



Email to scrutiny@parliament.uk

Dear Education Committee,

This is a submission from The British Association for Deaf Children and Young People (BATOD).

BATOD is the only professional association for Qualified Teachers of Deaf Children and Young People (QToDs) in the UK. The Association represents the interests of QToDs and the children and young people (CYP). The Association supports QToDs and organises continued professional development (CPD) courses and national and regional meetings to provide relevant up-to-date information and to disseminate good practice. Strong links are maintained between BATOD and the UK governments, as well as voluntary bodies, especially the National Deaf Children's Society (NDCS), in order to contribute to policy development in this field. BATOD is a key member of the National Sensory Impairment Partnership (NatSIP) working with partners in the sector to improve outcomes for deaf CYP.

Summary

Specialist provision for deaf CYP and their families is essential to support improving independence and outcomes for deaf CYP.

To ensure that deaf CYP and families are effectively supported there needs to be;

- funding to ensure that specialist support services are able to continue to provide qualified specialist statutory required support for deaf CYP; a low incidence high need population
- support for training QToDs to enter the profession and reverse the decline in numbers within the profession
- improved data collection methods for the deaf CYP population
- recognition of the reasonable adjustments duties under the Equality Act 2010
- improved accountability structures to ensure deaf CYP needs are met.

1. Support for children and young people with SEND

1.1. Improving SEN support in mainstream schools and early years settings including:

- Assessing the current quality of SEN support in mainstream schools and early years settings
 - Deafness is a low incidence disability, but it is not a learning disability. Deaf CYP have the potential to attain and achieve the same as any other child/young person, given the right support. However, the NDCS attainment 2023 report indicates some deaf CYP across all stages are not meeting expected levels.
 - Whilst the Government currently funds a 'What Works in SEND' programme that produces academic primary research and case studies that harness best practice, and funds the Whole School SEND (WSS) program, hosted by the National Association for Special Educational Needs (nasen), the material is often found to be lacking in accurate recommendations for supporting the needs of deaf CYP, a low incidence yet highly heterogenous population.

- o BATOD recommends investment in the training for the established professional role of the QToD, Mandatory Qualification in Sensory Impairment (MQSI). BATOD has documented the role of the QToD across different age groups in an 'Articulating the Specialism Series'. NDCS has a range of deaf awareness publications specific to educational settings.

- Deaf CYP are a heterogeneous cohort. There is a lack of knowledge among mainstream providers on how to meet the individual needs of deaf CYP. Settings must understand how they can ensure the environment is suitable (Universal curriculum) and also to understand that the individual needs time and professional support to learn individual access skills (Special curriculum). Advice on both aspects can be provided by the QToD.
- Within some deaf specialist services and provision within mainstream settings a lack of knowledge is perpetuated by the inappropriate appointment of non-specialist staff to the QToD post or inappropriate allocation of QToD resources due to inconsistent and/or non-specialist management. Non specialist managers may be unaware of the barriers in both the access to learning and the learning to access needs of deaf CYP.
- BATOD recommends an identified process of monitoring the legal requirement for QToDs to hold the relevant MQ and in line with employment regulations 2003 or qualify within three years. Whilst the employment regulations are specific to teaching of classes, the Code of Practice 2015 does state: 'Those teaching classes of children with sensory impairment must hold an appropriate qualification approved by the Secretary of State. Teachers working in an advisory role to support such pupils should also hold the appropriate qualification.' Section 6.61

2. Ensuring all settings are accountable for the quality of provision and outcomes for CYP with SEND

- BATOD supports the requirement for SENCo to have a National Professional Qualification (NPQ) but equally the QToD role should be recognised in line for deaf CYP. A QToD, or an appropriately supervised ToD in training, is considered an auxiliary aid in terms of the Equality Act.
- BATOD believes it is essential that the setting, regardless of the structure, must ensure there is a specialist workforce, including QToDs where there are deaf CYP. BATOD has evidence from our membership base that academic settings with resource provisions for deaf learners are failing to employ the specialist QToD workforce to which deaf CYP are entitled.
- More effective training of Ofsted inspectors (mainstream/specialist provision), to recognise the broader progress made by pupils with SEND, including deafness. The BATOD/NDCS Specialist Deaf Curriculum Framework (SDCF): Supporting deaf CYP's independence, created in February 2024, provides an overview of the specialist input areas.
- A stronger focus by Ofsted on quality of support specifically provided by QTSI and specialist education services for deaf children.

2.1. Measuring progress and improving outcome

- It is a responsibility of all settings including academies that leadership have an understanding of the impact of deafness through partnership working with QToDs.
- It should be set out clearly within a service level agreement (SLA), that there is ring fenced SEND money in mainstream resource provisions to meet the quality assurance expectations with specific reference to the NDCS resource provision quality standards.

- Research suggests 40% of deaf CYP have other needs. The SEND profile primary need focus is not effective. Targeted multi-agency evidence-based interventions and specialist training across education, health and social care is required to support the identification of co-occurring needs, meeting these diverse needs, and effective person-centered 'tell-it-once' multi-agency engagement is required.

2.2. Defining what inclusivity in mainstream schools and early years settings should mean and look like in practice

- BATOD agreed with the National Audit Office (NAO) 2025 recommendation for the Department to set out how inclusive education will be achieved. SEN performance data should incorporate factors other than academic attainment.
- The needs of the CYP as outlined in the EHCP must be met and appropriately funded
- BATOD welcomes the DfE announcement of their new Neurodivergence Task and Finish Group. Whilst the group has representation for vision impairment, there appears to be an absence of a group member with specialism in deafness. BATOD recommends there is close partnership working with specialists in deafness and autism.

2.3. How can inclusivity and expertise in mainstream schools and early years settings be improved to achieve consistent, high quality SEN support?

- There should be a consistent expectation for ITT to include deaf awareness training to support the understanding of deaf CYP.
- Whilst the recent DfE announcement that all new teachers will have to undergo mandatory training in how to effectively use assistive technology (AT) to support children with SEND is welcomed, BATOD recommends specific training is sought from local QToDs and Educational Audiologists to ensure effective use and engagement with assistive listening devices (ALDs) and connectivity with other AT.
- NAO report (2025) "funding training for additional educational psychologists to provide both more support within schools and undertake assessments for SEN." Educational psychologists required additional training and experience in understanding the impact of deafness, and identifying or not mis-identifying additional needs of deaf CYP.
- BATOD recommends the investment in specialist QToD MQ training is also considered alongside the investment to upskill the support staff in settings eg the communication support worker is a role that meets the needs of deaf CYP.
- QToD involvement to support, advise and implement low-cost interventions and relevant higher-cost resources eg ALDs, specialist support staff eg communication support workers, British Sign Language (BSL)-English training/notetaking.

3. Workforce development

The DfE's SEND and alternative provision improvement plan reflected the commitment of the Department to ensure there are enough QToDs and to explore further options to increase numbers. The plan noted the possible new apprenticeship for specialist teachers of children with SI. If the apprenticeship for QToD is not achievable under the current Government's planning, other funding options such as bursaries must be explored.

Class teachers and school staff require access to specialist workforce, including QToDs, in order to implement interventions specific to the needs of the CYP in the setting. These interventions may take the form of both facilitating an inclusive environment (access to learning) and supporting the development of specialist skills, such as BSL, to access every aspect of the school day academically and socially (learning to access).

4. Special provision

- If an EHCP central template is implemented, to meet the access needs of all care givers and CYP, it must be compatible for those requiring access for visual needs or requiring BSL interpretation.
- Specialist support including QToDs must be included in annual review meetings of deaf CYP.

5. Current and future SEND need

LISEND is a small population and variation has significant impact on provision. Models of support must be flexible to reflect the low incidence, less predictable numbers

- As LA support services move increasingly to traded models of provision to meet financial challenges, this has a negative impact on outcomes for deaf CYP
- There is clear evidence of the positive impact of early intervention through support services. Funding must be maintained and ringfenced to ensure on-going, universal support for LISEND

5.1. What does the DfE need to do to improve their current and future assessment of SEND need?

- Clarity in the understanding of terminology across all sectors. “A child or young person with SEN has a learning difficulty or disability which means they need special educational provision beyond that required by most others of the same age. Support should reflect individual needs and could be within mainstream school, specialist or alternative settings.” Whilst not all deaf CYP will have a SEN, especially if effective access to specialist services for early intervention from the earliest stages is enabled, they have access needs and some deaf CYP who do not have a SEN who are achieving ‘academically’ still require specialist input.
- Government has data via the annual SEN2 survey and annual school census but data on deaf CYP is inaccurate.
- Key metrics used to capture and measure local and national performance are important and should align with the existing work undertaken by the Consortium for Research in Deaf Education (CRIDE). BATOD requires clarification on the detailed components of the key metrics.
- It is BATOD’s view that, as deafness can have a significant impact on mental health and well-being, there should be national data collected around these themes, rather than focusing solely on academic outcomes.
- The current census system may miss deaf CYP if other needs are considered to be their ‘primary’ need. Investment should be made in recent evidence-based research, eg

updated epidemiology study such as that conducted by Fortnum *et al* (1997). Research should address the under-identification of other additional needs eg autism in ethnic minority populations.

- Recently the Minister for Early Education announced a £740 million capital investment in 2025–26. Research indicates the need for a review of the building bulletin (BB93) acoustic design of schools (2014). The acoustic environment of some settings may not be suitable for CYP with SEND especially deaf, vision impaired (VI), autistic and co-occurring deafness with autism and/or VI. Therefore, they may be disadvantaged with any site-based assessments and observations that are used to inform assessments and evidence for diagnosis. The learning from revisions and input from Educational Audiologists should be used to inform adaptations to learning environments.
- Parity in access to ALDs and effective connectivity with any AT to support technology-based assessments tools
- Support effective use of AT and AI in eg captioning, read aloud.

Under the Equality Act 2010, education settings and local authorities (LAs) have to make reasonable adjustments to make sure disabled CYP are not disadvantaged. BATOD believes that any new national standards should clearly set out what these reasonable adjustments might look like for deaf CYP.

6. Current and future model of SEND provision

How does SEND provision vary between local areas and what can be done to promote consistency of approach?

- BATOD agrees with the Public Account Committee report (2025) that the Department should work with others including LAs and the Ministry of Justice to routinely identify and share good practice from better performing areas. This should include involvement from professional associations eg BATOD .

6.1. What can be done to improve the effectiveness of multi-agency and joined up working across education, health and social care?

- Listen Up NDCS 2024 report findings indicate “not all audiology services are commissioned to provide hearing aids. Nearly two-thirds of services said they provide services for tinnitus (65%) and hyperacusis (62%). Almost one-fifth of services are unable to provide, or refer children for, wax removal.”
- BATOD agreed with the NAO 2025 report recommendation “Within six months, DHSC should set out how ICBs will consider SEN alongside wider priorities.” In the deaf specific context, the NDCS Listen Up 2024 report indicates “Some children are waiting up to 565 days for grommet surgery and may not have access to alternative interventions in the meantime. Very few services mentioned referring to, or working with, education partners, e.g. sensory support, schools or teachers of the deaf (ToD), or providing information and advice to parents about, for example, listening tactics for children with temporary deafness.”

- BATOD recommends joint commissioning opportunities are explored between health and education to best meet the need of the vulnerable unsupported population.

6.2. How can specialist provision, especially support for conditions which occur infrequently but give rise to the need to a high level of support and which may be beyond the capacity of individual local authorities, best be provided and commissioned?

- Planning and mapping of need at a regional and national level, informed by accurate data, to support planning of appropriate resources to meet the needs of deaf CYP.
- BATOD agreed with the National Audit Office 2025 recommendation that “the Department must work with the DHSC to better understand the reasons for increasing and changed demand for SEN support.”
- To enable LAs to successfully commission provision for low incidence high-cost need, and further education, across LA boundaries they require support to create effective information sharing protocols, shared/compatible IT systems, shared intelligence to support decision-making.
- Commissioned specialist provision requires clear expectations about the provision and funding for transport which historically has often been a barrier for deaf CYP to access appropriate support particularly in relation to college, specialist settings and non-statutory areas such as preschool.

6.3. What is working effectively within the current SEND system and how can best practice be sustained or scaled up?

- There are pockets of good practice existing in resource provision, specialist schools for deaf CYP and between mainstream settings working with local sensory support services. However, this requires investment in time, resource and opportunity for evidence-based action research to generate suitable peer-reviewed research publications, ‘good-practice’ case studies that involve education, health and social care.

6.4. What reforms are needed to ensure that all post-16 qualifications meet the needs of students with SEND?

- Some deaf learners are unable to progress to the desired level of study in college, carouseling through a number of different level 1/level 2 courses, whilst they try to achieve the required English and/or Maths grades, which evidently impacts on self of worth, emotional wellbeing.
- Alternative pathways options in secondary setting need to be offered to avoid deaf learners being channeled into inappropriate or inaccessible qualification pathways
- In all examinations, where necessary learners must have BSL as an access arrangement
- More opportunities to develop BSL skills Post 16 are required. The BSL level 3 certificate equates to 16 UCAS points.
- Effective strategic place-planning between LAs and post -16 education settings is under-developed. A ‘postcode lottery’ exists due to significant discrepancy between the levels of need of deaf learners that are not considered to have ‘high needs’ and the funding that post -16 colleges receive to meet the needs of those learners.
- A consistent focus in commissioning is required to ensure effective, joined-up planning of the transition beyond post-16 education, especially for YP with the most complex profiles.

- Guidance should exist to secure all professionals working with deaf CYP seek the specialist advice and support from suitably qualified professionals. Many deaf YP require support from QToDs to know about and access the support outlined in the Equality Act and within their EHCP, as well as with Disabled Students Allowance and applications for Access to Work. There are resources, training for professionals including career advisors, and publications specific to deaf CYP's needs, designed and led by NDCS. Whether the route is into further/higher education, apprenticeship or employment, these safeguards must be secured with guidance, funding and quality assurance.

6.5. What steps can local authorities take to ensure funding is in place to meet the transport needs of post-16 students with SEND?

- LA need to invest in independent travel training

7. Accountability and inspection of SEND provision

7.1 . What should Ofsted's new 'inclusion' criterion for the inspection of mainstream schools look like?

- It is important that LAs continue to be accountable for their provision to deaf CYP. Inspectors should have good knowledge of deaf education, and in particular the inspections of areas with deaf resource bases/deaf schools must have at least one QToD in the inspection team.
- Inspection of specialist settings ie resource provisions/bases/units for deaf CYP should review the SLA. There should be an expectation the SLA will require an annual review of the quality standards for resource provisions (ie an audit by a QToD).

7.2. How can Area SEND inspections of local authorities be made more effective?

BATOD has a website blog with the upcoming Area SEND inspections listed and encourages members to input into the surveys. The local area partnership must work jointly to make improvements to deliver outstanding/good quality of SEND service to deaf CYP and their families.

- Commissioners in Health and Education should seek input from specialists to develop their understanding of the impact of deafness across all ages. The NDCS 2024 Listen Up report highlight “Long waiting times for routine first assessments present a significant risk of delayed identification of deafness in children who are not identified at the time of the newborn screening”.
- Successful Children Hearing Service Working Groups (CHSWGs) have membership from parents and professionals from all sectors.
- Early identification of need and rapid access to specialist support when needed.
- Review of the impact of the two-year old checks that are usually done by a nursery nurse or health visitor. Involvement of specialists eg QToDs, SALTs for the checks of deaf children addresses gaps in knowledge in the workforce and lack of joined up working.
- Parity in the access to school hearing screening services.

If you require any other information, please do not hesitate to contact me, the National Executive Officer, on exec@batod.org.uk.



British Association of Teachers of Deaf Children and Young People

Yours sincerely

A handwritten signature in black ink that reads "Teresa Quail".

Teresa Quail
BATOD National Executive Officer