

**Cyflwynwyd yr ymateb hwn i ymchwiliad y [Pwyllgor Plant, Pobl Ifanc ac Addysg i weithredu diwygiadau addysg](#)**

**This response was submitted to the [Children, Young People and Education Committee inquiry into Implementation of education reforms](#)**

**IER 53**

**Ymateb gan: Royal National Institute of Blind People (RNIB)**

**Response from: Royal National Institute of Blind People (RNIB)**

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**Nodwch eich barn mewn perthynas â chylch gorchwyl yr ymchwiliad. | Record your views against the inquiry's terms of reference.**

RNIB Cymru is the largest sight loss charity in Wales, providing support and services to blind and partially sighted people, their families, friends, and carers. We aim to improve lives and empower people to adapt to sight loss and keep their independence. We work in partnership with public, private and third sector bodies across Wales to deliver projects, training, services and give information, advice, and guidance. RNIB Cymru provides tailored information, support and guidance to children and young people in Wales who have vision impairment, as well as their families. Our aim is to ensure society is inclusive of people with sight loss and that the children and young people we support can reach their full potential, enjoying the same rights and responsibilities as their sighted peers.

Vision impairment is a high need, low incidence disability and the support needed will differ greatly between individuals. For many children and young people in Wales who have vision impairment, navigating the complexities of education is hugely burdensome. Mainstream teachers and other professionals involved in education are likely to have little or no experience of supporting children and young people in Wales who have vision impairment. This leads to inequity of access, experience and outcomes within education settings. Our 2023 Freedom of Information report received responses from the vision impairment education/sensory services in all 22 Local Authorities across Wales. A key finding from the report is the patchwork of provision of services to children with vision impairment across Wales.

As a result of this, RNIB Cymru is calling the Welsh Government to embed the Curriculum Framework for Children and Young People with Vision Impairment (CFVI) into Additional Learning Needs policy. Use of the CFVI can improve understanding within education settings to ensure that there is fair

and equitable access to education, as well as the right support to maximise independence and prepare children and young people in Wales who have vision impairment for adulthood. The CFVI offers a UK wide framework for specialist and non-specialist practitioners, children and young people in Wales who have vision impairment and their families and carers to unlock and navigate necessary support and education. The CFVI helps by addressing the many issues experienced by children and young people with vision impairment, including:

- The attainment gap between children and young people with vision impairment and the general population
- Poor employment outcomes, including high vulnerability of becoming long term NEET (not in education, employment or training)
- Poor social inclusion, mental health and wellbeing
- Inconsistent provision of specialist support
- Lack of joined up working between specialist and non-specialist professionals.
- The framework has been developed in consultation with professionals, children and young people, parents and carers.

## References

Curriculum Framework for Children and Young People with Vision Impairment

[Curriculum Framework for Children and Young People with Vision Impairment | RNIB | RNIB](#)

Unlocking Education for All, Curriculum Framework for Children and Young People with Vision Impairment in Wales, 2023

[Unlocking education for all – Curriculum Framework for Children and Young People with Vision Impairment in Wales \(rnib.org.uk\)](#)

RNIB Freedom of Information Report, Wales, 2023

[Freedom of Information Reports | RNIB](#)

## RNIB Comments

- Implementation of the Curriculum for Wales in early years settings, primary schools and secondary schools.
- The level of consistency and equity of learning opportunities for pupils across Wales, given the flexibility for schools to develop their own curricula within a national framework.

Whilst RNIB Cymru appreciates the principals around the Curriculum for Wales, we're concerned that implementation could be hindered because the guidance does not contain enough detail or emphasis on developing

curricula that are inclusive for children with Additional Learning Needs, who make up a significant percentage of pupils in schools across Wales. There is no reference to the Additional Learning Needs code, which is pertinent. We feel that reference to Additional Learning Needs is necessary to raise awareness for teachers of the impact and support needs for children and young people with disabilities.

Vision impairment is a low incidence and high needs disability. Children and young people with vision impairment often require ongoing support from specialist staff including Qualified Teachers of Children and Young People with Vision Impairment (QTVIs) and Habilitation Specialists. Whilst we understand that all pupils learn differently and practice should reflect this, we are concerned that variation in curriculum design across schools could cause a lack of consistency in access to specialist support or implementation of the advice they give.

- The associated reform of qualifications to align with the Curriculum for Wales.

RNIB Cymru welcomes reforms to qualifications provided that accessibility plays an integral part in the planning and implementation process.

- Implementation of the new Additional Learning Needs (ALN) system and the effective transfer of learners from the existing Special Educational Needs (SEN) system.
- The application of the definition of ALN, compared to presently for SEN, and whether there is any 'raising of the bar' on the ground for determining eligibility for provision.

Whilst the Additional Learning Needs Act and Code has potential to open the door for more active engagement with families by schools to address any issues at the earliest possible stage, discussions with families and the findings of our 2023 Freedom of Information report show that there is still inconsistency of access to specialist support for children and young people with vision impairment.

The recent Estyn report into ALN stated that that "*Children and young people that are sight or hearing impaired are 'more likely to have ALN by virtue of the fact the impairment is likely to prevent or hinder them from making use of educational or training facilities and is likely to call for ALP'.*" (p19 & p33)

However, lack of awareness of vision impairment and its impact at school level can mean that the LA QTVI services are not always called in when needed. Estyn notes that "Terms such as 'universal', 'universal plus', 'targeted', 'specialist' and, 'specialist including multi-agency support', are being increasingly used to categorise the support and provision made by schools.

However, there is not always a common understanding of the terms or what constitutes provision under each of these categories. The extent to which provision in these categories is additional learning provision was not clear.”

RNIB Cymru is concerned that misinterpretation of the ALN Code will result in pupils with vision impairments missing out on Additional Learning Provision, thus widening the existing support and attainment gaps.

- The professional learning and other support settings are receiving to ensure effective implementation of the Curriculum for Wales and the ALN system.

RNIB Cymru believes that schools and Local Authorities must be given appropriate training and support on the law to understand when pupils require an IDP and whether the school or the Local Authority should maintain an IDP.

We note the Estyn report finding that “A few of the local authorities that we engaged with were not sufficiently aware of their statutory duty to keep additional learning provision under review.”

It is imperative that this issue is addressed as soon as possible via training for LAs on this aspect of the ALN Act and Code.

RNIB Cymru and other partners in the disability sector were given the opportunity to contribute to the Welsh Government Education Hwb, writing a playlist for education professionals on the types of ALN and disability. While this is a good start, the low incidence of vision impairment and the specialist support these pupils need mean that the most effective ongoing training and advice must come from the LA’s Vision Impairment Services. Such training must be properly resourced in order to be effective.

- Other factors potentially affecting implementation of the Curriculum for Wales and the ALN system, for example levels of funding and fall out from the pandemic.

The RNIB Cymru Freedom of Information (FOI) 2023 report highlights variation in practice and widespread geographical inequalities. Across local authorities in Wales there is a variation in service structures, practices and budgets.

- The ratio of QTVIs to CYP on active caseload varies from 1:13 to 1:85; with high caseloads, the specialists needed to teach and support the development

of specialist skills are under significant pressure in terms of time and resource

- The percentage of CYP on local authority (LA) VI service active caseloads accessing, or on a waiting list to access, habilitation support varies from below 9% to 48%, with the time from referral to an initial visit ranging from 1 week to approximately 12 months.

This patchwork of inconsistent support has the potential to leave some CYP without the support they need to access education.

- The particular challenges and opportunities facing different types of schools in varying circumstances (e.g. language medium, demographics and locality) in terms of implementing curriculum and ALN reform.

No comment at present