

Lewis McNaughton,
Deputy Committee Clerk,
Legislation Office,
National Assembly for Wales,
Cardiff Bay,
CF99 1NA

Dear Mr McNaughton,

Consultation on Vulnerable Children LCO

The vision of the National Deaf Children's Society is a world without barriers for every deaf child. We provide support across the UK and in Wales for deaf children and their parents and families through our network of Family Officers, provision of family weekends and other emotional, practical and education support.

We are responding to this consultation to ensure that deaf children and their families are fully taken into account in the details of this LCO and any legislation that arises from it.

We find that, all too often from our perspective and those of deaf children, the legislative structure, both in principle and in practice, responds to the needs of children with physical, learning or mental impairments but not those with communication impairments. These need to be considered just as acute a problem as the others, not a second tier issue whose resolution is less important.

For example, when deaf children are placed into care, or with foster parents, are their communication requirements addressed appropriately? Are deaf children only placed with foster parents who can sign, or at the least have deaf awareness training? If deaf vulnerable children are placed in a context where they literally can't communicate, their difficulties will only become more acute. Other similar issues exist from across the social care setting. The specific communication needs of deaf children do need to be considered carefully if their issues which led to them being identified as vulnerable aren't to be made more acute.

The LCO as drafted encompasses all children who are classed as vulnerable, including those with any form of sensory impairment. But I would urge you to examine whether the definition of well-being as part of the interpretation of matter 15.8 does include this area.

In answer to your specific questions

1. Would the terms of the proposed Order allow for the implementation of the policy agenda on vulnerable children and child poverty by means of Measures? If not, how would the proposed Order need to be re-drafted and why?

Much of this falls outside the remit of NDCS to comment on, so I will restrict my comments to observe that much of the child poverty agenda will need to

be addressed through the reserved function of social security and benefits; but that excepting that, within the competency of the Assembly the LCO appears to be drawn as widely as possible within the frame of vulnerable children and child poverty.

2. Are the terms of the proposed Order drafted appropriately, too narrowly or too broadly. If necessary how should the proposed Order be re-drafted and why?

Subject to the comment in answer to Q3 below, yes.

3. Are the definitions of 'well-being' and 'social care' in the proposed Order appropriate? If not, how should they be re-drafted and why?

We would want to see these definitions explored to ensure that they do encompass those with sensory impairments.

4. The proposed Order includes a table setting out certain exceptions from the scope of Matters 15.1-15.8. Are these exceptions appropriate? If not, how should they be re-drafted and why?

The exceptions seem to be appropriate.

Thankyou for taking the time to consider this submission. I, and NDCS, would of course be only too happy to provide any further information that would help the committee in its work.

Yours sincerely

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