

Welsh Government Consultation Document

Welsh Government Draft Equality Objectives for 2016-2020

Current Strategic Equality Plan Objectives – 2012 - 2015

Section A

The current Equality Objectives are listed below with questions we would like you to consider. It is your opportunity to shape the Welsh Government's Equality Objectives in the next four-year Strategic Equality Plan (2016-2020). We know many areas of inequality are deeply entrenched and will take many years to eradicate. For this reason, you may feel the priorities have not changed since 2012 and we therefore seek your views on whether the existing Equality Objectives should remain or change and/or whether we should include other priorities.

Objective 1

Strengthen advice, information and advocacy services to help people with protected characteristics understand and exercise their rights and make informed choices.

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

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.

We agree that this objective should continue to be prioritised. We believe that it is particularly important for children and young people with protected characteristics to have access to more and better advice, information and advocacy services.

At NDCS Cymru we support deaf children and young people of all ages and often find that deaf young people transitioning into adulthood and independence lack knowledge and awareness of their rights and of the support available to them. One example is the Access to Work scheme which can provide communication support in the workplace for deaf people. Another example is in relation to healthcare in 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.¹ 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 the standards exist and that they DO have certain rights.

NDCS Cymru believes that there is a role for the Children's Commissioner in strengthening advice, information and advocacy for children and young people with other protected characteristics. In her first week in her role the present Children's Commissioner, Prof. Sally Holland, said, *"Some groups of children are hidden from view – children in care, children with disabilities, children with mental health issues just to name a few. I don't want them to fade from our vision. I don't want them to be passive citizens, but enabled to be active, demanding and contributing citizens too. The challenge for us all is to create a country which values children as citizens right here and now."*

We would welcome a statutory duty on the Children's Commissioner to provide advice, information and advocacy for children with other protected characteristics.

We would also welcome an increased awareness of children and young people's rights within the national curriculum. There is a golden opportunity at present, with the reform of the curriculum following the Donaldson report, to embed awareness of rights in every school. At NDCS Cymru we believe that it is especially important for deaf young people to have a better understanding of their rights as they transition from school into further and higher education, apprenticeships or into work. Lack of awareness of rights and lack of information to be able to make informed choices could lead to deaf young people becoming NEET, as outlined below.

Any network or organisation offering information and advocacy service should take into account the specific needs of children and young people with disabilities. They should also ensure that all their services are fully accessible to deaf children and young people, which is not always the case at present.

Objective 2

Work with partners to identify and address the causes of the gender, ethnicity and disability pay and employment differences.

¹ <http://www.actiononhearingloss.org.uk/news-and-events/wales/news/dignity-of-deaf-people-still-not-respected-by-the-health-service-in-wales.aspx>

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

NDCS Cymru does not have a view on this issue

Objective 3

Reduce the numbers of young people not in education, employment or training (NEET).

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

We agree that this issue should continue to be prioritised in an equality objective.

Deafness is not a learning disability and given appropriate support a deaf young person can achieve the same things that all young people aspire to: to do well at school, college, in an apprenticeship or at university and to build a career. However, this support is not always in place and as a result deaf young people can face a number of barriers to achievement and are at risk of being NEET.

It is also true that young people who have learning difficulties or complex needs are more likely to have a hearing loss than the general population and that hearing loss might often be undetected.² It is important that their deafness is considered alongside any other needs.

Deaf young people face substantial barriers entering into training and employment. 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.³ 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.

The Welsh Government's proposals for an Additional Learning Needs Reform

² U. Hild, C. Hey, U. Baumann, J. Montgomery, H. A. Euler, K. Neumann (2008); Study: High prevalence of hearing disorders at the Special Olympics indicate need to screen persons with intellectual disability

³ *Opportunity Blocked: The employment experiences of deaf and hard of hearing people.* RNID, London, 2007.

Bill could be used to address some of these issues. The draft Bill proposes introducing Individual Development Plans for all children and young people with additional learning needs from birth to 25. At the moment the proposal is that only young people in FE colleges would be entitled to an IDP after the age of 19. NDCS Cymru wishes to see this entitlement extended to young people undertaking apprenticeships and entering HEIs. We would also wish to see a clear section in the IDP on transition planning in order to help prepare young people for the world of work and further and higher education. This could help address some of the issues faced by young people with additional learning needs at risk of becoming NEET.

NDCS Scotland has worked with Skills Development Scotland and Donaldson School for the Deaf to produce a resource, "Template for Success" which could be used as a benchmark for supporting young people transitioning into employment and post-16 education.⁴

Objective 4

Reduce the incidence of all forms of violence against women, domestic abuse, 'honour' based violence, hate crime, bullying and elder abuse.

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

We have no view on this objective

Objective 5

Tackle barriers and support disabled people so that they can live independently and exercise choice and control in their daily lives.

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

⁴ http://www.ndcs.org.uk/about_us/campaign_with_us/scotland/campaign_news/a_template_for.html

NDCS Cymru believes that this objective should be strengthened to include children and young people.

90% of deaf children have hearing parents and often assumptions are made that the parents will talk for the children in many circumstances. One example would be in health and specifically GP appointments. Deaf young people, like every other young person, will reach a stage when 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".⁵ 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 help disabled people to support independence, but this responsibility should be shared across society and public services.

Objective 6

Put the needs of service users at the heart of delivery in key public services, in particular health, housing and social services, so that they are responsive to the needs of people with protected characteristics.

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

We agree that this should continue to be prioritised as an equality objective and would strongly recommend that education be added as a key public service.

Much work is being done at the moment to support children and young people with disabilities and additional learning needs in education with a draft Reform Bill about to be published for pre-legislative scrutiny. It is anticipated that there will be substantial reform in the way children and young people with ALN are assessed and supported. A central theme of the reform is that a person centred approach is adopted. This will be a significant change in approach for many education authorities and NDCS Cymru is pleased to see that the

⁵ <http://youngpeople.ndcsbuzz.org.uk/mylifemyhealth>

Welsh Government is already providing training for LEAs in the new PCP approach. Nevertheless, it will be a challenge for LEAs to ensure that all staff involved with assessing and delivering support for children and young people with ALN are fully trained in this new approach. Including education services in this objective will support the government's existing commitment to children and young people with ALN.

Objective 7

Improve the engagement and participation of under represented groups in public appointments.

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

NDCS Cymru does not have a view on this objective.

Objective 8

This objective looks at equality barriers internally for Welsh government staff.

Create a more inclusive workplace that promotes equality of opportunity for staff with protected characteristics through improved employee engagement and increase awareness of learning and development opportunities that are accessible to all staff.

1. Do you think this issue should continue to be prioritised in an equality objective for the Welsh Government in 2016-20?
2. If yes, do you think it needs to be updated and if so, how?
3. If you think it is no longer a priority as an equality objective, why is this?

NDCS Cymru has no view on this objective