

Response to Welsh Government Inquiry into Impacts of COVID-19: Economy, Infrastructure and Skills Committee - Open Call for evidence and experiences

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 young people already face significant social, educational and employment 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 survey 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 young people are facing particular and unique economic and employability challenges during this time, and indeed, a number of challenges that could see them disadvantaged in the longer term if they are unaddressed.

Employment

1) Employment opportunities

As we already know, Wales has the highest proportion of disabled people in its population, the largest number of disability related benefit claimants and the widest employment gap with non-disabled people of anywhere in the UK¹. Coronavirus only risks widening this schism, especially for young people, with evidence from the Institute for Student Employers (ISE) highlighting how almost a quarter (23%) of entry-

¹ Joseph Rowntree Foundation, *Poverty in Wales 2018*. Available at: <https://www.jrf.org.uk/report/poverty-wales-2018>

level jobs had been cut across Britain as a result of COVID-19². Furthermore, recently published research from Wales Fiscal Analysis reveals that:

...shutdown measures have hit the youngest workers the hardest. For instance, 35.9% of all the employees under the age of 25 worked in a sector that is currently in shutdown. In contrast, on average only 13.3% of all the workers aged 25 and over were employed in shutdown sectors. It follows from the above that employees aged under 25 were almost three times as likely to work in a sector that is now shut down as other employees³.

Research shows that deaf young people already have worse outcomes than their peers in terms of securing employment. For example, O'Neill et al found that 31% of deaf 16-24 year olds in the UK were working compared to 53% of all the workforce of that age⁴.

For deaf young people, shrinking job opportunities coupled alongside employers' misconceptions about accommodating deafness in the workplace (for example, a lack of understanding and knowledge about what provisions the Access to Work fund can cover), COVID-19 presents an even bigger challenge.

The Chancellor of the Exchequer recently unveiled a package of measures to support young job-seekers. These include:

- *A £2-billion Kickstart scheme for young people aged 16-24 on universal credit to provide them with 6 month work placements*
- *An expansion of traineeships – these are work placements which are alongside training, similar to apprenticeships but shorter and unpaid*
- *Encouraging employers to offer more apprenticeships to young people*
- *Expanding the number of careers advisors within the National Careers Service (England)*
- *'High-value' courses for school or college leavers aged 18 or 19⁵*

We would like to see the Welsh Government go further in supporting the post-pandemic employment and education opportunities of deaf young people in Wales.

We appreciate the work that Welsh Government has undertaken over recent years to firmly put disability and employment on the agenda and we call on the Welsh Government to use

² BBC Wales, *Coronavirus: Jobless claimant count in Wales nearly doubles*. Available at: <https://www.bbc.co.uk/news/uk-wales-52722019>

³ Wales Fiscal Analysis, *Covid-19 and the Welsh Economy: shutdown sectors and key workers*. Available at: https://www.cardiff.ac.uk/_data/assets/pdf_file/0017/2410343/Covid-19-and-the-Welsh-economy-shutdown-sectors-and-key-workers-briefing-paper.pdf

⁴ O'Neill, R., Arendt, A. & Marschark, M. 'Report from the Achievement and Opportunities for Deaf Students in the United Kingdom': from *Research to Practice* project. Available at: https://www.research.ed.ac.uk/portal/files/18805218/EDU_37468_Nuffield_Report_MASTER_v3.pdf

⁵ National Deaf Children's Society, *Beating Unemployment*. Available at: <https://www.ndcs.org.uk/blog/beating-unemployment/>

COVID-19 as a catalyst for accelerating and pushing further existing work in disability employment.

We are grateful for the recent opportunity to feedback to the Disabled People's Employment Working Group on how the Inclusive Apprenticeships Action Plan can be adapted in light of COVID-19 and hope that our suggestions have been of use. In addition to our previous suggestions, the disability apprenticeships scheme would do well to be expanded to include pathways especially targeted to supporting deaf and disabled young people in the context of the pandemic. This may include courses to improve their knowledge and job-specific skills but should also include support and learning that concentrates on the wider 'softer' skills disabled young people need to find, and feel confident in, employment. Softer skills, such as 'self-confidence, patience, interest, motivation, ability to communicate, and capacities for teamwork' have been identified as key factors for deaf people achieving success in the workplace⁶.

We note that the Welsh Government recently announced its intent to 'offer everyone over 16 in Wales, advice and support to find work, pursue self-employment or find a place in education or training'⁷. We'd welcome reassurances of how this will be delivered and what form the advice and support will take. There is a great opportunity here to put together a targeted package of support for young people, with particular support for deaf young people and those with ALN, to ensure that Wales' brightest young people do not end up disillusioned and their talents lost as a result of the pandemic. We would welcome the opportunity to be involved in discussions around this.

In a difficult labour market, tailored and high quality careers advice is particularly important. The National Deaf Children's Society Cymru, alongside other organisations within Wales' Third Sector Additional Needs Alliance, is extremely concerned that the draft Additional Learning Needs Code of Practice significantly reduces the duty for careers advisors to provide support specifically to learners with additional needs. We understand that the Welsh Government is in the process of finalising the Code for approval by the Senedd this year. In light of this, the situation arising from the pandemic further highlights the need for duties in the Code on careers advice for these vulnerable learners to be strengthened. **We call for the Welsh Government to urgently strengthen the duty in the Code to ensure all learners with additional needs are proactively offered specialist careers advice.**

2) Raising deaf awareness amongst employers

While some employers are well informed about deafness and how to support deaf colleagues, there is much work to be done. With the anticipated recession and job losses as a result of COVID-19, employers may be feeling nervous about employing staff with what they perceive as additional needs- especially if they feel these needs may have financial

⁶ : [Hintermair, Manfred](#); [Cremer, Inge](#); [Gutjahr, Anja](#); [Losch, Antonia](#); [Strauß, Hans Christoph](#), 'Factors for Professional Success--What Deaf Education Can Learn from Deaf and Hard of Hearing People who are Successful in Their Career', in *The Volta Review*. Available at: <https://www.ingentaconnect.com/contentone/agbell/vr/2018/00000117/f0020001/art00003>

⁷ Welsh Government, *Driving up skills and employability vital for Wales' economic recovery*. Available at: <https://gov.wales/driving-skills-and-employability-vital-wales-economic-recovery>

implications for them. We are pleased to see the Welsh Government announcing their intent to 'support employers to recruit and prioritise those people who are most likely to be economically affected by coronavirus (COVID-19), including young people, people from BAME communities and disabled people'⁸. We are grateful to have been invited to feed in to the Disabled People's Employment Working Group's recent call for suggestions on how their Employers Toolkit can be amended in light of COVID-19. We would like to use this inquiry as a means to further highlight how the Welsh Government can work with employers to meet disabled people's needs in the workplace. Please find our suggestions outlined below:

- **Increasing Awareness of the Access to Work (ATW) scheme:** Increasing the awareness of Access to Work among employers- helping to alleviate their concerns and dispel misconceptions. Whilst we appreciate that this already forms part of the employer's toolkit, we know this is an area that needs far greater awareness and as such there is merit in using a multitude of platforms to promote this service including social media, promotion within Business Wales and their training schemes and mainstream marketing opportunities, amongst others.
- **Ensure Interviews are Accessible:** Interviews can also present accessibility concerns for deaf or disabled people. Whilst efforts should be made to inform individuals of their right to interview support under the Access to Work Scheme⁹, work must be undertaken to ensure employers know how to make the interview process supportive and accessible to a deaf or disabled applicant. With many interviews being conducted remotely, it is essential that sufficient and accessible options are given. Instead of phone interviews, video platforms such as Skype, Microsoft Teams or Zoom can be used. Some of these platforms come with their own in built captioning software. However, it should be remembered that live captions provide only around 80% accuracy- which is not suitable for a formal interview situation where every word must be understood to ensure parity of interview across candidates. A better means of captioning would be to book a live speech-to-text interpreter. In any interview situation, the candidate's individual communication support preferences should be accommodated and Access to Work funding used to deliver it.
- **Work to dispel negative misconceptions:** Alongside the promotion of Access to Work, work must continue to dispel any negative misconceptions employers have about employing deaf and/ or disabled young people. We appreciate that the Welsh Government have a disability positive campaign as part of their disability apprenticeship scheme. As part of our recent and ongoing *Deaf Works Everywhere* campaign, we have produced a number of [inspirational videos](#) containing case studies of deaf young people undertaking training and pursuing careers. We'd welcome the opportunity to share these resources and have them distributed as part

⁸ Welsh Government, *Driving up skills and employability vital for Wales' economic recovery*. Available at: <https://gov.wales/driving-skills-and-employability-vital-wales-economic-recovery>

⁹UK Government, *Apply for communication support at a job interview if you have a disability or health condition (Access to Work)*. Available at: <https://www.gov.uk/guidance/apply-for-communication-support-at-a-job-interview-if-you-have-a-disability-or-health-condition-access-to-work>

of the Welsh Government's proactive push for employers to employ disabled people- as mentioned above.

- **Disability Awareness Training:** Disability awareness training is an important part of any employability drive. The National Deaf Children's Society deliver bespoke deaf awareness training for organisations. We'd be happy to discuss the opportunity to deliver this alongside the Welsh Government as part of their COVID-19 response.
- **Creating Post-Covid Disability Friendly Workplaces:**
 - **Home working:** As part of the push for inclusive employment in a post COVID-19 Wales, attention must be paid to the value of creating deaf and disabled friendly workplaces. A recent survey by the Future Generation's commissioner highlighted that half of respondents wish to continue to work from home more often in the future¹⁰. If companies continue with the home working model, employers must ensure that this is accessible to all staff. For advice on how to make video meetings etc. accessible, please see: <https://limpingchicken.com/2020/03/23/jo-wooten-tips-for-working-remotely-when-youre-deaf-with-bsl-videos/> and <https://www.ndcs.org.uk/blog/how-to-provide-inclusive-online-learning-for-deaf-children/>.
 - **Workplaces:** For companies returning to an office or commercial setting, inclusivity should be a priority. Research shows that 7 out of 10 deaf workers feel that colleagues do not communicate effectively with them¹¹. Action on Hearing Loss have produced documentation on how workplaces can be safe and inclusive spaces for all the workforce. You can find it here <https://www.actiononhearingloss.org.uk/how-we-help/businesses-and-employers/employer-hub/supporting-employees-with-hearing-loss/>
- **Facemasks and deaf communication-** A lot of focus has been placed on office/ home based working environments. However, many disabled and deaf people work in environments such as retail, factories and hospitality amongst others. COVID-19 has fundamentally altered the physicality of these settings and adaptations implemented for virus protection may have an unintended negative impact on disabled members of the workforce: for example, facemasks will present an additional communication barrier in an already noisy setting such as factories. Whilst we acknowledge that workplaces have to follow government and public health guidance, where facemasks are required, it is important to work with deaf employers to think about how adaptations can meet their needs. It's vital that employers do not implement changes that have a negative effect on deaf workers health and safety and appropriate assessments should be made to help negate this. We have produced a

¹⁰ Future Generations Commissioner for Wales. Available at: <https://twitter.com/sophiehowe/status/1273910842136952832>

¹¹ Action on Hearing Loss, *Employers Guide*. Available at: <https://www.actiononhearingloss.org.uk/how-we-help/businesses-and-employers/employer-hub/supporting-employees-with-hearing-loss/>

guide to communicating when wearing facemasks which you can find here:

<https://www.facebook.com/watch/?v=3087775494640238>

- **National Deaf Children's Society Resources:** The National Deaf Children's Society have produced resources on recruiting and employing deaf employees- <https://www.ndcs.org.uk/documents-and-resources/breaking-the-sound-barrier-a-guide-to-recruiting-and-supporting-deaf-colleagues/> We're happy for the Welsh Government to use and circulate this, and any of our resources, freely.

3) 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 COVID-19.

Access to Work

Over the past weeks, deaf young people in employment have 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.

Going forward, whilst we appreciate that Access to Work is a reserved matter, we believe that there needs to be greater promotion of the service by the Welsh Government- both in general but especially in light of the current and impending job scarcity brought about by COVID-19. It is essential that deaf young people and employers are reminded that, with the right support put in place, deaf young people can work in almost any job role. Some deaf people rely on communication support or assistive technology in order to be able to do their jobs. Access to Work also covers the additional costs associated with organising and providing support for interviews- something that is, again, not widely publicised¹². We estimate that less than 5% of deaf young adults are benefitting from the scheme and believe it could work better for young deaf people- especially those who are moving from education into work or changing jobs as a result of COVID-19.

¹² UK Government, *Apply for communication support at a job interview if you have a disability or health condition (Access to Work)*. Available at: <https://www.gov.uk/guidance/apply-for-communication-support-at-a-job-interview-if-you-have-a-disability-or-health-condition-access-to-work>

Personal Independence Payments (PIP)

The Department for Work and Pensions (DWP) recently announced that face to face consultations will be suspended for the foreseeable future¹³. For many deaf young people, the suggestion of a telephone PIP assessment as opposed to face to face will present accessibility difficulties.

As we understand, Capita have put in place a video relay service to support all British Sign Language (BSL) customers through the PIP assessment process. This would do well to be offered to all deaf people as many deaf people do not use BSL but rely on lip-reading. It would be worth exploring the options of using video appointments with Palantypist Subtitles to assist communication.

4) Transport

The Welsh Government recently announced that facemasks will be mandatory on public transport from 27th July 2020.

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.

The National Deaf Children's Society Cymru would welcome the opportunity to work with the Welsh Government on raising awareness among employers and transport providers of the barriers that facemasks present, and of key communication tips that can be used to help. We have developed some tips and info here www.ndcs.org.uk/blog/the-impact-of-face-masks-on-deaf-children and on our short video at <https://www.facebook.com/112180125505122/videos/3087775494640238>.

5. Key asks

In light of the points raised within this response, we recommend that the Welsh Government:

- Ensure that the Inclusive Apprenticeships Scheme includes targeted support for deaf young people, including skills training to prepare young people with the 'soft skills' needed for the world of work
- Promote Access to Work to employers and disabled job seekers
- Re-instate the duty for Careers Wales to provide specialist careers advice for learners with additional learning needs in the new ALN Code of Practice.

¹³ UK Government, *Face-to-face assessment suspension continues for health and disability benefits*. Available at: <https://www.gov.uk/government/news/face-to-face-assessment-suspension-continues-for-health-and-disability-benefits>

- Provide employers with up to date guidance on disability in the workforce that reflects employment's changing needs in light of Covid-19.
- Encourage employers to undertake disability and deaf awareness training.
- Ensure that providers of public transport have deaf awareness where staff or passengers are using face masks.

Further Information

Many thanks for taking the time to read this response. If you require further information or advice, please do not hesitate to get in touch

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