

1. About NDCS:

- 1.1. The National Deaf Children's Society is the leading charity dedicated to creating a world without barriers for deaf children and young people across the UK. We support deaf children, their families and the professionals who work with them, and challenge governments and society to meet their needs.
- 1.2. At the National Deaf Children's Society we use the term 'deaf' to refer to all levels of hearing loss in children and young people, including a partial or total loss of hearing. This includes those who may describe themselves as having a 'hearing loss', 'hearing impairment' or as 'deaf', and includes those with temporary deafness, such as glue ear.

2. How accessible are apprenticeships for deaf young people?

- 2.1. The vast majority of deaf people are capable of full-time, sustained employment. However, there is a significant employment gap between deaf and non-disabled people¹. We believe that apprenticeships have an important role to play in ensuring deaf young people make a successful transition from education to employment because they provide deaf young people the opportunity to gain valuable work experience alongside achieving qualifications.
- 2.2. Unlike the Government in England, the Welsh Government does not publish the numbers of deaf people taking apprenticeships and their completion rates. This makes it difficult for us to comment on the accessibility of apprenticeships for deaf young people. However, a Welsh Assembly question by Mark Isherwood (AM) in December 2015 revealed the following data:

¹ Mirza-Davies, J., Brown, J. Briefing paper: *Key statistics on people with disabilities in employment*. December 2016. House of Commons Library.

Table 1: Numbers of learners at FE institutions or pursuing apprenticeship or traineeship programmes in 2013/14 who were aged under 25 and had a hearing impairment impacting on their ability to learn

Age group	FE Institutions	Apprentices (all levels)	Traineeships
Under 16	10	0	*
16	40	10	10
17	40	5	10
18	30	5	10
19	20	10	*
20 – 24	55	30	0
Total (under 25)	195	60	40

2.3. The data above shows that 30 deaf young people aged 16-19 were recorded as taking apprenticeships in 2013-14. We do not know what level of apprenticeship they were taking, whether they successfully completed nor what their destinations were following completion. We believe the Welsh Government must publish more detailed data in order for conclusions to be made about the accessibility of apprenticeships.

2.4. We believe that deaf young people must have access to specialist support whilst on apprenticeships, if required. However, a survey we sent out to apprenticeship training providers in 2016² revealed a lack of awareness about the support and advice for deaf apprentices. No providers referred to funding available from the Department for Work and Pensions’ Access to Work scheme to pay for support in the workplace or Government funding for learning support.

2.5. We are concerned that the Welsh Government lacks understanding of the qualifications required for sign language interpreters. Its guidance on Additional

² Adell, T. et al (2016) Access to apprenticeships for deaf young persons. Available on request from the National Deaf Children’s Society.

Learning Support for apprenticeships³ refers to 'sign language interpreters' at levels 1, 2 and 3 (page 210). There is no such thing as sign language interpreters at different levels. All registered sign language interpreters are required to hold a Level 6 qualification in BSL and an interpreting qualification⁴. A distinction should be made between BSL interpreters and Communication Support Workers (CSW). Where a learner would prefer a more flexible form of support than a BSL interpreter a CSW may be more appropriate. Where a CSW is supporting a sign language user, we believe a minimum of BSL Level 3 standard is necessary.

- 2.6. We welcome deaf apprentices having access to specialist assessments to identify their support needs. However, the Welsh Government's guidance⁵ refers to assessments from 'RNID' (page 210) which became 'Action on Hearing Loss' in 2011. It is not clear whether the charity still offers assessments for apprentices.

³ Programme specification and guidance for apprenticeships, traineeships and Jobs Growth Wales programmes. Available from: <http://gov.wales/docs/dcells/publications/150706-programme-spec-guidance-notes-en.pdf>

⁴ National Register of Communication Professionals Working with Deaf and Deaf-Blind People. [www] Available from: <http://nrpcd.org.uk/approved-courses>

⁵ Programme specification and guidance for apprenticeships, traineeships and Jobs Growth Wales programmes. Available from: <http://gov.wales/docs/dcells/publications/150706-programme-spec-guidance-notes-en.pdf>

3. Accessibility of Independent Careers Advice

- 3.1. Surveys of deaf young people and their parents in 2016 revealed that deaf young people were not receiving information about apprenticeships which suggests there are issues with schools not providing information. One parent stated:
“school's 6th form only interested in UCAS and would plague me & my husband to get our son to complete the application process. Our son doesn't want to go to uni. When we asked about support & guidance for apprenticeships, the school said he had to be 'independently proactive!'”

Whilst most of the survey respondents lived in England we believe the findings are likely to be relevant in Wales too where common issues have been picked up by Estyn in their review of access to apprenticeships⁶.

- 3.2. Our surveys also revealed examples of deaf young people receiving incorrect careers advice with one parent stating their local careers advice service told them that deaf young people could not do apprenticeships. A deaf young person informed us: *“...the government agency were useless. It was only through research with my mother that we could find out any information whatsoever. In fact my mother has become quite an advisor to my friends”*.
- 3.3. We believe it is crucial that deaf young people receive information about the support that is available to them in employment and on apprenticeships, such as BSL interpreters, speech-to-text or assistive listening technology, all of which can be funded through Access to Work. Focus groups we carried out in 2015 with deaf young people revealed that many were considering careers which they perceived to be ‘deaf-friendly’ such as those that involved working with animals (as communication would be easier). This is why specialist careers advice should be provided to disabled young people before they start choosing course options in Year 9.

⁶ Breaking down barriers to apprenticeships. (2015). Estyn. Available from:
<https://www.estyn.gov.wales/sites/default/files/documents/Breaking%20down%20barriers%20to%20apprenticeship.pdf>

3.4. Additionally, we believe young people should be given a basic understanding of their rights in employment under the Equality Act 2010. This would help them understand that employers and training providers should make reasonable adjustments to ensure deaf people can access apprenticeships.

4. Our recommendations are that:

4.1. The Welsh Government must publish more detailed data on the take-up, completion and employment outcomes of apprenticeships and traineeships with a breakdown by type of disability. This will enable the Welsh Government to better understand how its policies are impacting specific groups.

4.2. All Careers Wales advisors are provided with information about Access to Work and the rights of disabled people in education and employment under the Equality Act.

4.3. The Welsh Government provides apprenticeship training providers and employers easy access in one place to specialist resources on meeting the needs of disabled apprentices such as our *Supporting the achievement of deaf young people on apprenticeships*⁷ resource for training providers.

4.4. The Welsh Government reviews the funding system for additional support on apprenticeships. Currently, funding is split between Additional Learning Support from the Welsh Government and Access to Work funding from the UK Department for Work and Pensions. This was highlighted within the recommendations of the Paul Maynard taskforce last year which would mean ‘that potential hurdles are reduced and that the application is seamless from an apprentice/employer/provider perspective’⁸.

⁷ National Deaf Children’s Society (2017). Supporting the achievement of deaf young people on apprenticeships. Available from: www.ndcs.org.uk/professional_support/our_resources/supporting.html

⁸ <https://www.gov.uk/government/publications/apprenticeships-improving-access-for-people-with-learning-disabilities/paul-maynard-taskforce-recommendations>

- 4.5. The Welsh Government amends its guidance on Additional Learning Support so that the communication support and assessments for deaf learners that can be funded are appropriately outlined.