

Regulation and Inspection of Social Care (Wales) Act 2016

Phase 3 Implementation – Regulated Advocacy Services

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Consultation Response:

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About us

The National Deaf Children's Society Cymru is the national charity dedicated to creating a world without barriers for deaf children and young people.

We represent the interests and campaign for the rights of all deaf children and young people from birth until they reach independence.

In referring to deaf, we refer to all levels of hearing loss including mild to profound, unilateral and temporary.

Our Response

A good Advocacy service for deaf children and young people should include the following fundamental principles which we would like reflected in the regulations and statutory guidance for Advocacy services (referred to as "the guidance" in this document).

1) Language and Communication

Service providers must ensure that individual's language and communication needs are met.

Where required Individuals must be provided access to registered qualified BSL interpreters and any aids and equipment (for example Soundfield, radio aid or t-loop system) as may be necessary to facilitate their communication with the service provider and others.

The guidance should reflect that of the statutory guidance's for Adult Placement services regulations and Fostering services regulations and be expanded to include:

- any training or support, where appropriate, to communicate with the individual in their language of need and choice
- access, where appropriate, to additional means of communication appropriate to the individual such as PECS, TEACCH, Makaton or BSL
- use of registered qualified interpreters to communicate with the individual and service providers must not rely on the individual's family members or friends to provide this interpretation

The guidance should reference to the provision required for language and communication (i.e. Regulation 17) for any regulation where communication with the individual is required.

2) Written guides and other written documentation

Service providers must ensure written information or documentation is available in alternative forms suitable for deaf service users.

Examples include (but are not limited to):

- access to pre-recorded BSL videos or live interpretation of any written information by a registered qualified interpreter
- modified language
- use of visuals

We welcome the statutory guidance for **Regulation 15 Information about the Service** which provides a good template and it must be expanded to include all written information and documentation.

3) Deaf awareness training

Service providers should have comprehensive deaf awareness training to ensure accessible provision when proposing to provide services to deaf service users.

This training should include:

- understanding deafness and its social impact
- types of deafness/ hearing loss
- the range of equipment and technology used to support deaf children and young people
- communication needs of deaf children and young people
- good communication strategies for working with of deaf children and young people including the use of signed communication and identifying when suitably qualified interpreters are required
- the range of professionals that may work with a deaf child or young person
- how to book communication support (i.e. registered BSL interpreters)
- other organisations, alternative service providers or support available for deaf children and young people

4) Contacting the Service

Service providers must be contactable in ways that are accessible to deaf service users.

Examples include (but are not limited to):

- use of SMS
- webchat
- use of video calling (i.e. FaceTime, Skype)
- email

This is of such great importance that we strongly recommend it forms part of the statutory regulation and must be included in Regulation 15.

Other parts

Regulation 3 in regard to “suitable and accessible premises”

We welcome more information about accessibility for deaf service users and this can include examples such as:

- facilities with good acoustics and appropriate lighting
- deaf awareness for any front of house/ reception staff
- avoiding barriers to communication or access to the premises that can occur from any door entry/ intercom systems

Further information

For further information about the issues raised in this response, please do not hesitate to contact us at campaigns.wales@ndcs.org.uk.