

Consultation on Proposed Children and Families (Wales) Measure

A Response by NDCS Cymru

April 2009

The National Deaf Children's Society Cymru

4 Cathedral Road

Cardiff CF11 9LJ

Tel: 02920 373474 (voice)

Text: 02920 232739

Fax: 02920 399800

Email: campaigns.wales@ndcs.org.uk

www.ndcs.org.uk



Consultation on Proposed Children and Families (Wales) Measure: A Response by NDCS Cymru



About Us

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

We represent the interests and campaign for the rights of all deaf children and young people from birth until they reach independence.

NDCS believes that the family is the most important influence on a deaf child's development. NDCS supports the deaf child through the family as well as directly supporting deaf children and young people themselves.

NDCS Cymru is happy for this response to be published and would be prepared to give oral evidence to the Committee.

Please note: NDCS represents children with mild, moderate, severe and profound hearing losses, as well those with unilateral or temporary losses.

Background

NDCS Cymru welcomes WAG's commitment to eradicating child poverty. NDCS Cymru is aware of two broad types of poverty that affect deaf children and young people:

1. The potential vulnerability to monetary poverty

Families with disabled children can be more susceptible to financial difficulties. This may be because of more demands on a parent/carer's time. Expensive equipment can also put strains on families.

With regards to families with deaf children, it should also be noted that finding appropriate childminding/day care facilities, which is able to meet the child's communication needs, can prove difficult. Consequently, it could be difficult for parents/carers of deaf children to return to work. Informal parental feedback certainly highlights very disjointed access to childcare provision, and often a very limited choice that does not reflect the individual family needs.

Furthermore, research has indicated that there is an association between deprivation and congenital hearing impairment.¹

2. Poverty (or inequality) of opportunity

As outlined in WAG's consultation document for the *Welsh Index of Multiple Deprivation: Child Index*, "deprivation refers to problems caused by a general lack of resources and opportunities (not just money)" (p.6). NDCS Cymru believes that many deaf children and young people in Wales do not have equality of opportunity. For example, some inequalities of opportunity include:

¹ Haytham Kubba, Christine MacAndir, Karen Ritchie, Margaret MacFarlane (2003), "Is deafness a disease of poverty? The association between socio-economic deprivation and congenital hearing impairment," *International Journal of Audiology*
Consultation on proposed Children and Families (Wales) Measure: A response by NDCS Cymru
Contact: campaigns.wales@ndcs.org.uk
April 2009

- Statistics reveal that children in Wales who have hearing impairment as their primary type of SEN are **31% less likely** to achieve 5 GCSEs at grades A*-C than their hearing peers.² Deafness is not a learning disability and there is no reason why a deaf child cannot achieve the same as a hearing child – so long as they are given appropriate support. Low educational attainment can also have a bearing on the ability to find employment.
- Academics have noted evidence that deaf children from a deprived background have lower educational achievements and employment prospects than children who have the same impairment from more affluent backgrounds.³
- During our UK-wide *Change Your World Youth Consultation*,⁴ many young deaf people told us that they find it difficult to access activities. That is why we have launched our Me2 Campaign to encourage leisure facilities and sports clubs to become more deaf friendly.
- There is no statutory obligation on a local authority to fund a child's travel to a school if they are under 5 or over 16 years of age, even if their local school is unable to meet their needs.

Answers to Consultation Questions

1. Is there a need for a proposed Measure to deliver the stated objectives of:

- **Contributing to the eradication of child poverty**
- **Making provision in relation to child minding and day care for children**
- **Establishing integrated family support teams to provide services to families where there are children who need to be, or who are, looked after, and this is related to needs on the part of their adult carers (such as dependence on drugs and alcohol); and making provision for play opportunities for children?**

Yes. NDCS Cymru welcomes the Measure and its stated objectives. **However, NDCS Cymru is disappointed that the Measure does not make a clear objective to eradicate inequality of opportunity for disabled children.** NDCS Cymru believes that this should be a key part of the Assembly's initiative to eradicate child poverty.

NDCS Cymru receives many reports from the families of deaf children who simply do not feel that they are getting the support they need. For example, many families feel they have to struggle to get the support their child needs at school.

² Calculated from data provided by WAG's School Statistics branch, which was sourced from the Pupil Annual Leave Census (PLASC) and National Pupil Database 2008.

³ Downs, M, 1994. The case for detection and intervention at birth, cited in Haytham Kubba, Christine MacAndir, Karen Ritchie, Margaret MacFarlane (2003), "Is deafness a disease of poverty? The association between socio-economic deprivation and congenital hearing impairment," *International Journal of Audiology*

⁴ NDCS (2008): *Change Your World Youth Consultation*

Many deaf children and young people have also told us through NDCS consultation activities that they struggle to find employment.

“Can’t get a job because I wear hearing aids”

“Less job opportunities” [because of deafness]

“I’m not able to speak well so getting a job will be hard”

2. How will the proposed Measure change what organisations do currently and what impact will any such changes have?

a.) NDCS Cymru believes that currently poverty of opportunity exists in Wales for disabled children and their families. In order to ensure that this Measure is effective in addressing this issue, NDCS Cymru recommends that the Measure is amended to address this matter. For example, there could be an addition to the Measure introduction, reading: “to ensure equality of opportunity for all children regardless of ability.”

b.) NDCS Cymru welcomes WAG’s objective to draw up regulations for free childcare provision. NDCS Cymru would like to highlight the recent paper on Early Years Childcare for Disabled Children, which was submitted to the Rights into Action for Disabled Children and Young People Task Group in April 2009. The paper shows that many families with disabled children experience difficulty in accessing childcare. For example, NDCS Cymru understands that parents/carers of deaf children can experience difficulties in finding childcare that meets their child’s communication needs. **NDCS Cymru would strongly urge WAG to look into this issue when drafting the regulations on entitlements to free childcare.**

c.) NDCS Cymru welcomes WAG’s commitment to establishing family support teams to help families where children are at risk. The UK Government report *Mental Health and Deafness: Towards Equity and Access*⁵ recognised that deaf children and young people can be particularly vulnerable to abuse. Therefore, NDCS Cymru would like to ensure that these teams will be trained in deaf awareness.

d.) NDCS Cymru welcomes the objective to secure sufficient play opportunities for children. Through our *Change Your World Youth Consultation*,⁶ we learned that many deaf children and young people felt that they needed greater access to sport and leisure activities.

3. Are the sections of the proposed Measure appropriate in terms of achieving the stated objectives?

NDCS Cymru would like to make some recommendations to help ensure that the Measure will be effective for the young deaf population in Wales. Our recommendations below follow the structure of the Measure.

⁵ DOH (2005): *Mental Health and Deafness: Towards Equity and Access*, available at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4103995.

⁶ NDCS (2008): *Change Your World Youth Consultation*

Consultation on proposed Children and Families (Wales) Measure: A response by NDCS Cymru

Contact: campaigns.wales@ndcs.org.uk

April 2009

PART 1

Section 1: Eradicating Child Poverty

Within this section, NDCS Cymru particularly welcomes the following:

“(e) to reduce inequalities in educational attainment between children.”

As stated earlier, deaf children are underachieving in Welsh schools. Deafness is not a learning disability and there is no reason why a deaf child cannot achieve the same as their hearing peers so long as they are given the right support. **NDCS Cymru would urge the Welsh Assembly to make a firm commitment to close the attainment gap between deaf children and their hearing peers.**

“(f) to support parenting of children”

90% of deaf children are born to hearing parents with no previous experience of deafness, as such; learning that their child is deaf can be an emotional and confusing time for parents and carers of deaf children. NDCS Cymru believes more needs to be done to ensure that parents/carers are given appropriate support following diagnosis, including support in learning how to communicate with their child in the communication method of their choice.

NDCS Cymru recommends that this section also includes a specific aim to support parents of disabled children.

“(g) to reduce inequalities in health between children and between parents of children (so far as necessary to ensure the well-being of their children)”

NDCS Cymru is aware that many deaf patients experience difficulties in accessing the health service in Wales and as such, NDCS Cymru welcomes this aim. For example, NDCS Cymru is aware of one case in which a mother was asked to act as a BSL interpreter for her teenage daughter’s counselling service.

“(j) to reduce inequalities in participation in cultural, sporting and leisure activities between children and between parents of children (so far as necessary to ensure the well-being of their children.)”

NDCS Cymru welcomes this aim and understands that many deaf children and young people experience difficulties in accessing local leisure facilities and sporting clubs.

“(k) to help young persons participate effectively in education and training”

As highlighted elsewhere, NDCS Cymru would welcome a specific aim within this section to reduce the attainment gap between deaf children and their hearing peers. As part of this, there is a need to ensure that deaf children are receiving a service that meets their needs.

“(l) to help young persons take advantage of opportunities for employment”

NDCS Cymru would welcome a commitment to improve employment opportunities for young disabled people. As outlined in question 1, many young deaf people have expressed concern about finding employment because of their deafness.

Section 2: Strategies for contributing to the eradication of child poverty

NDCS Cymru welcomes the statutory obligation of local authorities to produce a strategy for their contribution to the eradication of child poverty within the Children and Young People Plans. **NDCS Cymru would also welcome a requirement for local**

authorities to include a strategy for improving equality of opportunity for young disabled people.

NDCS Cymru would also like to highlight our concern that the Measure requires Welsh authorities to “relate to one or more of the broad aims for contributing to the eradication of child poverty.” This could result in many of the key broad aims being overlooked, which is particularly disappointing in the case of local authorities. **NDCS Cymru recommends that local authorities are asked to address all of the broad aims listed in Part 1 within the Children and Young People Plans.**

Section 6: Local authority duty to secure the availability of free childcare

NDCS Cymru welcomes the above duty and hopes that subsequent regulations relating to free childcare consider the particular difficulties that many families with disabled children encounter when accessing childcare.

Section 7: Parental support services: powers of a local authority and Section 8: Health Support Services: powers of a local authority

NDCS Cymru would welcome a duty under these sections of the Measure for local authorities to ensure that families of disabled children are given adequate support following diagnosis. For example, NDCS Cymru would welcome a duty for local authorities to provide free training for parents to learn how to communicate with their deaf child in their preferred communication form. NDCS Cymru would like to highlight an example of best practice in Norway where parents of deaf children are entitled to 40 hours of free tuition. All transport/loss of earning costs are covered.

Part 2: Childminding and Day Care for Children

NDCS Cymru believes that regulations for childcare provision should not be restricted to those under 8 years old.

NDCS Cymru understands that it can be difficult for families to identify a childminder who is able to meet their deaf child’s communication needs. Therefore, NDCS Cymru would welcome the ability for childminders to register their specialisms, such as BSL.

Section 34: Inspection

NDCS Cymru welcomes this section of the Measure and would ask that when inspections of child minding/day care provision are carried out, an assessment is made as to whether the provision is adequate in meeting the needs of any disabled child who attends that provision.

Section 44: Functions of local authorities

NDCS Cymru urges WAG to include the following additional requirement in this section:
(c) Secure equality of provision for disabled children

Part 4: Miscellaneous and General

Section 59: Family social work officers

NDCS Cymru is concerned that social services may not be adequately serving young deaf people in Wales. A recent WLGA benchmarking study on services for deaf and hard of hearing people in Wales revealed:

“The majority of specialist staff were based in Adult Services – only 1 authority (Cardiff) had recruited a specialist worker within Children’s Services. In a number of authorities Social Workers with Deaf people worked with Adults & Children and did their best to work within the guidelines of Adults and Children’s Services. There is clearly some work to do in raising awareness levels generally within Children with Disabilities Teams.”

It is also worth noting a piece of research conducted in England by the University of Manchester, which concluded that by categorising specialist deaf social workers under adult services in England, deaf children may be slipping out of the social services radar.⁷

In light of these concerns, NDCS Cymru would ask that the family social work officers outlined in this Measure, assume a specific responsibility for ensuring that standards for supporting deaf children and their families are efficient.

Section 60: Local authority duties in respect of play opportunities for children

NDCS Cymru is pleased that local authorities are asked to pay regard to the needs of disabled children when securing and assessing local play opportunities.

Section 61: Participation of children in local authority decision making

NDCS Cymru welcomes this section of the Measure and would be happy to provide assistance in engaging with young deaf people.

A Summary of our key recommendations:

- That the Measure also makes a commitment to eradicating inequality of opportunity for disabled children.
- That the child poverty strategy which Welsh authorities are being asked to publish, encompasses the need to address inequality of opportunity for disabled children.
- That the current difficulties and inequalities that exist for families of disabled children accessing childcare are considered when drafting regulations for the local authority duty to provide free childcare in specified areas.
- That the Measure and subsequent regulations consider providing extra support to families of newly diagnosed deaf children, free of charge. Such support should include classes helping families to learn how to communicate with their deaf child.
- That inspections of childcare include an assessment of whether that provision is meeting the needs of disabled children.
- That family Social Work Standards Officers are tasked with assessing the effectiveness of social services for deaf children and their families.