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How do we measure the health of the nation? Proposals for a Public Health Outcomes Framework for Wales.

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.

Although we do not have a response to all of the points outlined in the consultation document, there is one specific issue that we feel compelled to address. This relates to section 5.1 of the consultation document: Areas for future consideration / development.

The consultation document outlines that sensory impairment will not have a specific indicator because either data is not currently collected or further work is needed to develop or select an appropriate indicator.

Whilst we welcome the intention to consider the feasibility and value of including sensory impairment as an indicator in the future, we consider the justification for not doing so now to be poor.

We acknowledge that data collection around sensory impairment is poor in many circumstances. However, we do not consider current poor performance as a reasonable justification for delaying the inclusion of sensory impairment as an indicator.

In terms of identifying indicators, educational attainment, employment, mental health and wellbeing and accessing healthcare would all be suitable and useful in identifying disparity in health and wellbeing outcomes between deaf and hearing young people.

Given that the Public Health Outcomes Framework will provide the vehicle for capturing and monitoring commitments set out in previous public health

documents, we are concerned that the lack of inclusion of sensory impairment as an indicator might limit scrutiny of both the suitability and delivery of public health policy from the point of view of a deaf child or young person.

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 in Wales still face too many barriers and challenges when transitioning into employment and training. This disparity has an adverse effect on their health outcomes.

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.

It is important that the Public Health Outcomes Framework captures the impact of these additional challenges faced by deaf children and young people.

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 As a result every GP surgery in Wales has received a copy of the leaflet which outlines what health professionals can do to support deaf young people.

However, without consistent and appropriate data it is impossible to challenge the provision and support for deaf children and young people.

Closing the gap between the educational attainment, employment prospects and access to health care of deaf children and young people and their hearing peers is essential for closing the gap in health and wellbeing outcomes.

We would suggest that if sensory impairment is not included as an indicator at this stage in development of the Public Health Outcomes Framework, it is essential that there is a clear pathway, with a particular timeframe, to work towards its inclusion.

If we can be of any further assistance please do not hesitate to get in touch.

Kind regards,

Kate Cabbage
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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>