient relevant and useful material to be worth citing in this report. Additional material was sourced by following up references noted in literature from the original search and from additional, targeted searches focused upon the legal framework and provision in the other UK nations. The lack of material identified by the search reflects the relatively narrow remit of the review. Most of the literature identified by the searches (but not included) focused on BSL provision for D/deaf people themselves or training for interpreters or teaching assistants, which was clearly out of scope.

Desk- based review of Lifelong Learning Wales Record data

- 2.9. The purpose of the desk -based review of Lifelong Learning Wales Record (LLWR) data was to identify:
- What BSL provision is funded by the Welsh Government (including: the type of provision (e.g. full/part time, the level, if learners contribute to fees; and the Welsh Government funding for the course, as an indicator of cost).
 - Where that BSL provision is delivered (by provider and also LA area).
 - The number and profile of learners (e.g. in terms of gender, home postcode and LA of the learner and disability (if any)).

2.10. The data draws upon the last two academic years (2016/17 and 2017/18). Although data for earlier periods was provided, differences in funding in 2015/16 and 2014/15 make comparisons with the current period (i.e. 2016/17 and 2017/18) difficult. Data was provided by the LLWR team and is discussed in section three.

Telephone survey of providers and the voluntary and public sector

2.11. Key providers and voluntary and public sector organisations were surveyed. They included:

- LA adult learning departments;
- FEIs; and
- voluntary and public sector organisations.

2.12. Interviews and the data collection template were used to collect qualitative and quantitative data on:

- The current and potential demand for BSL provision for adults.
- Existing and potential BSL provision, supplemented by a data capture template (discussed below).
- Learners (e.g. demographic information); their motivations and the funding they can access (where known).
- Workforce mapping to assess if there would be sufficient tutors in Wales to be able to support a commitment to designate BSL an essential communication skill.
- The feasibility and likely implications of designating BSL an essential communication skill (including, for example, how BSL skills could be assessed to determine eligibility).

2.13. In total, 33 stakeholders from Wales and a representative from the governments of Scotland and England contributed to the review⁸. Given the review questions, as outlined in table 2.2., most of the interviewees (n=25) were BSL learning providers (i.e. FEIs or LA adult learning departments), and the table outlines the

⁸ Unfortunately, it was not possible to identify who was responsible for policy on adult BSL learning provision policy in Northern Ireland.

response rates achieved⁹. The views of BSL learning providers were complemented with interviews and discussions with representatives from the voluntary and public sector (n=5), the Welsh Government (n=1) and two hearing specialists (who were consulted regarding data upon hearing loss).

Table 2.2. Sample achieved through the telephone surveys

Stakeholder group	Population	Sample achieved
LA adult learning departments	22	16*
FEIs	13	8**
Voluntary and public sector	N/A	5***

* Anglesey, Blaenau Gwent, Caerphilly, Cardiff, Carmarthen, Ceredigion, Conwy, Denbighshire, Gwynedd, Merthyr Tydfil, Monmouthshire, Neath Port Talbot, Newport, Pembrokeshire, Vale of Glamorgan and Wrexham.

**Adult Learning Wales; Gower College; Coleg Gwent; Cardiff and Vale College; Pembrokeshire College; Coleg Cambria; Coleg Y Cymoedd; and Grŵp Llandrillo Menai.

***Wales Council for Deaf People, Association of British Sign Language Teachers and Assessors, Children’s Commissioner’s Office, Community Learning Wales and National Deaf Children’s Society.

2.14. The sample was therefore not fully representative, but includes the key providers and voluntary and public sector groups, providing a reasonably solid basis for drawing conclusions about provision from across Wales.

⁹ Of the 23 BSL learning providers who responded, nine also provided information via the data capture template. Where the template was not provided, the report relies solely upon data gathered during the interview.

3. British Sign Language learning provision

Introduction

- 3.1. The Welsh Government does not currently have a policy for the provision of post 19 BSL learning provision. This means that (as outlined in section1) ACL partnerships/LAs and FEIs (colleges) are free to determine their planned activity in line with local need. In this section we discuss the post 19 BSL learning provision currently offered by ACL partnerships/LAs and/or FEIs in Wales.
- 3.2. Welsh Government funds BSL provision from non-accredited / entry level up to level 4. The boxed text below outlines what each of these levels would provide to learners.

BSL levels

Non- accredited/entry level: understanding and use of a limited number of words.

Level 1: understanding and use of a limited range of simple words and sentences and the ability to take part in simple everyday conversations and follow simple instructions.

Level 2: The ability to deal with most routine communication and have enough understanding of grammar to cope with some non-routine communication.

Level 3: The ability to understand and use varied BSL in a range of work and social situations.

Level 4: The ability to understand and use extended BSL in a range of work and social situations and undertake some interpreting.

Adapted from Signature, n.d.

Current provision

The levels of BSL currently being delivered to adults in Wales

- 3.3. Table 3.1. summarises current provision funded by the Welsh Government across Wales over the last two academic years. It shows that around two thirds of funding was for level 1 BSL provision.

Table 3.1. BSL provision in Wales funded by the Welsh Government (2016/17-2017/18)

Levels [in terms of activity]	2016/2017	2017/2018
Non-accredited / entry level	19%	7%
Level 1	62%	59%
Level 2	12%	20%
Level 3	2%	3%
Level 4	2%	2%
Not known	2%	9%

Source: LLWR 2019

Delivery of BSL courses

- 3.4. Interviews and responses to the data template (see table 3.7) identified that courses were delivered in classroom settings. Despite a few examples where online resources were used in the class environment, providers described all the provision as “classroom based” (rather than e.g. “mixed”).
- 3.5. Some stakeholders mentioned looking into online options in the future, particularly given the difficulties in recruiting tutors (see para 3.15), although it was reported to be unlikely that there would be any large changes in the near future. Many stakeholders reported that online courses were not suitable to teach BSL, given the importance of face to face contact (and the limitations of software such as Skype) and regional differences in dialect (creating challenges, as online provision might increase the likelihood of having a tutor from a different area to learners).

Provision across Wales

- 3.6. There is a patchy picture in terms of BSL learning provision in Wales, with some LAs, like Anglesey, Caerphilly, Conwy, Denbighshire, Merthyr Tydfil, Pembrokeshire and Wrexham reporting that they provide no BSL provision. However, in some of these areas providers meet demand by signposting learners to provision elsewhere; for example, Conwy and Denbighshire have a referral system to Adult Learning Wales (ALW) and Coleg Cambria refers to Grŵp Llandrillo Menai. In support of this, Conwy allocates its ACL money for BSL to Grŵp Llandrillo Menai (FEI). We discuss the reasons for this below.

3.7. Table 3.2. illustrates that there is little relationship between the population size of LAs and their BSL activity funded by the Welsh Government; for example, Merthyr Tydfil has the lowest population amongst the LAs (upon which LLWR has available data), yet it has more learning activity than Cardiff, which has four times more people living there. An uneven pattern also emerged in 2016/17. Moreover, the LLWR data shows that only people who lived in a minority of LAs in Wales in 2017/18 (i.e. Caerphilly, Conwy, Pembrokeshire and Rhondda Cynon Taf) and in 2016/17 (i.e. Caerphilly, Conwy, Pembrokeshire, Carmarthenshire, Gwynedd, Neath Port Talbot and Swansea) accessed level 1 and 2 Welsh Government funded BSL courses (most only accessed level 1 courses). This data has to be treated with some caution, as it does not take into account variabilities such as age distribution and there may be issues regarding the quality of the LLWR data.

Table 3.2. Welsh Government funded BSL activity according to domicile of learner (where data is available) and the population of the LA

LA of domicile	Population 2018	Welsh Government
		funded BSL activity levels 2017/18
Cardiff	364,248	35
Swansea	246,466	20
Rhondda Cynon Taf	240,131	30
Carmarthenshire	187,568	20
Caerphilly	181,019	60
Newport	153,302	50
Bridgend	144,876	50
Neath Port Talbot	142,906	15
Pembrokeshire	125,055	15
Gwynedd	124,178	25
Conwy	117,181	50
Denbighshire	95,330	10
Torfaen	93,049	5
Ceredigion	72,992	20
Isle of Anglesey	69,961	20
Merthyr Tydfil	60,183	45

Source: LLWR 2019

Welsh Government funding for BSL learning provision

- 3.8. As noted, there is currently no Welsh Government policy on post 19 BSL learning provision and it is up to the providers to determine if they deliver any BSL, and if they do, what form it takes. There was a marked difference amongst interviewees' interpretation of how Welsh Government ACL funding could be used for BSL (see section 1). In a few cases, such as the Vale of Glamorgan, BSL was effectively classed as an essential or employability skill, meaning it fell within current Welsh Government priorities. However, most felt that BSL fell outside the current priorities for ACL, or chose to focus upon other priorities, such as digital skills. Moreover, there were differences in the interpretation and use of funding; for example, one institution used Welsh Government funding to supply BSL provision to families whilst another stated that it could only be used for people over the age of 16. These differences, based upon differing interpretations of the rules and current guidance, contribute to inconsistencies in provision across Wales.
- 3.9. A few areas had access to further funding options, other than cost recovery (self-funding) by learners; for example, in North Wales, institutions could access the Skills for Employers and Employers Fund (funded by Welsh Government and the Welsh European Funding Office (WEFO)), although the available data suggests that only Grŵp Llandrillo Menai did so to fund BSL provision.

Welsh Government Funding for BSL courses

- 3.10. Based upon the sample of providers, table 3.3. shows that around half of all adult BSL courses were fully funded by the Welsh Government and 40 percent partly funded by the Welsh Government, leaving only a small proportion not funded at all. In interpreting the figures, it is worth noting that Grŵp Llandrillo Menai in particular provided many of the courses (see table 3.7.) and if Grŵp Llandrillo Menai is excluded, then half of all courses are partly funded and the proportion of courses not funded by the Welsh Government (full cost recovery) is twice as high, at 12 percent.

Table 3.3. The proportion of courses that were fully funded, partly funded or not funded by the Welsh Government

	Fully Welsh Government funded	Partly Welsh Government funded	Not funded (full cost recovery)
Provider (FEI, LA, 3 rd sector)	55% (No. 417)	39% (No. 296)	6% (No. 42)

Source: People and Work BSL data collection template 2019

The impact of funding cuts upon BSL provision

- 3.11. Many interviewees highlighted the impact of funding cuts, most notably in 2015, which had reduced both the volume of BSL provision and also that fully or partly funded by the Welsh Government. The LLWR data shows there has been a decline of around two thirds in the number of courses (activity) funded by the Welsh Government over the last four years. However, much of this is accounted for by the discontinuation of funding for BSL as part of the Welsh Baccalaureate.
- 3.12. Looking more broadly, interviewees identified a range of factors which meant that BSL provision was particularly affected by the cuts to post 16 education and training funding; for example, it was reported that:
- The funding provided by the Welsh Government does not cover the full costs of BSL provision.
 - BSL provision in some colleges had a low completion rate, meaning it was more likely to be discontinued when cuts were made.
 - Part time provision (linked to ACL provision) had been cut more in recent years (and BSL provision was often part time).
 - Funding in FEIs for accredited BSL was lower than it was for basic skills provision.
- 3.13. Some interviewees also reported that the Welsh Government funding model did not take into account factors such as levels of deprivation in local communities, and rurality.
- 3.14. Inevitably, in many areas, cuts in provision had a knock on effect on demand, in terms of the number of learners, (the focus of section 4) as courses were either no longer free or had been discontinued.

Table 3.4. The volume of Welsh Government funded BSL activity¹⁰ (2016/17-2017/18).

	2016/2017	2017/18
Welsh Government funded BSL activities	610	515

Source: LLWR 2019

3.15. Other barriers to provision, beyond funding constraints, identified by interviewees included:

- The small size of the tutor workforce, with providers consistently reporting that the number of appropriately qualified tutors was small (an issue discussed further in section 5), and that as the work offered was typically part time, it was difficult to recruit and sometimes to retain tutors.
- The lack of funding for activities to engage adult learners, including marketing and engagement workers and events, coupled with low levels of awareness of BSL courses. This could make it difficult to recruit sufficient numbers of learners to make courses viable and, for example, offer courses in both the day time and evenings. As one interviewee reported.

“These barriers are across the board for adult community learning. Engaging people is a daily fight for adult community advisors and with so little funds available there’s lots of barriers we can’t reach like crèche or paying for childcare....These are daily issues be it for BSL or adult community learning”.

The costs of provision

3.16. Many providers reported being able to deliver a level 1 BSL course for around £50-£80 per hour (this includes the costs of a tutor, venue and exams). However, there was a wide spread of costs across the providers surveyed, from around £30 per hour to over £100 per hour (see table 3.7). This reflected factors such as differing levels of demand (which affected providers’ ability to realise economies of scale), localised factors (e.g. access to venues) and inevitable differences in organisational efficiency.

¹⁰ Reference to ‘BSL activity’ in the tables refers to the number of BSL courses delivered rather than the number of learners, as an individual learner may be involved in more than one course in each year.

3.17. As expected, generally the cost of courses increased at levels 2 and 3. The increases in cost at levels 2 and 3 were more pronounced in some organisations than others.

Providers' decisions about BSL provision

3.18. Providers' decisions about how much and which BSL courses to provide depended upon a range of factors including:

- The costs of courses and their understanding or interpretation of funding opportunities including that offered by the Welsh Government and other sources, such as WEFO.
- Their assessment of the level of demand for BSL courses (including competition from other BSL providers).
- Competition from other courses which were generally easier to deliver (e.g. ESOL), which competed with BSL for classroom space and other resources.

The number and profile of adult BSL learners

3.19. There are two broad groups of learners: parents or carers of D/deaf children and professionals (people learning BSL for work). In addition, there are a small number of leisure learners (people learning primarily for personal interest or a hobby), who tended to be people who were retired, and a few examples of deaf people who lost their hearing as adults or who were deaf during childhood, but who had not had the opportunity to learn BSL when they were in school. Given the scope and remit of this study, only learners motivated to learn BSL to communicate with other family members would potentially be eligible to learn BSL as an essential communication skill. In addition, although out of scope of this study, deaf adults learning BSL themselves, might also be considered potentially eligible to learn BSL as an essential communication skill.

3.20. Providers collect limited data on their learners' motivations; for example, they do not systematically record whether learners are motivated for professional development or to help them communicate with a member of their family. Subject to this important caveat, anecdotal evidence from providers indicated that the majority (an estimated 60-70 percent) of learners are motivated to learn BSL for work in professions such as care and education (mainly schools). The proportion of learners motivated to learn BSL to communicate with a Deaf child was much

lower (an estimated 10 – 30 percent). However, there were some examples of areas where the proportion of learners motivated to learn BSL to communicate with a Deaf child was higher than this.

- 3.21. Most learners are female. Qualitative data gathered from interviewees and the LLWR (see tables 3.5 and 3.6) regarding the gender and age of learners suggest that the majority (consistently over 80 percent) are female and are of working age. This may reflect the type of professions where BSL is needed (e.g. caring professions and education, which have a large proportion of female staff). This pattern seemed to mirror learners who accessed courses that were not Welsh Government funded. However, the interviews with providers suggested there were slightly more people aged 65 and over, in non-Welsh Government funded activity.

Table 3.5. The gender of adult BSL learners (2016/17-2017/18) (%)

	2016/2017	2017/18
Female	83	84
Male	17	16

Source: LLWR 2019

Table 3.6. The age of BSL learners (2016/17-2017/18) (%)

Age	2016/2017	2017/18
16-18	3	6
19-39	53	53
40-64	41	38
65+	3	2

Source: LLWR 2019

Teaching BSL through the medium of Welsh

- 3.22. All the BSL courses identified for this study were delivered in English and through BSL. There were no BSL courses delivered through the medium of Welsh and BSL. Providers explained that this was because there was very little demand for this. It is not possible to identify with certainty if demand for BSL courses delivered through Welsh and BSL would increase if BSL was designated as an essential skill. However, it is reasonable to assume that there would be an

increase in the numbers who would prefer to learn BSL through Welsh and BSL, if given the choice.

- 3.23. Although it was not formally taught this way, there were examples given of learners who would sign and “mouth” words in Welsh. It was noted that the mouth pattern would be different in different languages and one college and its learners was involved in developing mouth patterns in Welsh, which they described as an innovative step for the Welsh language.

Table 3.7. Provision by provider

	Levels currently delivered	Mode of delivery	# of learners / year	Costs (£) per hour*	WG funding
Group Llandrillo Menai (FEI)	Mainly 1 but some provision up to 4	Classroom	450	50-55	Partly and fully
Coleg Gwent (FEI)	Non accredited and 1	Classroom	127	52-104	Partly and non- full cost recovery
CAVC (FEI)	1	Classroom	47	50	Fully
Coleg y Cymoedd (FEI)	1,2	Classroom	40	***	Partly
Pembrokeshire (FEI)	1,2,3	Classroom	35	34-110	Partly and none - full cost recovery
Carmarthen (LA)	1	Classroom	9	115	Fully
Gower (FEI)	1	Classroom		66-180	
Cambria (FEI)	No provision	N/A	N/A	N/A	N/A
Ceredigion (LA)	Non-accredited 1,2,3	Classroom	67	40-65	Partly

Monmouth (LA)	Non accredited	Classroom	5	80-120	None - full cost recovery
NPT (LA)	Non-accredited and 1,2,3	Classroom		£100**	Fully also franchise agreement with Agored
Newport (LA)	Non-accredited and 1	Classroom			
Caerphilly (LA)	No provision	Classroom	N/A	N/A	N/A
Conwy (LA)	None (although links to ALW)	N/A	N/A	N/A	N/A
Denbighshire (LA)	None (although links to ALW)	N/A	N/A	N/A	N/A
Ynys Mon (LA)	No provision	N/A	N/A	N/A	N/A
Merthyr Tydfil (LA)	No provision	N/A	N/A	N/A	N/A
Pembrokeshire (LA)	No provision	N/A	N/A	N/A	N/A
Wrexham (LA)	No provision	N/A	N/A	N/A	N/A
Adult Learning Wales (3rd Sector)	Accredited level 1	Classroom	175	****	Fully

Community Learning Wales (3rd sector)	1,2,3,4,5,6	Classroom	100-120	5**	None - full cost recovery
Wales Council for Deaf People (3rd sector)	1, 2	Classroom	21	60-80	None - full cost recovery
National Deaf Children's Society (3rd sector)	Non accredited	Classroom	3	17	None -full cost recovery
ABSLTA (3rd sector)	No provision	N/A	N/A	N/A	N/A

**This includes tutor, venue and exam costs. Generally, where a range is shown (e.g. 50-55) the higher level courses are the more expensive, although this is not always the case.*

*** Level 1 course.*

**** Costs per hour were not provided, although a cost per learner was: £150-225.*

***** Learner fee only (i.e. may not include costs such as venue): £3.50.*

Source: People and Work BSL data collection template and interview responses 2019.

4. Demand for BSL provision

Actual and potential demand from parents and carers

Introduction

4.1. It is very difficult to estimate potential demand for BSL learning provision for parents or carers, with any degree of precision. There is no clearly defined level of hearing loss or impairment, below which a child would need to use BSL (or an equivalent), and BSL is not the only option (or choice) for D/deaf children. There is also limited data on levels of hearing amongst the population as a whole. Therefore, in this section we use the available data to estimate:

- The **minimum level** of provision needed, based upon the number of children with moderate, severe and profound levels of deafness.
- The **maximum level** of provision needed, based on the number of children with mild, moderate, severe and profound hearing loss (see table 4.1. for details).

Table 4.1. Thresholds for different levels of hearing loss

Descriptor	Average hearing threshold levels (dB HL)
Mild hearing loss	21-40
Moderate hearing loss	41-70
Severe hearing loss	71-95
Profound hearing loss	In excess of 95

Source: BSA, 2018, p.28.

4.2. The estimates are based upon on the number of deaf children likely to be born each year, in order to estimate the number of new parents and carers eligible to learn BSL each year. Because it will often take parents or carers longer than a year to complete an accredited course, the total number of learners in any given year is likely to be higher. If, for example, it takes learners on average two years to complete a BSL course, the total number of learners in any given year would be roughly twice the estimate given. It is also likely that not all parents or carers of a Deaf child would choose to learn BSL and that some would start courses, but not complete them.

- 4.3. Because, as outlined in section 1, the vast majority of deaf children (90 percent) are born to hearing parents who rarely have any kind of understanding of BSL, for the purposes of creating an estimate, we assume that parents or carers of all D/deaf children will need to learn BSL. We also focus upon eligibility for BSL provision, rather than the actual take up of BSL provision (for the purpose of calculating the estimate). In practice, it is likely that not all parents or carers eligible for BSL provision would take it up, given the barriers outlined below, and that in some cases, only one parent or carer of a child would take up provision. Finally, it is worth noting that over the medium to long term, medical advances may lead to a decline in demand for children to learn BSL. Equally, it was observed that some medical advances, such as cochlear implants, are not necessarily alternatives to BSL, and D/deaf children with cochlear implants may still choose to learn BSL.
- 4.4. If BSL was to be designated an essential communication skill, and depending on how eligibility criteria were drawn, further work could be required to try to estimate demand from older people who were not able to learn BSL when younger, or who become deaf later in life. This is likely to be difficult, because there is a lack of data on (i) hearing loss amongst older adults; (ii) the take up of BSL by older adults; and (iii) the take up of BSL by, for example, the partners of older adults. Although this issue was out of scope for this study, as noted in section 3, this study identified very few partners of older adults learning BSL, but this may change as the population is aging¹¹ which may mean the number of adults learning BSL later in life increases, given the increased rate of hearing loss with age.

Minimum (or low) estimate of the numbers of D/deaf children in Wales

- 4.5. 1.5 out 1,000 children under five per have significant bilateral hearing loss¹², this is defined as moderate, severe and profound hearing loss (see table 4.1. for details)¹³. Given the birth rate of 33,279 in 2015 (the most recent readily available

¹¹ “The number of people aged 65 and over is projected to increase by 232,000 (36.6 per cent) between 2016 and 2041”. [National population projections](#). (WG, 2017b, Accessed: 5 April 2019)

¹² “Since the introduction of universal newborn hearing screening in 2003, the prevalence of permanent significant bilateral hearing loss (defined as greater than 40 db HL) in children under five years is 1.5 per 1,000”. (BSA, 2018, p.9).

¹³ Most of these include children with moderate hearing loss (64 percent of the total), followed by severe loss (19 percent of the total) and profound loss (17 percent of the total).

figure) (StatsWales, 2017) this indicates that around 50 children will be born each year who are likely to learn BSL. This means every year, 100 parents or carers (two parents or carers for each child) would become eligible for BSL provision, if BSL was designated as an essential communication skill.

- 4.6. The birth rate has been slowly increasing and there has also been inward migration, particularly to urban areas like Cardiff. This will mean the total number of D/deaf children likely to learn BSL will be somewhat higher than an estimate based upon the 2015 birth rate (the latest available data). Yearly variations in the birth rate also mean that calculations based upon the rate in a single year can be unusually low or high. Taking an average over four years helps smooth out any yearly variations. In 2018, the population of 0-4 year olds in Wales was 168,703 (StatsWales, 2019) equating to an average of 42,175 children in each year group. This figure indicates **that around 63 children are likely to start learning BSL each year**. This means every year, 126 parents (two for each child) would become eligible for BSL provision, if BSL was designated as an essential skill.

Maximum (or high) estimate of the numbers of D/deaf children in Wales

- 4.7. The Consortium for Research into Deaf Education (CRIDE) estimates there are at least 2,625 D/deaf children (0-19 year olds with mild to profound deafness) in Wales¹⁴. In crude terms this would mean around **140 children in each year group** learning BSL (the number is likely to be somewhat lower, the lower the age group and higher, the higher the age group). An estimate based upon this figure means that every year, 280 parents or carers (two for each child) would become eligible for BSL provision, if BSL was designated as an essential skill.

To what extent could current BSL provision cater for potential demand?

- 4.8. The LLWR data shows that in 2017/18 around 500 BSL learning activities were funded by the Welsh Government. Of these:

- Around 60 percent are delivered at level 1, equivalent to around 300 activities, which provides an estimate of around 300 new learners starting a level 1 BSL course each year; and

¹⁴ For the purposes of the survey, “deaf children” were defined as “all children and young people up to the age of 19 with sensorineural and permanent conductive deafness, using the descriptors provided by the British Society of Audiology and BATOD [The British Association of Teachers of the Deaf]” (CRIDE, 2018, p.1).

- Around 20 percent are delivered at level 2, equivalent to around 100 learning activities, which provides an estimate of around 100 new learners starting a level 2 BSL course each year.

4.9. The interviews with stakeholders suggest that around 30 percent¹⁵ of these learners would be parents/carers, which provides an estimate of around 90 new parent and carer learners starting a level 1 BSL course each year and around 30 starting a level 2 BSL course each year.

4.10. Table 4.2. outlines the estimated gap between the current number of parent or carer learners and the minimum and maximum estimates of the numbers of parents and carers who would be eligible for BSL courses each year, if BSL was designated as an essential skill

Table 4.2. The estimated gap between the current number of parent or carer learners and those eligible to learn BSL, based upon a low and high estimate.

Level	# current of learners	Minimum estimate of the # of eligible learners	Maximum estimate of the # eligible learners
1	90	126	280
2	30	126	280

4.11. Table 4.2. suggests that the numbers of eligible learners, even on the low (or minimum) estimate, is markedly higher than the current number of parents or carers accessing BSL learning provision in percentage, even if not absolute terms. The difference is particularly pronounced at level 2. It is important to bear in mind that table 4.2. is based upon the national figures, and that there are marked differences at LA level. As outlined in section 3, the distribution of the courses does not reflect population patterns, meaning it is likely that in some areas there is too little provision to meet demand from parents and carers. Equally, table 4.2. assumes that all those eligible take up their entitlement, which is unlikely; for example, both parents (or carers) may not choose to (or may not

¹⁵ This is an estimation subject to caveats. See para 3.20 for further details of this estimation.

be able to) take up their entitlement, given barriers like childcare, discussed below.

Barriers to taking up BSL leaning provision

4.12. A numbers of barriers to taking up BSL leaning provision that reduced demand were identified by interviewees; they included:

- Shortages of provision and/or provision that was offered at times that was not suitable for learners, as many learners were in employment (e.g. there is a lack of weekend delivery by many FEIs) and/or have parenting/caring responsibilities.
- Cost (as outlined in section 3); Welsh Government funding does not cover all costs, and learners may face other costs such as childcare and/or travel costs.
- Poor literacy and language skills (learning a second language is challenging);
- Negative prior experience of education, which can undermine people’s confidence or self-efficacy (often described as “dispositional barriers”).
- The school curriculum could also work as a barrier; for example, a parent or carer of a young D/deaf child may not want to learn the signs the Institute of British Sign Language (IBSL) curriculum requires. The BSL they may want to know may relate to toys, telling their child to go to bed, and how to read a bedtime story. Although the IBSL curriculum has some flexibility, it was reported to be very difficult to tailor it to the needs of individual learners.

Facilitative factors

4.13. A number of factors which can facilitate demand, often by reducing or removing barriers, were also identified by interviewees for this study; these include:

- Awareness raising activities.
- Engagement activities (like hook and taster courses).
- Subsidised or free provision.
- Support to overcome barriers like childcare (e.g. crèche facilities) and transport (e.g. local, community based provision accessible by public transport). An example is outlined in the boxed text below.

BSL provider example of facilitating demand

A provider had identified that potential learners of BSL were experiencing barriers to accessing BSL courses. The provider helped to overcome financial barriers (a common barrier) by offering access to their Financial Contingency Fund to contribute towards the costs of the exam fee. The fund is available for those who are claiming certain benefits and/or can provide evidence of low income. Staff (tutors or a Curriculum Delivery Officer) then verify the evidence and can assist with the application process, which some learners may find daunting, particularly those who have been out of education for some time. In addition, the provider works closely with other services when needed, such as Flying Start to help potential learners access affordable and local childcare provision, and Communities for Work to help those looking to expand their skillset to gain employment.

5. The feasibility of designating BSL an essential communication skill

Stakeholders' views on the desirability of designating BSL as an Essential Communication Skill

- 5.1. Stakeholders interviewed for this study were generally keen to designate BSL as an essential communication skill, citing principles of equality and justice (including reference to Article 8 of the Human Rights Act); for example, interviewees questioned why BSL is treated differently to ESOL provision and highlighted the negative impact upon D/deaf children and adults when their parents, carers or partners could not communicate with them in their chosen language.
- 5.2. Stakeholders were also often keen to widen eligibility beyond parents (and other relatives), carers and the partners of D/deaf children and adults, to other groups, including:
 - Those who needed BSL to communicate with D/deaf children and adults in the course of their work, such as some education and health staff.
 - Deaf adults who had not had the chance to learn BSL at school or who lost their hearing later in life.
 - Those who wanted to learn BSL in order to communicate with a D/deaf child or adult they knew (but who was not part of their family). Examples were given of adults who had enrolled on BSL courses because they knew a D/deaf person through their church, and they wanted to be able to make conversation with them to help reduce their isolation.
- 5.3. However, there were also concerns that widening eligibility, particularly to those learning BSL for work related reasons, would “inundate” providers, as one interviewee put it. This would both increase costs and the risk that demand would outstrip capacity (discussed below).
- 5.4. Stakeholders interviewed for this study were generally happy for BSL to be offered to level 1, in line with funding for other essential skills (which, as outlined in section 1, are provided free to all learners up to a “level necessary to function and progress both in work and society”¹⁶ (WG, 2017, p.6). However, a number of

¹⁶ Functionality is defined as “the ability to read, write and speak in English or Welsh, and to use mathematics, at a level necessary to function and progress both in work and society” ([Welsh Government, 2017a, p.6](#))

interviewees noted that some parents, carers or partners would want and need to progress to level 3 or 4 in order to really be able to communicate effectively with their D/deaf child or partner. It was observed that as D/deaf children progressed to their teenage years, the complexity of the communication required increased.

Stakeholders' views on demand and eligibility criteria

- 5.5. As outlined in section 4, the cost of courses, coupled with the patchy provision of courses (in large part due to funding constraints), is felt by stakeholders to have suppressed demand (if measured in terms of numbers of learners). There was therefore an expectation that demand would increase if free courses were available across Wales (following designation of BSL as an essential communication skill).
- 5.6. Concerns about capacity to meet this demand were the main reason why stakeholders supported introducing eligibility criteria; for example, as one interviewee put it (when asked about designating BSL as an essential communication skill): “yes it would help parents/carers, but I worry...that we’d get inundated with people wanting to do it for their work”. One interviewee also observed that the definition of “family” could be tightly or loosely drawn, and that they had examples where “whole family units turn up” and “it is extremely expensive to pay for six people out of the same family to learn BSL”.
- 5.7. The Welsh Government may also choose to introduce eligibility criteria to ensure that the costs of those learning BSL for work are borne by employers, rather than by the Welsh Government. The Welsh Government may wish to consider whether those who are unemployed or economically inactive, who are learning BSL in order to improve their employment prospects, should be eligible.
- 5.8. When asked about the practicalities of applying eligibility criteria, there was often a split between those stakeholders who were used to applying eligibility criteria for other essential skills, and those who lacked this experience. Those with experience of applying eligibility criteria were generally relaxed about the practicalities, and those who lacked this experience were unsure about how it could work. However, in practice, it appeared that eligibility criteria for other essential skills were not rigorously enforced and largely depended upon self-declaration by learners. In this context, it was noted that “proving” that a prospective learner was the parent, carer or partner of a D/leaf child or adult, and

that being able to communicate with them was their prime motivation, would be difficult to establish. This may create some challenges as, unlike other types of essential skill (like literacy or numeracy), there may be greater interest in learning BSL as a hobby. As outlined in section 3, the current number of leisure learners is low, but this could increase, if free provision was extended across Wales.

Is there capacity to meet demand if BSL was designated an essential skill?

- 5.9. As outlined in section 3, funding and the shortage of tutors are seen as key constraints upon delivery. There is likely to be some additional capacity that could be created by increasing existing class sizes, but this would be limited, and interviewees were clear that large classes were not effective for learning a language like BSL. A large increase in demand would therefore require an increase in capacity (i.e. more courses – and more tutors and/or more hours for existing tutors); as one interviewee put it:

“I think demand would escalate if the course was free. And then you’ve got a teaching problem, because you’d have to find qualified tutors and then [you’d] have to find courses for practitioners as well as the community. Then you’d have to have level 3 practitioners [tutors]....How many staff would be able to meet this need in the local community? The tutors are not out there, I can assure you of that. Welsh Government would need to do what they do with essential skills: they run a level 5 train the trainer, and people that qualify within level 5 and within the community were the practitioners to train the level 3 courses staff.”

- 5.10. The size of the teaching workforce was consistently reported to be small. It was reported that very few tutors who were not Deaf (i.e. culturally part of the deaf community and actively using BSL) were willing to teach above level 1 and that the numbers of Deaf people who are qualified to at least level 3 in BSL (the minimum to deliver a level 2 course), and who hold a teaching qualification, were “few and far between”. The lack of training and shortage of tutors meant that, as one interviewee put it, “maintaining standards is always a challenge”. It was also reported that Signature (the awarding body for BSL courses) was trying to put a list of BSL tutors together, but as an English organisation, it was unclear how comprehensive their coverage of Wales would be. i

- 5.11. Nevertheless, some interviewees observed that because they were currently able to offer only part time hours to tutors, increasing the number of courses would mean they were able to offer more hours to existing tutors. Because some existing tutors work across a range of areas, it is possible that if all the areas they worked in asked them to deliver more hours, they would not be able to meet that increased demand.
- 5.12. Not all areas have tutors, and the difficulties areas report in recruiting tutors suggest that areas which do not currently have tutors are likely to struggle. It appears likely that it will be necessary to train up a number of new tutors who have a BSL qualification and the necessary people skills, but lack a post 16 teaching qualification, to meet any increase in provision.
- 5.13. More positively, an increase in provision is likely to mean that areas are able to offer more hours to BSL tutors, which might make it easier to recruit and retain appropriately qualified tutors. It is possible that increasing demand through eligibility changes would make the BSL tutor role more sustainable and viable for tutors, helping to address the current shortage of tutors, and encouraging more tutors to enter the market. An increase in provision would also make it more viable to train Deaf people who lacked adult teaching qualifications, to become tutors. Interviewees drew analogies with other types of technical skill, like carpentry, where it was common to train up people with the technical (and also people) skills required, but who lacked adult teaching qualifications and experience. They described, for example, how they could enrol prospective tutors on the Preparing to Teach in the Lifelong Learning Sector (PTLLS) qualification (colloquially known as “Petals”).
- 5.14. In order to maximise the value of investment in BSL provision, it might also be possible to prioritise places on courses for those learning BSL to communicate with a D/deaf child or adult. This would mean that the number of learners learning to support a D/deaf child or adult could be increased without increasing the total number of BSL learners (or BSL provision).
- 5.15. The level of increase in demand, and therefore the additional capacity required to meet that demand, would depend upon a number of factors including:
- How tightly eligibility criteria were drawn (and therefore the number of people who were eligible).

- The engagement activity (including marketing) undertaken.
 - The support offered to learners to help them overcome barriers like childcare and transport.
 - The flexibility of provision (e.g. in terms of start dates, when they were held, such as evenings or weekends, the intensity and duration of courses).
 - The possibility of accessing non-accredited courses, which might be less demanding and more attractive to learners wishing to communicate with a D/deaf child or adult.
- 5.16. The estimates of the numbers of new parent/carers of D/deaf children outlined in section 4, suggest that the overall increase in demand would be modest in terms of the total increase in the number of learners if, as seems reasonable to assume, not all those eligible take up the offer.

The costs of designating BSL as an essential communication skill

- 5.17. The cost implications of designating BSL as an essential skill would depend upon the impact upon demand which, as outlined above, depends on a number of factors, whose impact is difficult to quantify or estimate. Table 5.1. provides an estimate of increased demand based solely upon the difference between the current number of learners estimated to be parent or carers and the total number estimated to be eligible.

Table 5.1. Estimate of the difference between the current number of parent or carer learners at levels 1 and 2 and the number of parent or carer learners who would be eligible if BSL was designated as an essential communication skill

Level	Current # of learners	Minimum estimate of the # of eligible learners	Difference between the current # and the estimated # learners (minimum)	Maximum estimate of the # of eligible learners	Difference between the current # and estimated # of learners (maximum)
1	90	126	36	280	190
2	30	126	96	280	250

5.18. Although as suggested by table 5.1., the overall increase in demand and learner numbers would be relatively modest in absolute terms (at most 440 at levels 1 and 2), the impact upon costs could be quite high. The cost per learner is calculated on the basis of eight people per course. These costs are outlined in table 5.2. An estimate based upon the potential increases in demand (outlined above) and the cost of delivering courses (outlined in section 3) is provided in table 5.3. The estimates use the cost per hour (£50-£80/hour) and assume that a level 1 course would require 60 hours and a level 2 course would require 100 hours.

Table 5.2. Estimated total cost per learner for a level 1 and level 2 course

Level	Total # of hours	Estimated cost per hour	Estimated total cost of the course	Estimated cost per learner (if 8 people per course)
1	60	£50-£80	£3,000-£4,800	£375-£600
2	100	£50-£80	£5,000-£8,000	£625-£1000

Table 5.3. Estimated costs of designating BSL as an essential skill

Level	Estimated cost per learner (if 8 people per course)	Low estimate of the # of additional eligible learners	Total additional cost (based upon low estimate of the # of additional eligible learners)	High estimate of the # of eligible learners	Total additional cost (based upon high estimate of the # of additional eligible learners)
1	£375-£600	36	£13,500-£21,600	190	£71,250-£118,750
2	£625-£1000	96	£60,000-£96,000	250	£156,250-£250,000

5.19. It is important to bear in mind that these estimates include a large range and are very dependent upon the validity of a large number of assumptions. The impact of incorrect assumptions (e.g. on the numbers of learners who are currently parents or carers of D/deaf children) could also cascade through the calculations, affecting a number of subsequent calculations, like the increase in the numbers of eligible learners, based upon them.

5.20. As outlined in section 3, some providers also raised concerns that the current funding model did not fully reflect the costs of delivering BSL courses. This is a separate issue to the impact of designating BSL as an essential skill, but suggests that any expansion of BSL provision would lead to calls from the sector for greater funding.

Evidence from England and Scotland

5.21. As outlined in section 1, the Scotland BSL National Plan (2017-23) aims to provide parents, whose child is diagnosed as D/deaf or Deafblind, with the support they need to learn BSL (Scottish Government, 2017). However, Scotland

has not designated BSL as an “essential skill”. Discussions with a representative of the Scottish Government highlighted that it was too early to comment on the impact of this policy; however, there were indications of a lack of capacity (i.e. BSL teachers and tutors) to deliver the plan effectively, and consequently there were plans to address this lack of capacity. This suggests (in line with the analysis outlined above) that demand would increase if parents’ or carers’ entitlements to learn BSL are extended in Wales, and that this demand is likely to outstrip capacity.

- 5.22. There is no equivalent commitment in England (to that in Scotland). Discussions with a representative from England suggested a similar situation to Wales in that the level of provision was largely based on providers’ (i.e. FEIs’ and LAs’) perception of demand and the feasibility of delivering courses (given e.g. consideration of costs, capacity and funding).

6. Conclusions

Current demand for and provision and funding of BSL courses in Wales

- 6.1. BSL provision is patchy across Wales. Provision is driven more by the availability of funding (including providers' interpretations about what can be funded) and also the availability of appropriately qualified tutors, rather than demand. This increases the risk that parents, carers or adults who wish to learn BSL to communicate with a D/deaf child or partner cannot find a free course and/or a course at a time and place that they can access.
- 6.2. It is estimated that around two thirds of current learners are people learning BSL to improve their employment prospects and around one third are parents or carers who wish to learn BSL to communicate with a D/deaf child.
- 6.3. Cuts in post 16 funding have contributed to a reduction in BSL provision over the last five years. Currently around half of all adult BSL courses were fully funded by Welsh Government and 40 percent were partly funded by the Welsh Government.

The feasibility of designating BSL as an essential communication skill

- 6.4. There was considerable support across the stakeholders interviewed for the case for designating BSL as an essential communication skill. However, this poses some practical challenges, particularly around how eligibility criteria could be defined and enforced.
- 6.5. It is very difficult to estimate with any precision what impact designating BSL as an essential skill would have upon the demand for BSL provision or upon costs. Our estimates suggest that the total increase in learners at levels 1 and 2 eligible to take up provision, but who are not currently taking it up, would be relatively modest in absolute terms (around 130-440 new learners a year). The total costs could potentially be quite high (our estimates range from around £70,000 to £350,000 per year). However, it is reasonable to assume that not all of those eligible to learn would take up their entitlement, meaning the increase in demand, and the costs, would be lower than these estimates. Equally, there may be pent up demand from existing parents or carers of D/deaf children, given the shortage of provision in some areas. It is important to bear in mind that these estimates include a large range and are very dependent upon the validity of a large number of assumptions.

- 6.6. It is also difficult to assess if there is capacity, in terms of a sufficient number of tutors able to meet increased demand and provision. Areas which have BSL tutors generally felt that the tutors would be willing and able to take on more hours. However, the difficulties that some areas report in recruiting tutors suggest that areas which do not currently have tutors are likely to struggle. It appears likely that it will be necessary to train up a number of new tutors who have a BSL qualification and the necessary people skills, but lack a post 16 teaching qualification, to meet any increase in provision, particularly in areas where there is currently no tutor.
- 6.7. Finally, it is worth noting that the focus of the review has been upon BSL delivered as a formal qualification for adults. Some interviewees observed that there may also be a case for more informal models of learning for parents and carers, who may not need or want the rigour and structure of accredited courses, and/or models of family learning (like I-Sign, discussed in section 1), in which parents or carers learn alongside their children.

7. Recommendations

7.1. The review identifies a *prima facie* (plausible, but as yet, unproven) case for designating BSL as an Essential Communication skill for parents and carers of d/Deaf children, given the support from the stakeholders consulted for this review, and the evidence on likely demand, capacity (of learning providers) and cost. However, there is considerable uncertainty about the impact of this upon demand, providers' capacity and post 19 learning funding. Moreover, although beyond the scope of this review, it is not clear if this would be the most effective and/or efficient way to ensure that parents and carers can communicate with d/Deaf children. For example, more informal (non-accredited provision) and/or family learning, could also be appropriate, but might not be covered by funding for BSL as an Essential Communication skill.

Recommendation 1. The Welsh Government will need to decide if designating BSL as an Essential Communication skill is the most efficient and effective way to ensure that parents and carers could communicate with d/Deaf children.

Recommendation 2. If BSL was designated an Essential Communication skill for parents and carers of d/Deaf children, the Welsh Government will need to ensure that learning providers are given adequate time to prepare to increase capacity (e.g. by recruiting and training tutors) and to publicise and market courses to parents and carers, in order to satisfy the anticipated demand.

Recommendation 3. If BSL was designated an Essential Communication skill for parents and carers of d/Deaf children, given the uncertainty about the review's forecasts for demand, capacity and costs, the Welsh Government should ensure there is robust monitoring and evaluation of the impact of this upon demand, capacity and cost.

Recommendation 4. If BSL was designated an Essential Communication skill for parents and carers of d/Deaf children, the Welsh Government will need to give careful consideration to how eligibility criteria are defined and enforced.

Recommendation 5. If BSL was designated an Essential Communication skill for parents and carers of d/Deaf children, given the current pressure upon Post-19 learning funding, the Welsh Government should consider providing additional funding to cover the costs of any increase in post 19 BSL learning provision.

Recommendation 6. If BSL was designated an Essential Communication skill for parents and carers of d/Deaf children, the Welsh Government should also give consideration to designating it as an Essential Communication skill for other groups, most notably deaf adults. This was beyond the scope of this review and would require further scoping.

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