

Chime Submission

To the Department of Children, Disability and Equality on the

Statement of Strategy 2025-2027

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1.0 Introduction

1.1 Chime is the National Charity for Deaf and Hard of Hearing people. Chime was founded in 1964 and is dedicated to a society where deafness or hearing loss does not limit individual potential, personal choice or quality of life. Chime works to achieve this through advocating for a more accessible and inclusive society and providing a range of personal support services for Deaf and Hard of Hearing (D/HH) people. Chime's services entail a holistic approach, addressing the person's social, technological and emotional needs.

1.2 Chime welcomes the consultation on the development the department's Statement of Strategy 2025-2027. Chime welcomes the renewed focus of the department following the transfer of the Integration and Youth functions from the Department. These developments, amongst others, should ensure that any new Statement of Strategy has disabled people at the centre of its planning, conceptualisation and implementation, underpinned with core values of equality, fairness and justice.

1.3 There are two main cohorts of people within the communities of Deaf and Hard of Hearing people. Firstly, there are those people who were born deaf, or acquired their deafness in early childhood, and use Irish Sign Language (ISL) as their primary language. These are the members of the Deaf community and there are approximately 5,000 Deaf people in Ireland whose first language is ISL.

Secondly, there are those who have acquired a hearing loss in adulthood, typically from middle age onwards. These people tend to describe themselves as 'Hard of Hearing', and there are over 300,000 in the country. It is important to note that people within both groups might describe themselves as Deaf and/or Hard of Hearing.

1.4 This submission is focussed from two perspectives. Firstly, it concentrates on the issues of particular interest to D/HH people. Secondly, the scope and focus of this submission is limited to the Department's outlined key objectives and in line with the Programme for Government.

2.0 Objective 1: Implementing Young Ireland, the Government's national policy framework for children and young people, supporting them to achieve their potential

2.1 Education and Training

Education is a key issue in enabling D/HH children to reach their potential and can play an important role in breaking the cycle of poverty experienced by many D/HH people. Early intervention support for families is critical, and language acquisition is probably the most important developmental issue in the early months and years of a D/HH child's life. Delayed language development is linked to other challenges, such as social and emotional difficulties.

It is important to understand that hearing loss or deafness is not a barrier to learning. In fact the National Council for Special Education (NCSE) state that the objective for D/HH students

should be that they achieve educational outcomes on a par with hearing peers of similar ability.¹ However, currently the NCSE has not monitored outcomes for D/HH children, so we have no data to determine if this objective is being achieved.

Evidence from the UK suggests that D/HH students there are generally one grade per subject behind their hearing peers.² Importantly, while D/HH children from the most affluent areas in the UK may actually be achieving above average results, those from the least affluent areas can be as low as the 21st percentile.³ Anecdotally, parents tell us that their children are struggling, and are receiving even less support than before under the new model for allocating Special Education Teaching Support.⁴

The shortcomings of the educational system for D/HH children is further illustrated in the low numbers of D/HH students in Third Level education.⁵ Barriers in terms of access to training and employment supports further exacerbate the challenges faced by D/HH people, and this is especially so for members of the Deaf community.⁶

For members of the Deaf community, an additional barrier is the lack of available ISL interpreters. In a number of instances Chime is aware of Deaf students who have dropped out of their course due to the unavailability of ISL interpreters.

The barriers and challenges experienced by D/HH people in terms of education and training are lifelong. They begin early in life and continue throughout the educational and training system. Addressing these issues requires action from across government and relevant agencies, but key actors include the Department of Education, NCSE, Department of Children, Department of Social Protection and the Department of Health. Key areas to be addressed include:

- Provision of Early Intervention support with an emphasis on language acquisition. Support to include early access to ISL, early access to personal FM systems, and a focus on assessment and monitoring of language development.
- Educational outcomes for D/HH children to be collated in the primary and secondary system, with appropriate levels of educational supports to be provided to ensure that D/HH children reach their potential. A specific focus should be placed on improving teacher CPD in teaching D/HH students and minimum levels of ISL competency for teachers in Deaf schools and units for D/HH students.
- D/HH students to receive individual career guidance in secondary schools to enhance transition to further education and training. Increased applications to

¹ The Education of Deaf and Hard of Hearing Children in Ireland (NCSE, 2011)

² National Deaf Children's Society note on Department for Education figures on attainment for deaf children in 2022. NDCS (2023).

³ Hutchinson, J. The educational outcomes of deaf children in England: Attainment at key stages 1,2 and 4. Education Policy Institute (2023).

⁴ Parent statement on RTE documentary DEAF – *not dumb*, broadcast on RTÉ One on 23rd Nov 2023.

⁵ Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2021/22. AHEAD (2023).

⁶ Report on the Operation of the Irish Sign Language Act. NDA (2021).

DARE and numbers of D/HH students graduating from Third Level education should be key goals.

- Access to the full curriculum for D/HH students.
- Provision of ISL as a Leaving Certificate subject exam.
- Development of an ISL curriculum throughout primary and post-primary school
- Consistency in access to Assistive Technology (AT) for D/HH student in all schools, and that AT assigned to a student can be made accessible at home as well as at school.
- Access to ISL in schools for all D/HH students, through the allocation of Specialist Support Teachers who are trained in ISL.
- Consistency in access to AT in all further education institutions.

2.2 Wellbeing and social care services

We live in a pre-dominantly hearing world, and at times this can result in increased risk of isolation and exclusion for D/HH people. This can be true, whether we are talking about a young child who is D/HH, who most likely (more than a 90% chance) has hearing parents with little or no experience of deafness; or a mature adult who experiences reduced hearing later in life and associated challenges communicating with family and friends.

Communicating with family, friends and wider society is a core element in our wellbeing and (especially for children) development. However, despite some progress, many barriers remain.

Outlining these barriers in detail is beyond the scope of this submission, but there is ample evidence in research to demonstrate the increased toll on general wellbeing that is experienced by both children and adults who are D/HH.^{7,8} In turn, while this indicates that D/HH people might have an increased need to avail of social care services, the reverse is true, due in part to the communication challenges in availing of such services and the lack of awareness amongst education and health professionals.^{9,10}

In the absence of a National Hearing Care Plan with clear policy guidelines for managing hearing loss in the population, hearing aid uptake in Ireland is only at 50% of the level in the UK,¹¹ resulting in a very high level of unmanaged hearing loss in the Irish population.

⁷ Mathews, E. Socio-Emotional Development in Deaf and Hard of Hearing Children. DCU (2021).

⁸ Health and Wellbeing : Active Ageing for Older Adults in Ireland. TILDA (2017).

⁹ Beresford, B. et al. An evaluation of specialist mental health services for deaf children and young people. York: Social Policy Research Unit (2008).

¹⁰ Alexander, A. et al. Deafness might damage your health. The Lancet, 379, 979-981, (2012).

¹¹ Report under Section 23 of the Social Welfare (No 2) Act 2019 on the Cost of Hearing Aids and the Adequacy of Financial Supports. DEASP (2020).

Unmanaged hearing loss is associated with increased risk of depression,¹² dementia,¹³ and other health and social challenges.

The Statement of Strategy will be key to substantially improving the wellbeing of D/HH people across all ages. Important areas for focus include:

- Improved early intervention and support for D/HH children and their families.
- Development of a National Hearing Care Plan to support more people, including children, to access relevant interventions such as hearing aids and assistive technology, in a timely manner.
- Develop the Mental Health Service for the Deaf community in line with the agreed business case for the service.¹⁴
- Provide access to assistive technology to enhance independent living and quality of life in the community for D/HH people.
- Improve access for the Deaf community across a range of critical services, such as emergency departments and counselling services.

3.0 Objective 2: Promoting the development of a progressive, respectful and equal society, including for persons with disabilities, in line with a rights-based approach and with a particular focus on intervention

3.1 Implementation of the ISL Act 2017

Chime supports calls from the Deaf and Hard of Hearing community to progress the implementation of the ISL Act 2017, including the following commitments:

- Ensure interpreting supports for Deaf job seekers, employees and employers of Deaf people including the Work and Access scheme are simplified, effective and measure outcomes against latent demand.
- Update the legislation in light of UNCRPD.
- Government to consult with stakeholders and update ISL Act 2017.
- The Minister to ask the NDA to commence the next review of the implementation of the ISL Act.
- In line with the Disability Act 2005 and the Public Sector Duty, public bodies should be obliged to develop and implement an ISL Action Plan in consultation with stakeholders.

¹² Blake, J. et al. Hearing Loss and Depression in Older Adults: A Systematic Review and Meta-analysis. The Gerontological Society of America, 60, 137-154 (2020).

¹³ Amieva, H. et al. Death, Depression, Disability, and Dementia Associated With Self-reported Hearing Problems: A 25-Year Study. The Gerontological Society of America, 00, 1-7 (2018).

¹⁴ HSE reply to Parliamentary Question No 3780/22.

3.2 Development and implementation of a new National Assistive Technology Strategy

The lack of access to AT for Deaf and Hard of Hearing people creates barriers in daily living, impacting on quality of life and health and safety. Reduced independence, reliance on others and increased social isolation are just some of the impacts on Deaf and Hard of Hearing people. There is an abundance of research demonstrating the impact of unmanaged hearing loss on individuals on their families, including increased incidence of depression, cognitive decline and social isolation (e.g. see WHO World Report on Hearing: <https://www.who.int/publications/i/item/9789240020481>).

There is a need for a National Hearing Care Plan which will provide clear care pathways for audiology and related services such as assistive technology.

There is inconsistent and inadequate access to AT through the HSE and other areas such as education. Proper funding and processes need to be put in place to ensure this happens.

Access to AT in education (such as personal FM systems) is generally good in primary schools – but families do not have access to this technology at home and when a student progresses to secondary school, they will find that they have access in only one classroom, though they may use multiple classrooms. Funders, such as the Department of Education, need to provide equipment based on the real lived experience of the student in their school.

Historically there has been very poor access to AT in employment. With the introduction of the new Work and Access scheme in 2024, it is hoped that this will change, however there has been very limited uptake of the scheme and investment on promoting and improving accessibility and appeal for the scheme is required.

Last year 400 people with acquired hearing loss received adapted smoke alarms from their local Fire Services, providing them with fire safety protection at night when they are sleeping. However, many tens of thousands do not have any protection.

Access to AT in public places (e.g. theatres and other performance areas) is extremely poor. It is simply not a priority and there is no enforcement of legislation.

In summary, there is very poor access to AT for Deaf and Hard of Hearing people. There are multiple providers in health, education and elsewhere, resulting in a fragmented, uncoordinated and inefficient environment that is not person-centred and is completely inadequate.

Chime participated in the consultation with the department and the World Health Organisation on the provision of AT in State services, and one of the major recommendations being proposed by the WHO to the department is to develop and implement a new National Assistive Technology Strategy. The strategy should aim to address the inconsistencies and seek to mainstream AT across all departments and state agencies.

Chime supports the WHO's recommendations to the State and the urgent implementation with required resources to provide consistent access to high quality AT, to ensure the rights

of disabled people are fulfilled and that all disabled people are supported to reach their potential.

3.3 Employment and Anti-poverty

Like people with disabilities in general, D/HH people experience higher levels of unemployment and poverty. While the rate of unemployment for D/HH people is slightly higher than disabled people generally, D/HH people are more likely to be under-employed, as they experience higher levels of isolation in the workplace and are often not supported to engage in training and development opportunities. Educational attainment and participation in higher education is lower for D/HH students¹⁵, which in turn results in lower incomes higher levels of poverty.

The newly focussed Department needs to commit to the delivery of improved education supports and outcomes and enhanced employment opportunities for D/HH people.

Important actions in regard to employment and anti-poverty include:

- Ensuring that D/HH people, especially ISL users, can access employment supports such as INTREO and CE schemes.
- Providing relevant in-work supports for D/HH people, including access to ISL, to reduce isolation and remove barriers to training, development and career progression in the workplace.
- Provide targeted support to D/HH children and their families from less affluent areas as a specific anti-poverty measure.
- Introduce financial supports to address the cost of disability identified in the Indecon Report.¹⁶

3.4 Transport and mobility

Transport is a key element in supporting mobility amongst the general population, and people with disabilities rely more than most on accessible public transport. D/HH people welcome developments in the use of visual communications to provide information on transport services in recent years, such as next destination or time of next bus etc. While these accessibility features were advocated for over many years by D/HH people, they are now almost standard features that benefit users generally – an excellent example of universal design in action. From the perspective of D/HH people, the current issue of most concern in terms of transport is when there are unexpected disruptions to services. Typically details of such events are communicated through audio announcements only, leaving many D/HH travellers unaware of what is happening. Customer services in places such as train stations or airports are often not accessible for D/HH people who need to make inquiries, make changes to their travel plans etc.

¹⁵ (Reference 5)

¹⁶ The Cost of Disability in Ireland. Indecon (2021).

D/HH people can now generally use public transport independently and with increased confidence due to improvements in accessibility. However, there continue to be concerns with a lack of accessible communications by some providers, inaccessible announcements where changes are being made at short notice, and inaccessible customer service desks. The new National Disability Strategy should address these issues as part of a universal design approach to all licensed passenger transport providers.

3.5 Independent living in the community

Some D/HH people, particularly those with additional needs, struggle to live independently in the community. For many adults with acquired hearing loss, earlier intervention, particularly through the provision of hearing aids, could significantly enhance quality of life and improved independence for many. For members of the Deaf community with additional needs, state interventions can often increase marginalisation and reduce quality of life, such as when a Deaf person is placed in a care environment without access to sign language.

A new National Hearing Care Plan, which the Department of Health have recently committed to developing, should deliver improved access to audiology services and technology such as hearing aids for those with acquired hearing loss. In turn this should reduce the risks associated with unmanaged hearing loss and improve quality of life and independence.

For members of the Deaf community, access to services is key. The ISL Act has resulted in some improvements but much remains to be done.¹⁷ The recent commitment to introduce the 'Voucher Scheme' on a permanent basis is an important step in the right direction.

One of the biggest barriers to access for the Deaf community currently is the lack of qualified ISL interpreters.¹⁸ This matter requires urgent action from the Department of Further and Higher Education, Department of Children, Equality, Disability, Integration and Youth, Trinity College and other stakeholders to increase the number of ISL interpreters urgently.

In recent years some progress has been made in enhancing independent living for D/HH people in the community, though much remains to be done. The department, in line with the new National Disability Strategy, needs to focus on:

- Ensuring D/HH people receive timely support, whether they are children born deaf or adults with acquired hearing loss.
- Ensuring all public services are accessible to everyone on an equitable basis, with a particular focus on members of the Deaf community.

¹⁷ Report on the Operation of the Irish Sign Language Act. NDA (2021).

¹⁸ Evaluation of SLIS National Disability Inclusion Strategy (NDIS) actions. Sign Language Interpreting Service (2022).

- Developing and implementing a National Hearing Care Plan to address deficits in service provision for D/HH people in accessing audiology, assistive technology and other related services.

3.6 Active participation in society

Deaf and Hard of Hearing people must be given every opportunity to enjoy active participation in society. The chronic shortage of ISL interpreters is causing a major step-back in achieving this and the government must actively pursue all routes to develop the pathways for increasing the recruitment and provision of ISL interpreting services that is regulated and provides a viable and attractive career. Chime advocates for the department to progress this work by:

- Working with stakeholders to scope and begin addressing structural issues to ensure the viability of interpreting as a profession.
- Ensuring RISLI can carry out a function as a regulator including quality assurance processes, enforcing and monitoring of CPD requirements and an effective complaints and feedback system.
- Ensuring SLIS services such as IRIS, emergency response and Social Inclusion Scheme (Voucher Scheme) are funded, promoted and provided on a rights basis to meet demand.
- Working with the Coimisiún na Meán on ensuring that all audio-visual projects funded by Sound and Vision provide access services and have Subtitles, Irish Sign Language and Audio Description.
- Supporting the development of an action plan to ensure the implementation of the European Accessibility Act.
- Ensuring all platforms report on quality control measures in their assessment of subtitling targets.
- Progressing the NDA development of a new Sound Guidance document for accessibility in public buildings with an action plan and oversight, and with a plan to regulate in private buildings also.

4.0 Summary

4.1 Chime advocates for all objectives to include focussed inclusion of the Deaf and Hard of Hearing community and that accessibility is thread through all new policy and initiatives that include a variety of modes including ISL interpretation, good quality assistive technology, easy-to-read forms and documents for public use, closed captioning and subtitles, sound friendly spaces and the promotion of wider awareness training on Deaf and Hard of Hearing community. It is imperative that the implementation of the ISL Act 2017 is proactively pursued across all departments through engagement and collaboration to ensure the rights of all Deaf and Hard of Hearing people to express themselves in ISL as a recognised national language, with sufficient resources and oversight.

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