

3. Do the flowcharts adequately reflect the process for managing individual cases? If not please specify which flowchart and how it could be improved.

Yes **yes**

If no please specify: Yes

4. We would like to know your views on the effects that the guidance would have on the Welsh language, specifically on

- i) opportunities for people to use Welsh; and
- ii) on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please specify:

5. The Welsh Government is interested in understanding whether the proposals in this consultation document regarding this guidance will have an impact on groups with protected characteristics. Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation. Do you think that the proposals in this consultation will have any positive impacts on groups with protected characteristics? If so, which and why/why not?

Yes

No

Please specify:

There is no mention of disability or any other protected characteristic throughout the document. Whilst this must be deliberate we cannot state whether this will therefore have a positive or a negative impact on those groups.

We look forward to the revised *All Wales Protection Procedures* which should make clear the additional risks for example that deaf and disabled children are subject to abuse and neglect and the required steps needed to ensure such children are safeguarded. For

example by seeking additional advice and guidance from a professional with expertise in the child's disability.

6. Do you think that the proposals in this consultation will have any negative impacts on groups with protected characteristics? If so, which and why/why not?

Yes

No

Please specify:

Please refer to our answer at 5 above.

7. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to tell us about them

1. We feel that the draft title for paragraph 19 (page 8) should instead read;

'Language Requirements',

This is because this paragraph refers to all languages, however the title states *'Welsh'*, which could confuse readers and may water down the point about the need to meet the range of potential first languages of individuals, of which Welsh may be one.

We would recommend that the word *'Welsh'* is removed here and a new title on the following paragraph 20 stating *'Welsh language'* is inserted here, given that this paragraph is specifically about Welsh.

2. paragraph 35 (page 11)

Under the heading *'neglect'*

We would suggest the following is inserted as highlighted

*failure to use prescribed medical equipment,
failure to meet the children's language needs*

Hearing aids are medical equipment and where these are required by deaf children who are learning language through oral/aural approach it is vital that they are promoted by parents/carers and professionals. Without this such children will miss language learning opportunities which are critical in the early years and will have long term detrimental consequences for their well-being that they will take into adulthood.

Failure to meet the language needs relates not only to children whose principle communication is through other languages e.g British Sign Language, but who can only communicate through augmented communication modes. Again where such children are not supported in their language and communication needs by their parents/carers and significant professionals this will have similar long term detrimental effects to their welfare and will constitute neglect.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: