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Ymateb gan: Y Gymdeithas Genedlaethol i Blant Byddar Cymru Response from: National Deaf Children's Society Cymru

The National Deaf Children's Society seeks to create a world without barriers for deaf children, young people and their families. We support children and young people aged 0-25 with all levels of deafness, from mild through to profound, including those with temporary hearing loss and a unilateral loss.

Part 1: Strategic framework for tertiary education and research

The pathway of progression for how deaf students access support should be clearer. Currently, deaf students move from a SEN/ALN system, to a Disabled Students' Allowance system and then onto an Access to Work system. We know that the additional learning need reforms have not yet come in to force for post-16 education, but the join up between both systems needs to be thoroughly considered. Where appropriate, information should be able to flow between the different systems to help plan what type of support the deaf young person needs.

It should be a requirement for protection plans to consider the needs of disabled students and access requirements are appropriately considered.

Part 2: Registration and regulation of tertiary education providers

We recommend the Commission could play an important role in providing accountability on whether providers are delivering appropriate support plans for their disabled learners and delivering accessible application systems to higher education.

Part 3: Securing and funding tertiary education and research

The National Deaf Children's Society Cymru would welcome efforts from the Commission to promote support and funding for research into topics on deafness and disability.

Part 4: Apprenticeships

We would welcome a consistent approach to equality issues across all forms of tertiary education. Principles established for equality of access for disabled people in higher education should also apply to further education and apprenticeships

Part 5: Learner protection, complaints procedures and learner engagement

The National Deaf Children's Society Cymru feels it is important that Chapter 17 of the explanatory memorandum on student engagement should also require evidence that providers have sought to engage with a range of disabled students and that their engagement has been accessible.

Disabled students are not one homogenous group with the same needs. For example, some disabled students may find lecture capture technology to be very useful. However, others, including many deaf students, may face barriers with this technology due to issues around lip reading on a low-resolution screen and audio quality. Seeking a wide range of views and reaching out to specific groups, such as consulting with deaf higher education groups would be helpful.

The Commission should also include disabled students when consulting with stakeholders on the format and content of learner protection plans. Complaints procedures taken forward by learners

must be fully accessible and made as clear as possible to all learners. Complaints procedures should be shared in particular with learners on or seeking disability support.

Part 6: Information, advice and guidance

There are many myths and misunderstandings around disability and employment. Deaf young people often tell us that they are unaware of reasonable adjustments that can be made in the workplace and of key support available such as Access to Work. For this reason, it can be important to offer specific careers information to deaf and disabled learners on these areas. The National Deaf Children's Society Cymru would welcome the Commission's support in encouraging universities to improve their information in this respect.

Part 7: Miscellaneous and general

We believe there is a role for a regulator to provide guidance and quality assurance on ensuring equality of access to disabled students, including during a lockdown. We would welcome regular reports on equality of access for disabled students in our universities.

Historically, there has been a lack of published data in Wales on post-16 outcomes for deaf students and other disabilities. This makes it difficult to understand the effectiveness of the post-16 education system in ensuring positive outcomes for deaf young people. Indeed, the availability of school attainment data by ALN type in recent years has provided a helpful indicator. The National Deaf Children's Society believes the establishment of the Commission presents an opportunity to seek improvements to the availability of this data.

More information

National Deaf Children's Society Cymru would welcome the opportunity to discuss these points further and to feed into the discussions around these developments. Please do not hesitate to contact us at campaigns.wales@ndcs.org.uk for further information. Many thanks for taking the time to read our response.