

Chime Submission

re the consultation on the

National Disability Strategy

February 2024

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 of a National Disability Strategy (NDS). Since the last strategy, there has been some important changes, not least the ratification of the UN CRPD and the transfer of disability functions from the Department of Health to the Department of Children, Disability, Equality, Integration and Youth (DCEDIY). These developments, amongst others, should ensure that any new NDS 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. 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 emergent themes identified during consultations by the DCEDIY, namely, employment and anti-poverty, transport and mobility, wellbeing and social care services, education and training, independent living in the community.

2.0 Theme 1: Employment and anti-poverty

2.1 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 students¹, which in turn results in lower incomes higher levels of poverty.

- 2.2 A new National Disability Strategy needs to deliver improved education supports and outcomes (see Theme 5) 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 (see Theme 5).
 - Introduce financial supports to address the cost of disability identified in the Indecon Report.²

3.0 Theme 2: Transport and mobility

- 3.1 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.
- 3.2 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.

4.0 Theme 3: Wellbeing and social care services

4.1 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.^{3,4} 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.^{5,6}

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,⁷ resulting in a very high level of unmanaged hearing loss in the Irish population. Unmanaged hearing loss is associated with increased risk of depression,⁸ dementia,^{9,10} and other health and social challenges.

- 4.2 The new National Disability Strategy needs to be ambitious in 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 (see Theme 5).
 - 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. 11
 - 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.

5.0 Theme 4: Education and training

5.1 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. 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. ¹³ 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. ¹⁴ 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. ¹⁵

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. 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. 16

For members of the Deaf community, an additional barrier is the lack of available ISL interpreters (see Theme 5). 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.

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

6.0 Theme 5: Independent living in the community

6.1 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 significant 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. 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. ¹⁷ 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.

- 6.2 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 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.
 - 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.

7.0 Summary

7.1 This submission focusses on the themes ... The themes are broad and complex, and a comprehensive response within this submission to these themes is not possible. Furthermore, the range of needs and challenges faced by D/HH people are also broad both in terms of individual need and the nature of the challenges. Suggested actions are typically at a high level, and are focussed on the areas of greatest need and opportunity.

They are made in good faith in the belief that the next National Disability Strategy will have the full commitment of Government and other stakeholders to make a real and substantial difference to the live experience of people with disabilities in Ireland.

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