

Consultation Response

Call for views: Teachers of children and young people who are blind or partially sighted, deaf, or deafblind: guidance - consultation

July 2025

Sight Scotland and Sight Scotland Veterans welcome the opportunity to respond to the Scottish Government's consultation on qualifications for teachers of children and young people who are blind, partially sighted, deaf, or deafblind. As Scotland's leading charity supporting people with sight loss, we provide services, advocacy, and support programmes across Scotland. The Royal Blind School, which is part of our family of services, supports 27 pupils with complex needs, with around a quarter taking advantage of an innovative split placement approach that allow young people to benefit from specialist support while remaining connected to their local communities.

Consultation questions

Consultation on revising the Guidance on appropriate qualifications and teacher competencies for teachers of children and young people who are blind or partially sighted, deaf, or deafblind.

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on the revised language used to describe sensory impairments, specialist provision and educational needs within the draft guidance?**

The 2007 Guidance refers to “visually impaired children and young persons” and states in footnote 5 on page 8 that “The terms hearing impaired and visually impaired are used in this document since these terms are used in the Regulations. It is accepted that some may prefer that the terms deaf and blind are used”.

The Requirements for Teachers (Scotland) Regulations 2005 also refers to ‘visually impaired pupils’ and states in section 6 that “ Without prejudice to regulations 3 and 4, where, in discharging their functions under section 1 of the 1980 Act and section 2(1) of the 2000 Act, an education authority employ a teacher wholly or mainly to teach visually impaired pupils that teacher shall possess an appropriate qualification to teach such pupils.

This use of visually impaired rather than blind is in line with the change made when the Scottish Certificate of Vision Impairment replaced the BP1 form, and the Scottish Certificate of Vision Impairment now certifies someone as ‘sight impaired’ or ‘severely sight impaired’.

However, the draft guidance refers to teachers of children and young people who are blind or partially sighted rather than the language used in the 2007 Guidance or the 2005 regulations. It is not explained why this shift has been made.

It is noticeable that as well as blind or partially sighted, the draft guidance frequently uses the term visual impairment because of its standing regulations or guidance without definition or explanation. Indeed, the specialist job role is described as Qualified Teacher of the Visually Impaired, and the field of education is described as "Visual Impairment Education". In addition, ‘vision impairment education studies’ is used, and elsewhere in the document, "visually impaired pupils" appears in citations of the regulations and "vision impairment" is used when referring to the broader field.

However, the document does not make it clear whether the terms "blind or partially sighted" and "visually impaired” are identical terms and interchangeable in practice or refer to different groups.

Teachers, educational psychologists, health professionals, and families are accustomed to using "visual impairment" as the umbrella term that encompasses the full spectrum of vision conditions not correctable with glasses, whilst allowing for specific descriptions where appropriate. Creating terminological divergence between this guidance and established Scottish frameworks could complicate inter-professional communication and service coordination.

Recommendation:

We recommend the Scottish Government address these inconsistencies by retaining “visual impairment" as the primary terminology throughout the guidance, aligning with Scottish Sensory Centre guidance (University of Edinburgh, 2023), VINCYP standards, and existing local authority frameworks. This would support clearer communication across the professional network whilst maintaining person-first language ("children and young people with visual impairment").

The Scottish Government could also issue a guidance note on appropriate terminology alongside this policy, ensuring consistency across education, health, and social care documentation.

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?

We understand that the Inclusive Education offered by the University of Edinburgh’s Moray House School of Education and Sport currently requires 120 credits for a Postgraduate Diploma on either the Visually Impaired learners Pathway or the Deaf learners Pathway, with the MSc Inclusive Education requiring 180 credits.

We recognise that it is appropriate that some of the credits required for a course like this are not specific to Visual Impairment Education, Deaf Education, or Deafblind Education, for example in Research Methods.

We are therefore content with the recommended minimum of 90 credits specific to Visual Impairment Education, Deaf Education, or Deafblind Education at SCQF Masters Level 11. However, the current wording of the guidance is ambiguous about how these 90 credits fit within the studying for a programme which leads to a to a Postgraduate Diploma at 120 credits at SCQF Level 11 in Visual Impairment Education, Deaf Education

or Deafblind Education. It should be made clear in guidance that all 120 credits are required for an appropriate qualification to be gained.

**Recommendation:**

We suggest paragraph 10 of the guidance be re-written as follows:

“The appropriate qualification recommended comprises a minimum of **120 credits** at SCQF 11 Master degree level learning, of which **90 should be specific** to Visual Impairment Education, Deaf Education or Deafblind Education (gained on a programme which leads to a to a Postgraduate Diploma at SCQF Level 11 in Visual Impairment Education, Deaf Education  or Deafblind Education).”

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 / **No**

If no, please specify which areas are unclear.

The recommended route by which teachers will acquire the necessary competencies is stated as “through attending programmes at higher education institutions”. Currently there are seven programme providers in Visual Impairment Education, Deaf Education and Deafblind Education – six in England and one in Scotland, the University of Edinburgh.

The proposed competencies include the requirement that QTVIs understand the Scottish context for rights-based child and young person-centred inclusive education, have knowledge of Scottish legislation and policy including the Additional Support for Learning Dispute Resolution (Scotland) Regulations 2005 and the roles and responsibilities of a range of specialist services and agencies that work with children and young people in Scotland.

As policy and practice diverges between Scotland and England, we are concerned that attending programmes at higher education institutions outwith Scotland may not lead to teachers acquiring an appropriate understanding of Scotland specific policy and practice.

Therefore, we believe that this recommended route should be clarified to ensure that, to be part of an appropriate route, the programmes at higher education institutions must fully equip students with an understanding of the distinct Scottish context for inclusive education, including by containing course content that fully covers Scottish policy and legislation such as ASL, GIRFEC and rights under the UNCRC or, if this is not possible within the programmes of institutions outside Scotland, how this Scotland-specific knowledge and competence will be acquired.

For teachers with international qualifications and experience, there should be clear pathways for recognition of prior learning and targeted top-up training focused on Scottish-specific policy, legislation, and practice contexts. This would allow Scotland to benefit from international expertise whilst ensuring all teachers understand the Scottish framework for supporting children with visual impairment.

The guidance should specify how international qualifications will be assessed for equivalency and what additional requirements may be needed to ensure full competency in the Scottish educational context.

Recommendations:

We believe that this recommended route should be clarified to ensure that, to be part of an appropriate route, the programmes at higher education institutions should fully equip students with an understanding of the distinct Scottish context for inclusive education, including by containing course content that fully covers Scottish policy and legislation such as ASL, GIRFEC and rights under the UNCRC or alternative routes to gaining this knowledge and understanding be identified.

Therefore, for teachers with qualifications and experience from other parts of the UK or internationally, we believe there should be clear pathways for recognition of prior learning and targeted top-up training focused on Scottish-specific policy, legislation, and practice contexts. This would allow Scotland to benefit from wider pool of teachers whilst ensuring all teachers understand the Scottish framework for supporting children with sensory impairments.

The guidance should specify how qualifications obtained outside of Scotland will be assessed for equivalency and what additional requirements may be needed to ensure full competency in the Scottish educational context.

##

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?

We believe contracted UEB qualification should be essential for all Qualified Teachers of the Visually Impaired employed by local authorities to work with pupils who are visually impaired in Scotland. Current Scottish Government guidance from 2018 requires QTVI to start with Grade 1 Braille skills, with authorities responsible for ensuring pupils who need contracted Braille are taught by QTVI with all the skills they need. This recommendation would make contracted UEB the standard qualification from day one, ensuring all local authority QTVI have the complete skill set they need.

This requirement reflects practical realities in Scottish schools working within Curriculum for Excellence. Nearly all published educational materials use contracted Braille, meaning QTVI without these skills cannot give pupils proper access to curriculum materials or age-appropriate books. This creates barriers to educational equality that would go against Scotland's commitment to inclusive education under the Education (Additional Support for Learning) (Scotland) Act 2004.

Different pupils learn best through different approaches, which fits with Curriculum for Excellence's focus on personalised learning. Some learners  do better starting with uncontracted Braille before moving to contracted forms, whilst others can go straight to contracted instruction. QTVI with full Braille skills can make informed teaching decisions that serve each pupil's individual needs within Scotland's flexible curriculum.

Recent RNIB Scotland research covering 2,471 children with visual impairments found eight local authority teams have no QTVI qualified in either uncontracted or contracted Braille, despite 45 children currently using or expected to use Braille. The research also shows major geographic inequalities, with teacher-to-pupil ratios ranging from 1:16 to 1:62 across Scotland, and nearly half of authorities facing budget cuts affecting vision impairment services. This creates a serious gap where pupils needing the most specialist support cannot access QTVIs with the full skill set required. The impact on individual children cannot be understated - as one of our pupils, Jemima, shared with Sight Scotland: 'They taught me braille, it is my superpower, which lets me read and write again and now I can learn and grow but just see in a different way. When children describe Braille as their superpower, we must ensure every teacher has the complete skillset to nurture and develop that potential.

Current arrangements requiring only Grade 1 Braille initially mean QTVI may need to seek extra training when they meet pupils needing contracted Braille. Making contracted UEB qualification mandatory from the start would fill these service gaps and ensure consistent provision across all Scottish local authorities.

Recommendation:

We support this recommendation and believe it represents vital strengthening of professional standards within Scottish education. This requirement would build on the existing framework under the Requirements for Teachers (Scotland) Regulations 2005, moving from current guidance that suggests contracted UEB skills to making it a mandatory qualification standard.

Given the current shortage of specialist teachers, implementation should include proper transition time and support for existing QTVI with uncontracted Braille qualifications to develop contracted Braille skills, protecting the valuable expertise already in the system whilst raising overall standards.

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)

N/A

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?

Additional information:

The draft guidance recommends that the period of time for a teacher to obtain the appropriate qualification should be up to 3 years. The Requirements for Teachers (Scotland) Regulations 2005 provide that this is a period of 5 years.

Supportive

Not supportive

No comment

Please provide further comments

We believe that every visually impaired child or young person should receive the specialist support they need from a teacher with an appropriate qualification. However, we recognise that a transition period is helpful in allowing teachers who are in the process of obtaining a qualification to play a role in providing specialist support. It is stated in The Requirements for Teachers (Scotland) Regulations 2005 that “a teacher who does not possess a qualification as referred to in regulations 5, 6 or 7 may be employed by an education authority wholly or mainly to teach pupils who are hearing impaired, visually impaired or both hearing and visually impaired, if the education authority are satisfied that the teacher is in the process of obtaining a qualification as referred to in regulations 5, 6 or 7, provided that the aggregate period for which the teacher wholly or mainly teaches pupils who are hearing impaired, visually impaired or both hearing and visually impaired, does not exceed five years.”

However, our concern is that, whether the maximum period is the 5 years as set out in regulations, or the 3 years set out in the proposed guidance, the current guidance provides no clarity on who monitors compliance and assess the quality of teaching provided during transition periods, what enforcement mechanisms exist, or what consequences apply when the five-year period is exceeded. There's no indication whether the Scottish Government, Education Scotland, the new Chief Inspector of Education in Scotland or even the General Teaching Council for Scotland have oversight of the number of teachers in this position, and the quality of teaching they are providing. We do not believe it is appropriate to simply leave the education authority to judge whether the process is satisfactory.

These governance gaps are especially troubling given that children with vision impairment already face inconsistent provision across different local authority areas.

More broadly, the practicalities process of acquiring the qualifications required to be a specialist teacher remain unclear. The draft guidance rightly expects a stronger and clearer set of competencies and qualifications but offers no clarity on expectations around support with training costs, study leave, or broader workforce planning. This becomes particularly complex when teachers work across multiple authorities as freelance specialists, with no clear primary responsibility for ensuring ongoing competency.

Recommendation:

Further guidance should be given on the monitoring and quality assurance of teaching within transition periods, and on the expectations on local authorities around supporting teachers who wish to become QTVI or QToDs to acquire the appropriate qualifications.

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?

Additional information:

The draft guidance recommends that the period of time for a teacher to obtain the appropriate qualification should be up to three years. The Requirements for Teachers (Scotland) Regulations 2005 provide that this is a period of five years.

Changed to three years

**Kept the same**

Alternative suggestion

If alternative suggestion, please provide details

We would support retaining the five-year maximum period for a teacher to obtain the appropriate qualification whilst in the process of obtaining a qualification, while supporting moves to make sure a three-year completion becomes normal and achievable. We recognise that there may be exceptional circumstances where for an individual teacher it is appropriate to go beyond a three-year norm for qualification.

However, we would emphasise that visually impaired children and young people should not routinely taught only by teachers who do have the qualifications required, as part of long drawn-out processes of achieving qualifications. Again, this requires proper oversight of the sensory specialist teaching workforce and quality of specialist teaching in each local authority.

What are your views regarding the recommended minimum allocation of three days of study time per 20 credit course by Education Authorities to support teachers in acquiring the minimum qualifications?

**Supportive**

Not supportive

No comment

Please provide further comments

We welcome the guidance that teachers studying to become sensory specialists will require a regular allocation of time by their employing authority for study, appropriate visits, and a period of teaching practice in a setting different from their own current post.

We believe three days of study time per 20-credit course represents an appropriate time requirement commitment that we support and welcome. However, consistent implementation, alongside the other suggestions in paragraph 21 of the guidance, will require careful workforce planning, particularly for smaller local authorities with limited QTVI capacity. It is not clear how this will be monitored to ensure that every local authority aligns their practice with this recommendation.

RNIB Scotland's research shows QTVI to pupil ratios varying from 1:16 to 1:62 across Scotland, meaning that releasing teachers for study creates immediate service gaps in many authorities. With 2,471 children on active caseloads and an additional 227 "known to VI services but not actively receiving support," every day of teacher absence affects vulnerable children's educational access.

The guidance should acknowledge that study time allocation must be accompanied by robust workforce planning and funding support for temporary staffing. Rural and remote authorities face challenges with a lack of local cover options, requiring creative solutions such as temporary placement arrangements or enhanced distance learning support to maintain service continuity during study periods.

We recommend the guidance provide more details of best practice in facilitating teachers who wish to become QTVIs in embark on programmes of study, together with an appropriate oversight mechanism.

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

The proposed competency framework represents a significant and welcome evolution from the 2007 requirements; it recognises the complexity and specialised nature of visual impairment education whilst maintaining clear standards for professional development.

Scotland's existing teacher competency framework for visual impairment education, established through the 2005 Requirements for Teachers Regulations, requires teachers to possess "appropriate qualifications" beyond general teaching certification.

The proposed competency framework that introduces an enhanced three-domain structure—encompassing Professional Knowledge and Understanding, Professional Skills and Abilities, and Professional Values and Personal Commitment—provides a holistic approach that moves beyond technical skills to embrace the full professional competencies required for effective practice.

The current competencies focus primarily on school-age pupils and emphasize basic specialized knowledge including medical understanding of visual impairments, curriculum adaptation skills, assistive technology familiarity, and assessment capabilities.

The expansion to include ages 0-19 is a step in the right direction and signifies meaningful progress. Research consistently demonstrates that early intervention dramatically improves outcomes for children with visual impairments, yet the current framework inadequately addresses the critical early years.

We support NDCS's emphasis on the crucial role of specialist teachers in early years support, recognising that early intervention dramatically improves outcomes for children with sensory impairments. Local authorities must ensure adequate specialist teacher capacity to support families from identification onwards.

The explicit requirement for both contracted and uncontracted Braille represents essential strengthening of standards. Our experience at the Royal Blind School confirms that teachers must be fluent in contracted braille to provide meaningful access to curriculum materials and age-appropriate literature. The current situation, where some authorities have no teachers qualified in braille despite serving children who use it, is simply unacceptable.

The framework's emphasis on assistive technology reflects modern realities. However, we note that technology competencies must be understood as constantly evolving.

However, competencies alone cannot address systemic challenges.

Implementation must be supported by adequate funding, creative approaches to training delivery, and recognition that investing in specialist teachers represents investment in Scotland's commitment to inclusive education and children's rights.

However, the framework does not specify what oversight there will be of how well courses are delivering against the proposed framework, especially courses outwith Scotland. We have previously highlighted the issues around courses that may not fully explain the Scottish legal and policy context for supporting visually impaired children and young people.

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

N/A

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

N/A

##

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 / **No**

If no, how could this be clarified further.

We strongly support clearer definition of who is required to gain an appropriate qualification, and welcome statement set out in paragraph 12 of the draft guidance: “Where specialist provision is required for children and young people who are blind or partially sighted, deaf, or deafblind it must be provided by teachers who possess an appropriate qualification or are becoming qualified to teach children and young people with these additional support needs.”

This definition correctly focuses on on the provision of specialist support and the requirements of the children and young people, rather than on the proportion of the teacher’s time spent providing this kind of support. We believe that it is irrelevant whether a local authority employs a teacher to provide specialist support for 100% of their contracted time or for only 10% - as teacher employed by a local authority to provide specialist support, they should have the appropriate qualifications to provide that support.

The examples are helpful in illustrating why the term ‘wholly or mainly’ is problematic and outdated. Example 2 in paragraph 15 describes a situation where a teacher spends the majority of their contracted teaching hours teaching young people who are blind or partially sighted, deaf, or deafblind, and spends remaining hours teaching a specialist subject at secondary level. This teacher requires the appropriate qualifications as set out in the guidance.

However, it is not clear what would happen if a teacher spent a minority of contracted teaching hours teaching young people who are blind or partially sighted, deaf, or deafblind, and spent the majority of their time teaching on a programme of higher education, or teaching a specialist subject at secondary level.

The implication appears to be that if a child or young people who is blind or partially sighted, deaf, or deafblind is receiving specialist provision, in a situation where the teacher is only spending 49% of their contacted hours delivering specialist teaching, they would not be required to hold an appropriate qualification. This cannot be right.

Recommendation:

We would like to see an acknowledgement that whenever a teacher is employed by a local authority to deliver specialist provision that is required by a child is blind or partially sighted, deaf, or deafblind for their rights to an appropriate education under article 23 of the UNCRC to be upheld, that that teacher should hold the appropriate qualification.

Otherwise, in a local authority where all the teachers who are contacted to deliver specialist support to pupils with a sensory impairment spend the majority of their time either teaching a specialist subject to a mainstream class, or providing additional support for leaning to pupils who do not have a sensory impairment, there would be no requirement for any of their teachers to hold an appropriate qualification, despite a significant amount of specialist teaching being delivered.

We support the ALLIANCE and NDCS position that guidance should move away from statistical thresholds to focus on ensuring children requiring specialist provision for their local authorities receive support from appropriately qualified teachers.

##

Do you think the guidance is clear and easy to understand?

**Yes** / No

If no, please specify which areas are unclear.

Generally, the guidance itself is clear and easy to follow. However, as we have mentioned the lack of clarity about why the terms blind or partially sighted have replaced visual impairment, and how the different terms are defined is unhelpful.

More broadly it would assist in the clarity and understandability of the guidance if there was more information about the responsibilities education authorities have to implement the guidance, the quality assurance mechanisms, and how data on implementation will be collected to allow effective oversight

It would also be helpful if the guidance clarified funding responsibilities for training, how study leave should be facilitated and support for ongoing professional development.

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

We would wish to highlight that while the proposed strengthening of the guidance on qualifications and competences for teachers of children and young people who are visually impaired, deaf, or deafblind is welcome, the broader workforce issues around the appropriate provision of specialist teachers must also be addressed. Visually impaired children and young people, and their parents, have told us that the support they receive from specialist teachers is almost always excellent, but there are often not enough appropriately qualified specialist teachers.

This aligns with the findings of the Scottish Parliament Education, Children and Young People Committee’s Additional Support for Learning inquiry in 2024, where “the Committee was alarmed to hear there was strong evidence to suggest that the majority of ASN pupils are not having their needs met”.

It also aligns with the findings of the Audit Scotland Briefing on Additional support for learning produced in February 2025 “The Scottish Government’s decisions on resourcing are not currently based on a good understanding of additional support needs and outcomes”.

We therefore agree with the conclusion of the RNIB’s report into education provision for children and young people with vision impairment in Scotland published in May 2024 that the Scottish Government should take immediate action to boost the numbers of Qualified Teachers for Vision Impairment (QTVIs) this should include a clear and fully funded plan of action to improve recruitment and opportunities to qualify into the profession. More must be done to support retention of the specialist workforce through provision of career development opportunities.

The impact of qualified specialist teachers is perhaps best captured through the voice of one of our pupils, Jemima, who shared her experience that: 'QTVI teachers are gold dust. They 'get me' like mainstream teachers never did and give me the freedom to learn on my own and at my own speed – that makes me much more independent.'

Jemima's journey from educational uncertainty to confidence - including learning Braille which she describes as her 'superpower' and publishing poetry - demonstrates what appropriate specialist support can achieve. However, her observation that 'I wish there were more near me and in schools and colleges' reinforces our concerns about workforce capacity. The fact that she must travel far from home to access specialist education highlights the geographic inequalities of provision that qualification improvements alone cannot address.

Her words remind us that behind these policy discussions are real young people whose educational futures depend on having access to appropriately qualified teachers who understand their needs and potential.

We endorse calls from NDCS and the ALLIANCE for integrated workforce planning covering the full range of specialists supporting children with visual impairments, including habilitation specialists, educational psychologists, and communication support workers.

Therefore,  would like to see a clear workforce plan for the future of QTVIs and indeed QToDs, and this should include examination of whether financial incentives are required to encourage more teachers to undertake the specialist learning required, and whether it would be possible to have a financial recognition in specialist teachers' salaries of the additional time and qualifications required to be a QTVIs or a QToDs.

Every child with visual impairment in Scotland should have access to specialist teachers provided by their local authority who, in Jemima's words, 'get them' and provide 'the freedom to learn at their own speed.' Achieving this vision requires not just stronger qualifications but sustained commitment to building and supporting Scotland's specialist teaching workforce.