Response to Welsh Government Children, Young People and Education Committee: "How the outbreak of COVID-19 is affecting all aspects of life for children and young people (including students in further and higher education)"



# May 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

Deaf children and young people already face significant social and educational barriers in life. The effects of the Covid-19 situation and 'lockdown' are presenting additional significant barriers to all, including some specific and unique barriers for deaf children and young people.

In putting this document together, we have drawn upon a poll of our family members on their thoughts/concerns around the pandemic, experts working with deaf children across our organisation and our conversations and correspondence with professionals in Wales.

We know that the Welsh Government, public bodies and local authorities are having to make swift decisions in response to unprecedented circumstances. However, we are grateful to the Committee for bringing forward this inquiry as deaf children and young people are facing particular and unique challenges during this time, and indeed, a number of challenges that could see them disadvantaged in the longer term if they are unaddressed.

## 1) Education

### Learning resources

The move towards home schooling and online teaching resources has presented issues around accessibility. For example:

- At the time of writing, not all of the video content on HWB or BBC Bitesize is subtitled.
- Learners who rely on sign language may also struggle to access the same learning resources as their peers online.

• Students have also told us that remote contact through platforms such as Skype and Zoom can be problematic due to the inability to lip-read or hear what is being said.

#### Specialist support

While we recognise the efforts of many specialists to provide support in these very difficult times, there is a post code lottery in relation to support available.

The current lack of specialist support for deaf children and the wider family is one of the most concerning issues for our members. Deaf children of all ages rely on support from specialist professionals such as Teachers of the Deaf, communication support workers, specialist teaching assistants, speech and language therapists and deaf role models. In addition, families also rely on support and advice around language and communication from Teachers of the Deaf, particularly in the early years.

Whilst many local authority specialist education services for deaf children are continuing to provide support remotely, we understand that the level of support at present can vary.

In addition, where support can be provided remotely, this may not be accessible to some deaf children unless additional communication support is provided – e.g. remote speech to text or sign language interpreters. Some families may not have computers/tablets to be able to access remote support. We are aware that the Welsh Government have announced funding to ensure all students have access to technology and we would strongly recommend that a proportion of the funding be used for communication support for deaf children.

#### Parents' views

"Our daughter has received support from teachers of the deaf since she was 11 weeks old she is now 11 years old and in her transition year to secondary school. She is struggling without her daily structure and routine of school. She dislikes change and is finding home schooling difficult[...] She misses her one to one support along with her ToD and specialist communicator." (parent of a deaf child, Wales)

"She used to have weekly visits from specialist speech and language as well as a teacher of the deaf, she also visited a deaf preschool once a week and had a one to one support in a mainstream preschool twice a week. Now the services can't visit face to face, her progress has massively declined. Her profound hearing loss means she gets next to no benefit from hearing aids, and we are praying that Covid-19 doesn't affect her development too much by the services being on hold." (parent of a deaf child, Wales)

#### **Specialist equipment**

Deaf children may use specialist equipment – such as radio aids – in education. Radio aids are used with hearing aids and cochlear implants and help to amplify sound so that deaf children can hear speech more clearly, without background noise.

We believe that children who use radio aids would always benefit from using them in the home setting too since they enhance the inclusive environment and boost learning opportunities. However, during this period of home-learning, being able to use this equipment at home is

particularly pertinent. Despite this, some local authorities have a policy of not allowing deaf children to take radio aids home and do not appear to have relaxed this policy in the current crisis.

We contacted local authorities across Wales to ascertain if children were being sent home with radio aids. Of those who responded, there was a split between those who had organised this provision and those who had not. This lack of consistency across local authorities means that children in certain local authorities will be disadvantaged over others.

#### Transitioning

Preparing to transition to other education settings school/college next year can be an anxious time for deaf learners who may be concerned about how effectively the new environment will meet their communication needs. In the current climate, without the usual visits and support mechanisms in place, these anxieties can be heightened. While we are aware of some cases where staff are trying hard to ease this difficulty by arranging virtual tours etc., many young people may be lacking key support to ease this move. This could place these learners at a disadvantage in their education.

#### **Parent views**

"I have received no communication from my Teacher of the Deaf and was meant to be seeing her this term to plan University applications and how to ensure the Unis I pick will be able to support me. My 6th form will be doing our UCAS application with us online but they don't have the specialist knowledge about disability support." (Deaf young person)

"My main concern for [child] is that these last few months of primary school were crucial and part of her transition to secondary. We were due to meet her support staff in secondary etc. I am also concerned that her statement hours are not going to be sufficient. [child's] ToD has already raised this as a concern and is planning on discussing with the appropriate officer in access and inclusion re increasing [child's] allocated hours". (parent of a deaf child, Wales)

#### Exams and qualifications (including vocational qualifications)

The National Deaf Children's Society Cymru recently responded to the consultation outlining Qualifications Wales proposals for awarding grades this year. We are concerned that there are equality risks within the proposals.

In particular, we are concerned for those such as the Wales student outlined in the below case study, where deaf learners may not have had appropriate support in place for their mock exams or previous course work. They are concerned that their final grades will now be based on results that do not show their full potential due to access barriers. We are also mindful that there may be an unconscious bias of lower expectations for deaf learners.

"X has started studying for her GCSE exams in May 2018, this was long before any help for her was established. In Jan 2019 she started to have a TA in many lessons, a radio aid, maths intervention. When she took her Science modules in June 2019 she had access to extra time but not a reader, hence not doing so well in those exams. X has continued to have support in school, but for many of the tests she did in class (which could contribute now to her final grade) she did not have a reader present and may not have had the extra time.

In January 2020 X now has access to a reader in her GCSE exams, this has already made a huge difference to her[...]. These exams gave X incredible confidence and made her even more determined for the Summer exams, she said she felt it really helped her with the reader. X was due to resit all her science modules from last year and would not really want 2019 results to be looked at this year, X was upset at the exams being cancelled as she felt she really wanted to prove that she could do this. I think for X she feels she has not been able to show many of her teachers what she is really capable of through having a reader." (Parent of a deaf young person)

Whilst we understand there are enormous practical implications for enabling a student appeal process, we believe that the proposals from Qualifications Wales are too strongly weighted towards the protection of centres and exam boards. Without any transparency about what evidence has been used to calculate a student's grade, it will be very difficult for a student to challenge on the grounds of malpractice. There also means there is a lack of accountability on the evidence used by centres. We believe that an appeals process needs to be in place for students with disabilities where they believe their grades are based on evidence that is unfavourable due to barriers to access.

Furthermore, we strongly believe that input for grading should be sought from specialists who normally work with students who have additional learning needs, such as Techers of the Deaf. This would help to prevent an unconscious bias of lower expectations and would be in line with the recent decision from Ofqual, (see page 7 at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_dat a/file/883150/Summer\_2020\_grades\_for\_GCSE\_AS\_A\_level\_guidance\_for\_teachers\_students parents\_UPDATED\_05MAY2020\_FINAL.pdf.)

We have strongly recommended that Qualifications Wales take on board these points and would welcome the support of the Committee on this.

"COVID 19 has meant all GCSES have been cancelled and therefore the grades will be predicted off mock exam results and classwork. This means deaf students like myself are disadvantaged since it has been proven by the NDCS that nationally we get one grade lower than our hearing peers. This is evident by the constant struggle for deaf students to keep up with often inaccessible classwork and homework and non-Deaf aware teaching systems which has been causing us to fall far behind our hearing peers and therefore creating lower expectations from our teachers. This means that the final GCSE grades will be highly unfair and will poorly reflect on what deaf young people could have achieved. We could have had the chance to prove ourselves at the GCSE exam day by working hard and catching up with our peers but this has been stripped away from us." (Deaf young person)

#### Higher and further education

We are aware that many universities are still continuing remote lessons (e.g. online lectures). There is a concern around the accessibility of any online teaching. Deaf students are likely to be disadvantaged by online teaching unless proactive reasonable adjustments are made. Some students may require more communication support from Disabled Students Allowance. It is unclear how flexible and responsive this will be. The National Deaf Children's Society Cymru has reached out to Disability Offices within our universities, but has not received any response.

A similar issue applies with the accessibility of any online assessments or exams. Whilst exams have been cancelled for schools and colleges, we understand that some universities in the UK are continuing some remote assessments in a way which isn't accessible for deaf young people. This presents them at a significant disadvantage – we believe it should be seen as unlawful under the Equality Act.

"I had a young deaf person on a chat last week about problems with her dissertation advisor. No communicating, no organising meetings...She told me she received an email from said dissertation advisor, telling her that she was going to have a facetime or skype assessment conversation (counting towards her dissertation). The young person told him that she can't hear properly via skype or facetime, but he insisted that they have to do it this way due to corona virus." (Staff member at the National Deaf Children's Society)

#### **Parents and carers**

Echoing the experiences of many, our parents of deaf children have informed us that they are struggling with the challenges of juggling work alongside home-schooling. However, it is also worth noting that the pressure to juggle this support can be greater for parents of children with additional needs who may require more support to complete tasks than their peers. We know that many of our members have additional learning needs besides their deafness.

"Helping with school work as I don't want him to fall behind however I am also a single parent working from home so it's difficult trying to be mum and teacher too as my sons needs a lot of support when it comes to school work which he's not able to get now he has to work from home." (Parent of a deaf child, Wales)

#### **Statements and IDPs**

The Coronavirus Act gives the Welsh Government the power to issue a notice that would effectively temporarily suspend the requirement on local authorities to provide any support set out in a Statement. Instead, local authorities and schools would use 'reasonable endeavours' to ensure that any required support is provided. While these powers have not yet been utilised, we understand that the Welsh Government intends to do so.

We would urge that, should the Welsh Government decide to use these powers, clear guidelines are issued as to what "reasonable endeavours" would look like in practice. It would be imperative that there are no 'blanket' policies or wholesale cancellation of support, plans or statements across an area.

We would urge that, in these circumstances, the learner's Statement should continue to be met wherever possible, with reasonable endeavours being applied as a last resort. Each case should be looked at individually to see what could reasonably be provided if what is normally provided or required is no longer possible and education settings and local authorities should work with families as much as possible to agree any changes. Families may have their own suggestions and ideas for how things could be done differently. If what is normally provided or required is no longer possible, families should be given the reasons for this in writing, along with an explanation of what reasonable endeavours the local authority have used to ensure that the required support is still, as much as possible, provided. In addition, it will be important to ensure families retain a means of appeal and that the suspension of statements is regarded as a temporary measure that is kept under review.

It is also worth noting that (despite Welsh Government instructions) many local authorities have been pushing towards IDPs and issuing them in the place of Statements in recent times. Theoretically (since the ALN reforms have not yet come into force), learners with these plans do not have the same legal backdrop to accessing support in these difficult times as those with a Statement. The Coronavirus Act refers to powers around Statements. We would urge the Welsh Government, in taking forward actions around SEN support under the Act, to also consider what guidance can be provided to ensure that children who have been placed on IDPs are also supported in these times.

#### **Returning to School**

The National Deaf Children's Society Cymru is mindful that the First Minister has announced children with SEN will be amongst those learners prioritised for a return to school. Many families may welcome this as we know that there are concerns among our members about their children missing out on valuable support and falling behind in their studies. However, we are also mindful that some families may not feel comfortable in sending their children back earlier, be that due to personal issues or underlying health conditions of the child or family members. We would urge the Welsh Government to provide assurance that these families will be presented with informed choice and still be able to access a strong and suitable level of remote support should they chose not to send their child back with the priority cohort.

We would also welcome the opportunity to be part of discussions around potential social distancing measures when children are asked to return to school, as there may be particular considerations for our learners, particularly if they are normally in receipt of specialist support or equipment in the classroom.

### 2) Health and wellbeing.

#### Newborn Hearing Screening Programme

The National Deaf Children's Society Cymru appreciates that Public Health Wales has worked hard to ensure that the Newborn Hearing Screening Wales programme continues to operate across all health boards in Wales during these very difficult times. The service has looked to redeploy staff and worked with audiologists to ensure that as many babies as possible are screened. However, given the current situation, there are many babies who are not being screened and are being referred for a behavioural screen at 8/9 months of age. The later diagnosis will have a significant impact for families, as we know that early diagnosis and support is so valuable in building a good foundation for language.

The current situation will also add to the backlog of audiology appointments for the future. This will present a further strain on services which were already facing challenges with high caseloads and low staff numbers.

#### Paediatric audiology services

We fully appreciate that audiology departments are doing their upmost to ensure children receive services and support during these unprecedented times and our professional networks tell us that all services are operating postal repair services for hearing aids.

However, inevitably, routine appointments have been delayed and there are risks of later diagnosis for families who have concerns about their child's hearing (around half of all deaf children are not born deaf, but acquire deafness during childhood). As indicated above, delays in diagnosis present a significant risk to a child's linguistic, educational and social development.

The cancellation of routine audiology appointments also has a number of other implications. For example, it means that audiologists can't see deaf children directly to create new ear moulds (known as an ear mould impression) for the child to use with their hearing aid. Ill-fitting ear moulds can result in feedback. The family may use hearing aids less as a result. Fortunately, audiology services are innovating to address this issue and new ear moulds for children's hearing aids are being made without impressions in some cases – using a reprint of moulds or working from a copy of an existing mould. This will work for some, but not all deaf children.

"My child has issues with one of his cochlear implants he will only wear one and not together as it's making strange noises and is uncomfortable to wear. He is due a tuning session to check his hearing levels. This had been cancelled because of the coronavirus. He is only able to wear one cochlear implant until we are able to get an appointment, we don't know how long this will be." (Parent of a deaf child)

The National Deaf Children's Society Cymru is concerned about the strain that the building backlog of cases will have on our audiology services when lockdown measures ease. We are aware that, in many areas across Wales, these services were already struggling with low staff numbers and high caseloads prior to Covid19.

#### Cochlear implantation and other surgeries

The NHS has stopped routine surgery to free up capacity and beds for those people who are seriously ill with Covid-19. Routine surgery for deaf children includes: grommet surgery for glue ear, bone anchored hearing aids, and cochlear implant surgery. Delays to these sorts of surgeries cause anxieties for families and result in deaf children being without effective access to sound for longer than would otherwise have been in the case. Given the importance of early intervention, this is likely to have an impact on their language and communication development, and result in the need for more intensive support later in life.

"I am writing to you about my 8-month old daughter. She was born with bilateral profound hearing loss, currently wearing hearing aids. She... was going to be implanted bilaterally this month (April). She is showing absolutely no response with the hearing aids and we are going through an extremely stressful and worrying period, knowing how time sensitive a CI operation is and not knowing when operations will resume. We are wondering if there is anything we could do to try and get those time-sensitive operations restarted as soon as possible. Also, if you have any information on how long it will take for operations to resume after lockdown is lifted." (Parent of a deaf child)

My child has issues with one of his cochlear implants he will only wear one and not together as it's making strange noises and is uncomfortable to wear. He is due a tuning session to check his hearing levels. This had been cancelled because of the coronavirus. He is only able to wear one cochlear implant until we are able to get an appointment, we don't know how long this will be. (Parent of a deaf child, Wales)

#### Mental health

The National Deaf Children's Society UK helpline has taken a large volume of calls from families who are experiencing difficulties with isolation at this time.

"Being deaf is already very lonely and isolating. Being taken away from peers etc. is just very difficult for my son." (Parent of a deaf child)

As with most other children, deaf children and young people are isolated at home and are disconnected from their peer group. This is a particular issue for deaf children who may rely on being able to attend clubs and events where they can be with other deaf people.

For some deaf children and young people (particularly BSL users), there is also potential isolation within the family, if the child is the only person who uses sign language.

"My daughter's frustration is terrible as she cannot communicate, BSL needs to be more widely taught to children and young adults to stop communicate problems. If I was taught basic BSL I would know basics to help teach and communicate with my daughter." (Parent of a deaf child, Wales)

As information and resources on Covid-19 and emotional wellbeing are not always accessible, this may cause higher levels of anxiety and stress.

"Guidance online relating to mental health and more do not have BSL versions available, which is unacceptable given the fact that deaf people are also greatly affected by issues such as mental health." (Deaf young person)

Some deaf children may experience bereavement within the family as a result of Covid-19 and if they have delayed language skills they may find it harder to process and handle their feelings around bereavement.

As identified elsewhere within this response, access to online and remote counselling may also present challenges for deaf young people if appropriate measures (such as a speech to text

reporter or an interpreter) are not put in place. Video technology may not be of sufficient quality for lip-reading.

Overall, we believe there is a considerable risk of deterioration in wellbeing and that deaf children are disproportionately affected compared to other children.

"I am finding it really hard being away from my friends, and it is hard to speak to people using facetime when I need subtitles so it is harder to keep in touch." (Deaf young person)

"Audiology not seeing any outpatients for 2 months at least. My son was due there the week they stopped seeing patients. He desperately needs new moulds as the feedback is horrendous. He also has a faulty aid. We have been told to send his moulds to them and they'll send them to the manufacturer which will mean no access to speech for 2 weeks minimum with a high risk that the moulds won't fit anyway. He is 14, is oral only, and would feel even more isolated if he had no hearing aids. It's awful, it's having a major impact on his mental health." (Parent of a deaf child)

We are also mindful that parents of deaf children have also reported feeling isolated as they are missing peer support from others.

#### **Parent views**

"My son not being able to attend the deaf youth theatre which is a massive help with building his confidence especially when it comes to him using his sign as he's around other deaf young children."

"Our daughter has been told she doesn't need to do any more work as exams are cancelled. However that means she has no focus now potentially until September when she would start A level courses."

"We are very proud of the support we have here in South Wales and hope that after this pandemic that cochlear assessments are hurried and seen as absolute priority, particularly to children under five who are at the vital time of development. My daughter's frustration is terrible as she cannot communicate, BSL needs to be more widely taught to children and young adults to stop communicate problems, if I was taught basic BSL I would know basics to help teach and communicate with my daughter. I also hope that SenCom has the financial support to provide extra support to children after this crisis to make up for time lost."

#### Safeguarding

Concerns around the pandemic exacerbating difficulties with abuse as well as the potential for reduced disclosures are well documented. Research demonstrates that deaf children are more vulnerable to experience abuse (see Sullivan and Knutson, 2000) and as such we share these concerns.

#### 3) Early childhood education and care

Our parent members have informed us of the detrimental effect nursery closures are having on their deaf child:

"My daughter is 3 with bilateral implants and also has selective mutism but was making good progress before the pandemic happened. I worry with her no longer getting any therapy all the progress she has made is going to be lost. She gets frustrated at the videos from nursery as she struggles to lipread the videos and understand. We sign and talk at home so I keep it going but she is struggling to understand why she can no longer go out, go to the park etc." (Parent of a deaf child)

"Mostly missing the face to face rehab sessions with our Teacher of the Deaf. XXX was implanted 9 months ago, and early rehab is so important to help develop speech. She's also missing nursery for interaction with other children of the same age." (Parent of a deaf child, Wales)

### 5) Face coverings

We appreciate the public health considerations underpinning the use of face masks and coverings at this time, particularly in health settings, where masks provide essential protection for staff. We understand that the Welsh Government's position is to neither mandate nor recommend the use of face masks for the general population, but to respect people's personal choice to use face coverings. We are mindful that many members of the public may choose to wear masks for their own confidence.

The use of face masks or coverings for the general public in public places will create a very significant barrier to communication for deaf people. We have received correspondence from members across the UK who are anxious about the increased communication barriers that deaf young people will encounter in light of Covid19 and the increased use of face coverings.

Communication for virtually all deaf people, including those who use sign language, relies in part on being able to see someone's face clearly – whether this is for lip-reading, understanding facial expressions or for understanding non-verbal communication more widely (e.g. seeing whether someone is smiling or looks upset). An obstruction to the mouth makes it extremely difficult, if not impossible, for a deaf person to understand what is being said. Face masks also have the effect of obscuring and muffling speech, making it harder for deaf people to make use of any residual hearing that they have.

In order to try to address this issue, it will be extremely important for government or public health guidance or advice on face masks and coverings for the general public to highlight the barriers this introduces for deaf people, and to set out mitigating steps that can be taken. The National Deaf Children's Society has outlined some helpful communication tips (see <a href="https://www.ndcs.org.uk/blog/the-impact-of-face-masks-on-deaf-children/">https://www.ndcs.org.uk/blog/the-impact-of-face-masks-on-deaf-children/</a>).

We appreciate that there are great challenges in the commissioning and availability of protective face masks and visors for health settings at this time. However, we would urge that consideration be given to the practicalities and possibility of commissioning and availability of

transparent face coverings. This is especially important for settings where the primary audience is deaf people, e.g. audiology services.

## 6) General issues

Our Children and Families Support Officers at the National Deaf Children's Society work directly with families to support them. Our officers tell us that many of the families they work with have felt overwhelmed by the current situation – particularly where they are caring for children with multiple or complex needs. As a result, anxieties and mental loads have increased, resulting in families struggling more in other areas such as making DLA applications.

We know that there is an increased incidence of childhood deafness in deprived regions and we have seen many of our members requiring support in these times to access food and also facing difficulties to access online learning.

## 7) Welfare Benefits and Employment Support

While we appreciate that welfare benefits and Access to Work are reserved matters, we wanted to highlight that our deaf young people in Wales have been facing difficulties in these areas as a result of Covid19.

For many deaf young people, the suggestion of a telephone PIP assessment as opposed to face to face will present accessibility difficulties.

Over the past weeks, deaf young people in employment have also faced difficulties with having to submit paper claims with ink signatures from their manager, which is very difficult in lockdown and if shielding. We have been calling on Access to Work to consider email/digital applications. There has now been some movement on this point, with Access to Work accepting printed emails from managers. However, the delays to the digitalisation of the claims process continues to make submitting claims cumbersome. The process means that (unless there is no other option), claimants are still required to make trips to the post office to post their claims, at a time when social distancing is expected. We are urging the UK Government to ensure that all Access to Work users are able to submit claims online regardless of their individual circumstances. Many deaf young people feel that the Department is being insufficiently flexible at this challenging time.

## 8) Good news

In amongst the current difficult times, we believe it is important to highlight instances where our members have felt well supported by their local services. We know that many of our teachers, newborn hearing screeners and audiologists and other professionals are going above and beyond in very difficult circumstances to support children. We've gathered some feedback from parents in Wales who want to say thank you to and draw attention to the good work that is being done.

- Our Hearing impairment team are fantastic by emailing they have set up a WhatsApp group and are available by phone or text. They are also sending out work by post or hand delivery.
- We have had resources through the post, and lots of messages of support from ToD.

- We usually collect batteries from our local audiology department in Ysbyty Gwynedd but given the current situation I rang my daughter's audiology department in Wrexham to ask if we should go to collect and they posted huge pile of batteries to us which should see us through a good few months so that saved us a lot of hassle.
- Our professionals have always gone beyond the call of duty to not only supporting our daughter but us as a family.
- Phone calls from different services, particularly our teacher of the deaf who thinks of activities that our daughter would enjoy and checks in regularly.

### 9. Key asks

In light of the barriers and difficulties outlined within this response that deaf children, young people and their families are facing, we recommend that the Welsh Government:

- 1. Supports professionals, services, schools and colleges with guidance on the reasonable endeavours and adjustments they should be making to ensure deaf children's needs are still met and their progress in education is maintained, as much as practically possible.
- 2. Set out a clear plan of support for transitions for deaf young people who will be leaving education this year and/or entering employment.
- 3. Provide higher education institutions and apprenticeship providers with guidance on how deaf students should be supported and allocate increased funding for additional communication support from the Disabled Students Allowance, as needed.
- 4. Support service leads to develop costed plans for when lockdown measures subside to ensure services build back stronger, reinstate inspections and take rapid action to address any backlog in identification of deaf children, providing emergency funding and additional capacity as required.
- 5. Encourage Qualifications Wales to take on board recommendations to include specialist teachers in the grading process and to provide learners with a right of appeal on accessibility grounds.
- 6. Ensures the needs of deaf children are included within wider Welsh Government support initiatives on the provision of equipment for home learning and supporting young people with their emotional wellbeing.
- 7. Calls on the UK Government's Department for Work and Pensions to take steps to ensure its for Personal Independence Payments assessments and Access to Work systems are fully accessible, and to remove unnecessary bureaucracy for disabled people during this crisis.
- 8. That official advice on facemasks and coverings in Wales helps to raise awareness of the communication difficulties for deaf people and of appropriate communication tips.