

# Action on Disability: the Right to Independent Living

## National Deaf Children's Society Cymru Response

January 2019



### About us

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

### Response

The National Deaf Children's Society Cymru welcomes the Welsh Government's action plan on the right to independent living for disabled people. As identified within the consultation document, deafness can present a number of barriers to independent living given the hearing-orientated nature of the world in which we live.

Whilst there are elements of the action plan that we welcome, we believe further improvements could be made to ensure the action plan delivers for deaf children and young people in Wales. We have highlighted these suggestions throughout our response.

### Prosperous and Secure

We are pleased the report acknowledges the barriers disabled people are facing in accessing employment in Wales and the urgent need to address this issue.

Deaf young people on the National Deaf Children's Society UK Youth Advisory Board tell us that improved support is needed so that they can access employment and fulfil their career ambitions. In particular, our Youth Advisory Board has identified issues with:

- A lack of awareness of support available to disabled people in the workplace (e.g. Access to Work and rights under the Equality Act), both among employers and disabled young people themselves.
- Misconceptions around deafness preventing people from being able to do certain jobs. For example, often people have reservations around the health and safety of deaf employees in the building industry. However, adaptations can be made to address these concerns.
- A lack of awareness of support for disabled students at university (e.g. Disabled Students Allowance).
- A general culture of low expectations for deaf young people. With appropriate support, deaf young people can achieve on a par with their hearing peers.
- A lack of access to tailored careers information.

We would welcome the opportunity to work with the Welsh Government on the actions identified to address issues in accessing employment. In particular, we would urge the Welsh Government to consider the following points:

- Utilising and promoting our existing and up-and-coming resources, which seek to provide advice to deaf young people and the professionals supporting them. We are currently developing video resources which will challenge myths around deafness limiting career choices.
- Raising awareness of the DWP Access to Work scheme and disability rights among deaf young people. Many deaf young people are unaware that this support is available to them.
- Improved careers support at schools and FEIs. In particular, we are concerned that the current Draft Additional Learning Needs Code for Wales does not contain appropriate detail or emphasis on the need to provide tailored careers advice for ALN learners. These learners are particularly vulnerable to becoming NEET. We believe clear and consistent duties are required to ensure these learners receive appropriate careers advice and support.
- Working with us to ensure the bespoke tool-kit, guidance and training for the Work Based Learning provider network identified in the Welsh Government action plan contains relevant information with regard to deafness.
- Given the wide-spread misconceptions around deafness and deaf access issues, we would welcome a deaf specific element to the proposed Welsh disability award scheme for employers, as identified in action eight.

## Healthy and Active

We are pleased to note that the document highlights the barriers faced by those with a sensory impairment in accessing health and social care services. In particular, the acknowledgment that young disabled people are facing particular challenges when transitioning into adulthood. Indeed, being deaf in a hearing orientated society can present certain challenges around independent living and deaf young people have told us they would like support in this regard.

We also would agree there is a lack of awareness among disabled young people and their families about their rights. Furthermore, it is to be noted that deaf young people can be particularly vulnerable to experience difficulties with emotional wellbeing due to the communication barriers they can face and the social isolation that can result. Research also demonstrates that deaf young people can be particularly vulnerable as victims of abuse or bullying.

In light of these points, we welcome many of the actions identified within this area of the proposed action plan. In particular, we wish to highlight the following:

- We were pleased with the development of the *All Wales Standards for Communication and Information for People with a Sensory Loss*. We were concerned that some level of accountability is required to ensure the standards work well in practice. We therefore, welcome action one, which commits to monitoring the use of the standards in secondary care settings. However, we would urge the Welsh Government to commit to further monitoring of the standards across the wider healthcare settings.
- We would welcome the opportunity to work with the Welsh Government to assist with providing an online digital platform for citizens to give them information around their health and well-being. In particular, we would like to share guidance around ensuring that such a digital platform is accessible to the young deaf population. Furthermore, there are resources that we could share such as our *My Life, My Health* resources. These seek to empower deaf young people to achieve improved communication with health professionals. For more information, please visit: [http://www.ndcs.org.uk/family\\_support/positive\\_parenting\\_families/my\\_life\\_my\\_health.html](http://www.ndcs.org.uk/family_support/positive_parenting_families/my_life_my_health.html).

## **Ambitious and Learning**

As the document points out, disabled young people can face barriers in reaching their full educational potential. This is certainly the case for deaf young people in Wales. In 2017, deaf learners were 26.2% less likely to achieve A\*-C grades in the core subjects of English/Welsh language, Maths and Science than their hearing peers. Deafness is not a learning disability and with the appropriate support, these learners should be achieving on a par with their hearing peers.

We agree with the document that a culture of low expectations for disabled learners and issues around bullying need to be addressed. We also agree that there is a requirement to improve access to families to support learning in the earliest stages of a child's life.

In considering the Welsh Government's identified actions for this area of work, we would make the following suggestions:

- We welcome action one. In particular, we would wish to see greater development of and investment in specialist services to deliver support for early years deaf children and their families following the introduction of the Additional Learning Needs and Education Tribunal Wales Act in September 2020. We are concerned there may not be enough emphasis on workforce planning to deliver support in practice for the younger age range of learners when the act goes live.

We would also wish to highlight concerns around the barriers families of young deaf children face in accessing sign language courses. The vast majority (around 90%) of deaf babies are born to parents with no prior experience of deafness. It is essential that these families are supported to develop effective communication with their child in the

earliest stages. For many, this will include learning sign language. However, cost and availability of relevant classes currently make this difficult for families. This is an issue that the Children's Commissioner has also highlighted and we urge the Welsh Government to take action.

- With regard to action two and accessible opportunities to play, we would like to work with the Welsh Government to highlight our resources and support to organisations to help them become "deaf friendly." More information is available at: [http://www.ndcs.org.uk/me2/are\\_you\\_an\\_organisation/index.html](http://www.ndcs.org.uk/me2/are_you_an_organisation/index.html).
- We would welcome the opportunity to work with the Welsh Government and local authorities on the next CSA to consider how childcare is meeting the specific needs of deaf children across the authorities. Indeed, this is particularly relevant given the high prevalence of glue ear and temporary hearing loss in children under five years of age. We were particularly concerned by the recent [review of the childcare offer pilots](#). The review indicated that there was a lack of uptake of funding for adaptations to childcare placements for learners with additional learning needs. We are concerned that this is likely to be a lack of awareness that such adaptations are required.
- In relation to action four in this section. We believe it is essential that children with ALN are supported in the early years to provide firm foundations for their future educational and social development and welcome that, the new Additional Learning Needs and Education Tribunal Wales Act will entitle children aged 0-5 to a support plan. However, we have reservations around whether local authorities are appropriately planning their capacity and workforce to deliver such support from September 2020.
- With regard to action five, we have concerns that funding issues need to be addressed to ensure learners with learning disabilities and disabilities can access post-16 education. Currently, local authorities are not statutorily obliged to provide free transport to ALN learners that would otherwise struggle to access FE. Given the current economic climate, a number of local authorities have recently sought to cut this funding support. We are aware that the Welsh Government has committed to review statutory guidance around transport for learners. We urge that this review is conducted as a matter of urgency with key consideration to enhancing local authority responsibilities to ensure that transport does not present a barrier for vulnerable ALN learners in accessing FE provision.

Furthermore, we are aware of plans to devolve funding for specialist FE placements to local authorities as part of the RSG, and to create a formula for the allocation of ALN funds to FEIs. We are conscious that such funding is not to be ring-fenced. As such, we are particularly keen to ascertain how the Welsh Government intends to ensure that local authorities and FEIs appropriately meet the responsibilities that come with the devolution of these funding streams.

- With regard to action six, we are conscious that Disabled Students Allowance (DSA) is crucial for many deaf learners to access Higher Education in an equitable manner. We would be nervous of proposals to adopt a similar approach to that taken in England, which has been problematic. We would wish to be involved in any such considerations so that we can advise on the impact for deaf learners, who, as a group of learners face a

particular and varied set of access requirements. We would also welcome consideration of how awareness of DSA could be improved among young disabled people applying for university places.

- As part of action seven, we would welcome the opportunity for the Welsh Government to promote our anti-bullying materials.
- Similarly with regard to action eight, we would welcome the opportunity to work with the Welsh Government to ensure that such a service includes or signposts to relevant information to support deaf young people and their families. The National Deaf Children's Society offers a number of free resources and services in this regard.

## United and Connected

We are pleased to see these issues highlighted within the document. Deaf young people face many barriers in accessing services generally and we would welcome any opportunity to work with the Welsh Government to address these issues.

We would also like to take this opportunity to highlight our broad support for the petition, *P-05-806 We call for all premises in Wales to be awarded an Access Certificate number similar to the Food Hygiene Certificate*. This petition is currently being considered by the Petitions Committee and calls on the Welsh Government to operate a door scoring system on accessibility of a venue, including the needs of hearing impaired people.

## Further information

For more information on any of the points raised within this consultation, please contact [campaigns.wales@ndcs.org.uk](mailto:campaigns.wales@ndcs.org.uk).