

British Association of Educational Audiologists and British Association of Teachers of Deaf Children and Young People

10th April 2026

Dear Education Committee,

Call for Evidence Submission - The Use of Artificial Intelligence and EdTech in Education: implications for deaf children and young people (CYP)

Executive Summary

This submission is made on behalf of the British Association of Teachers of Deaf Children and Young People (BATOD) and the British Association of Educational Audiologists (BAEA). It focuses on how AI-enabled tools and wider EdTech affect access, inclusion and outcomes for deaf children and young people across early years, schools, further education and higher education.

AI-enabled tools (such as automated captioning, speech-to-text and language-support technologies) can improve access to teaching, classroom talk and learning materials when they are implemented alongside good acoustic conditions, appropriate assistive listening technology (ALT), and specialist oversight from Qualified Teachers of Deaf Children and Young People (QToDs) and Educational Audiologists.

However, professional evidence indicates that without consistent infrastructure, commissioning arrangements, training, robust safeguarding and data protection, and a consistent national approach, AI and EdTech risk widening existing inequalities and increasing listening effort and concentration fatigue for deaf learners. This is particularly acute where tools rely on continuous audio capture, or where schools treat AI as a substitute for specialist support.

Key recommendations

1. Develop national guidance and assurance processes for AI/EdTech that explicitly address SEND and deaf education, including accessibility, acoustics and assistive listening technology (ALT) compatibility.
2. Require specialist involvement (QToDs and Educational Audiologists) in procurement, implementation and evaluation of AI-enabled access tools used with deaf CYP.
3. Set clear expectations that AI is an assistive tool, not a replacement for qualified specialist professionals; embed accountability for checking accuracy, suitability and impact on learning.

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4. Strengthen safeguarding and data protection requirements for tools using audio/video/biometric data, with clear consent pathways and procurement checks reflecting the sensitivity of audiological and health-related information.
5. Address inequality through commissioning and investment: ensure equitable access to appropriate technology at home and in education, including maintenance, upgrades and insurance where relevant.
6. Invest in targeted CPD for school leaders, teachers and support staff on deaf awareness, acoustics, ALT, and safe and critical use of AI (including appropriate microphone and captioning use).
7. Support co-designed applied research and pilots (early years through post-16) involving deaf CYP, families and specialist professionals, evaluating learning impact and listening effort, and publishing findings.

About BATOD and BAEA

This submission draws on professional evidence from BATOD and BAEA; the only professional associations in the UK for Qualified Teachers of Deaf Children and Young People (QToDs) and Educational Audiologists respectively. QToDs are qualified teachers who have completed the Level 7 mandatory qualification in deaf education. Educational Audiologists are often QToDs who have completed a postgraduate qualification in educational audiology. Both professions advise education settings on the selection, fitting, verification and evaluation of hearing technologies and assistive listening technology (ALT).

BATOD and BAEA welcome this inquiry into EdTech and artificial intelligence (AI) across the education system. Our members support deaf babies, children and young people and their families from the stage of identification of deafness onwards, and advise education professionals in early years, schools, further education (FE) and higher education (HE). Specialist roles include QToDs working in early years and mainstream settings, in FE/HE, in auditory implant centres, and as Educational Audiologists.

1. Context: deaf learners, listening conditions and assistive listening technology (ALT)

Data published by the Consortium for Research in Deaf Education (CRIDE) highlights the number of deaf children identified through the Newborn Hearing Screening Programme (NHSP). At this early stage, QToDs and Educational Audiologists (working with health colleagues and other early years professionals) support families with

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unbiased, evidence-based information so that parents can make informed decisions about communication approaches and the use of hearing technology. This includes advice on when and how to introduce ALT in home and early years environments, where paediatric health services may have more limited experience of educational use and early years services may have limited understanding of the impact of deafness.

Successful use of EdTech and AI-enabled access tools for deaf CYP depends on specialist support from QToDs and Educational Audiologists to:

- Enable effective use that supports listening, language, communication and social wellbeing.
- Support parents and early years staff to troubleshoot connectivity issues and ensure child-safe use of technology.
- Develop independent use of technology over time.
- Develop self-advocacy skills so CYP can report barriers (for example, acoustics, connectivity, device compatibility and technology failures).
- Develop shared understanding among adults and CYP about appropriate and safe use of technology.

As each child's competency develops, QToDs and Educational Audiologists support decision-making about how hearing technology and associated assistive listening technology are used across lessons, examinations and social spaces, and how this interacts with independence and self-advocacy.

2. Opportunities: how AI-enabled tools and EdTech can improve access

Alongside direct classroom tools, there is a growing body of supporting guidance, training and quality frameworks that can help education settings select and use EdTech effectively for deaf CYP (including materials on reasonable adjustments, troubleshooting and professional standards).

Building on these resources, AI-enabled tools such as automated captioning, speech-to-text systems and language-support technologies can offer opportunities to:

- Improve access to classroom talk when used alongside professional judgment and appropriate acoustic conditions.
- Support the development of literacy and language.
- Support personalised learning, particularly for deaf learners with additional needs, by adapting pace, modality and repetition.
- Reduce some administrative and transcription burdens for QToDs, allowing greater focus on direct teaching and family support.

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- Allow automated note taking so that deaf students are able to watch and lip read during lessons.

These opportunities align with BATOD's wider body of guidance on access to sound, assistive listening technologies and inclusive classroom practice.

3. Inequality, infrastructure and commissioning

Professional evidence points to inequalities in access to appropriate technology and specialist support, linked to:

- Local authority and/or health provision, and variability in commissioning arrangements.
- Budget constraints and the absence of planned, rolling budgets for maintenance, upgrades and compatibility.
- Availability of specialist educational services (including educational audiology).
- Health inequalities (including cohorts with fluctuating deafness such as glue ear, and CYP with auditory processing difficulties).
- Variability in school understanding of deaf CYP and how access needs change by age and context.
- Risks of manufacturer bias and purchases informed by cost as opposed to functionality where procurement decisions are not supported by independent specialist advice.

4. Risks and limitations: accuracy, listening effort and age-appropriate use

Educational audiology evidence highlights the relationship between listening conditions, cognitive load and educational outcomes. AI-enabled technologies may support access to learning, but there is a risk that poorly implemented tools increase listening effort and concentration fatigue, or mask underlying access issues such as poor acoustics.

- **Accuracy and reliability:** AI systems trained on general populations may not reflect the linguistic, auditory or communication profiles of deaf CYP, particularly in noisy classrooms or where multiple speakers are present.
- **Listening effort and cognitive load:** Poor audio input, latency or inconsistent outputs can increase cognitive demand and fatigue.
- **Over-reliance on automation:** there is a risk that AI tools are treated as substitutes for qualified professionals, rather than tools requiring specialist oversight, verification and adjustment.

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- **Age-appropriate use:** early years practice must prioritise responsive adult–child interaction and language development; older learners may benefit from AI-supported study provided outputs are checked for suitability and accessibility.

5. Safeguarding, ethics and data protection

Tools that use microphones, live captioning or continuous audio/video capture can involve sensitive personal, educational and health-related data. Procurement and use therefore require robust safeguards, transparency and clear consent pathways, including clarity about what is recorded, stored, processed and shared.

- Children’s privacy and data protection, particularly where audiological and health-related information may be inferred from audio data.
- Clear operational guidance for staff on appropriate microphone use, avoiding inadvertent capture of sensitive conversations, and managing unsuitable content.
- Transparency about how data is collected, stored, processed and used (including any third-party processing).
- Professional accountability for decisions informed by AI outputs, including checking accuracy and suitability.

6. Implementation: workforce, training and effective practice

Effective implementation depends on school infrastructure (including acoustics, connectivity and compatibility with assistive technologies) and staff confidence in selecting, implementing and evaluating digital tools. While some AI tools can reduce routine workload (for example, drafting transcripts or materials), they also require professional time to check accuracy and adapt outputs for subject-specific language, deaf-aware pedagogy and individual communication preferences.

Live captioning is a key example. Captioning for recorded video is increasingly well understood due to accessibility requirements in HE. However, implementation of live captioning in classrooms is often limited by privacy concerns, variable accuracy, audio input quality, staff confidence, and the cost of advanced platforms. BATOD is working in partnership with Jisc, alongside charities, research study leads and education groups currently piloting captioning projects, to produce guidance and reference publications and explore the concerns and needs of primary, post-primary, FE and HE staff to support effective use of live captions.

Implementation planning should include ongoing funding for maintenance, upgrades, connectivity and compatibility with other devices, and where relevant, practical support

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such as insurance for home use. Parity of access between home and education settings supports consistent listening and communication development.

7. Recommendations

Drawing on BATOD and BAEA evidence, we recommend that Government, regulators and education system leaders:

1. Publish SEND-and deaf-aware guidance for AI/EdTech procurement and implementation, including minimum expectations for acoustics and ALT compatibility.
2. Require specialist professional oversight (QToDs and Educational Audiologists) for AI-enabled access tools used with deaf CYP, including evaluation of impact on learning and listening effort.
3. Establish quality assurance expectations for AI outputs used in teaching and assessment (accuracy, suitability, accessibility), with clear accountability for checking and correction.
4. Strengthen safeguarding and data protection standards for tools using audio/video/biometric data, with consent, transparency and procurement checks reflecting audiological and health-related sensitivity.
5. Address inequalities through coherent commissioning and investment so that deaf CYP have equitable access to appropriate technology and specialist support across local areas.
6. Fund targeted CPD for education setting leaders and staff on deaf awareness, acoustics, ALT, and safe and critical use of AI-enabled tools.
7. Support co-designed research and pilots across age phases and settings, involving deaf CYP and families, and publish findings to inform national practice.

8. Reference materials

British Association of Educational Audiologists (BAEA) [Role and competencies](#) (2019) *for educational audiologists*, defining professional responsibilities across education, health and family contexts.

[BATOD Audiology Refreshers](#) (continuing professional development materials).

[BATOD/NDCS Specialist Deaf Curriculum Framework \(SDCF\)](#). The SDCF has been written to support deaf babies, children, young people, and their families to develop knowledge and make informed and independent decisions about their deafness, from identification through to adulthood.

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[NDCS Quality standards for assistive listening technology \(ALT\) in education settings.](#)

BATOD [Audiology guidelines for the assessment of children with special needs \(2020\)](#)

BATOD [Acoustics position statement](#)

[Assistive Listening Technology Working Group Good Practice Guides](#) (revised documents pending publication)

[Jisc Guide Video captioning and accessibility regulations](#)

Education Authority Northern Ireland [Caption Connect Pilot project](#)

Sound Waves Foundation [Action for Captions](#)

University of Edinburgh Research: [Captions and Summaries for Deaf Students Project](#)

[National Deaf Children's Society research \(NDCS\) research publications](#)

Educational Audiology guidance within the [Deaf Education MESHGuides](#) (managed by BATOD), including evidence-based resources on:

- Educational audiology practice
- Audiological support in schools
- Listening effort, access and learning outcomes

[Masters research](#) produced through the UK's only postgraduate educational audiology programme

[BATOD Articulating the specialism series](#) – role of the QToD