

Climate Change and Natural Resources Policy Division
Welsh Government
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Shared Purpose: Shared Future: Draft Statutory Guidance for the Well-being of Future Generations (Wales) Act 2015

About us

The National Deaf Children's Society (NDCS) Cymru is the national charity dedicated to creating a world without barriers for deaf children and young people. We support and represent the interests of deaf children and young people from birth through to independence. In referring to "deaf" we refer to all levels of hearing loss, including mild, moderate, severe, profound and temporary hearing loss.

Response to: Shared Purpose: Shared Future: Draft Statutory Guidance for the Well-being of Future Generations (Wales) Act 2015

We welcome the requirement of specified public bodies to maximise their contribution to improving the wellbeing of Wales. We agree with the seven wellbeing goals as described which together provide a comprehensive working definition of wellbeing.

The overarching aims of the Future Generations Act and the Statutory Guidance are sound and have the potential for wide reaching impact. However, we are concerned that the obligations placed on public bodies and Public Service Boards do not go far enough, particularly in terms of health outcomes.

Whilst we welcome the introduction of Wellbeing statements and Wellbeing plans respectively, we are concerned that the objectives public bodies and Public Service Boards could set to meet their obligation to positively contribute to wellbeing goals could be too narrow in scope.

It is encouraging that the Act specifies that public bodies are required to maximise their contribution to achieving each of the wellbeing goals through the setting of wellbeing objectives. However, this does not set a minimum

acceptable standard enforceable through this Act, meaning in practice improving a bad situation could be sufficient to satisfy duties a public body is under. This does not go far enough.

In difficult economic circumstances it is not unlikely that public bodies and Public Service Boards could seek to set the most easily achievable objectives to meet their obligation rather than the most beneficial ones. For children and young people with a low-incidence need, such as deafness, specific impacts to their wellbeing could easily be over-looked during the objective setting process.

With regard to the wellbeing goals, we would like adequate consideration to be given to the specific barriers facing deaf children and young people as outlined below:

A prosperous Wales, a more equal Wales

Deaf children and young people have rights under international law. The United Nations Convention on the Rights of the Child and the United Nations Convention on the Rights of Person with Disabilities both make clear that children and young people who are deaf have the right to access education, employment and training on the same basis as their peers – and to be provided with the necessary support to do so. But deaf young people still face too many barriers and challenges when transitioning into employment and training.

Research conducted in 2007 into the employment experiences of severely and profoundly deaf people, found that at a time of near full employment, deaf people were four times more likely to be unemployed than the general population. Negative attitudes from employers were seen as the main barrier to getting a job.ⁱ Deaf young people are much more likely to be unemployed than hearing peers. If they do work they are more likely to be in semi-skilled or unskilled jobs.

Data from the Department of Work and Pensions Work Choice scheme from 2011-2014 indicates that in England, Wales and Scotland 970 people with hearing and/or speech impairment achieved a job outcome out of a total of 26,660, which is about 3.65% of the total. There is no regional breakdown of referrals by primary disability. In the same period 2,790 people in Wales achieved a job outcome. Therefore, we can extrapolate that fewer than 100 people with a hearing impairment managed to get a job through Work Choice in Wales between 2011 and 2014.ⁱⁱ

Action on Hearing Loss in Northern Ireland has recently published a report on the transitions experiences of young people with hearing loss (Opening Doors).ⁱⁱⁱ The research highlights many of the barriers that young deaf people face when embarking on training or apprenticeships. These include:

- Deaf young people not aware of their rights and the requirement for employers to make reasonable adjustments under the Equality Act 2010.
- Employers and training providers being unaware of how to access the support and funding available for deaf young people in the workplace
- Employers and training providers being unaware of the needs of the deaf young person
- Employers and providers being unaware of what reasonable adjustments should be made to support deaf young people
- Lack of awareness in deaf young people of the different options available to them at 16, including apprenticeships

Careers Wales works with all children and young people to develop a transitions plan and has specific guidance on working with young people who have a statement of special

educational needs. Only a minority of deaf children and young people have a statement of SEN/ALN with most having support through Individual Education Plans (IEPs). There is a risk that the present transition planning process fails to take account of the specific needs of the majority of deaf young people. This means that many deaf young people miss out on vital support in this crucial transition period.

A healthier Wales

The All Wales Standards on Accessible Communication for People with Sensory Loss were launched by the Welsh Government in December 2013. Research by Action on Hearing Loss Cymru, RNIB Cymru and Sense Cymru, earlier in 2015 indicated that 4 out of 5 respondents requiring communication support were not asked about this.^{iv} This is partly because health care settings are not aware of the requirements outlined in the Standards and partly because deaf people are not aware that the standards exist and that they confer certain rights.

90% of deaf children have hearing parents and often assumptions are made that the parents will talk for their children in many circumstances. One example would be during GP appointments. Deaf young people, like every other young person, will reach a stage where they will want and need to visit the GP independently. Deaf young people face significant barriers when reaching this stage, including lack of deaf awareness in surgeries and lack of knowledge about accessing communication support.

In 2014 the NDCS Youth Advisory Board launched a resource to support deaf children and young people at this important stage in their lives, "My life, my health".^v We were very encouraged by the support shown by the Health Minister, Mark Drakeford AM, at the Wales launch and are pleased to report that every GP surgery in Wales has received a copy of the leaflet which outlines what health professionals can do to support deaf young people. This initiative is an example of how third sector organisations can have an impact. However, we believe that this responsibility should be shared across public services. We would anticipate that in order for the Future Generations Act to achieve wellbeing outcomes for deaf children and young people in line with their hearing peers, all public bodies will need to ensure specific engagement with them and subsequent dissemination of relevant information as exemplified by the "My life my health" campaign.

General comments

The Statutory Guidance places emphasis on the importance of consultation and engagement with stakeholders. There is a clear duty for public bodies to engage and inform those who might be impacted by wellbeing objectives. It is particularly important that a range of communication methods are used and appropriately promoted so as to ensure that deaf children and young people have sufficient opportunities to put their views forward.

In terms of written materials the following key points should be adopted to ensure that they are as accessible as possible:

- Information presented visually with use of images, animation and/or colour
- Broken down into chunks, using boxed out text, sub-headings, bullet points and bold text
- Uses simple language and avoids complex words, jargon or idioms
- Using short sentences

Further advice on making information accessible to deaf young people can be found online at: <http://www.ndcs.org.uk/document.rm?id=9325>

We would advocate all public bodies providing a variety of engagement methods to suit the diversity of communication methods used in communities in Wales.

If you require any further information regarding our feedback to this consultation please do not hesitate to contact me.

Kind regards

Kate Cabbage
Policy and Campaigns Officer

ⁱ Opportunity Blocked: The employment experiences of deaf and hard of hearing people. RNID, London, 2007.

ⁱⁱ <https://www.gov.uk/government/collections/work-choice-statistics-number-of-starts-and-referrals--2>

ⁱⁱⁱ <http://www.actiononhearingloss.org.uk/news-and-events/n-ireland/news/new-research-report-on-transitions-for-young-deaf-people.aspx>

^{iv} <http://www.actiononhearingloss.org.uk/news-and-events/wales/news/dignity-of-deaf-people-still-not-respected-by-the-health-service-in-wales.aspx>

^v <http://youngpeople.ndcsbuzz.org.uk/mylifemyhealth>