

Written evidence submitted by the National Deaf Children's Society (MRS0106)

1. About us:

- 1.1. We are the National Deaf Children's Society, the leading charity for deaf children. We give expert support on childhood deafness, raise awareness and campaign for deaf children's rights, so they have the same opportunities as everyone else. There are over 50,000 deaf children in the UK. We're here for every deaf child who needs us – no matter what their level or type of deafness or how they communicate. We support deaf children, young people, and their families. We work with decision-makers and professionals to overcome the barriers that hold deaf children back.

2. Introduction:

- 2.1. 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.
- 2.2. We know that, with the right support, deaf children and young people can achieve just as well as any other child or young person. Yet action will need to be taken to ensure that deaf children and young people, as much as possible, continue to receive the support they need and are not further disadvantaged in the longer term.
- 2.3. The evidence in this submission has been gathered from: our members, who are families of deaf children, deaf young people on our Young People's Advisory Board, external professionals, and experts working with deaf children across our organisation.

3. Oral evidence:

- 3.1. We believe that the voices of deaf children, young people and their families should be heard by the committee. We have heard from around eight deaf young people who would like to give evidence. We know one parent who would like to give evidence to the committee. With some notice, we would be able to facilitate these people to give oral evidence to the committee. We would also be very happy to give evidence as an organisation.

4. Summary of recommendations:

- 4.1. The Department for Education (England) should publish separate wider guidance on support for disabled children. This guidance should:
 - set out expectations for how disabled children and their families should still be supported and have their needs met at the current time. This should include support for pre-school deaf children and support around transitions;
 - be clear on what 'reasonable endeavours' means in practice if statutory Education, Health and Care (EHC) plans are suspended;
 - require local authorities and schools to make radio aids and other specialist equipment available for families to use in the home; and

- ask local authorities and schools to fund additional communication support if needed to access online teaching or learning.
- 4.2. The Department for Education should widen the criteria for its equipment fund so that deaf and other disabled children can be provided with laptops/tablets and 4G routers where needed, enabling them to access online learning and remote support.
 - 4.3. The Department for Education should produce guidance for online education providers on accessibility for deaf and other disabled children and/or signpost to resources produced by others. The Department should consider providing additional funding to ensure existing content is accessible if capacity prevents them from doing so quickly. They should also ensure that accessibility is not an afterthought in any future commissioning of online resources.
 - 4.4. The Department for Education should publish guidance on support for disabled students in higher education. This should remind higher education institutions of their duties under the Equality Act to make reasonable adjustments, including in any online teaching or remote assessments. They should make clear that additional funding can be provided through Disabled Students Allowance if additional communication support, beyond what is normally provided, is needed.
 - 4.5. We believe the Departments of Health and for Education will need to urgently oversee the development of action plans to address a likely backlog of children whose diagnosis of deafness has been delayed, once the crisis has passed. We believe that the Government should provide emergency funding as needed, particularly to ensure that intensive early intervention support can be provided to ameliorate the effects of late identification.
 - 4.6. The Department of Work and Pensions should take steps to ensure its processes are fully accessible, and to remove unnecessary bureaucracy for disabled people during this crisis. This includes:
 - accepting paper-based evidence for Personal Independence Payments (PIP), instead of requiring deaf young people to undergo telephone-based assessments. Alternatively, to make use of webchats or video calls as alternatives to telephone assessments, with any communication support provided as needed.
 - being more flexible in how Access to Work claims are handled at this time and accepting digital claims rather than paper only.
 - 4.7. The Government should review the accessibility of information to deaf young people on emotional wellbeing, as well as on Covid-19 more generally.
 - 4.8. The Government should review and prioritise the commissioning of face masks with transparent panels that allow deaf people to be able to lip-read. The Government should also consider the accessibility of information and support to deaf children and young people around face masks and any advice on covering faces.
 - 4.9. In the following sections, we list our evidence of the impact of the Covid-19 pandemic and ‘lockdown’ measures on deaf children and young people.

5. Education:

5.1. Specialist support

- 5.1.1. 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. Most, if not all, of these professionals have stopped routinely meeting with deaf children, young people and their families.
- 5.1.2. Whilst many local authority specialist education services for deaf children are continuing to provide support remotely, this is not available consistently across England. This is for range of reasons – including redeployment of key staff, staff having to self-isolate, or issues around IT infrastructure.
- 5.1.3. 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.
- 5.1.4. The lack of specialist support for deaf children and the wider family is one of the most concerning issues for our members.

“I worry with her no longer getting any therapy etc. all the progress she has made is going to be lost” (Parent of deaf child)

“My daughter who has two cochlear implants really needs her speech and language teacher...She tells me I am not her teacher. I’ve asked for help in this, and have been told we can go on Skype, I don’t have the equipment to do this. So for now we just have to carry on struggling”. (Parent of a deaf child)

“My daughter is unable to have her speech and language sessions or her 1-2-1 sessions as per her SEND at school. There is no contact with her Teacher of the Deaf.” (Parent of a deaf child)

- 5.1.5. Deaf young people who need support with transitions and moving into the next phase of education or employment may be affected and not be receiving the support required at this time. Deaf young people have told us that, before Covid-19, there were significant challenges in receiving specialist and tailored careers advice. There is therefore a risk that the crisis will make a bad situation worse, resulting in many deaf young people falling through the net and significant future disadvantage for this cohort.

“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)

- 5.1.6. Some families of deaf children are concerned that there may be further austerity or cuts in the future, due to the economic implications of Covid-19.

“I’m quite worried that council cuts might mean we lose our Teacher of the Deaf”. (Parent of a deaf child).

5.2. Specialist equipment

5.2.1. 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.

5.2.2. We believe that deaf children should be able to use radio aids at home. Some deaf children may benefit from the opportunity to use their radio aids to access online lessons (by connecting their radio aid to a computer) or to connect with family members.

5.2.3. 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. In our recent survey of parents, 46% reported that they had been unable to take home equipment, such as radio aids, that their child used in an education setting.

5.3. Accessibility issues

5.3.1. Where children and young people are being provided with home learning materials, there are issues around whether they can access this content without their usual specialist support (e.g. communication support worker or specialist teaching assistant). The content is not always being differentiated for their specific learning needs.

“I don't know how to solve the problem at the moment the teachers give me learning I don't understand. Why is it that learning doesn't ever think about deaf people?” (Deaf young person)

“She gets frustrated at the videos from nursery as she struggles to lip-read the videos and understand” (Parent of deaf child)

“The work that xxx has been set is ridiculous, definitely has not been adapted to meet his needs” (Parent of deaf child)

“College assign an audio book every day. You couldn't make it up!” (Parent of a deaf child)

5.3.2. Where children and young people are being asked to engage in online teaching or learning, there are significant issues around accessibility. For example, at the time of writing, not all of the video content on BBC Bitesize or on the recently launched Oak National Academy has subtitles.

“Not enough thought has gone into the accessibility, particularly of the Oak National Academy which all teaching appears to be...spoken lessons via a video.”

“It is disappointing to see that Deaf and hard of hearing students have not been taken into account when the Oak National Academy was created.”

“The Oak National Academy however is completely inaccessible to anyone with a hearing loss.” (Head Teacher at a specialist deaf school)

5.3.3. Whilst BBC Bitesize and the Oak National Academy have committed to making improvements, there is still a concern that accessibility continues to be an afterthought. As far as we can tell, the importance of accessibility is not highlighted on government webpages for parents or professionals in England on home learning at this time.

5.4. **Education, Health and Care plans**

5.4.1. The Coronavirus Act gives the Government the power to issue a notice that would effectively suspend the requirement on local authorities to provide any support set out in an EHC plan. Instead, local authorities and schools would use ‘reasonable endeavours’ to ensure that any required support is provided.

5.4.2. Whilst we understand that these powers have not yet been used in England and are temporary in nature, we believe it would be helpful for the Government to set out clear guidelines of what ‘reasonable endeavours’ might look like in practice, and how these powers should be used.

5.4.3. We are also concerned that some families have been told, wrongly, that EHC plans have already been suspended.

“No contact or access to most services. Falling behind with school work, been advised EHCP requirements do not have to be met currently. Deaf daughter is feeling very socially isolated.” (Parent of a deaf child).

Recommendations:

The Department for Education in England has issued guidance on vulnerable children, including children with EHC plans. However, only around 20% of deaf children in England have an EHC plan. We recommend that the Department for Education should publish separate guidance on support for disabled children. This guidance should:

- set out expectations for how disabled children and their families should still be supported and have their needs met. This should include support for pre-school deaf children and support around transitions;
- be clear on what ‘reasonable endeavours’ means in practice if EHC plans are suspended;
- require local authorities and schools to make radio aids and other specialist equipment available to families to use at the home; and
- ask local authorities and schools to fund additional communication support if needed to access online teaching or learning.

We recommend that the Department for Education widen the criteria for its equipment fund so that deaf and other disabled children can be provided with laptop/tablets and 4G routers where needed, enabling them to access any online learning and remote support.

We recommend that the Department produce guidance for online education providers on accessibility for deaf and other disabled children and/or signpost to resources produced by others. The Department should consider providing additional funding to ensure existing content is accessible if capacity prevents them from doing so quickly. They should also ensure that accessibility is not an afterthought in any future commissioning of online resources.

5.5. Higher education

- 5.5.1. 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 any 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.
- 5.5.2. 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 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)

Recommendations:

The Department for Education in England should also publish guidance on support for disabled students in higher education. This should remind higher education institutions of their duties under the Equality Act to make reasonable adjustments, including in any online teaching or remote assessments

The Department should make clear that additional funding can be provided through Disabled Students Allowance if additional communication support, beyond what is normally provided, is required.

6. Health:

6.1. New-born hearing screening

- 6.1.1. The new-born hearing screening programme is, for the most part, continuing. Hospital-based new-born hearing screening services (which amount to around 95% of all services) will continue for the near future.
- 6.1.2. However, community-based screening has stopped. For children born in areas with a

community screening model, there will be a need to screen a number of children at a later point. There is a risk that some children may fall through the net at this time, because of movement between areas, etc. This means that some children may not be referred to audiology for a formal diagnosis of hearing loss, missing out opportunities for early intervention.

6.2. Paediatric audiology services

6.2.1. Whilst many audiology services are seeking to keep going as much as possible and are starting to re-open in some areas, nearly all routine appointments are being cancelled in many areas.

6.2.2. Where we believe this will have the biggest impact is around identification of deafness. It is likely there will be a significant number of families whose child's new-born hearing screening results indicate a concern but which cannot be formally identified by an audiologist in the near future. The same applies to families who are concerned that their child has acquired hearing loss. Half of all deaf children acquire deafness during childhood. Delays in diagnosis are likely to cause significant anxiety for families.

6.2.3. These delays present a significant risk to these deaf children, particularly given what we know about the importance of early intervention for deaf children.

Recommendation:

We believe the Departments of Health and for Education will need to urgently oversee the development of action plans to address this backlog of children awaiting a diagnosis of deafness, once the crisis has passed. We also believe that the Government should provide emergency funding as needed, particularly to ensure that intensive early intervention support can be provided to ameliorate the effects of late identification.

6.2.4. 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.

6.3. Cochlear implantation and other surgeries

6.3.1. The NHS has stopped all 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)

7. Welfare benefits and employment support

- 7.1. Face to face PIP assessments have been cancelled. The Department for Work and Pensions and the assessment providers have indicated that telephone assessments will be conducted instead. These will not be accessible to many deaf young people. As such, we believe the Department should introduce alternative arrangements (such as video calls or funding remote communication support). Alternatively, they should allow PIP to be awarded based on paper evidence, e.g. an audiogram from an audiologist.
- 7.2. In terms of the Access to Work scheme, the Department for Work and Pensions is still requiring paper claim forms to be sent. This involves additional trips out of home, visits to the post office, and significant delays. This situation risks resulting in deaf young people not being able to access the support they need, and the provider or supplier not being paid by Access to Work.
- 7.3. The Department has cited data protection as a reason for why they can't receive Access to Work claims by email. However, at the time of writing, they have not explained why data protection legislation prevents them from handling claims by email. Many deaf young people feel that the Department is being insufficiently flexible at this challenging time.

Recommendations:

The Department for Work and Pensions should take steps to ensure its processes are fully accessible, and to remove unnecessary bureaucracy for disabled people during this crisis. This includes:

- accepting paper-based evidence for PIP, instead of requiring deaf young people to undergo telephone-based assessments. Alternatively, to make use of webchats or video calls as alternatives to telephone assessments, with any communication support provided as needed.
- being more flexible in how Access to Work claims are handled at this time.

8. Emotional wellbeing:

“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)

- 8.1. 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 rely on being able to attend clubs and events where they can be with other deaf people.
- 8.2. 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)

- 8.3. 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)

- 8.4. 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.
- 8.5. 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)

Recommendation:

The Government should review the accessibility of information to deaf young people on emotional wellbeing, as well as on Covid-19 more generally.

9. Face masks:

- 9.1. Communication for virtually all deaf children and young 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). Face masks can also have the effect of obscuring speech, making it harder for deaf children to make use of any residual hearing they have. Face masks therefore present specific challenges for deaf children and young people.

- 9.2. Face masks are already being used in some situations for public health reasons (for example, in hospital settings). At the time of writing, there is speculation that the UK Government may recommend that face masks be worn more widely by the general public.
- 9.3. In the event that the Government issues guidance on face masks or on covering faces with scarves, etc. we believe it would be helpful to issue guidance around how the needs of deaf children can be accommodated at this time. It is also helpful to review the commissioning of face masks. Alternative face masks with transparent panels, where the mouth can still be seen, are known to be manufactured internationally.
- 9.4. Our advice to families and professionals is be flexible and creative in how they communicate with deaf children and young people, depending on the resources they have to hand and the situation they find themselves in. Options might include:
- temporarily removing the face mask and communicating within the current social distancing guidelines of 2m apart
 - using alternative forms of communication – such as writing things down or via text messages, depending on the individual needs of the child
 - communicating via a window/glass panel
- 9.5. It's possible that public health guidance may require deaf children to wear face masks themselves in some situations. Face masks may present particular challenges to deaf children with speech impediments and/or facial disfigurements. More widely, it would significantly change the way that all children communicate. Some deaf children may therefore need emotional support and patience to get used to this.

Recommendations:

The Government should review and prioritise the commissioning of face masks with transparent panels that allow deaf people to be able to lip-read.

The Government should also consider the accessibility of information and support to deaf children and young people around face masks and any advice on covering faces.

10. Contact for more information:

- 10.1. If you would like additional information from deaf young people and families on how Covid-19 is affecting them please contact us.

April 2020