



# How do we reverse the fall in the number of Qualified Teachers of Deaf Children and Young People in Scotland?

Report for the Cross-party  
Group on Deafness in the  
Scottish Parliament

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Summary of  
report in BSL:



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## Foreword by Karen Adam MSP

**At the Cross-Party Group on Deafness (CPGD) in the Scottish Parliament we have heard a great deal of evidence about the vital role Qualified Teachers of Deaf Children and Young People (QToDs) perform in enabling deaf children to fulfil their potential and ensuring that deaf children's rights are upheld.**

However, the CPGD was presented with stark evidence that the numbers of QToDs employed to support deaf children in Scotland has fallen dramatically in recent years (Consortium of Research In Deaf Education (CRIDE), 2023). The CPGD therefore commissioned this report into what could be done to understand the nature and causes of this decline, and what could be done to reverse it. As a deputy convener I was asked to convene the group.

As this report outlines, QToDs are qualified teachers who have undergone specialist postgraduate training in order to support deaf children and young people. As we took evidence for the report, we learnt that their support starts as soon as a child's deafness is first identified and continues until they transition to adulthood. We heard about the breadth of the role, where some QToDs support deaf children by working as classroom teachers in deaf schools or in specialist resource bases within mainstream schools while others have a local-authority wide peripatetic role as part of local authority sensory education teams. Wherever they work, we saw the difference that QToDs make.

The working group sought further evidence on the numbers of QToDs in Scotland. We discovered the only assessment of the number of QToDs employed by local authorities in Scotland is carried out through the Consortium for Research into Deaf Education (CRIDE) annual survey of local authority sensory education services. The survey has now run since 2011, and it shows that it appears that there has been a 37% fall in the number of QToDs. This is deeply concerning.

We found that there is uncertainty around the legal requirements of local authorities to provide support to deaf children through a QToD. We were surprised by this, given that QToDs are a long-established role within the Scottish education system. There is therefore nothing in law to prevent this fall in QToD numbers continuing to a point where only deaf children with the most profound needs are offered support from a QToD, or where support is withdrawn from some deaf children, for example in the early years.

The working group explored the legal requirements that do exist around QToDs. The Requirements for Teachers (Scotland) Regulations 2005 require that "where a local authority employs a teacher wholly or mainly to teach pupils who are hearing impaired, then that teacher should possess an appropriate qualification to teach such pupils". These qualifications were detailed in the Scottish Government Guidance on "Qualifications for teachers of hearing and visually impaired children and young persons" issued in 2007, and the University of Edinburgh University is currently the only institution in Scotland that runs a course that would allow teachers to acquire such qualification. It is welcome that the legal requirements are in place, and we understand the University of Edinburgh course is well regarded. It is disappointing that the requirements haven't been updated since 2007, though we understand this is being worked on. In contrast the mandatory qualifications in England were updated only last year. These existing requirements however do not clearly align the QToD role within current child support and education structures.

We also heard concerning evidence about the lack of workforce planning for QToDs in Scotland, and its contribution to the decline in numbers. I was very thoughtful about the fact that QToDs, alongside Qualified Teachers of Visually Impaired children (QTVIs), are therefore the only group of teachers who require specific qualification, but do not have a salary uplift in recognition.

Individual QToDs shared their concerns, for example around the impact of a staff member going on maternity leave when a service had been reduced to a handful of QToDs, on the pressure to limit support to generic advice to a school rather than 1-2-1 support for a child, and the need to make sure deaf children in rural areas got a similar level of support to those in urban areas.

The working group has therefore sought to develop a set of recommendations which strengthen and clarify the role of the QToD and position the role more clearly within wider Scottish policy frameworks.

Taken together, we believe these recommendations will help reverse the decline in QToD numbers and ensure that deaf children and young people can get the support they need. Most positively, we repeatedly heard that with the right support deaf children can achieve just as much as their hearing peers.

**Karen Adam MSP, member of the Cross-Party Group on Deafness in the Scottish Parliament**



## Executive summary

The CPGD short-life working group on deaf children and young people's attainment conducted a study into the role of QToDs and the reasons behind the declining numbers of QToDs. The short-life working group involved a range of experts from third sector, university, union and professional organisations (for more details, see Appendix 1).

As part of the process, the short-life working group consulted with key stakeholders including the Heads of Sensory Services, the teaching trade unions, QToDs, and the Deaf QToD group. From this process the following themes were identified:

- Although the QToD is a well-established position within Scottish education, there is currently no explicit right for any deaf child or parent to have access to a QToD.
- The role of the QToD is not always clear in law, and some of the duties carried out by QToDs are not aligned with the Additional Support for Learning (ASL) and Getting It Right For Every Child (GIRFEC) frameworks, despite in practice playing a vital role in the delivery of these frameworks (Scottish Government, 2009a; Scottish Government, 2022). QToDs play a pivotal role in the development of language(s), deaf identity and enhancing the wellbeing of deaf children. They provide family-centered early intervention for families from the point of identification, in nurseries, schools and at points of transition. However, these important roles are not always recognised or understood.
- The declining numbers of QToDs (37% fall in numbers since 2011) is in part down to a lack of strategic consideration being given to the recruitment and retention of QToDs and other specialist roles.
- Although QToDs are required to complete postgraduate training (Scottish Credit and Qualifications Framework Level 11) and achieve an appropriate level of British Sign Language (BSL), there is no salary increment associated with this level of specialist training, unlike in all other parts of the UK.
- The declining number of QToDs is occurring at a time when deaf attainment is below that of the hearing population, regardless of the degree of deafness, which assistive hearing device the deaf pupil uses (such as cochlear implant or other hearing aids) or language used (spoken and BSL). Deafness was found to have a negative effect on English grades for all categories of deafness, including mild (Hutchinson, 2023).
- Different types of support from QToDs are provided across Scotland. Deaf children in mainstream schools will receive some form of support from a visiting (also known as 'peripatetic') QToD at least on an annual basis, as part of the local authority deaf education service caseload. Examples of support include direct teaching, visits to the family or school, liaison with the family, school, teachers, providing hearing aid checks, etc. Currently there is no guidance on what an appropriate caseload should be for a QToD. Furthermore, the declining number of QToDs means that the support deaf children need to access mainstream schools or in the crucial early years has often either been reduced or removed for many deaf children and young people.

- Research into audiology services in Scotland carried out by the National Deaf Children's Society (NDCS, unpublished) indicates that around 44% of children in Scotland with permanent childhood hearing impairment (PCHI) are identified soon after birth, following a referral from the newborn hearing screening programme. This is a significantly lower proportion in Scotland compared with Northern Ireland and England (where the majority of deaf children are identified through the newborn screening process).

## **Key areas for action**

The short-life working group then identified a number of proposed key areas for action, which along with the rest of the report was agreed by the CPGD deafness at its meeting on 9<sup>th</sup> December 2024:

1. Scottish local authorities must always uphold the regulatory requirements for supporting deaf pupils. Clear guidance is needed from the Scottish Government and the Convention of Scottish Local Authorities (COSLA), setting out local authorities' duties to provide specialist support, including an appropriate pupil caseload for each QToD. Deaf education services should be managed by professionals with appropriate qualifications and knowledge.
2. The required qualifications and competences for QToDs have not been updated since 2007. The regulations should be updated to ensure every deaf child gets support from an appropriately qualified specialist teacher.
3. Becoming a QToD requires additional study to Master's level (in addition to a teaching qualification) and achieving BSL Level 1. Unlike in the rest of the UK there is no salary uplift in recognition of this additional study, and this needs to be addressed.
4. There is no guidance on how the role of the QToD should align with the Additional Support for learning (ASL) and Getting It Right For Every child (GIRFEC) frameworks, the BSL (Scotland) Act 2015 or audiology pathways. The Scottish Government should issue practice guidance on the role of QToDs. Any such guidance should discuss the wellbeing needs of deaf children regardless of their level of deafness.
5. There is currently no national oversight of the recruitment and retention of QToDs nor has there been any 'sufficiency' assessment of how many QToDs are needed. Scotland-wide QToD workforce planning is required in order to ensure that there is appropriate pipeline planning and to improve access for deaf people who wish to become QToDs.
6. As well as QToDs, other specialist professionals that are vital in supporting deaf children include Speech and Language Therapists, Educational Audiologists, BSL tutors and trained Communication Support Workers and BSL/English interpreters. Local authorities must also plan for appropriate provision of these specialist professionals and integrated approaches to support. Shared job descriptions across Scotland. National guidance on how to advertise, recruit and retain these specialist staff would also support local authorities to find and train staff for these specialist roles.

## Context

QToDs, as the specialist and additionally qualified teachers of deaf children and young people, perform a vital role in enabling deaf children and young people to fulfil their potential. They can directly support deaf children with their learning, as well as with the development of their social and emotional wellbeing. They also support families with unbiased information and guidance to enable informed choice in decision making. QToD also work with educational settings in providing deaf awareness training, advice on learning strategies, the classroom environment, support with amplification and assistive listening devices, and examination access arrangements. They often work as part of a multi-disciplinary team with other professionals. Their work with deaf children and their families can start from birth and the early years through to transition to adulthood.

QToD also provides support to families with deaf children following identification of deafness, which is particularly important in early years. More than 90% of deaf children are born to families with no prior experience of knowledge of deafness (Mitchell and Karchmer, 2004). QToDs provide advice and support to families on effective language and communication development in the critical early years. They also support families with unbiased information and guidance to enable informed choice decision-making.

QToDs are crucial in effectively delivering Scottish government commitments to supporting deaf children and young people, and upholding their rights under legislation, policy and the international conventions that are being incorporated into Scots Law. This includes ensuring deaf children's rights under the United Nations Convention on the Rights of the Child (UNCRC) including Article 23 (support for disabled children), Article 28 (right to education) and Article 30 (minority language rights, including BSL) are upheld in the teaching of deaf children. QToDs are also central to ensuring the realisation of deaf children's rights under Article 24 of the UN Convention on the Rights of People with a Disability (UNCRPD), which commits governments to recognise the right of persons with disabilities to education, (United Nations, 2006).

Their work includes giving essential support for deaf children in assessments and national qualifications, which helps to close the educational attainment gap for deaf children and young people. There is still an extensive attainment gap between deaf children (regardless of level of deafness) and their hearing peers, especially around language and communication. According to NDCS's Scotland-wide network local advice and guidance officers this educational attainment gap is especially pronounced for deaf children in areas of social and economic deprivation (O'Neill, 2014).

Scottish local authorities have a duty to support deaf and disabled children under section 23 of the Children (Scotland) Act 1995. In addition, where deaf children have been accepted by their local authority as children with additional support needs, their local authorities are required to make adequate and efficient provision to ensure those children can fully access education, as set out in the Education (Additional Support for learning) (Scotland) Acts of 2004 and 2009.

In addition, the Equality Act 2010 sets out the legal obligations that schools, early years providers, post-16 institutions, local authorities and others have towards disabled children and young people (Incomes Data Services, 2010):

- They must not directly or indirectly discriminate against, harass or victimise disabled children and young people.

- They must not discriminate for a reason arising in consequence of a child or young person's disability.
- They must make reasonable adjustments, including the provision of auxiliary aids and services, to ensure that disabled children and young people are not at a substantial disadvantage compared with their peers.

This latter duty is anticipatory – it requires thought to be given in advance to what children and young people with disabilities might require and what adjustments might need to be made to prevent that disadvantage.

A QToD, or an appropriately supervised ToD in training, is considered an auxiliary aid in terms of the Equality Act. The provision of QToDs can also be considered a means by which public bodies can remove barriers for deaf children and young people and promote equality of opportunity.

QToDs who work in local authority services must meet the requirements set out in the 2007 guidance on qualifications for teachers of hearing-impaired children (Scottish Government, 2007). To become a QToD, a fully qualified teacher must undertake and complete further study, as set out in the guidance. The University of Edinburgh is currently the only institution in Scotland offering such studies.

## Challenges

According to research carried out by CRIDE in Scotland, there has been a very significant decline in QToD numbers since 2011. In 2011 Scotland had 165.3 Full Time Equivalent (FTE) QToDs (CRIDE, 2011). By 2023 this had fallen to 104 FTE – a 37% drop (CRIDE, 2023). However, while QToD numbers have fallen, the number of deaf children and young people being supported by local authorities reported to CRIDE has increased. This reduction in support is having a detrimental effect on deaf children and young people in Scotland, as this fall in numbers means that in some areas the number of QToDs will not be sufficient to provide the support required.

While there has been a decline in QToD numbers in other UK nations, the fall in Scotland has been far larger. According to the 2023 figures published by CRIDE for England, Wales and Scotland since 2011 the number of QToDs in Wales has fallen 17%, and in England by 21%, around half the fall in numbers experienced in Scotland.

### Case study

A rural local authority in Scotland had a team of 6 QToDs when surveyed in 2011, but by 2023 this has fallen to less than 2 full-time equivalent QToDs. The local authority is large and rural; the local deaf education service has over 80 deaf children registered on its caseload. Local parents have told NDCS that the deaf education service cannot support their deaf children from birth because they do not have the staff. This means deaf children in the area are not getting the early support they need.

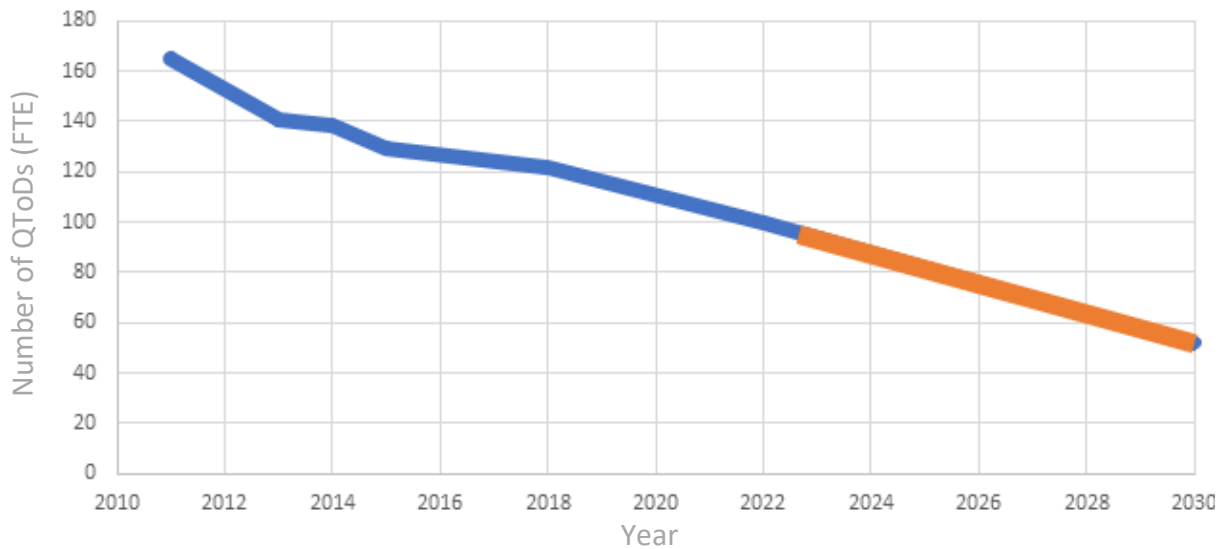


It should be noted that this CRIDE data series started in 2011, in response to concerns being raised with NDCS, so 2011 does not necessarily represent a high point. However, the broad picture since 2011 is one of rapid decline in numbers being reported in CRIDE. If these trends continue, by the 2030s the number of QToDs will fall to a level which is not sustainable. In some areas the role of the peripatetic QToD, which should be to visit a deaf child in mainstream school and work directly alongside them, has been reduced to checking hearing aids are working and meeting senior teachers. In others, support has been withdrawn in the early years leaving families without access to specialist support from professionals with specialist knowledge and understanding of deafness at a crucial stage in the child's development. A limited number of deaf children do well with this provision because they have support from school and home. However, many others will not – including deaf children who were identified late, individuals with significant language and communication delays, those with vulnerable social, emotional and mental health needs, BSL users, children growing up in poverty, and deaf children with additional disabilities. QToDs also work in resource base schools and the three remaining deaf schools in Scotland where they may teach classes, or work with groups of students, or work in the mainstream classroom team teaching, interpreting, note-taking and jointly planning curriculum support.

There are also regional variations in provision. CRIDE reports have frequently found wide variations in caseloads for QToDs – in 2023 the highest caseload found was 86, the lowest caseload found was 11, and the average caseload was 37 (CRIDE Scotland, 2023).

Alongside the fall in QToD numbers, there has been a significant increase in the numbers of deaf children and young people supported by local authority deaf services, from 2,524 in 2011 to 3,418 in 2023 (CRIDE, 2011; CRIDE, 2023). However, this is the number reported by local authorities to CRIDE, and the working group was informed that practice varies across local authorities in terms of which deaf children are included in data returns. There is a long-running issue about a lack of accurate data on the number of deaf children in Scotland, flagged most recently in the *Independent Review of Audiology Services in Scotland* and the work of the Hearing Impairment Network for Children and Young People (HINCYP) (Scottish Government, 2023). Figures from CRIDE do not necessarily align with data gathered from other sources, such as information from audiology departments.

## CRIDE figures on the number of QToDs in employment in Scotland



**Table 1: Numbers of QToDs in employment in Scotland (CRIDE, 2011; CRIDE, 2023)**

In recent years the CRIDE data indicates that there has been an increasing number of teachers employed by local authorities as teachers of deaf children and young people who are neither qualified as QToDs nor in training to receive those qualifications. By 2023 this amounted to 9% of all those employed to teach deaf children and young people in Scotland (CRIDE, 2023). In England the CRIDE report for 2023 indicated the figure is only 5% for England and the 2023 CRIDE report for Wales indicated all ToDs are either qualified or are in training for the appropriate qualifications. Deaf children should not be taught by unqualified teachers who do not know how to adapt the curriculum for deaf learners or assessment, or to plan appropriate language development.

### Consultation evidence

The Working Group consulted with a wide range of stakeholder groups in Scotland. The evidence from this consultation indicated that the decline in QToD numbers in Scotland is likely to be the result of several factors including:

- The role of QToDs and their importance to deaf babies, children and young people is not always recognised and understood. More work needs to be done to raise awareness of the vital role QToDs play, among trainee and qualified teachers and local authority staff. The role of QToDs should be a key part of local authority briefing materials for decisions on educational funding, and of teacher training.
- Management structures in local authorities lack appropriately qualified senior staff with a robust understanding of the needs of deaf children and young people.
- Lack of recognition of the impact of all kinds of deafness, including mild, moderate, unilateral or temporary deafness, on the wellbeing of a child or young person if appropriate support is not put in place.

- There is no Scotland-wide workforce planning for recruitment, retention and training of QToDs.
- Long term underinvestment in Additional Support for Learning (ASL) more broadly.
- The need for more clarity around how the QToD role fits into wider Scottish Government systems and approaches such as GIRFEC.

The unique role of the QToD is not always widely recognised. There is a lack of clarity about the duties and obligations of local authorities to provide a service to deaf children that includes an adequate number of QToDs. This is despite the efforts of organisations such as BATOD (British Association of Teachers of Deaf Children and Young People), the Scottish Sensory Centre at the University of Edinburgh and NDCS to raise the profile of the QToD. The management structures of deaf education services were raised as a particular issue. During the consultation people highlighted that, if senior managers do not understand the needs of deaf children and young people, then deaf education services can be overlooked. Conversely, where managers understood the value of QToDs and their work, staff – and deaf children and young people – received better support.

More broadly there has been significant under-resourcing of the specialist staff and settings needed to meet the requirements of the Education (Additional Support for Learning) (Scotland) Act 2004. In recent years numbers of all specialist ASN teachers in Scotland have fallen. For example, between 2008 and 2022, according to the Educational Institute of Scotland (EiS) the number of Primary teaching staff with a general ASN role has declined by 70%, with a 78% decline for Primary teachers in a behaviour support role. As such, any action addresses the fall in the number of QToDs must not be at the expense of the numbers of other specialist teachers of children with ASN.

Currently, deaf children's needs are often not being assessed holistically on the basis of the impact of deafness on their language and communication, or their wellbeing, because there are no suitable frameworks. Instead, support is frequently allocated based on the audiometric (i.e. medical) categories of mild, moderate, severe, profound and on whether the child has permanent rather than temporary deafness. Therefore, many deaf children with mild, moderate or temporary deafness may not get the support they need and this negatively impacts their educational attainment – with potentially life-long impacts. A Scotland-wide, holistic approach to assessment and support allocation is urgently required. To facilitate this support for all deaf children and young people in need of support, we need to ensure that there are sufficient numbers of QToDs to support a realistic caseload for each local authority area, able to assist all deaf children and young people in need of support.

Qualification as a QToD requires a high level of specialist training but acquiring the necessary qualifications without support from the local authority can be expensive and time-consuming for teachers. The support, training and additional pay and reward for QToDs in Scotland is weaker than the package provided in the other nations of the UK (although overall teachers' pay is higher in Scotland). There are generally limited promotion prospects which may also prevent teachers wanting to train or remain as QToDs. They put in significantly extra time and effort to become qualified with the postgraduate diploma and, despite the job role requiring specialist skills over and above those of a class teacher, pay levels are identical.

Many Scottish QToDs are moving towards the end of their professional careers, with 40% due to retire in the next decade (CRIDE Scotland, 2023). The shortage of QToDs means recruitment of replacements can be challenging. This, combined with the increasing of number of children with ASN (currently around a third of all children in Scottish schools), means that NDCS's Local Engagement team have reported on cases where local authorities replaced specialist QToDs with generic Additional Support for Learning staff. Whilst this is a crucial element of effective general educational support, generic staff will not have the specialist knowledge and skills needed to support deaf children in education and in the home, particularly with amplification, assistive listening devices, detailed knowledge of language and communication options, emotional, health and wellbeing development and an understanding of strategies to use in teaching deaf children.

## Conclusion and recommendations

Scottish local authorities, the Scottish Government, Edinburgh University (as the provider of the QToD postgraduate diploma in Scotland) and BATOD therefore need to work together to increase the number of QToDs to a level that can adequately meet deaf children and young people's needs.

We recommend an initial target of returning QToD numbers in Scotland to 2011 levels over the course of the next decade – from approximately 100 FTE in 2024 to 165 FTE in 2034. As previously discussed, the 2011 figure is based on this being the starting point for CRIDE surveys, and therefore seems to be an achievable target. However, this target would have to be combined with recommendations around caseloads to ensure that every local authority has sufficient QToDs to meet the needs of deaf children in their area.

### Recommendation 1: Guidance and regulation

*Scottish local authorities should always uphold the regulatory requirements for supporting deaf children and young people. Clear guidance should be provided by the Scottish Government and COSLA to local authorities, setting out local authorities' duties to provide specialist support, and agreeing appropriate caseloads for QToDs. Deaf education services should be managed by professionals with appropriate qualifications and knowledge.*

- a) We need recognition in policy and guidance at a local and national level of the vital and unique role of QToDs in supporting deaf children and young people, and their families, often from birth (following newborn hearing screening and audiological assessment) through school and to transition to post-school destinations. This should include support and information for families during antenatal care planning, and from birth, where appropriate, to ensure language support is in place from the earliest possible age.
- b) The Scottish Government needs clarity around the legal duties local authorities should provide to support deaf children, from birth onwards. This guidance should include the need to provide clear pathways of support for all deaf children from birth onwards, including those with glue ear/temporary/mild deafness, especially in early interventions. Pathways should be based on a holistic assessment of deaf children's needs. They should then be clearer, be more explicit and joined up, and include support from audiology, Ear, Nose and Throat (ENT), health visitors, QToDs, Speech and Language Therapists (SALT), BSL tutors and so on. Such pathways should be co-created by local authorities in partnership with health services and deaf children and young people and their parents.

- c) The Scottish Government should develop guidance on appropriate caseloads for QToDs. Guidance on caseloads should pay particular attention to the need for appropriate levels of support for deaf children in more rural and isolated areas. Such Scotland-wide caseload guidance should be holistic and based on GIRFEC wellbeing principles. It should take into account factors including the child's age, the nature and cause of their deafness, and whether they or their families are experiencing any other adversities.
- d) Commitment from local and national government to return QToD staffing numbers, as a minimum, to 2011 levels through the creation of additional QToD positions. Local and national, in order to uphold the rights of deaf children and young people, as part of clearer quality standards for the support of deaf children. Increasing the total number of QToDs would have to be carried out in parallel with guidance on caseloads, to ensure adequate provision in areas which have historically had low numbers of QToDs.

## **Recommendation 2: Regulations on QToD qualifications and competencies**

*The required qualifications and competences for QToDs have not been updated since 2007. The regulations should be updated to ensure every deaf child gets support from an appropriately qualified specialist teacher.*

- a) The 2007 guidance on the appropriate qualifications for teachers of pupils who are hearing impaired, visually impaired or both hearing and visually impaired must be updated. The new guidance should make it clear that the only way of ensuring a high-quality cohort of QToDs in Scotland is through a course at an accredited academic institution, removing the current unclear wording about other training options. However, there needs to be appropriate protection for existing teachers who have already become QToDs through the alternative CPD route (though we understand this route had very limited use in practice).
- b) Local authorities should then be accountable for aligning their policy and practice with the guidance, to ensure that everyone who becomes teachers who wholly or mainly teaches deaf children (i.e. a QToD) must have the appropriate qualification. Inspection by the proposed new office of His Majesty's Chief Inspector of Education in Scotland could be an appropriate accountability mechanism.
- c) The Scottish Government and local authorities should enable more teachers to become QToDs through greater availability of qualification bursaries, both as part of the wider workforce strategy and to support local need, as well as other measures on widening access. In addition, the University of Edinburgh should be supported by Scottish Government to offer a full-time route to becoming a QToD, with appropriate financial support for students. This would support qualified teachers who are not yet in work as ToDs but who want to qualify to become part of the workforce quickly.
- d) The ongoing specialist professional development needs of QToDs must be recognised and supported. This could include development of intermediate and advanced skills in providing 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 to ensure that these development opportunities are available to all QToDs.

- e) The Scottish Government should develop a plan in partnership with BATOD and organisations representing BSL users for the delivery of Action 17 of the British Sign Language Nation Plan 2023-29 – “Support opportunities for teachers of the deaf and teachers working with deaf and deafblind children and young people in obtaining qualifications up to SCQF Level 10”.

### **Recommendation 3: Financial recognition for QToDs**

*Becoming a QToD requires additional study to Master's level (in addition to a teaching qualification) and achieving BSL Level 1. Unlike in the rest of the UK, there is no salary uplift in recognition of this in Scotland and this issue should be addressed.*

- a) The Scottish Government, Convention of Scottish Local Authorities (COSLA), BATOD, the teaching unions, the Scottish Sensory Centre at the University of Edinburgh and Heads of Deaf Education services should work together to identify viable pay reward options for QToDs/ToDs. This should include exploration of the Lead Teacher role (see Appendix 3), especially for peripatetic QToDs with a local authority-wide leadership role. This could include a revision of the Lead Teacher model, with additional lower points on the scale to bridge the gap between classroom teachers and QToDs.
- b) Consideration should be given to the creation of more promoted posts for QToDs, to give a clear promotion pathway in relation to, for example, higher level BSL skills, excellence in teaching practices and additional specialism in audiology.
- c) QToDs should have their specialty recognised through a separate category by the General Teaching Council for Scotland (GTCS). This would build on requests made by QToDs and QTVIs for a separate category under the GTCS due to the highly specialist nature of the roles. This change would mean it would sit separate from the existing Registration in Additional Support Needs. Such a change would also enable better tracking of the demographics and retention of QToDs.

### **Recommendation 4: Practice guidance**

*There is no clear guidance on how the role of the QToD should align with ASL and GIRFEC frameworks, the BSL (Scotland) Act 2015 or audiology pathways. The Scottish Government needs to issue practice guidance on the role of QToDs. Any such guidance should discuss the wellbeing needs of deaf children, regardless of their level of deafness.*

- a) The Scottish Government should issue clear guidance on how the role of the QToD aligns with the ASL and GIRFEC frameworks, the BSL (Scotland) Act 2015, and audiology pathways, to support deaf children and young people from birth onwards (and, in some cases, offer family

support within antenatal settings). Guidance should discuss the well-being needs of deaf children regardless of their level of deafness.

- b) Local authorities and health boards should establish clearer relationships and shared working between clinical services including audiology, ENT, cochlear implant service staff, BSL tutors and QToDs, ensuring that support is joined up at every stage in the deaf child's journey with families receiving high-quality family-centred support from the point of identification. This shared services planning should be done through Integrated Children's Services Plans. The development and delivery of plans should be underpinned by the Scottish Sensory Centre's 'How Good is My Sensory Service' framework, an updated set of Quality Standards for Paediatric Audiology in Scotland, and the *Scottish Standards for Deaf Children (0-3): Families and professionals working together to improve services* (Scottish Government, 2009b; Shannan and O'Neill, 2011; Scottish Sensory Centre, 2019). Such plans should be co-produced by the relevant health and education bodies, as well as stakeholders such as NDCS, local deaf children's societies and Deafblind Scotland to ensure that the needs of specific groups of children are recognised.

### **Recommendation 5: Ensure national oversight of the recruitment and retention of QToDs**

*There is currently no national oversight of the recruitment and retention of QToDs. Scotland-wide QToD workforce planning is required in order to ensure that there is appropriate pipeline planning.*

- a) Scottish Government should ensure that there is national oversight of the recruitment and retention of QToDs. There should be an annual Scotland-wide QToD workforce analysis to ensure that there is appropriate pipeline planning, and deaf children and young people receive the support they require, when they need it.
- b) The Scottish Government and COSLA should work together to develop a workforce plan for QToDs and other support staff for deaf children that covers support in pre-school, school, and at home. This strategy should be developed in partnership with key stakeholders such as BATOD, the Scottish Sensory Centre at the University of Edinburgh, the Scottish Sensory Hub at the Health and Social Care Alliance Scotland (the ALLIANCE), the Scottish Heads of Sensory Services forum, Unions and staff associations, the British Deaf Association the Scottish Deaf Teachers Group, the Association of Sign Language Interpreters (ASLI), and deaf children and young people and their parents.
- c) The Scottish Government should support and ensure accurate data collection and data reconciliation to align data from health boards, Deaf Education Services and the pupil census. It is vital to know how many deaf children there are in Scotland so that the workforce plan is based on accurate information.
- d) Deaf teachers have lived experience and can act as positive deaf role models for deaf learners and staff. Scotland-wide QToD workforce planning should therefore include a strategy to recruit more deaf QToDs, by encouraging deaf people in Scotland to consider becoming teachers and enabling them to access the additional learning required to become a QToD.

### **Recommendation 6: Other support staff for deaf children and young people**

*As well as QToDs, other specialist professionals that are vital in supporting deaf children include Speech and Language Therapists, Educational Audiologists, BSL tutors and trained Communication Support Workers and BSL/English interpreters. Local authorities must also plan for appropriate provision of these specialist professionals and integrated approaches to support. Shared job descriptions across Scotland. National guidance on how to advertise, recruit and retain these specialist staff would also support local authorities to find and train staff for these specialist roles.*

- a) Education Scotland, the Scottish Government and COSLA should work together with deaf children and their parents, unions and professional associations to develop guidance that gives greater clarity around the skill, qualification and training required by those support staff in schools or in sensory services who work directly with deaf children. This should include Pupil Support Assistants and Communications Support Workers, BSL/English interpreters, BSL tutors and qualified BSL teachers. Such guidance should ensure that all staff supporting deaf children are all working at an appropriate level and registered. The support offered by such staff should be part of needs assessment for children carried out under the ASL framework. A key element of this should be qualifications in BSL. All such staff should have nationally agreed terms and conditions around BSL qualifications. There should also be recognition of the needs of children with Usher syndrome – who will experience deafblindness during the course of their lives - around the need for early acquisition of tactile BSL. This work should also include planning ahead for better mental health for young people with Usher by teaching BSL to hearing peers.
- b) All deaf children need to be able to access high quality speech and language provision, especially in the early years, provided by therapists who have specialist training in meeting the needs of deaf children and young people. This support should be part of a wider system of support to deaf children that involves QToDs and other staff and services from local authorities working together with staff from health boards from birth onwards. Deaf children who have chosen BSL should also be able to access appropriate speech and language provision, i.e. specialist SALTs who also have fluent BSL skills.

Delivering on these recommendations will be a multi-year process. In order to see effective change, implementation must involve a wide group of stakeholders. In line with the Scottish Approach to Service Design, deaf children and young people, and their families, must be at the heart of this process.



## Appendix 1: Methodology

The Cross-Party Group on Deafness in the Scottish Parliament commissioned a working group to produce this report after a presentation by NDCS and BATOD, the professional association for Qualified Teachers of Deaf Children and Young People (QToDs) in May 2023. Initially a large working group was established involving a number of members of the Cross-Party Group, and non-members, but this proved impractical to manage. A smaller group then came together with a membership including NDCS, BATOD, the teaching trade unions, the University of Edinburgh and Queen Margaret University, the Scottish Sensory Hub at the Health and Social Care Alliance Scotland (the ALLIANCE), and a service manager of a deaf children's service to produce a more focused set of potential recommendations. However, this report is a standalone document and participation by a staff member in development of the report should not be taken as automatically indicating that their employer endorses the report. These draft recommendations were presented to the Cross-Party Group on Deafness in the Scottish Parliament on 20 March 2024. Following further comment and discussion, this report was drawn up, based on the recommendations, but adding further context and explanation to the draft proposals.

Much of the information on QToDs in Scotland used in the preparation of this report is drawn from research carried out by CRIDE. The CRIDE Scotland reference group has been in place for seven years. The Scotland reference group has worked to improve how the CRIDE research process aligns the Scottish context, whilst ensuring the data collected can still be compared with other parts of the UK. Current members include the NDCS, Scottish Sensory Centre, University of Edinburgh, BATOD, Aberdeenshire Sensory Service, Ayrshire Hearing Impairment Service and Highland Deaf Education Service.

CRIDE Scotland runs without any external resourcing and relies entirely on responses from local authority specialist education services for deaf children. They report that anomalies can arise in their data from year to year, depending on the quality of the response from the local authority, but are confident in the overall trends over time described in their reports. Ultimately, CRIDE Scotland believes that ongoing monitoring of deaf children and the workforce is a task that should be carried out by the Scottish Government.

A copy of this report was shared with the Cross-Party Group on Deafness in December 2024, and discussed at the Cross-Party Group on Deafness meeting on 11 December 2024.

## Appendix 2: Legal duties to provide QToD support including to children under three

QToDs, and the requirement to support deaf children and people, are referenced in a number of legal and policy documents including:

1. The commitment in the Scottish Government's 2014 See Hear strategy that "Children and young people with a sensory impairment should expect appropriate and timely intervention in the early years and for as long as is required".
2. The requirements under the Education (Additional Support for Learning) (Scotland) Act 2004 to "make adequate and efficient provision for such additional support as is required" by a child or young person requiring additional support, including section 5 of the Act which requires an education authority to provide additional support to certain disabled pre-school children in their area, normally those who are under three years old.
3. The UN Convention on the Rights of the Child, especially Article 23, on the right to support for disabled children, and Article 30, on the language rights of children.
4. Sections 22 and 23 of the Children (Scotland) Act 1995 – Section 22 stating that, "*A local authority shall— (a) safeguard and promote the welfare of children in their area who are in need; and (b) so far as is consistent with that duty, promote the upbringing of such children by their families, by providing a range and level of services appropriate to the children's needs*" and Section 23 stating that "*(1) Without prejudice to the generality of subsection (1) of section 22 of this Act, services provided by a local authority under that subsection shall be designed— (a) to minimise the effect on any— (i) disabled child who is within the authority's area, of his disability; and (ii) child who is within that area and is affected adversely by the disability of any other person in his family, of that other person's disability; and (b) to give those children the opportunity to lead lives which are as normal as possible.*"
5. The Equality Act 2010, including the need to make adjustments in advance of a child attending a school, making reasonable adjustments and not indirectly or directly discriminating.

## Appendix 3: Note on QToD pay proposals

An initial suggestion was made to the CPGD that giving QToDs an increment similar to the English Special Educational Needs (SEN) allowance or Welsh Additional Learning Needs (ALN) allowance would be a way of addressing the need for financial recognition of their additional study. This was based on a recognition that while this financial incentive would not in itself tackle the root causes in the decline of QToD numbers - it would help to improve the recruitment and retention of QToDs.

In England, Wales and Northern Ireland teachers may receive specific allowances in respect of certain work with children with SEN, including deaf children. Allowances in England range from a minimum of £2,384 to a maximum of £4,703, and in Wales the ALN range is set at £2,426 to £4,786. This payment must be made to teachers in special schools, or in SEN/ALN posts requiring a mandatory SEN/ALN qualification, and to teachers teaching pupils with SEN/ALN in special classes/units.

However, in Scotland the ASL system operates quite differently from that in England and Wales, with no role comparable to SENCo (Special Educational Needs Coordinator) in England or ALN co-ordinator in Wales. Different cohorts of children are also involved, with twice as many children in Scotland being recognised as having ASN (37% in 2023) as are identified as having SEN in England (17.3% in 2022-23).

However, teachers in Scotland are also paid more than teachers in England as a result of years of negotiations between the Scottish Government, COSLA and the unions. Any such allowance in Scotland would need to cover all teachers of pupils with ASN, and will therefore require the wholesale redesigning of the teacher pay structure. This therefore does not seem to be a viable option for addressing concerns about QToD pay or within the scope of the work of the Cross-Party Group on Deafness.

If it is impractical to add an ASN allowance to the Scottish teacher pay structure, the next option for the group was to explore using the scales that do exist in Scotland to recognise teachers who take on additional responsibilities such as the Principal Teacher scale. However, while the Principal Teacher role comes with a salary increase, it is designed for teachers taking on management responsibilities. The part of the QToDs' role that parents and deaf children have told us is most important to them is that QToDs are able to work directly with deaf children rather than to take on management responsibilities. It is therefore unlikely that QToDs would fit into Principal Teacher roles.

The group therefore explored the Lead Teacher role, and how this might align with the need to recognise QToDs' additional qualifications. The working group concluded that the Scottish Negotiating Committee for Teachers Lead Teacher Framework aligned with elements of the QToD role especially for peripatetic QToDs. The local authority Lead Teacher role includes the duties of a classroom teacher and local authority-wide responsibilities, including providing a lead role in the development of an area of specialism; sharing, demonstrating and modelling effective practice in their area of specialism; and leading local networks, and collaborating through and contributing to regional and national networks related to their area of specialism. Lead Teachers would also keep abreast of developments in content and methodology related to their area of specialism. ASN is specifically mentioned as an area of specialism for Lead Teachers.

Therefore, in the context of the need to recognise that significant additional study is required by a QToD (1,200 study hours including home and university study), the Lead Teacher role has the potential to be a focal point in terms of QToDs. If QToDs could be considered as Lead Teachers, this would provide both career development and validation of individual QToDs with leadership roles, and aid the building of the sustainability of ongoing specialist teaching of deaf children and young people. This conclusion has been confirmed by union representatives who wrote to the working group in February 2024 and shared that their view that:

*“Set alongside a demand for increased funding and support to create more QToD posts, QToDs taking up Lead Teacher roles would be, in our view, an argument which coheres with the wider campaign for more specialist support in Scottish education and therefore more likely to be impactful than requesting additional pay allowances for QToDs.”*

It is worth noting that the Lead Teacher role has not been taken up to any significant extent. A freedom of information request from June 2023 indicates that there were only five Full-Time Equivalent Lead Teachers at that point, all from the Scottish Borders. It would be important to draw on learning from the existing cohort in developing this proposal. However, QToDs offer an opportunity to increase use and awareness of the Lead Teacher role in Scotland, improve the provision and retention of QToDs, and benefit hundreds of deaf children and young people in Scotland.

Action to enable QToDs to be promoted as Lead Teachers would require work in the following areas:

1. The local authority Lead Teacher framework aligns well with the role of peripatetic QToDs. However, around a third of QToDs in Scotland work mainly in a resource provision or specialist school. Further work will be required to adjust the framework to better fit a classroom-based QToD.
2. The bottom of the Lead Teacher scale is higher than the top of the main teacher scale. The Lead Teacher starting salary appears to be £55,077, compared to a Principal Teacher starting at £52,896, while top of the Main Grade scale is £48,516 (<https://www.eis.org.uk/pay-and-conditions-of-service/salary-scales>). That would be a significant increase in salary, compared to Teacher of Deaf Children roles that are typically being advertised at £38,655 - £48,516 per year. However, given the current cost of qualifying as a QToD via a Master's degree can range from £7,334 to £13,000, in addition to fees to learn BSL from an accredited provider, this higher rate of pay can be justified as commensurate with expertise and level of study. An alternative approach to this variance would be to extend the Lead Teacher scale downwards to clear a lower starting salary band. Such action would close the gap between the Main Grade scale and Lead Teacher to something closer to the SEN/ALN uplift of the £2,500 – £4000 used in England and Wales.
3. COSLA support would be needed to approve the principle that all QToDs could become Lead Teachers. Without this, it is possible that some teachers in a local authority sensory service would be Lead Teachers while others were not, leading to issues with inconsistent recruitment and retention (and provision of support). It would also be important to discuss the current structure of deaf education/sensory support services in local authorities with the Heads of Sensory Services forum to understand better the options for introducing QToDs as Lead Teachers.

On this basis the report recommends the further work to be carried out in partnership with COSLA, BATOD and the teaching unions to explore what could be done to enable QToDs to be considered for Lead Teacher roles.

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## **Further information**

The Cross-party group on Deafness's purpose is act as a channel of communication between the Scottish Parliament, individuals with deafness / hearing loss and organisations working or supporting individuals with deafness / hearing loss.

For more information on the work of the group please contact Hannah Tweed, the secretary of the Cross party group and Scottish Sensory Hub Manager at the Health and Social Care Alliance Scotland (the ALLIANCE) - [hannah.tweed@alliance-scotland.org.uk](mailto:hannah.tweed@alliance-scotland.org.uk).