

Submitted to Qualifications for teachers of children and young people who are blind, partially sighted, deaf, or deafblind
Submitted on 2025-07-04 11:47:03

Questions

1 What are your views on the revised language used to describe sensory impairments, specialist provision and educational needs within the draft guidance?

Please answer below.:

BATOD welcomes the change in terminology from 'hearing impairment' to 'deaf'. This positive language usage aligns with the joint BATOD/Deaf teachers 'Moving towards positive use of language' publication.

BATOD would recommend there is a consistency in usage and would recommend 'deaf' is used instead of 'hearing impairment'; in the second bullet point in section 3.1 Curriculum and Pedagogy.

"Demonstrate knowledge of the impact on learning of specific medical conditions, syndromes and disabilities which can be associated with hearing impairment, including where hearing impairment arises as part of multiple and complex support needs, and additional learning difficulties, and how these may affect their development."

BATOD welcomes the specific wording in relation to an "understanding of the range of provision" and the associated list of provision types that is stated for 'blind or partially sighted' and 'DSI' but not for children and young people who are deaf. BATOD recommend it is added for deaf children and young people too.

"Demonstrate an understanding of the range of provision for children and young people who are blind or partially sighted, including home based learning, early years settings, mainstream schools, specialised resource-based units, special schools, and grant aided schools."

"Demonstrate an understanding of the range of provision for children and young people with DSI, including home-based learning, early years settings, mainstream schools, specialised resource-based units, special schools, and grant aid schools."

BATOD would recommend Post secondary provision ie college and university provisions are added to the list as 2.2 Professional Responsibilities states "an enhanced and critically informed understanding of Education Systems: Understand the Further and Higher Education system, including potential barriers and articulation routes.

2 What are your views regarding the recommended minimum of 90 credits specific to Visual Impairment Education, Deaf Education, or Deafblind Education at SCQF Masters Level 11 as an appropriate qualification for teachers who teach children and young people who are blind or partially sighted, deaf, or deafblind?

Please answer below.:

BATOD welcomes this revision that safeguards ensuring every deaf child gets support from an appropriately qualified specialist teacher. BATOD feels strongly that the previous wording is not included ie "post-graduate certificate (PG Cert) in addition to local authority-based training," where "a Post-Graduate Certificate (PG Cert) is awarded when a student has successfully met 60 credits of SCQF Level 11 Masters credits." As QToDs who work in local authority services must meet the requirements set out in the guidance on qualifications for teachers of deaf children, the qualification route must ensure and embed assurances that a QtoD is a fully qualified teacher who has undertaken and completed further study ie the Post Graduate Diploma that has been designed to SCQF Level 11 (Masters level).

Whilst BATOD recognises the 90 credits recommendation wording, is referenced on the SDCF website 'Know Your SCQF Level', the minimum number of credits at SQCF 11 Master degree level at 90 rather than 120, appears to be odds with Masters degree programme provision in Scotland, including at the University of Edinburgh, which provides the current Masters level training options in Scotland.

120 credits are required to graduate from the University of Edinburgh's PgDip in Inclusive Education, under the Deaf Learners pathways.

The PgDip required students to take 90 credits of compulsory course (such as "Inclusion of Children with Visual Impairment: Policy and Practice" or "Audiology and Audiometry"), a 10 credit course of research methodology, and a 20 credit optional module of their choice (such as "Inclusive Pedagogy"). Cumulatively, 120 credits are required to graduate and complete the course, with no early exit option available at 90 credits.

BATOD agrees with the National Deaf Children's Society's view that if the guidance only recommends that Teachers be supported to complete 90 credits of the relevant PgDip course, there is a strong risk that Teachers who are being supported by a Local Authority to complete relevant training will only receive financial support and time buy out for 75% of the degree – leaving them with the choice of either not receiving their qualification, or of having to fund the remining 25% themselves. This could also cause a breach in the employing education authority's responsibility to ensure that a teacher employed wholly or mainly to teach pupils who are deaf, have vision impairment or dual sensory impairment holds an appropriate qualification (i.e. has the specific competences as listed by the Scottish Government). Therefore, BATOD agree with the NDCS and subsequently the ALLIANCE's strong recommendation that the guidance be amended to recommend a minimum of 120 credits at SCQF 11 Masters degree level.

3 Does the draft guidance set out a clear route on how teachers can acquire the appropriate qualification to teach children and young people who are blind or partially sighted, deaf, or deafblind?

Yes

If no, please specify which areas are unclear.:

4 What are your views regarding the recommendation for teachers working with children or young people who need to use braille to acquire a qualification in Contracted Unified English Braille?

Please answer below.:

BATOD supports the recommendation for teachers working with children or young people who need to use braille acquire a qualification in Contracted Unified English Braille

5 What are your views regarding the minimum British Sign Language (BSL) level recommended for teachers working with children or young people who use BSL? (BSL Level 3 at point of acquiring the qualification, and BSL Level 5 within a year of qualifying)

Please answer below.:

BATOD has a public page on the BATOD website with a brief description of the work that Qualified Teachers of Deaf Children and Young People (QToDs) do, and describes the qualifications needed and how to obtain them. It is BATOD's position that there must be "a commitment to acquire basic sign language skills to Signature level 1 or equivalent." <https://www.batod.org.uk/information/training-as-a-teacher-of-deaf-children-and-young-people/> Whilst BATOD does not feel there must be a requirement for all QToDs on the level 11 qualification to achieve BSL Level 5 within a year of qualifying, we strongly believe there should be opportunities for QToDs and other staff provided by the employer to access funding to complete further BSL studies, BSL Level 5 and higher, as part of career-long professional learning. BATOD endorse the right of deaf children and young people who use sign language to be educated and supported by QToDs and other professionals with signing skills that are higher than the skills of the child/young person, and/or support by deaf QToDs who are fluent in sign language. Therefore, BATOD support point 28 "The authority must be prepared for the possibility of a child or young person who uses fluent BSL moving into the area. For this reason, it is recommended that each authority ensures it employs a minimum of one teacher of deaf children and young people who has SCQF Level 6 BSL or above."

6 What are your views regarding the recommendation for a three-year transitional period to allow teachers who teach children and young people who are blind or partially sighted, deaf, or deafblind to acquire the recommended qualifications?

Supportive

Please provide further details below.:

BATOD support this recommendation as it would place the Scottish QToD qualification timeframe in line with the England system where it is law (2003 regulations), not guidance, that a ToD can start under supervision but the MQ must be achieved within three years of starting to work with deaf children. BATOD would strongly recommend it is clear that the three-year period does not start again if the ToD change jobs.

7 Do you think the Requirements for Teachers (Scotland) Regulations 2005 regarding the length of time to obtain the appropriate qualification should be changed to reflect the recommendation in the guidance or kept the same?

Changed to three years

If alternative suggestion, please provide details below.:

8 Do you think a minimum allocation of three days of study time per 20 credit course module by Education Authorities to support teachers in obtaining the minimum qualifications recommended is appropriate?

No

Please answer below.:

BATOD does not feel the minimum allocation of three days of study time per 20 credit course module by Education Authorities to support teachers in obtaining the minimum qualifications recommended is appropriate. The University of Edinburgh website states "each 20 credit course, you should be putting in 200 hours of study per semester". 200 hours of study per semester equates to ~ 28-33 days (based on UoE guidance of 6-7 hours/day). BATOD strongly recommend, with any deaf education course provider, employer support one day/week study leave for students, who are typically doing the QToD 'day job' role alongside the MQ study. The appropriate study time is essential due to demands of the academic rigour of a Masters Level 11 qualification, the need for exposure to a range of activity eg audiology clinics, observations of deaf education professionals across the ages and contexts, further reading and related continued professional development, preparing for teaching placements etc. In addition, some students will have to complete the British Sign Language (BSL) SCQF Level 3 (BSL Signature Level 1) for teachers of children and young people who are deaf at the point of gaining the mandatory qualification. BATOD strongly feel that throughout the study it is vital the students maintain good mental health and wellbeing and life/work balance.

9 What are your views regarding the teacher competencies for teachers of children and young people who are blind or partially sighted?

Please answer below.:

10 What are your views regarding the competencies for teachers of children and young people who are deaf?

Please answer below.:

BATOD feel the competencies could articulating the roles linked to the QToD specialism ie local authority, school or health (auditory implant) – based employment.

Children's rights are primarily enshrined in the United Nations Convention on the Rights of the Child (UNCRC), which are incorporated into Scots law, therefore BATOD recommend with the following two bullet points that there is additional wording in relation to young people engagement.

- Report outcomes and prepare accurate assessment reports whose findings can be understood and used by teachers, other professionals, and parents/carers (and were applicable young people)

• Engage with other teachers and colleagues of deaf children and young people, including allied professions in practitioner enquiry. Devise enquiries based on local authority service needs, co-constructed with others including parents of deaf children and deaf young people themselves (and were applicable young people)

11 What are your views regarding the competencies for teachers of children and young people who are deafblind?

Please answer below.:

12 Does the clarification of the terms 'wholly' and 'mainly', and the examples in the guidance provide clarity on who is required to hold an appropriate qualification?

Yes

If no, how could this be clarified further? Please answer below.:

13 Overall, do you think the guidance is clear and easy to understand?

Yes

Please provide further comment below.:

14 Is there anything further you would like to comment on or propose for inclusion into the guidance?

Not Answered

Please answer below.:

BATOD feel the guidance should have strong reference to Getting it right for every [deaf] child (GIRFEC)

BATOD would welcome wording that reflects how inclusive the University of Edinburgh MQ courses for teachers of deaf children and teachers of CYP with VI are for teaching professionals with lived experience of deafness and/or VI.

BATOD support the need for thee authority to "be prepared for the possibility of a child or young person who uses fluent BSL moving into the area. For this reason, it is recommended that each authority ensures it employs a minimum of one teacher of deaf children and young people who has SCQF Level 6 BSL or above." BATOD feel the ongoing specialist professional development needs of QToDs must be recognised and supported. This could also include the development of intermediate and advanced skills in providing the provision for deafblind children and young people plus their families, early years support, auditory verbal approaches and educational audiology. QToDs should be trained in supporting families through the process of investigation into the reasons why a child is deaf, including genetic testing which can help identify conditions such as Usher Syndrome. There should be minimum expected standards of professional development, including funding in place from local authorities for specialist training. The new Centre of Teaching Excellence should work with the Scottish Sensory Centre at the University of Edinburgh and with BATOD as appropriate to ensure that these development opportunities are available to all QToDs.

BATOD recommend

- outdated terminology relating to radio frequency systems (FM) is replaced with the typical terms now used Assistive Listening Devices (ALD) – radio aids and proprietary remote microphone systems.
- the following roles, BSL tutors/Deaf role models and educational audiologists, are included in section 2.2 Understand the roles and responsibilities of the QToD and other professionals and staff.
- consistency in wording regarding identity and culture. BATOD is pleased to see specific reference to deafblind identity and culture, and deaf culture(s),
- the consistency in the use of 'Qualified' Teacher of Deaf Children in the document to recognise the status of mandatory qualification.
- the 2025 Scottish specific research into 'investigating informed choice' funded by the NDCS is recognised in the guidance. BATOD feel there should be reference to information in ways which take account of family diversity and support their ability to make informed choices, emphasising choices opposed to supporting misconceptions regarding signed or spoken only communication options
- inspection by the proposed new office of His Majesty's Chief Inspector of Education in Scotland could be an appropriate accountability mechanism is recognised in the guidance.

About you

15 What is your name?

Name:

Teresa Quail

16 Are you responding as an individual or an organisation?

Organisation

17 What is your organisation?

Organisation:

British Association of Teachers of Deaf Children and Young People (BATOD) in conjunction with BATOD Scotland

18 Further information about your organisation's response

Please add any additional context:

BATOD and BATOD Scotland sought feedback through BATOD blog post, newsletters and committee meetings.

19 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

20 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

21 What is your email address?

Email:

exec@batod.org.uk

22 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

23 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: