

Agenda – Equality and Social Justice Committee

Meeting Venue:

Committee Room 2 (Senedd)

Meeting date: 14 October 2024

Meeting time: 13:30

For further information contact:

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Committee Clerk

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Private pre-meeting

(13:00–13:30)

Public meeting

(13:30 – 16:00)

1 Introductions, apologies, substitutions and declarations of interest

(13:30)

2 Disability and Employment: evidence session 6

(13:30 – 14:30)

(Pages 1 – 22)

Rhian Davies, Disability Wales

Miranda Evans, Disability Wales

Break (14:30 – 14:45)

3 Disability and Employment: evidence session 7

(14:45–16:00)

(Pages 23 – 64)

Gerraint Jones–Griffiths – Engage to Change Lead Ambassador, Learning Disability Wales and Honorary Associate, Engage to Change Research and Evaluation Team, National Centre for Mental Health, Cardiff University

Angela Kenvyn – Project Manager, Learning Disability Wales



Dr Elisa Vigna – Research Fellow – National Centre for Mental Health, Cardiff University

4 Papers to note

(16:00)

4.1 Correspondence from the National Deaf Children's Society Cymru to the Chair regarding the suspension of the Made for Wales British Sign Language GCSE qualification

(Pages 65 – 66)

4.2 Correspondence from the Equality and Human Rights Commission to the Chair regarding the Public consultation: "Updated Code of Practice for services, public functions and associations"

(Pages 67 – 69)

4.3 Correspondence from the Cabinet Secretary for Housing and Local Government to the Chair regarding the inspection report published by the Chief Fire and Rescue Adviser and Inspector for Wales on the effectiveness of South Wales Fire and Rescue Service's response to domestic dwelling fires

(Pages 70 – 71)

5 Motion under Standing Order 17.42(iv) to resolve to exclude the public from the remainder of this meeting

(16:00)

Private meeting

(16:00–16:20)

6 Disability and Employment: consideration of evidence

(16:00–16:20)

Document is Restricted



Consultation Response to Equality and Social Justice Committee Disability and Employment Inquiry

About Disability Wales

Disability Wales (DW) is the national association of Disabled People's Organisations (DPO) striving to achieve the rights and equality of all disabled people.

DW's core role is to represent the views and priorities of our members to government with the aim of informing and influencing policy.

DW actively promotes the adoption and implementation of the Social Model of Disability in society including in employment policy and practice.

DW is an organisation run and controlled by disabled people. This includes a constitutional requirement for all members of its Board of Directors to identify as disabled people. Full voting members of DW must be DPOs with committee and general membership comprising a minimum 51% of disabled people.

DW's policy on recruitment requires that as the national DPO all externally facing roles are open only to disabled people.

DW's consultation submission draws on the 53 responses to our online survey designed around the Inquiry questions.

DW liaised with the Senedd Citizen Engagement Manager in circulating information to members about the opportunity to participate in the Inquiry focus groups aimed at working age disabled people.

What progress has been made to deliver the recommendations set out in the ‘Locked Out’ report and to reduce and remove barriers faced by disabled people who want to access Wales’s labour market. Why progress to reduce the employment and pay disability gap has been so difficult to achieve.

Disability Wales was actively involved in establishing the Disability Equality Forum Steering Group, which coproduced the report *Locked-Out: liberating the lives and rights of disabled people in Wales beyond Covid-19*. DW’s Chief Executive chaired the group, which consisted of nine disabled people and liaised with members, Welsh Government officials and report author Professor Debbie Foster in researching, producing and disseminating the report.

The *Locked-Out* Report is the only document of its kind commissioned by a jurisdiction in the UK to represent the experiences of disabled people during the Covid-19 pandemic. The report depicts the stark reality of life for disabled people during Lockdown which exposed and exacerbated inequalities imposed by the previous decade of austerity. The reference to ‘liberating’ in the full report title emphasised the steering groups’ hope and ambition for a transformation in society’s response to disabled people.

Following publication of the *Locked-Out* Report Welsh Government recommitted itself to the Social Model of Disability as the organising principle for action, as well as to incorporate the UN Convention on the Rights of Disabled People in Welsh law and establish a Ministerial Disability Rights Taskforce.

The Taskforce first met in November 2021 and held its final meeting in July 2024. Ten working groups relating to themes outlined in the Report were set up to consider report findings and recommendations in depth and report to the Taskforce. More than 300 people were involved including Welsh Government policy leads, DPO representatives and individual disabled people. The Social Model of Disability and coproduction with disabled people provided the underpinning principles.

DW was actively involved in the process including contributing to drafting the Terms of Reference, representation on the Taskforce and all its working groups, and delivering Social Model training to all participants.

To date Welsh Government has yet to publish for consultation the draft Action Plan based on Taskforce proposals and recommendations.

Given the time commitment and contribution of so many disabled people to the process, the high expectations generated and in the context of further

hardship created by the cost-of-living crisis, **we call on Welsh Government to publish the draft Action Plan as a matter of urgency.**

The recent initiatives introduced by Welsh Government aimed at tackling barriers to disabled people in the workforce and reducing the employment gap were not directly related to recommendations in *Locked-Out*. Some, such as the appointment of Disabled People's Employment Champions were commitments in the *Action on Disability Framework (2019)*. The publication *A More Equal Wales: A practical guide for employers to employing disabled people* was already in progress prior to publication of the Report. The *Stronger, Fairer, Greener Wales, Employability and Skills Plan (2022)* sets out Welsh Government's approach to ensuring a wide range of people excluded from the economy can work. While the plan references *Locked-Out*, the focus of action on people with 'long term health conditions' and creating a 'healthy' working Wales appears to indicate a Medical Model approach.

This default position may help explain the lack of progress made by all governments in reducing the employment and pay disability gaps. Without acknowledging the historic and deep-seated institutional ableism in society and formulating and resourcing a cross-cutting long-term plan to address it, disabled people will remain economically and socially excluded.

How the **social model of disability is being used to underpin employment and recruitment practices**, and what barriers continue to exist throughout society that impact on access to work (i.e. transport, attitudes).

There is far greater awareness if not full understanding of the Social Model of Disability in society however it tends to be patchy in implementation. Despite comprising a fifth of the population disabled people are generally not considered in planning processes whether this relates to housing, transport, the economy or even a global health pandemic.

As a DPO and employer of disabled people, DW endeavours to create an inclusive workplace and implement the Social Model of Disability in recruitment processes.

We have hosted more than 30 disabled university students on placement, providing many with their first opportunity of work experience. They report that it has helped raise their awareness of their workplace rights including the Access to Work scheme and how to identify and request reasonable adjustments from future employers.

The following quotes from some of the students, express the value they placed on the experience:

“As a vision impaired person, it has also been nice to find myself working with people who wouldn’t bat an eyelid if work needs to be changed into a more accessible format, there’s a definite sense of inclusion even when working virtually. It’s been wonderful to work with the charity over the past five weeks and I’m so grateful to have been a small part of Disability Wales’ work during that time.”

Elin 2019 Volunteer Intern

“I feel incredibly lucky to have had this experience with Disability Wales! This placement has given me a beneficial opportunity to learn about the Social Model of Disability, the effectiveness of current legislation and the active research taking place about disabling barriers in society.”

Emily 2020 Volunteer Intern

“I have also learnt about the Social Model of Disability and the societal barriers faced by disabled people. Everyone at DW always made me feel included and that my work and ideas were valued, and were incredibly supportive of me developing my skills and increasing my confidence.”

Amy 2021 Volunteer Intern

“Many workplaces, leisure activities and heritage site’s facilities are created with an image in mind which excludes disabled people. Volunteering has taught me that a few hours a week can have a huge impact on social change.”

Haris 2022 placement through EEquip Project

With funding from Welsh Government DW has published *The Social Model of Disability Toolkit* (2024) co-designed with Deaf and Disabled people which includes practical examples for employers¹.

We know from feedback from members, many disabled people struggle to get reasonable adjustments approved. This includes flexible/hybrid working. They

¹ [SMD-Toolkit.pdf \(disabilitywales.org\)](https://disabilitywales.org/SMD-Toolkit.pdf)

report negative attitudes from managers and colleagues and face unacceptable delays in securing support from Access to Work.

How effective Welsh Government actions (e.g. the network of Disability Employment Champions and apprenticeships) have been in reducing barriers to employment and reducing the employment gap between disabled and non-disabled people, including the extent to which Welsh Government policies complement/ duplicate/ undermine those set by the UK Government.

Appointing the network of five Disabled People's Champions is a welcome initiative especially the pro-active approach to recruiting disabled people to these roles. However, survey responses indicated a lack of knowledge about them or their role. Greater visibility would enhance the initiative, however as there are only five Champions, currently, realistic expectations are required of what can be achieved.

Another notable effort by the Welsh Government is the development of apprenticeship opportunities. This is a significant move toward creating accessible career pathways and addressing the employment gap between disabled and non-disabled people. However, similar to the Disability Employment Champions, the success of such initiatives depends on adequate promotion and outreach to ensure that disabled individuals and employers are aware of and can access these opportunities with the required bespoke support (e.g. provision of job coaches).

In conclusion, while the Welsh Government's initiatives, such as the network of Disability Employment Champions and apprenticeships, represent important steps in reducing employment barriers for disabled people, their effectiveness could be further enhanced by increasing visibility and expanding capacity. These efforts are promising but require ongoing attention to ensure they reach their full potential in reducing the employment gap.

Whether disabled people are accessing apprenticeships and if any further support is needed to ensure a schemes are inclusive.

Survey responses indicated that greater awareness of Apprenticeship schemes is required and more flexibility is needed. Age criteria was also highlighted as a barrier. Comments received included:

"This option has been considered, though I think that I would be too experienced in my chosen roles. I also would not even know/where to find apprenticeships."

"Don't think I can apply being a disabled 44 yrs old women."

“That’s the problem I wouldn’t know where to go to access an apprenticeship in Wales because I’m not informed or told disabled people are always put to the wayside when it comes to any type of employment we aren’t encouraged to go for these jobs or routes into employment like apprenticeships or studying they just think we can’t do anything which is a big part of the problem that we as disabled people have to face”

What further policy measures are needed to support disabled people, young disabled people and employers to increase participation rates and what can be learned from elsewhere.

Employment support must be decoupled from the benefits system which has created a toxic environment for disabled people over the last 14 years. Humiliating work capability assessments, cruel sanctions and draconian cuts to benefit have caused considerable harm to disabled people. A recently published book *The Department* by disabled journalist and author John Pring catalogues details related to the harrowing number of deaths amongst claimants².

In 2016 the UK Government was found by the UN to be in breach of three Articles of the Convention on the Rights of Disabled People on account of the impact of austerity measures in relation to rights to independent living, adequate standard of living and employment. A formal review of these findings undertaken by the UN in March 2024, in which DW participated, found that there had been “no significant progress” by UK Government in addressing the grave and systematic violations of Deaf and Disabled people’s rights that it highlighted more than seven years ago³.

It is therefore vital that the new UK Government working in partnership with the Welsh Government takes a very different policy approach. This should include recognition of disabled people’s rights through incorporation of the UNCRDP in UK and Welsh law. Furthermore, taking a social model approach by tackling disabling barriers in society that condemn so many disabled people to poverty and lack of opportunity in education and employment.

More focus is required on challenging discrimination in the workplace with less blame on individual disabled people for being unemployed. As well as

² [The Department \(thedeptmentbook.com\)](http://thedeptmentbook.com)

³

tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FGBR%2FFUIR%2F1&Lang=en

repercussions for employers who regularly breach the Equality Act (2010), there should be stronger incentives to embed good employment practice. DWP's Disability Confident Scheme is ineffective as well as discredited among disabled people and should be scrapped. DW has long supported a 'made in Wales' scheme for employers which engages with DPOs as part of the quality assurance process.

Drawing on the *Locked-Out* Report and the outstanding work undertaken by the Taskforce, Welsh Government has a golden opportunity to develop a new long-term Action Plan that sets out a progressive direction for achieving the rights of disabled people in an inclusive Wales.

The plan should include robust and measurable objectives with clear lines of accountability for delivery at Ministerial level and across the public sector. Key to this will be a powerful voice for disabled people, whether through a Commission or an Advisory Board with support for grass roots DPOs.

What actions would support those who are currently unable to work to access voluntary opportunities (which could lead to future work opportunities).

There is more to be done in creating greater inclusion across the Third Sector which includes opportunities for disabled people to volunteer and to gain employment. There is no equivalent of Access to Work for volunteers, which could make a significant difference to funding equipment, personal assistance and communication support and other reasonable adjustments.

Agenda Item 3

Response to The Equality and Social Justice Committee inquiry into the disability employment and payment gap.

Corresponding author

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Evidence submitted on behalf of: Influencing and informing: Engage to Change (Learning Disability Wales and the National Centre for Mental Health at Cardiff University).

Confirmation of whether you would prefer that your name is not published alongside your evidence: We are happy to be named in conjunction with this evidence.

Confirmation of whether you would like the Committee to treat any or all of your written evidence as confidential: The information contained in this response is in the public domain and is not confidential.

All responses below are in relation to people with learning disabilities, For a definition please see: [About learning disability | Mencap Cymru ~ Wales](#))

Position statement on use of language from All Wales people First : [Position-Statement-on-language-December-2023.docx \(live.com\)](#)

People with learning disabilities remain the population most excluded from the labour market with only 4.8% in employment ([Employment Rates for People with Disabilities 2022-23 | British Association for Supported Employment \(base-uk.org\)](#)). This is a statistic based on the number of adults with a learning disability and autism known to adult social care in England. Wales does not currently record figures relating to the number of people with learning disabilities in employment. Although it is reasonable to assume a comparable figure to England, this represents a significant gap in our knowledge about the Welsh LD population and the challenges of employment within the Welsh economy and employment landscapes.

The “Locked Out” report did not go far enough in addressing the concerns affecting people with a learning disability in relation to employment. Recommendations failed to explore the importance of needs led and whole systems approaches, including the role of supported employment and job

coaching, for supporting people with learning disabilities to train for, gain and maintain employment.

Engage to Change was a seven-year, pan Wales project, funded through the National Lottery Community Fund and supported by the Welsh Government to help young people with a learning disability and/or autism to tackle employment barriers and transition into a paid job. Led by Learning Disability Wales, it brought together ELITE and Agoriad Cyf supported employment agencies to deliver job coaching, unpaid and paid placements and paid jobs in ordinary workplaces. The project was supported by self-advocates from All Wales People First and evaluated by the National Centre for Mental Health (NCMH) at Cardiff University.

The Engage to Change project successfully provided employment support through job coaching to 1075 young people and delivered 244 supported internships, gaining an overall paid employment rate of 41%. This is compared to an estimated employment rate of 4.8% for people with learning disabilities in England (BASE 2023). This project is no longer accepting referrals, however during its operation it provided an important pathway for addressing the transition and employment needs of young people with learning disabilities and reducing the employment gap.

In Wales there is a high proportion of working age people who are economically inactive (28.4%) because of long-term sickness and disabilities (Welsh Government, 2024), however young people with learning disabilities are also likely to be economically inactive due to the lack of transition and employment support. People are generally excluded from the labour market as they experience difficulties in getting, learning, and maintaining a job without the right support. We know Supported Employment frameworks, which adopt the social model of disability, are effective ways of supporting young people into real employment in the open labour market. However, the Supported Employment model is not widely available for everyone who may need it.

In addition, there are still common misconceptions from stakeholders that people with learning disabilities cannot work, do not want to work, or do not make good employees. These misconceptions need to be urgently addressed. This will require a whole systems approach between people with learning disabilities, education, parents/ carers, employers and policy makers to develop a clear and accessible strategy that promotes the fact that there are people with learning disabilities who can work, who want to work and who should be supported to work.

Wales has some excellent employment support programmes, but many programmes are still not accessible to people with learning disabilities, who require specialist, flexible and person-centred support.

It is also clear that there should be better cross-party working within Welsh Government to encourage discussions and improve knowledge around employment for people with learning disabilities and/or autism across Wales. Welsh Government divisions, directorates, and working groups, together with bodies funded by Welsh Government, should better communicate with each other to support people with learning disabilities and/or autism around employment. This includes: The National Neurodivergence Team/ ALN transformation programme/ Curriculum for Wales consortium/ Young Persons Guarantee Group/ Learning Disability Ministerial Advisory Group/ The Disabled People's Employment Working Group / Careers Wales/Working Wales/ Medr and others. Discussions should include, as mandatory, people with learning disabilities, parents and carers, employers and commissioners of services.

It is important to recognise the employment support and Supported Employment are not the same thing.

To enable equality of opportunity and support there is a call for transition support to be guided by the [Supported Employment National Occupation Standards \(NOS\)](#) which is an internationally agreed 5-stage model of Supported Employment. The 5 stages are: client engagement, vocational profiling, job finding, employer engagement, on and off job support. This is aimed at enabling support for people to find, access and stay in employment.

A National Job Coaching Strategy is needed to ensure equality of opportunity and support for young people by promoting job coaching as a trained and qualified role.

The network of Disability Employment Champions is a welcome addition to Wales, but it is still too new to make a statement on its impact on reducing barriers to employment and lessening the employment gap. However, it was disappointing to see the loss of a Disabled Peoples Employment Champion with lived experience of learning disability.

In relation to **Supported Internships** for people with Learning Disabilities:

The Supported Internship model has been extended to more sites in Wales under the Welsh Government funded post-16 Independent Living Curriculum, as Pathway 4. Delivered by FE colleges, in some sites the model has deviated from the DFN Project SEARCH model, introduced to Wales by Engage to Change and to some extent the Alternative Supported Internships model developed by the project. There is more flexibility on outcome, with paid employment not regarded as the singular goal of supported internships, with other routes of progression such as supported apprenticeships being valid.

A Supported Internship Quality Assurance Framework (SIQAF) has recently been introduced in the UK (BASE 2023b) and is primarily available to be used by all supported internship providers and their delivery partners as part of the Internships Work programme in England. The aim is to ensure supported

internship models operate to the strengths of the individual site whilst also offering high quality and robust experiences to interns (NDTi 2023). In Wales, Quality Standards and Guidance for delivery of supported internships was published in 2023 by Colleges Wales, a member led organisation that acts as the voice of further education in Wales. These are independent and different from the English SIQAF.

It will be important to see how these standards impact on quality in supported internship delivery. In particular, whether these standards continue to evolve to ensure high quality outcomes for young people, including higher numbers of interns progressing into paid employment.

There remains a gap in provision to both prepare learners for the start of their internship and for ongoing support needed by interns not able to find jobs following their internships, who still require support to get employment. Pathway 4 funding, can only be used for the intern during the academic year while they are a learner on the supported internship course at the college. It pays for tutors and job coaching either provided by college staff or a supported employment agency. This is often supplemented by Access to Work being claimed as an hourly rate for support provided to the intern while on placement in the host business. Access to Work cannot be claimed for internship/work preparation but can be claimed for follow on employment support in paid work. However, ongoing delays in decision making and payment of claims continues to be a huge issue for supported employment agencies that may not be able to take the financial risk. Permitting Access to Work funding for permanent salaried job coach staff within large host employers should be considered.

As a result of Engage to Change, job coach support is available for young people with learning disabilities and /or autism participating in **Jobs Growth Wales+**. However, this programme is aimed at 16–19-year-olds and is not aligned to the age range of the Young Persons Guarantee. Many young people with learning disabilities and/or autism remain in school until they are 19 meaning they do not access this programme. There is a need for this programme to be promoted as a pathway to employment for these young people, their parents/carers and others who support them. We would also like to see any training and employability programmes aimed at young people to have an age range that is at minimum in line with the Young Person Guarantee and preferably for those up to 30 years of age.

We worked with Welsh Government to ensure apprenticeships were more inclusive. People with learning disabilities can get job coach support to undertake a **supported or supported shared apprenticeship** but must be able to achieve a Level 2. This, together with the other programmes mentioned, is not suitable for everyone with a learning disability.

There are gaps that need to be filled in order to provide equity of opportunity.

Recommendations

Moving forward, we know what works, but we need better data to fully understand the employment situation of people with learning disabilities in Wales. We need a clear idea of the number of people with learning disabilities, whether unemployed or in employment, what types of support are provided and where the support is available.

Previously we have called for a National Job Coach Service to be developed and funded across Wales. We recognise that in the current climate this has not been possible to achieve. However, we remain committed to ensuring that Welsh Government and stakeholders in Wales are engaged in the employment of people with a learning disability and/ or autism. If we are to provide effective support in Wales for people with a learning disability, we need to be clear about the model fidelity and the resources needed to deliver an effective service. We are now calling for a National Job Coaching Strategy that would be fully consistent with this.

Job coach support should not be limited to people with a learning disability, autism diagnosis or ALN status. Some people might self-diagnose and still need support. Job coach support should be given to any person, of any age, who would be unable to gain and or/ maintain paid employment without it.

In addition, experience matters. Having previous work experience does improve young people's job chances, particularly if they have had more than one opportunity. Welsh Government should consider the role of job coaching in schools in conjunction with Careers Wales for the children and young people who require additional support or reasonable adjustments for work experience.

The Welsh Government should also consider a policy of developing standardised *good practise* examples of Easy Read employment forms. Including examples for advertising job roles, CV's, job application forms and reasonable adjustment forms for employers.

Employment is everyone's business. There are direct links between employment and wider life, for example, wellbeing, independence, health and social care provision, caring roles and the economy. Sadly, people with a learning disability and/or autism are not regarded generally as a priority for employment support. This needs to change.

Reports from Engage to Change:

[Engage to Change: From service to strategy A national job coaching strategy for Wales.pdf](#)

[The impact of Covid-19 pandemic on jobs for people with LD in Wales: Vigna](#)

[Job equality and inclusion in Supported Employment for people with LD in Wales](#)

[Supported Employment for neurodivergent young people](#)

[Supported Internships: Evaluating the outcomes of a nationwide project](#)

[Supported Internships: Evaluation EASY READ](#)

[Parent views on Supported Employment for young people with LD](#)

[A demographic and qualitative analysis of success in a national SE project](#)

[Engage to Change briefing: Jobs for people with LD The role of the NHS](#)

References:

Vigna, E., Beyer, S., & Meek, A. (2023). A demographic and qualitative analysis of the determinants of success in a National Supported Employment project. *Journal of Applied Research in Intellectual Disabilities*, 36(4), 787–795. <https://doi.org/10.1111/jar.13094>

Vigna, E., Meek, A., & Beyer, S. (2024). Supported employment, quality of jobs and employment typicalness: The experience of the Engage to Change project. *Journal of Applied Research in Intellectual Disabilities*, 37(3), e13226. <https://doi.org/10.1111/jar.13226>

Vigna, E., Meek, A., & Beyer, S. (2024). The impact of COVID-19 pandemic on jobs for people with intellectual disabilities and autism in Wales. *Journal of Applied Research in Intellectual Disabilities*, 37(2), e13194. <https://doi.org/10.1111/jar.13194>

[Beyer, Stephen; Meek, Andrea; Davies, Amy](#) (2016). Supported work experience and its impact on young people with intellectual disabilities, their families and employers. *Advances in mental health and intellectual disabilities*, Vol. 10, Issue 3, pages 207 - 220

Making a National Job Coaching plan for Wales

Helping people with learning disabilities and autism find jobs



The Influencing and Informing Engage to Change project wrote this document. It is an easy read version of 'From service to strategy: A National Job Coaching strategy for Wales to support people with learning disabilities and autism into employment'.

How to use this document



This is an easy read document. You may still need support to read it. Ask someone you know to help you.



Words in **bold blue writing** may be hard to understand. You can check what the words in blue mean on **page 22**.



Where the document says **we**, this means the **Influencing and Informing Engage to Change project**.

The people working on the project are:

Dr. Elisa Vigna - NCMH, Cardiff University

Andrea Meek - NCMH, Cardiff University

Angela Kenvyn - Influencing and Informing Engage to Change, Learning Disability Wales.

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About Engage to Change



Engage to Change was a 7-year project. It ended in May 2023.



The project worked across Wales. And supported 1075 young people with a learning disability and or autism.



The **National Lottery Community Fund** funded the project and the Welsh Government supported it.

The project helped young people with a learning disability and or autism to:



- Learn skills for work



- Move into paid jobs



Almost half of the young people on the project found paid work.



You can find out more about the project on the website here: www.engagetochange.org.uk



This part of the project is **Influencing and Informing Engage to Change**.

The project is run by:



Learning Disability Wales
Anabledd Dysgu Cymru

- **Learning Disability Wales** and



- **The National Centre for Mental Health (NCMH) at Cardiff University.**

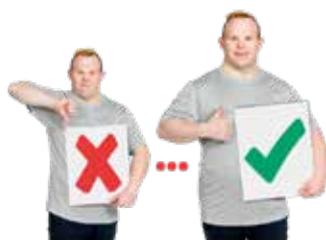


Our aim is to find out what helps people with a learning disability and or autism get paid work.



We will use what we learn to:

- Change policies.
- Improve how we support people with a learning disability and or autism to find and keep paid work.



We want a **Wales National Job Coach Strategy**. This would be a plan to provide **job coach** support to anyone who needs it.



Job coaches help people find, learn and stay in their jobs. This help is **job coaching**.

A national job coaching service



In 2020, we said there should be a **National Job Coaching Service**.



This would be a good way to help people with a learning disability and or autism get paid work.



We are basing this idea on what we learned from the **Engage to Change** project.



Supported employment and **job coaching**:

- Helps people develop skills for work
- Supports people into paid work



In Wales few people with a learning disability aged 18 to 64 have a paid job.



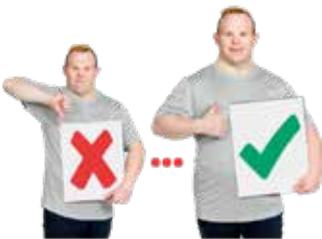
Only 4.8% of people with a learning disability in England have a job. This means less than 1 in every 20 people have a job.



21.7% of autistic people in England have a paid job. This means less than 5 in every 20 people have a job.



We do not know the numbers in Wales. But we do know that more people in Wales do not have a job compared to the rest of the UK.



There are good employment support schemes in Wales. But many of these do not meet the needs of people with learning disabilities.



Since 2020, we have collected more information about what works and what people need.



What works

What we learned from Engage to Change.



Work experience

Good work experience helps young people get paid jobs. We must offer high quality work experience to young people in school or college.



Job coaching

Job coaching was the most important part of getting young people into paid work.



Needs-led support

Support must be based on each person's needs. Some might need more time and support to learn work skills. Others might need help with social rules in work.

Paid work placements and supported internships



Work experiences like **supported internships** and paid work placements were most successful.



A **supported internship** is where people go to college for some hours each week but are learning in a workplace for most of the week. The work is unpaid. They get help from a **job coach**.



More young people found paid work after doing these types of placements.



In the Engage to Change project, we matched placements to young people's skills and interests. They did real work, in real workplaces and had support from a **job coach**. This worked very well.



Working with employers

We need to work with employers to provide supported employment and **job coaching**. It works best when we work with each employer.



The importance of paid work

Having a paid job helps people gain confidence and improves mental health.



Making the move from school to work easier will help the Welsh Government meet its health and social care goals.



Funding

Funding is important for this work. We think every job and skills programme should have money just for **job coaching**.

Where the money could come from:

1. [Access to Work](#)



Department
for Work &
Pensions

This is a scheme from the **Department for Work and Pensions (DWP)**. It provides money to help disabled people in paid work. **Engage to Change** supported more people because of this funding.



Llywodraeth Cymru
Welsh Government

We think the **Welsh Government** should keep this going and work closely with **DWP** to make using it more accessible and better. It is important to make sure this works well and without long delays.

2. Pathway 4 funding



This money is for **supported internships** and is available to Further Education colleges in Wales. There is no money for **job coaching** to help people get ready for their **internship** or for helping people after their **internship** ends.



Department
for Work &
Pensions

We need to do more work with **DWP** so that **Access to Work** funding can be used for more support in Wales.



Department
for Work &
Pensions

3. Universal Support

Universal Support is a **Department for Work and Pensions (DWP)** programme. It gives money for training and support at work for disabled people.



It should be based on supported employment models that we know work. If the Welsh Government sets up a **National Job Coaching Strategy** it should work with this funding.

4. The North Wales Learning Disability Employment programme



Health and Social Care run this. The **Regional Integration Fund (RIF)** funds it.



It provides supported employment for people of all ages who have a learning disability. This could work in other parts of Wales.

What we think should happen



These are our ideas for a **National Job Coaching Strategy**, based on what we learned from the Engage to Change project:



- Welsh Government employment programmes must have money that is just for **job coaching**.



- **Job coaching** should be based on each person's skills, interests and needs.



- **Supported Employment Agencies** are experts in helping people with extra supports needs. They should provide **job coaches**.



- All **job coaching** should follow the **National Occupational Standards for Supported Employment**. These standards describe the skills and knowledge needed to do **job coaching** well.



- All organisations that provide **job coaching** should have training in the **Supported Employment Quality Framework** and **job coaching**. They should learn **Training in Systematic Instruction**. This is a way to teach people by breaking tasks into smaller steps.



- The Welsh Government should support a national **job coach** training program. This would set what someone needs to learn to become a qualified **job coach**.



- There should be ongoing **job coach** support for people who do not get a paid job after they have finished **Jobs Growth Wales+**, a **supported internship**, or a **supported apprenticeship**.



- Programs like **supported internships**, **Jobs Growth Wales+** and **supported apprenticeships** do not work for everyone. All job and skills programs should include **job coach** support.



- **Job coach** support should be given to anyone who cannot get and keep a paid job without it.



- The Welsh Government should look at including **job coaching** in schools, alongside the support from **Careers Wales**. This would help children and young people who need extra help during work experience.



- Government employment and skills programmes for young people should cover at least 16 to 24 year olds, but it would be better up to 30 year olds.



- **Job coach** support should be for everyone who is of working age, not just young people.



- People need to recognise that **job coaching** helps people get paid work.



- Employers across Wales should get information about supported employment and **job coaching**.

As well as these ideas, we have found some best ways of working:



- We need to raise the **aspirations** of young people with learning disabilities.

Aspirations mean their goals, wishes and aims for what they can achieve in life.



- Information about how to get a paid job needs to be better. It should be easier for young people to find and understand.



- Information for parents and carers should also be easier to find and understand.



- Parents, carers, employers and teachers should believe that young people with learning disabilities and or autism can get and keep paid work.



- Work experience should help young people explore their work options. Around age 14 years, work experience should be about what work is. From age 16 years, it should focus more on:
 - Skills
 - Types of jobs
 - Practical experience



- **Careers Wales** should work with supported employment agencies to do these things.



- There should be a **Youth Friendly Employer** scheme. This would help employers provide good work experiences for young people.



- Welsh Government departments should work with politicians to better understand the impact of paid work. This is for people with learning disabilities and or autism.



- Welsh Government departments should work better together and with the organisations they fund. This is to support people with a learning disability and or autism to get paid work. And keep paid work.



- Any talk about helping people with a learning disability and or autism into paid work must include:

- People with a learning disability
- Parents and carers
- Employers
- People who plan and pay for services



- We need to encourage employers to include everyone. To make it easier for people to apply for jobs, go to interviews and get training.



- The Welsh Government should look at making Easy Read examples that everyone could use. Like Easy Read job adverts and application forms.

Thank you



Thank you to the **National Lottery Community Fund** for funding and supporting our work.



Llywodraeth Cymru
Welsh Government

Thank you to the Welsh Government for their support.



Thank you to the **Engage to Change** partners:

- Agoriad Cyf
- Elite Supported Employment
- All Wales People First
- DFN Project SEARCH



Special thanks to the employment advisors and **job coaches** for helping us collect data.



And to the young people and parents for helping with this research.

Hard words

Aspirations

Aspirations mean their goals, wishes and aims for what they can achieve in life.

Job coaches and job coaching

Job coaches help people find, learn and stay in their jobs. This help is job coaching.

Supported internship

A supported internship is where people go to college for some hours each week but are learning in a workplace for most of the week. The work is unpaid. They get help from a job coach.

From service to strategy: A National Job Coaching strategy for Wales to support people with learning disabilities and autism into employment.

July 2024

By **Dr. Elisa Vigna and Andrea Meek**, Engage to Change Evaluation Team, The National Centre for Mental Health, Cardiff University.

Angela Kenvyn, Influencing and Informing Engage to Change Project Manager, and **Gerraint Jones-Griffiths**, Influencing and Informing Engage to Change Lead Ambassador, Learning Disability Wales.



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Background:

[Engage to Change](#) was a seven-year, pan Wales project, funded through the National Lottery Community Fund and supported by the Welsh Government to help young people with a learning disability and/or autism to tackle employment barriers and transition into a paid job. Led by Learning Disability Wales, it brought together ELITE and Agoriad Cyf supported employment agencies to deliver job coaching, unpaid and paid placements and paid jobs in ordinary workplaces. The project was supported by self-advocates from All Wales People First and evaluated by the National Centre for Mental Health (NCMH) at Cardiff University.

The Engage to Change project successfully provided employment support through job coaching to 1075 young people and delivered 244 supported internships, gaining an overall paid employment rate of 41%. This is compared to an estimated employment rate of 4.8% for people with learning disabilities in England (BASE 2023).

The project is no longer accepting referrals.

Influencing and Informing Engage to Change is a partnership between Learning Disability Wales and NCMH at Cardiff University. We are taking forward the policy, research, and legacy work of the Engage to Change project. We are advocating for a Wales National Job Coach Strategy.



Building opportunity:

In 2020, we published a briefing which called for a National Job Coaching Service as an effective model to support people with a learning disability and/or autism to equally access the labour market in Wales. This briefing used evidence and learning from the evaluation of the first four years of the Engage to Change project and stated:

“Central to any redesign must be the provision of supported employment for people with a learning disability or ASD, including job coaching, of a significant intensity and quality to support those most distant from the labour market and who do not easily develop skills to work through pre-placement training or qualification. Any employment recovery plan, or replacement for the Job Support Wales scheme, should include ring fenced resources for a National Job Coaching Service to ensure people with autism and/or learning disabilities are not left behind in the competition for new jobs post-Covid-19.” (Beyer, Meek & Vigna 2020)

Supported employment including job coaching, was recognised as the key element to supporting the development of work-related skills and transition into paid employment through work-based learning.

In Wales, where unemployment is currently lower than the UK average, there is a high proportion of working age people who are economically inactive (28.4%) because of long-term sickness and disabilities (Welsh Government, 2024). Young people with learning disabilities and/or autism are also likely to be economically inactive due to lack of transition and employment support.

The latest data shows that only 4.8% of adults with a learning disability aged 18-64 and known to social services were in paid employment in England (BASE 2023) and 21.7% of autistic people were employed (Office for National Statistics 2022). In Wales we do not currently know the specific employment rate for people with learning disabilities and/ or autism because this data is not routinely collected or available.

Wales has many excellent employment support programmes, but many programmes are still not accessible to people with learning disabilities, who are more likely to require specialist, needs led and person-centred support (Miles and Rutter 2024).

Over a seven-year period, Engage to Change supported young people with learning disabilities and /or autism to gain employment. Since our previous briefing was published a series of further evaluation reports and data collection has provided additional evidence of what works and what is still needed.

Supporting equality of opportunity.

It is important to recognise that employment support and Supported Employment are not the same thing.

Within our previous call for a National Job Coaching Service, we focused on the importance of redesigning employment support to better include supported employment provision, delivered through job coaching, with a person-centred approach. We specified that any employment recovery plan, or replacement for the Job Support Wales scheme, should include ring fenced resources for a National Job Coaching Service to ensure people with autism and/or learning disabilities are not left behind in the labour market.

A recent report by Dr. Hefin David MS, written for the Welsh Parliament, welcomed the idea of a National Job Coaching Service for learners with Additional Learning Needs (ALN), but also acknowledged some barriers, mainly due to the divisions between devolved and reserved responsibilities (David, 2023). Recommendation 8 states that *“The Welsh Government should review support for job coaching for those transitional learners with Additional Learning Needs who request it. With reference to the good practice developed by Engage to Change and Learning Disability Wales, an ALN job coaching strategy should be prepared, expanding the provision of specialist coaches to support learners with ALN to gain paid employment.”* (David, 2023 p.24).

As a result of work done by the Engage to Change project, the Welsh Government Employability and Skills Plan, Stronger, Greener, Fairer Wales (2023) states that in future Welsh Government will be:

“Taking forward activity to improve access to, and outcomes on our employability programmes for people with significant learning disabilities by providing specialist intensive job-coach support.”

This positive recognition, supported by updated Engage to Change research findings, leads us to summarise where we are now regarding what works in getting young people with learning disabilities and/ or autism into employment:

- **Experience matters:** Previous work experience (prior to participation in Engage to Change) had a positive influence on future employment for young people. This included work experience when in education, volunteering and paid employment. Having previous work experience does improve young people’s job chances, particularly if they have had more than one opportunity. This underlines the need for high quality work experience with support while young people are at school or college. Our research suggests that this alone will lead to better than normal rates of employment for young people with learning disabilities and/or autism, if experiences are organised and resourced properly.
- **Specialist job coaching support is a key factor:** Job coaching was central in getting young people into employment, learning a job in the workplace, developing social skills and facing the challenges imposed by the Covid Pandemic (Vigna,2024). A Job Coach is a qualified, specialist and wide-ranging role; it begins with getting to know the individual to understand skills and aspirations, matching features of a job to the interests, talents, and abilities of the person with a learning disability and/or autism, and tailoring support to the needs of the person and employer (Meek et al. 2023).
- **Needs led approach:** The Engage to Change project supported individuals with a wide range of support needs, and therefore the employment trajectory of individuals varies. Some young people may need more support than others to acquire new employment skills, others might need more input from job coaching to navigate the social aspects of employment and some will need targeted help around job maintenance (Vigna, 2024). Job coaching should not be a *“one size fits all”* approach in regard to the amount of time allocated to individuals within the *“place, train and maintain”* model of supported employment.
- **Significant employment experience** such as **paid placements and supported internships**, gave the highest rates of transition into paid employment. In this project the placements were individually matched to young people, in real workplaces, doing real work, with job coach support provided as needed including in the workplace.

- **Engaging employers:** This is best done directly on an employer-by-employer basis, particularly where they have a relationship with the supporting organisation. Offering supported employment and job coach services are crucial to gaining employment for people with learning disabilities in a tight labour market.
- **Recognising the wider outcomes of employment:** Being in employment has an impact on confidence, independence and improved mental health. Having a strategy that can help young people transition smoothly from education into employment can provide a contribution to both the Welsh Government’s Health and Social Care and well-being agendas.

Since 2016, supported employment and transition support has evolved across Wales. This included the introduction of supported internships by Engage to Change. The project ended in May 2023 but aimed to leave a legacy. Work in partnership with Welsh Government and other organisations has resulted in: around 20 Supported Internship programmes; Supported/Supported Shared Apprenticeships schemes both in North and South Wales; Supported Traineeships models (Jobs Growth Wales+); 2 Local Supported Employment programmes funded by the DWP covering 4 areas in Wales; the North Wales Learning Disability Employment Strategy covering the 6 local authority areas in North Wales; the new National Lottery Community Fund Sustainable Steps – Green Careers programme call to include supported employment and job coaching in projects.

Moving forward, as part of the Influencing and Informing Engage to Change phase, the Engage to Change evaluation team at the NCMH, Cardiff University, in partnership with Learning Disability Wales intend to map the supported employment provision in Wales, to understand what it is currently available in different areas. We need to build on these approaches in Wales and make sure young people, their families, education settings, health and social care, employers, providers and Welsh Government are aware of what it is available. We need to make sure information and communication around transition, support and employment is accessible and closer to home in line with the Welsh Government’s and the Wales TUC “Better Jobs, Closer to Home” strategy for localising the availability of jobs and individualised packages of support.

Funding

Funding is a key element in this discussion. We support the idea that every employment and skills programme should have ring fenced funding dedicated to job coaching support for those individuals who would not be able to achieve employment without it.

What are the options?

1. **Access to Work** is a DWP scheme that provides flexible funding for disabled people entering work. Access to Work payments for continuing job coaching provided a significant resource for Engage to Change, helping the project to support more people than through its main grant funding alone. Access to Work funding has also enabled additional job coaches to be employed within its supported internship programmes in Wales. In our previous briefing we discussed how developing a Relationship Team within DWP has been crucial to our success with this funding. We still recommend that this arrangement be taken forward for any future Welsh Government national programmes of job coaching or supported internship. However, the lengthy delays in decision making for Access to Work funding and in making payments experienced by Engage to Change continue to be issues that need to be addressed, for this to work and be sustainable. We need additional liaison by Welsh Government with DWP and Access to Work on internship programmes to ensure flexibility in payments for personal support and equality with English schemes.
2. **Pathway 4 funding** for supported internships has been extended to many more sites in Wales under the Welsh Government's post-16 Independent Living Skills Curriculum. However, there are no dedicated sources of funding to provide one-to-one support through job coaching for interns who may require preparation support, such as travel training, for intern's pre-internship or for those post-internship who are still looking for employment or may need ad-hoc support in employment. Further work is needed with the UK Department for Work and Pensions so that Access to Work funding can be more easily utilised in Wales, including to extend job coach support hours around supported internship provision.
3. Support through the **Universal Support** programme by DWP should be based on delivering services that conform to a recognised model of supported employment that has been shown to work. Any delivery of a National Job Coaching Strategy by the Welsh Government should have synergy with this funding and lead to the joint provision of an effective service across Wales.
4. The North Wales Learning Disability Employment programme is led by Health and Social Care and is funded by the **Regional Integration Fund (RIF) granted by the Regional Partnership Board**. This programme delivers a supported employment model for people of all ages who have a learning disability that could be replicated in other regions in Wales.

From Service to Strategy

Employment is everyone's business. There are direct links between employment and wider life, for example, wellbeing, independence, health and social care provision, caring roles and the economy. Sadly, people with a learning disability and/or autism are not regarded generally as a priority for employment support.

Our previous briefing paper called for a National Job Coach Service to be developed and funded across Wales. We recognise that in the current climate this has not been possible to achieve.

However, we remain committed to ensuring that Welsh Government and stakeholders in Wales are engaged in the employment of people with a learning disability and/ or autism. If we are to provide effective support in Wales we need to be clear about the model fidelity and the resources needed to deliver an effective service.

A National Job Coaching Strategy would be fully consistent with this.

We developed the following **key recommendations** for a National Job Coaching Strategy based on the Engage to Change evaluation and research: We need to ensure that ANY employment programmes developed by Welsh Government have ring fenced funding allocated to job coaching.

- We recommend a needs-led approach of significant length for job coaching with the aim of offering a flexible package of supported employment for people with a learning disability and/or autism.
- Best practice is for job coach support to be provided by a Supported Employment Agency. A Supported Employment Agency can provide well trained job coaches, together with an extensive network of employers and local labour market knowledge, which is fundamental when looking for the best job match for the person within their community.
- All organisations and individuals providing job coach support should work to the National Occupational Standards for Supported Employment and should have completed supported employment and job coach training along with Training in Systematic Instruction (TSI). [NOS BASE 2017](#)
- Welsh Government should consider supporting a national job coach training and qualification programme in line with BASE recommendations. ([Level 3 Certificate for Supported Employment Practitioners BASE](#))
- Supported Internships, Jobs Growth Wales+, Supported Apprenticeships and Supported Shared Apprenticeships are excellent ways to get young people into paid employment. However, if employment is not achieved within the timeframe, we risk these initiatives being unsuccessful in transitioning young people. Follow on support from employability programmes that provide job coach support for people who need it should be available.

- Supported Internships, Jobs Growth Wales+, Supported Apprenticeships and Supported Shared Apprenticeships are not appropriate pathways to employment for some young people with a learning disability and/or autism. Also, many of these young people remain in school until they are 19, meaning they are not eligible for the Jobs Growth Wales+ programme. All employability and skills programmes should have job coach support built into them to ensure equality of opportunity.
- Job coach support should not be limited to people with a learning disability, autism diagnosis or ALN status. Some people might self-diagnose and still need support. Job coach support should be given to any person who would be unable to gain and or/ maintain paid employment without it.
- Welsh Government should consider the role of job coaching in schools in conjunction with Careers Wales for the children and young people who require additional support or reasonable adjustments for work experience.
- The eligible age criteria for employability and skills programmes specifically for young people (such as Jobs Growth Wales+), should at minimum be in line with the Young Person's Guarantee (16-24 years), but ideally should be for 16–30-year-olds in line with NLCF Sustainable Steps - green careers programme.
- Job coach support should not be limited to young people (16 to 25). It should be available for any person of working age.
- There needs to be a stronger expectation that the provision of job coaching will lead to employment for individuals receiving support.
- Information should be provided to employers across Wales regarding Supported Employment and the role of the job coach.



In addition to the above recommendations, we would also highlight the following as good practice:

- We need to raise the aspirations and confidence of young people with learning disabilities around employment by working with them and the schools, colleges, families and others who support them, including Careers Wales. Peer mentoring should be considered for this.
- There needs to be better and more accessible communication about the pathways to employment for young people with learning disabilities.
- We need to raise the expectations of parents/ carers, education providers and employers that young people with learning disabilities can work with the right support and the right job match.
- There needs to be better and more accessible communication for parents and carers about the support available for young people with learning disabilities.
- Work experience needs to be more nuanced. In first instance (age 14+) it should be around “what work is” and the role of employment, then at later age (16 to 18+) it should be more focused on skills, types of jobs/ sectors and practical experiences so that young people can make informed choices around employment options.
- “Youth Friendly Employer” scheme should be developed and promoted across Wales to engage and support employers to provide work experience placements for young people with learning disabilities and/or autism.
- To achieve the above, Careers Wales advisors should be supported to connect with supported employment agencies to explore possibilities
- There should be better cross-party working within Welsh Government to encourage discussions and improve knowledge around employment for people with learning disabilities and/or autism across Wales.
- Welsh Government divisions, directorates, and working groups, together with bodies funded by Welsh Government, should better communicate with each other to support people with learning disabilities and/or autism around employment. This includes: The National Neurodivergence Team/ ALN transformation programme/ Curriculum for Wales consortium/ Young Persons Guarantee group/ Learning Disability Ministerial Advisory Group/ The Disabled People’s Employment Working Group / Careers Wales/Working Wales/ Medr and others.
- Discussions should include, as mandatory, people with learning disabilities, parents and carers, employers and commissioners of services.
- Employers should be encouraged to adopt inclusive and accessible practices, including recruitment processes, reasonable adjustments from interview to retirement, job tasters, job carving, and training in systematic instruction.
- The Welsh Government should consider developing standardised examples of Easy Read employment forms. Including examples for advertising job roles, CV’s, job application forms and reasonable adjustment forms,

Acknowledgements

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Website: www.engagetochange.org.uk

YouTube: Engage To Change

Facebook: @engagetochangewales

Twitter: @Engage_2_Change / @ncmh_wales

Dear Lynne Neagle MS, Cabinet Secretary for Education and Jane Hutt MS, Cabinet Secretary for Social Justice,

We are writing to you to express our dismay, despair and disappointment at the devastating news that development of the Made for Wales British Sign Language (BSL) GCSE has been suspended due to "practical challenges".

There has long been strong support for developing a made-for-Wales BSL GCSE – and, until yesterday's announcement was published, we were absolutely delighted that BSL users in Wales would have the opportunity to achieve a GCSE in their own, legally recognised language, just as they can with English and Welsh. In addition to eradicating the inequality of opportunity, the development of the GCSE is a real chance to celebrate deaf culture and history in classrooms and create a more inclusive education system.

Indeed, Qualifications Wales has previously acknowledged a wide range of reasons why a made-for-Wales BSL GCSE is needed, including;

- Raising the profile of BSL in Wales to enable a more inclusive society.
- Giving more young people the opportunity to learn BSL. BSL has been visible on prime-time television programmes which has raised its profile generally and the visibility of positive role models could lead to more people wishing to learn BSL.
- Giving schools time to build capacity to deliver BSL at the higher levels of the progression steps.
- Helping to build a critical mass of BSL users and those who can understand BSL in the workforce of the future.

On 1 October, only a few days ago, the Cabinet Secretary for Social Justice said: "I think it is really important that we look at what we are doing in Wales. You know that Welsh Government is making provisions to promote and facilitate the use of BSL and its tactile forms in Wales, and we do think that a more collaborative, inclusive approach will be effective if we can have a positive impact on the BSL signing community of Wales." Yet, less than 24 hours later, the announcement suspending development of the GCSE has delivered the exact opposite.

To be clear, we consider this decision to be a step backwards for equality, inclusivity, and for the BSL community of Wales.

The promises to develop a BSL GCSE, like the campaign calling for its establishment, span years. You will be aware that in October 2018 the-then Petitions Committee called for the creation of the GCSE, a call that the Welsh Government agreed to in principle at the time. Communication between the government and Qualifications Wales on this, by our records, goes back to at least 2017. Deaf children and their hearing peers have long been looking forward to having the opportunity to study the GCSE. To receive this news, only a few short months after being told that the GCSE would be delayed, is heartbreaking for them. Given the amount of time and dedication from yourselves, Qualifications Wales and other external organisations, that has already gone into the establishment of the GCSE, it is our strong belief that this effort should not be wasted by scrapping the plans to launch the GCSE.

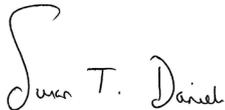
We're also deeply concerned about the message this sends to the people of Wales on the Welsh Government's commitment to support the deaf community and BSL, given it is also the government's intention to reject the upcoming BSL (Wales) Bill. Despite the Cabinet Secretary for Social Justice's laudable comments on the floor of the Senedd highlighting the government's support of the language, the rejection of the GCSE and the Bill combined sends completely the opposite message.

In terms of the skills suite qualifications, it is our belief that this is not a sufficient replacement for the GCSE to facilitate wider use of BSL and to build that critical mass of BSL users for the future. The proposed BSL GCSE would have covered elements of deaf awareness, and deaf culture, which we know to be incredibly important context for students studying BSL. Additionally, a GCSE qualification would have unquestionable legitimacy in terms of progression into further and higher education, whereas we are unsure if this new qualification will hold that same standard. In short, the GCSE has the potential to greatly strengthen deaf children's opportunities in terms of post-16 education progression and consequently, their opportunities in later life.

We are keen to work with you to discuss the practical challenges to which Qualifications Wales has referred, and to demonstrate to you how the GCSE could be made a reality. We firmly believe that we can overcome these challenges and ensure the made-for-Wales BSL GCSE becomes a reality for those students in Wales who are so looking forward to taking the course.

We look forward to hearing from you and to meeting you to discuss this further at your earliest convenience.

Yours sincerely,



Susan Daniels OBE
Chief Executive Officer
National Deaf Children's Society



Lindsay Foster
Executive Director
Signature

CC:

David Jones OBE DL, Chair of Qualifications Wales
Dawn Bowden MS, Minister for Children and Social Care
Jack Sargeant MS, Minister for Culture, Skills and Social Partnership
Tom Giffard MS, Shadow Minister for Education
Cefin Campbell MS, Plaid Cymru Spokesperson for Education
Mark Isherwood MS, Chair of the Cross Party Groups for Deaf Issues and Disability
Buffy Williams MS, Chair of the Children, Young People and Education Committee
Jenny Rathbone MS, Chair of the Equality and Social Justice Committee



Jenny Rathbone MS
Chair, Equality and Social Justice
Committee
Senedd Cymru / Welsh Parliament
Sent via email

Our ref: RathboneJ241003

Thursday 03 October 2024

Dear Chair,

Subject: Public consultation: Updated Code of Practice for services, public functions and associations

This week, we have launched a public consultation on our updated Code of Practice for services, public functions and associations.

The Code of Practice sets out the steps that service providers, public bodies and associations should take to ensure people are not discriminated against. It applies the legal concepts in the Equality Act 2010 to everyday situations, with practical examples to illustrate how the law can be used to protect against discrimination.

Bydd y Comisiwn yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg.

The Commission welcomes correspondence in Welsh or English.

Ff/T: 029 2044 7710

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equalityhumanrights.com



The Code has been updated to incorporate our technical guidance on age discrimination (originally published March 2016) and our single sex services guidance (published April 2022).

The updated Code also reflects significant developments in legislation and case law since it was first published in 2011. These developments include case law relating to the definition of disability and the threshold for a philosophical belief to be protected under the Equality Act 2010.

Our consultation is open to everyone, and we are keen to hear from both organisations and individuals. We particularly want to hear from those who use the Code of Practice on how easy the updated Code is to understand, and whether its interpretation of changes to the law are clearly articulated.

The consultation closes on 3 January 2025. We would welcome the Committee's views on this subject and we'd be grateful if it could be shared through your networks.

Yours sincerely,

Rev Ruth Coombs

Head of Wales

Bydd y Comisiwn yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg.

The Commission welcomes correspondence in Welsh or English.

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Comisiwn
Cydraddoldeb a
Hawliau Dynol

Equality and
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Agenda Item 4.3

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Tai
Cabinet Secretary for Housing and Local Government



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA-JB-10454-24

Jenny Rathbone MS
Chair, Equality and Social Justice Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

SeneddEquality@senedd.wales

8 October 2024

Dear Jenny

I have today made a statement in respect of an inspection report published by the Chief Fire and Rescue Adviser and Inspector for Wales (CFRAI) on the effectiveness of South Wales Fire and Rescue Service's (SWFRS) response to domestic dwelling fires. Links to the [Statement](#) and [report](#) are provided here.

In summary the inspection has found that the firefighting tactics and equipment deployed in SWFRS during the review period were not as effective as they could have been in containing and extinguishing fires swiftly and effectively, and in some instances they may have increased the damage to property and risks to life.

I am conscious that the Committee's inquiry into fire and rescue governance, and its subsequent report "Sound the Alarm", was initiated because of the serious issues identified in Fenella Morris KC's review into Culture in SWFRS, and the Welsh Government's subsequent decision to intervene there. The Commissioners requested the CFRAI inspection to help them understand the overall state of the organisation and to give them a benchmark for their work to secure its recovery.

However I thought it was important to draw to your attention that the concerns that the CFRAI has identified regarding firefighting tactics used in SWFRS are not confined to that Service, or associated with the broader failings that led to the Welsh Government intervention. SWFRS uses firefighting tactics that are standard across the whole of the UK. These tactics reflect National Operation Guidance that all FRSs use, and stem from an approach to fighting domestic dwelling fires developed many years ago that is highly questionable in light of published research.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I believe all three of our FRSs need to address these issues as a priority, and I have written to them accordingly. I have also written to my counterparts in the UK and other devolved governments to raise awareness of the issues which the CFRAI has identified.

Yours sincerely

A handwritten signature in black ink that reads "Jayne Bryant". The signature is written in a cursive, flowing style.

Jayne Bryant AS/MS

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Tai
Cabinet Secretary for Housing and Local Government