

# Talk with Me: Speech, language and communication delivery plan 2020 to 2021



April 2020

## Response by the National Deaf Children's Society Cymru

### 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.

We support deaf children and young people with all levels of hearing loss from mild to profound, including those with a unilateral loss (hearing loss in one ear) and temporary hearing loss.

### Our Response

#### Key points

The National Deaf Children's Society Cymru believes that all children must be supported to develop strong language and communication skills in their formative years. Tailored and child-specific approaches are essential in order to ensure that deaf children do not begin their developmental journey at a disadvantage to their hearing peers.

We believe there needs to be a reassessment of the current early years speech, language and communication support, especially in relation to deaf children. The attainment gap at Foundation phase is currently the highest since our records began in 2012. The relative gap between deaf children and their peers now stands at its highest level. **In 2019, deaf children were 20.8% less likely to achieve the core subject indicator than their hearing peers at Foundation Phase.**<sup>1</sup> Deafness is not a learning disability and, with appropriate support, deaf children should be able to achieve on a par with their hearing peers.

The National Deaf Children's Society Cymru is keen to work with the Welsh Government to reduce this attainment gap – both through its upcoming Additional Learning Needs reforms and the new Speech, Language and Communication Delivery Plan. We would like to ensure that these areas of work provide deaf children aged 0-5 with the individualised support they need to develop effective language and communication skills. After all, this is key to a child's social, emotional and intellectual development.

---

<sup>1</sup> Calculated from Welsh Government PLASC statistics, see <https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Level-Annual-School-Census/Special-Educational-Needs>.

We'd also like to reiterate that speech, language and communication difficulties can be a sign of undiagnosed hearing loss or of a temporary hearing loss. Indeed, many children will experience an episode of temporary hearing loss in their early years as a result of glue ear. It would, therefore, be a worthwhile opportunity to equip frontline staff with information and materials to help identify cases where a hearing loss may be suspected.

We welcome the opportunity to respond to the Welsh Government's consultation: *Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*<sup>2</sup>. We have responded to each objective separately. Please find our response below.

## Objective 1- Raise Public awareness<sup>3</sup>

**Key action 1. To promote key messages to parents about the importance of talking, engaging and playing with children in the early years to develop language acquisition<sup>4</sup>.**

The National Deaf Children's Society Cymru agrees that parents are key in supporting their child's early year development and language acquisition. However, it is important to note that the vast majority (around 90%) of deaf children are born to parents who have no previous experience of deafness. For these families, diagnosis can be a confusing time and they may need support in navigating choices to determine which mode of communication works best both for them and in developing communication with their deaf child.

### Language

We note that the delivery plan has a strong emphasis on spoken language. It would be helpful to ensure that campaign messaging encompasses the importance of communication in the round, including sign language. It would also be helpful to emphasise the importance of ensuring you have a child's attention before speaking to them and that the child can see your face. This is key for children who are deaf or experiencing a temporary hearing loss, but is also helpful for children more generally.

At the National Deaf Children's Society Cymru, we support parents to make an informed choice as to which communication method would be most suitable for their child. For some, this may be an oral approach to communication, but for others this might be sign language or even a mixture of sign and spoken language. For many parents, a severe shortage and lack of access to sign language classes creates substantial barriers, as identified within the recently published *Independent Review of BSL Provision for Adults in Wales*.<sup>5</sup> Campaigns that promote key messages to parents about the importance of engaging and talking to their child may be met with frustration for parents who desperately wish to communicate with their child and support

---

<sup>2</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>3</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.9. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>4</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.9. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>5</sup> Bowen, R, Holtom D, (2020). *Independent Review of BSL Provision for Adults in Wales*. Cardiff: Welsh Government, GSR report number 4/2020. Available at: <https://gov.wales/independent-review-british-sign-language-bsl-provisionadults-wales>

their developmental needs, but are being prevented from doing so. We believe that the Welsh Government should support parents to access BSL classes that are targeted to the communication needs of children.

We would also urge that the awareness campaign gives consideration to the sensitivities for parents of children who are facing concerns around communication as a result of complex needs.

## Technology

For many children, technology, such as radio aids, are essential tools for communication and, in turn, for their emotional, educational and social development. Hearing aids and cochlear implants do not restore typical hearing levels and, for many hours of the day, deaf children are in locations where the level of background noise is such that the benefits of these listening devices are limited. Homes can be a noisy environment, especially in households where there is more than one child. In these cases, the provision of radio aids can support children's language and communication development by allowing speech to be heard more clearly above any background noise – thereby assisting with linguistic development.

We would recommend that the Welsh Government awareness campaign encompasses imagery of children using these devices.

We would also recommend that, as separate piece of work, the Welsh Government seeks to ensure that local authorities are able to provide such key devices to families of deaf children as part of their Individual Development plan.

### ***Activity 1.1 The Welsh Government will undertake a national publicity campaign<sup>6</sup>.***

Representation and inclusivity in advertising and publicity campaigns is essential to ensuring all members of society feel included. As the United Nations highlights, by 'increasing the awareness and understanding of disability issues and the diversity of persons with disabilities and their situations, the media can actively contribute to an effective and successful integration of persons with disabilities in all aspects of societal life'<sup>7</sup>. If the national publicity campaign features depictions of families, we would hope that the Welsh Government have secured a wide range of representation, including children with ALN, deaf children and their families.

### ***Activity 1.7- Public Health Wales is currently producing a suite of parental information resources with a view to replacing Bump, Baby and Beyond. We will seek to ensure that SLC awareness will be part of the new resources<sup>8</sup>.***

---

<sup>6</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.9. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>7</sup> United Nations, *Disability and the Media*. Available at: <https://www.un.org/development/desa/disabilities/resources/disability-and-the-media.html>

<sup>8</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.10. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

The National Deaf Children's Society Cymru would have welcomed the opportunity to have fed into the new *Bump, Baby and Beyond*. We know that half of deaf children become deaf during childhood<sup>9</sup> and that very many children will experience temporary deafness through glue ear in the early years. As such, it would be helpful for parents to be mindful of key factors that may indicate a hearing loss and to signpost to further information to support those who have a child diagnosed with a hearing loss. However, our understanding is that the redraft of this document has already taken place. We would welcome the opportunity to work with the Welsh Government on the accompanying website. Please do get in contact – our details can be found at the end of this response.

## **Objective 2: Improve the assessment of SLC in children (Early Years)<sup>10</sup>**

***Activity 2.1. To ensure there is consistency in the assessment of children's SLC needs, following the review of WellComm, any decision to either continue with WellComm or introduce a new screening tool will be consulted on with the aim of developing a consistent approach throughout Wales.<sup>11</sup>***

Deafness is not a learning disability. While deaf children face barriers as a result of living in a hearing orientated society, with appropriate support for children and their families, deaf children need not be left behind on language development.

The National Deaf Children's Society Cymru is aware that the concurrent validity of the Wellcomm Early Years Assessment Tool was tested with reference to the NRDLs 4 and PLS 5, which are other assessment tools often used with deaf children. The new form of the Wellcomm toolkit can be appropriate for use with deaf children who have an oral approach to communication. However, we would recommend that it should be utilised alongside resources that offer deaf specific information and advice. For example, our resource *Success from the Start: a Developmental resource for the families of deaf children 0-3*, which was published this year. The National Deaf Children's Society also offers a range of other free publications to support families of deaf children and also professionals. More information is available on our website at [www.ndcs.org.uk](http://www.ndcs.org.uk).

However, it is important to highlight that this tool is **not** appropriate for those deaf children who use BSL. As part of its plans, we would urge the Welsh Government to consider how children who are signers can be appropriately and consistently assessed so that their language development is also monitored. It is important that the Welsh Government work with Speech and Language Therapists to ascertain a tool to use with BSL children. There are a number of tests on the market but the two most used are the **British Sign Language Receptive test** and **The BSL Production test**. The **British Sign Language Receptive test** was standardized on children who used BSL, measures comprehension of BSL grammar in children aged 3-13 years and enables professionals working with deaf children to make a baseline assessment, identify

---

<sup>9</sup> Fortnum et al. (2001). *Technology Appraisal of School Entry Screening* (2007). 'Prevalence of permanent childhood hearing impairment in the United Kingdom and implications for universal neonatal hearing screening: questionnaire based ascertainment study'; *BMJ* 2001; 323:536

<sup>10</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.11. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>11</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.11. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

language difficulties, and evaluate the outcomes of therapy programmes. **The BSL Production test** does the same for productive language but for 4-14 year olds<sup>12</sup>. However, this test requires delivery by a native, or high level, BSL user who has been on a training course.

Furthermore, it is important to acknowledge that there are some concerns about the scoring of WellComm being greatly linked to expected progression, without allowance for additional learning needs. This could be disheartening for families of children who have complex needs or learning difficulties. Seeing so many scores in the 'red' could be demoralising. In rolling this screening tool out, we would urge that further consideration be given as to how screening would work for these children and how parents would be subsequently supported.

The National Deaf Children's Society also notes that the information on using the Wellcomm tool with languages other than English does not mention Welsh. Revision and consideration of a standardisation sample of Welsh native speakers (including an appropriate number of deaf children) would be needed.

***Activity 2.4 An assessment of Care Inspectorate Wales level of training needs in respect of children's early language development will be undertaken to help inspectors gain a better understanding and appreciation of children's early language development. Following the assessment it has been agreed that, where appropriate, inspectors will receive introductory training in children's early language development provided by the Royal College of Speech and Language Therapists.***<sup>13</sup>

The National Deaf Children's Society Cymru would like to ask if the training contains specific guidance on deafness. This is particularly relevant given the high incidence of temporary deafness and glue ear within the early years.

The National Deaf Children's Society recently worked with Estyn to develop guidance on deafness for school and FE inspections and would welcome the opportunity to do similar for inspectors of childcare settings.

## Further Observations

### **The need for specialist speech and language therapists.**

There does not appear to be reference within the *Talk With Me* consultation document to specialist speech and language therapy. As such, we wanted to take this opportunity to highlight the important role that specialist speech and language therapists can play in working with deaf children. We are aware that access to a specialist speech and language therapist can be a postcode lottery for families of deaf children in Wales at present and would urge the Welsh Government to give further consideration to this issue within its wider initiative on speech and language therapy.

---

<sup>12</sup> The BSL Production test ( Herman.R, Grove.N, Morgan.G, Sutherland.H, & Woll.B. 2004).

<sup>13</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.11. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

A specialist speech and language therapist will have developed additional expertise in working with deafness and can:

- undertake differential diagnoses, taking into account conditions such as autism, auditory neuropathy disorder and auditory processing disorder and specific language impairments
- recognise where good speech intelligibility in a child may mask any underlying problems or issues
- be able to work effectively with deaf children who use sign language
- support speech/sound production skills in deaf children
- help develop skills in pragmatics and wider social interaction skills, both verbal and non-verbal.

A specification for the role of a specialist speech and language therapist has been produced by the Royal College of Speech and Language Therapists. You can find the information here: <https://www.rcslt.org/speech-and-language-therapy/clinical-information/deafness#section-3>

It is important that Teachers of the Deaf and speech and language therapists work effectively together around the child. In particular, therapists should ensure that Teachers of the Deaf are familiar with and can support the interventions being used with the child so that ongoing support can be provided (and vice versa).

The Royal College of Speech and Language Therapists recently issued best practise guidance on working with Teachers of the Deaf. It would be a great resource during the planning and delivery of support <https://www.rcslt.org/-/media/docs/clinical-guidance/rcslt-batod-guidance.pdf>

## **Glue Ear**

Whilst not all children are permanently deaf, children between 2-5 years old are the demographic most likely to experience glue ear. With 8/10 children experiencing Glue Ear before the age of 10, it is essential that deaf friendly ways of working are in place across mainstream provision to ensure that no child loses out on essential speech, language and communication development.

## **BSL**

We'd like to reiterate that BSL is an official recognised language in Wales and any speech, language and communication assessment must take this into account.

## **Culture of low expectation**

Professionals should not have lower speech, language and communication progression expectations for deaf children. With the right support, they should be on par with hearing peers (accounting for all other mitigating factors).

### **Objective 3: Upskill the childcare workforce and relevant health professionals to address SLC needs.<sup>14</sup>**

***Activity 3.1 The Welsh Government's Education Directorate is working with the South East Wales consortium (SEWC) to develop and pilot an SLC training pathway for staff in the childcare workforce, aligned with descriptors from the ALN Act. The pathway has been designed to align with the ALN transformation programme and the SLC Framework. The pathway is intended as a tool that childcare practitioners can use to determine their own training needs<sup>15</sup>.***

As identified elsewhere in this response, the National Deaf Children's Society Cymru acknowledges the important role that frontline professionals play in a child's linguistic development and believes that raising awareness of SLC would be greatly beneficial. Given the high incidence of temporary hearing loss in the early years, and the key role that such professionals play in identifying children who require support plan (IDP) under the new ALN Act, we would urge that such training includes a basic level of deaf awareness and of factors which may indicate a hearing loss. It is also worth noting that communication tips recommended for working with deaf children are also likely to be beneficial for children more generally.

While it is helpful for frontline staff to have a basic level of deaf awareness, the National Deaf Children's Society Cymru wishes to emphasise that this does not reduce the need to seek specialist advice from professionals such as speech and language therapists and teachers of the deaf. Deafness affects children very differently and support from specialists is imperative to ensure that individualised and tailored support is available.

We welcome the extension of support plans to the 0-5 age range under the new ALN Act and believe that deaf children would particularly benefit from such a support plan in the early years. Childcare practitioners can play a vital role in referring children for an IDP. As such, we would urge that the training helps childcare providers to develop links with their local EYALNLO as the key professional for co-ordinating plans and to be aware that deaf children should be eligible for such plans.

We have concerns about childcare practitioners being able to identify their own training needs where deaf children are concerned. It is our experience, organisation wide, that many workers (and indeed the general public) are unaware that children with hearing aids etc. are deaf. As previously mentioned, hearing aids and cochlear implants do not restore typical hearing levels and there is a misconception that children who use such devices do not require staff to adopt any deaf specific ways of working.

***Activity 3.3 Allied health professionals (AHPs) work with children, young people and their families to help them protect and improve their health and well-being. Including speech and***

---

<sup>14</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.13. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>15</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.13. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

**language communication skill. This will be delivered as part of the new AHP Framework implementation programme.<sup>16</sup>**

We believe that this training should include ALN specific and deaf specific training. It is vital that all professionals working with deaf children are able to meet their needs.

**Activity 3.5. It is recognised specific skills are required for practitioners in Welsh-medium settings employing Welsh language immersion techniques. Training for practitioners working in Cylchoedd Meithrin to develop Welsh language immersion methodologies has been rolled out across Wales in 2019-20. Building on this, we will ensure workforce development is a key component of any further steps undertaken to strengthen Welsh language immersion provision.<sup>17</sup>**

It is imperative that families of deaf children are able to make the same informed choices on English/Welsh medium education as other families. As such, it is important to ensure that Welsh-medium workforce development and training ensures appropriate support for deaf children and sign language users can be delivered in the Welsh medium.

#### **Objective 4: Embed SLC in Welsh Government policies<sup>18</sup>**

**Activity 4.1 The Welsh Government is developing an integrated approach to early childhood education and care (ECEC) which will be based on key principles of child development. The aim of the single system is to ensure a consistency and coherency for children, providers and parents<sup>19</sup>.**

The National Deaf Children's Society Cymru would welcome the opportunity to feed into this work. We can provide information and learning materials (for example, see <https://www.ndcs.org.uk/information-and-support/being-deaf-friendly/information-for-professionals/early-years-education/>). We would appreciate and welcome contact with the relevant department to help facilitate this, our contact details are at the end of this response.

**Activity 4.4 Working Wales provides employability advice and guidance services to individuals in Wales.<sup>20</sup>**

The National Deaf Children's Society recently launched an exciting new campaign, developed by deaf young people, called *Deaf Works Everywhere*. Deaf Works Everywhere is a campaign to get more deaf young people into work – and into jobs that inspire them. You can read more about

---

<sup>16</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.14. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>17</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.14. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>18</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.15. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>19</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.15. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>20</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.16. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

it here <https://www.ndcs.org.uk/information-and-support/education-and-learning/deaf-works-everywhere/>.

At The National Deaf Children's Society Cymru, we are open and welcome to supporting *Working Wales* in providing employment and careers advice to deaf attendees as well as staff training as required. Please contact us for more information.

***Activity 4.5 The current suite of employability programmes, Traineeships, ReAct, Jobs Growth Wales, Access and the Employability Skills Programme, is intended to be replaced by one programme, Job Support Wales in April 2020. Job Support Wales will support people into employment. It will be responsive to individuals' needs to ensure they receive the right support to enter employment. As part of this support, help will be provided to help overcome barriers to participation including essential skills and additional learning needs.***<sup>21</sup>

Providing the right support is essential to ensure people enter into meaningful employment. The National Deaf Children's Society has been pleased to work with the Welsh Government on its recently published plan for inclusive apprenticeships and would welcome the opportunity to work with the Welsh Government on any further employment initiatives to help deaf young people into work that inspires them.

***Activity 4.6 Offender Learning: The Welsh Government funds the education and learning provision and prison libraries in Welsh public sector prisons through a joint Memorandum of Understanding with Her Majesty's Prison and Probation Service (HMPPS).***<sup>22</sup>

Undiagnosed hearing loss, either in childhood or during their adult life, can be a huge barrier for adult literacy. Testing the hearing of prisoners showing persistent difficulties with learning may support learning programmes.

### Further information

At the National Deaf Children's Society Cymru, we have a vast array of resources for families. We would welcome the opportunity to share these with the Welsh Government and families. Please contact us to obtain resources or visit our webpages for more information <https://www.ndcs.org.uk/information-and-support/>

Thank you for the opportunity to respond to this consultation. Please contact us for more information at [campaigns.wales@ndcs.org.uk](mailto:campaigns.wales@ndcs.org.uk).

---

<sup>21</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.17. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>

<sup>22</sup> Welsh Government, *Talk with me- Talk with me: Speech, Language and Communication (SLC) Delivery Plan 2020-21*, p.18. Available at: <https://gov.wales/sites/default/files/consultations/2020-01/speech-language-consultation-document.pdf>