



# Welsh Government

## Consultation – Summary of Responses

### Action on Disability:

### The Right to Independent Living

September 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

## **Action on Disability: the Right to Independent Living**

<b>Audience</b>	Local authorities and other public bodies, Third Sector, disability groups and other interested parties.
<b>Overview</b>	This consultation sought views on proposals which are intended to develop and improve access to help, advice and services for disabled people in Wales. Action on Disability: the Right to Independent Living aims to tackle inequalities and poverty experienced by these communities, promoting equality of opportunity and supporting them to more easily and readily access resources and mainstream services.
<b>Action required</b>	No action – for information only.
<b>Further information</b>	<p>Enquiries about this document should be directed to:</p> <p>Equality Branch Communities Division Education and Public Services Group Welsh Government Cathays Park Cardiff CF10 3NQ</p> <p>Email: <a href="mailto:EqualityBranch@gov.wales">EqualityBranch@gov.wales</a></p>
<b>Related documents</b>	<p>Welsh Government Consultation Document – Action on Disability: the Right to Independent Living (2018). URL: <a href="https://beta.gov.wales/sites/default/files/consultations/2018-10/181018-action-on-disability-consultation-v1.pdf">https://beta.gov.wales/sites/default/files/consultations/2018-10/181018-action-on-disability-consultation-v1.pdf</a></p>

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## **Introduction**

On 22 October 2018 the Welsh Government launched a consultation to seek views on proposals which are intended to develop and improve access to help, advice and services for disabled people in Wales.

The Welsh Government's Framework for Action on Independent Living, published in 2013, set out the actions being taken across government departments to promote an inclusive and enabling society. There have been many developments affecting disabled people in Wales since the previous framework was published, but the Welsh Government remains committed to working with, and for, disabled people of all ages, to challenge negative perceptions and remove barriers which prevent them participating fully in society.

During 2017 Welsh Government held a series of meetings and engagement events with disabled people, disability organisations and other stakeholders including many Welsh Government departments and a wider range of service providers to review the original Framework and to consider the way forward. The Welsh Government was also able to take account of the views and experience of disabled young people who took part in engagement events organised by Children in Wales. The aim was to find out what progress had been made since 2013 and whether the key priorities for action remained the same. An Independent Living Steering Group was established to develop a successor to the Framework. Action on Disability: the Right to Independent Living is the result of this work.

The consultation asked respondents to consider the new framework document and accompanying action plan, and to provide feedback on their content.

## **Summary of consultation responses**

The consultation period ran from 22 October 2018 to 18 January 2019 (although an extension was granted for some organisations up to 31 January 2019). It was a written, electronic consultation, with it being possible to respond via the questionnaire included in the consultation document or the online form. Responses could be emailed or posted using the contact details provided.

A total of 67 responses were received in the form of emails (n = 42), online consultation responses (n = 20) and hard copy consultation responses (n = 5). The 67 consultation respondents can be categorised by type as follows:

<b>Consultation respondent type</b>	<b>Number of respondents</b>
Private individual	18
Council	5
Health and social care practitioners / representatives	7
Education and early years sector	3
Third sector	30
Public Sector	2
Other	2

Two of the responses incorporated the views of participants at consultation events held specifically to discuss Action on Disability: the Right to Independent Living. Five respondents submitted an additional document to complement their consultation response. These documents will be analysed separately as part of the Welsh Government response to this consultation exercise, and so the specific points raised have not been included in this report.

This document summarises the responses to the consultation questions. It aims to give an overview of the breadth and depth of responses, and to provide an indication of the issues which were raised most frequently.

All quotations from consultation responses have been translated unless specified otherwise.

### **General Comments**

Of the 67 consultation responses received, 21 included a general comment, i.e. not related to a specific consultation question. The following sections look at the general comments provided by theme.

#### **Social Model of Disability**

Several comments welcomed references to the Social Model of Disability in the new framework and action plan. One respondent went on to recommend that Welsh Government sets clearer actions on how it intends to cascade and embed the model in the wider Welsh public service. A couple of comments cited the inconsistent use of social model language found throughout the documents, with instances of non-social model language being cited.

*“It is arguable, however, that the Framework would be strengthened by a greater critical engagement with the model to ensure that statements of commitment to it do not become a substitute for its effective implementation. Equally, if the social model is to be the underpinning principle of Action on Disability, greater care needs to be taken with the language in the document. Under the social model, disability is critically distinct from impairment. This distinction is carefully explained in Action on Disability, but the document also contains statements in which these ideas are conflated.”*

#### **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)**

References to the UNCRPD in the new framework and action plan are welcomed, as is the Welsh Government’s commitment to the UNCRPD, however, some respondents indicated their disappointment that the UNCRPD had not yet been made part of Welsh law.

*“the Action on Disability, put forward as the means by which the Welsh Government will fulfil its obligations under the UNCRPD, would be strengthened if the Welsh Government had first committed itself to make the UNCRPD part of Welsh law so that the actions set out in Action on Disability could be assessed against legally binding rights guaranteed to all disabled people in Wales.”*

There was also a call for awareness of the UNCRPD to be raised across Welsh Government, plus for it to be referred to differently.

*“The United Nations allows state parties to refer to the convention in a manner consistent with the language used in the country. With this in mind and in keeping with Social Model of Disability terminology, we call for the Welsh Government to refer to the convention as the United Nations Conventions on the Rights of Disabled People.”*

In addition, one respondent expressed regret that the new framework and action plan did not mention a number of Articles of the Convention despite their relevance to the devolved context in Wales, while another asserted the Welsh Government has a responsibility to take forward the recommendations issued by the Committee on the Rights of Persons with Disabilities.

#### Indicators, Timescales and Targets

Multiple comments indicated that the new framework and action plan would be strengthened if the documents included specific indicators, timescales and targets.

*“The effectiveness of the Action Plan would be strengthened if the actions included measureable targets, success indicators and timeframes. This would improve transparency and accountability on the delivery of the Action Plan across the Welsh Government departments and allow scrutiny by outside organisations including Disabled People’s Organisations, which would further drive improvement.”*

#### Welsh Independent Living Grant (WILG)

A number of respondents referenced the closure of the WILG and questioned why this was not addressed within the new framework and action plan documents.

*“Explicit reference could also be made to ensuring that the transfer of the Welsh Independent Living Grant to Local Authorities does not negatively impact on disabled people, and result in care packages being reduced with a commitment in the Action Plan to review the impacts after 12 months.”*

*“The revised document does not include discussion on the closure of the Welsh Independent Living Grant (WILG) and the impact on former recipients of the grant. We are concerned about the impact of the transfer of WILG to Local Authorities in Wales. In the transition to Local Authority packages some disabled people have seen their care packages drastically reduced. These reductions are having a negative effect on disabled people’s ability to live independently in their communities. We would like the action plan to include a commitment from Welsh Government to guarantee that disabled people will not be negatively impacted by the transition of WILG to local authorities.”*

#### Advocacy

The lack of a mention of advocacy services in the new framework and action plan was questioned on a couple of occasions in the comments provided.

*“advocacy has gone missing from the Framework, despite having been a high priority in 2013. The need for disabled people to have access to independent advocacy is self-evident.”*

*“the importance of independent advocacy has been under-emphasised, despite this having been identified as a high priority in the original Framework. Whilst acknowledging that Action 4 under the ‘Healthy and Active’ section in the Action Plan undertakes to “ensure disabled people have a voice on advocacy matters by consulting them” on a RISCA framework, independent advocacy should be a much stronger theme in ‘Action on Disability.’”*

### Endorsements

The work of, and consultation responses by, Alison Tarrant and Dr Simon Hoffman (on behalf of the Wales Human Rights Stakeholder Group) were referenced in a number of the general comments.

*“We have not included any sections of the response from Alison Tarrant at Cardiff University, circulated at the last meeting of the Disability Cross Party Group. However, we would like to reference that response here and our support for the comments made regarding the need to connect this work with the relevant policy and legislative drivers contained in the Social Services and Wellbeing (Wales) Act.”*

*We would also like to reference and offer our support, without inclusion of the substantive points made, to the response submitted by Dr Simon Hoffman on behalf of the Wales Human Rights Stakeholder Group.”*

### Supporting a Range of Disabilities

A number of respondents called on Welsh Government to ensure people with all types of disabilities were reflected, including those with hidden disabilities and those who are doubly disadvantaged.

*“We believe it might be useful to include a definition of disability in Chapter 1 that makes it clear that this Framework and Action Plan is not limited to visible, physical disabilities. To avoid ambiguity, or the risk that organisations, services or agencies focus on one specific ‘type’ of disability, we would argue that this definition should explicitly include ‘hidden disabilities’ as well as visible physical disabilities. This should include mental health problems, learning disabilities, autistic spectrum disorders or longer-term health conditions which may be less visible”.*

*“We would like to see the Action Plan reflect in greater details those who are ‘doubly disadvantaged”.*

### Legislation

Specific pieces of legislation were referenced in several of the comments, such as the Well-being of Future Generations (Wales) Act 2015, the Social Services and Wellbeing (Wales) Act 2014 and the Additional Learning Needs and Educational Tribunal (Wales) Act 2018. Some respondents queried why the legislation was not mentioned in the new framework and action plan, with others wanting further clarification of how the new documents would align with certain legislation.

*“Explicit reference could also be made to how the Action Plan aligns with the Social Services and Wellbeing (Wales) Act 2014, and its associated Code of Practice..... Explicit*

*reference should also be made as to how the Action Plan aligns with other Welsh Government policy documents and legislation such as the Wellbeing of Future Generations (Wales) Act 2015 and the Sustainable Social Services for Wales: A Framework for Action white paper.”*

In addition, one respondent called for British Sign Language to be embedded into Welsh law.

#### Alignment to other Welsh Government Plans

A number of respondents indicated their support for the new framework and action plan being aligned to the Welsh Government’s ‘Prosperity for All’ strategy.

*“there is merit in aligning the Action Plan with the Prosperity for All National Strategy. The Action Plan should take the opportunity to take forward the equality aspirations set out in the Strategy and articulate the aspiration of achieving an inclusive society in Wales.”*

However, one respondent, whilst supporting the alignment to ‘Prosperity for All’ cited the importance of ensuring the specific needs and vulnerabilities of disabled people are not lost given ‘Prosperity for All’ is based on high level outcomes for the whole population. In addition, another respondent felt linking the new framework and action plan to ‘Prosperity for All’ meant there was too much of a shift towards the priorities of the Welsh Government, and away from the priorities of disabled people.

*“Action on Disability is explicitly stated to be as much about the priorities of the Welsh Government as those of disabled people; and is structured around the Welsh Government’s own priorities, as set out in its national strategy: Prosperity for All. From the outset therefore, there is a pronounced shift in emphasis away from the concerns of disabled people and towards those of the Welsh Government. In terms of independent living, this is a retrogressive step – it suggests that matters of importance to disabled people are no longer paramount in policy on independent living in Wales, and creates a risk that aspects that are less confluent with the Welsh Government’s own principles will be side-lined. Certain ideas, such as the development of centres of independent living and other disabled people’s organisations, which enable peer support for disabled people, already appear to have been lost.”*

There were calls for the new framework and action plan to be viewed in parallel to other Welsh Government strategies and action plans.

*“We note this Action Plan should be seen in parallel to other Welsh Government Strategies and Action Plans including the Inclusive Apprenticeships Action Plan, Employability Plan, Additional learning Needs Transformation Programme and the Transport Strategy.”*

#### ‘Prosperity for All’

Multiple respondents refer directly to the different parts of ‘Prosperity for All’. Some of the points made are included below, stratified by ‘Prosperity for All’ theme.



## Prosperous and Secure:

- welcome acknowledgement of barriers disabled people are facing in accessing employment and urgent need to address this;
- call for Welsh Government to utilise and promote Third Sector resources, and work with Third sector to ensure guidance, toolkits and training includes up-to-date info on specific disabilities;
- call for Welsh Government to improve careers support in schools and Further Education Institutions;
- welcome a deaf specific element to the proposed Welsh disability award scheme for employers, as identified in Action 8;
- concern there is too much of a focus on employment in the framework and action plan without acknowledging that some disabled people are not able to work in the traditional way;
- call for measures to tackle barriers in education, housing, social care and transport and recommendation the action plan should be strengthened to reflect this;
- claim that the current Access to Work system is not working for all disabled people. Call for ongoing work to ensure that disabled people and employers are aware of the scheme and the support it can provide to them;
- Welsh Government should make known its own target to increase the number of disabled employees and its plans for achieving this;
- call for bold yet achievable targets to increase the number of disabled people participating in apprenticeships in Wales within the context of an overall target to reduce the disability employment gap in Wales;
- call for Welsh Government to set targets for accessible homes and to make it mandatory that each Local Authority regularly maintains and publishes a local Accessible Housing Register;
- claim the action plan lacks any detail as to how it will complement and support delivery of the Welsh Government Employability Plan;
- call for Welsh Government to work with disability organisations to develop policy and to outline how these can be enacted in practice;
- call for measures to address both the disability employment gap and disability pay gap;
- call for greater transparency as to how the Equality and Diversity champions and their teams will operate in real terms and how their impact will be measured, particularly in terms of more disabled people securing apprenticeships;
- call for pathways into the workplace to be broadened out to include - volunteering schemes, work experience and career guidance that are tailored to disabled young people;
- call for the support and advice currently made available to public sector organisations undertaking their own 'Disability Confident journeys' to be made available to support commercial and Third sector organisations;

- recommendation that the objective of seeking ‘to help employers understand the barriers faced by disabled people’ should be amended to become ‘to help employers understand and take action to help overcome the barriers faced by disabled people’;
- claim that the scope of Action 9 does not sufficiently address the scale of the housing challenge and it should be expanded;
- recommendation that ‘Action 10 – Housing’ is expanded to provide further information on what ‘housing related support’ means in practice.

#### Healthy and Active:

- welcome acknowledgement of barriers disabled people are facing in accessing health and social care services – in particular when transitioning into adulthood and welcome many of the actions;
- concern about the lack of awareness among disabled young people and their families about their rights;
- welcome action one, which commits to monitoring the use of the standards in secondary care settings. However, call for Welsh Government to commit to further monitoring of the standards across wider healthcare settings;
- call for Welsh Government to work with the Third Sector in providing an online digital platform;
- support for the expansion of the 111 service and a digital online platform – call for these to be coproduced with disabled people and disabled people’s organisations – call for services to be widely promoted to the public, national and local organisations;
- call for a restatement of Welsh Government’s commitment to the development of CILs as a vital tool in tackling barriers to independent living. Furthermore, call for Welsh Government to actively promote widespread use of ‘reserved contracting’ to encourage the development and sustainability of CILs and similar services;
- concern about the lack of actions regarding the role of social care within the revised document;
- call for Welsh Government to work co-productively with stakeholders in developing an overarching strategy on Direct Payments with the aim of improving take-up, support for recipients and identifying and promoting innovative approaches;
- concerns that local authorities are tending to provide services that meet the statutory minimum rather than enabling people to live full and active lives;
- query as to why ‘Action 1 – communication and information’ is limited to secondary care;
- call for Welsh Government to consider requiring Healthcare Inspectorate Wales (HIW) and Community Health Councils (CHCs) to monitor adherence to these standards as part of their routine activities;
- call for ‘Action 4 - Advocacy’ to be extended for the benefit of all vulnerable adults, with a view to adoption by both the Care Inspectorate Wales and HIW;

- reference to the work in other parts of the UK that is underway to support 'Action 9 - technology enabled care services';
- call for learning disability within 'Action 11 - 'Improving Lives' –not to be the responsibility of a single Government department – identified in the Plan as 'Nursing' – but rather should be escalated to the Learning Disability Ministerial Advisory Group;
- call for 'Action 12 – Sports' to be expanded to include increasing awareness amongst disabled people of available accessible sports opportunities. Call for clarity to be provided within this objective on the timeframe for providing financial support to Disability Sports Wales, and further information on how and to whom funding will then be distributed;
- concern that opportunities for disabled people in Wales to engage in sporting and leisure activities are very limited and vary greatly depending on where disabled people live. Suggestion for a more community based approach with funding being made available to smaller local groups and organisations to support the introduction of grass roots sporting activities;

#### Ambitious and Learning:

- welcome action one – call for greater development of and investment in specialist services to deliver support for early years deaf children and their families following the introduction of the Additional Learning Needs and Education Tribunal Wales Act in September 2020;
- concern that the cost and availability of sign language courses are a barrier to families of young deaf children;
- concern about the recent review of the childcare offer pilots, which indicated that there was a lack of uptake of funding for adaptations to childcare placements for learners with additional learning needs. Concern that this is likely to be due to a lack of awareness that such adaptations are required;
- call for children with Additional Learning Needs (ALN) to be supported in the early years to provide firm foundations for their future educational and social development and welcome that the new Additional Learning Needs and Education Tribunal Wales Act will entitle children aged 0-5 to a support plan. However, concerns around whether local authorities are appropriately planning their capacity and workforce to deliver such support from September 2020;
- call for funding issues to be addressed to ensure learners with learning disabilities plus other disabilities can access post-16 education – need to ensure that transport does not present a barrier for vulnerable ALN learners in accessing Further Education provision;
- claim that Disabled Students Allowance (DSA) is crucial for many deaf learners to access Higher Education in an equitable manner – concern over proposals to adopt a similar approach to that taken in England - welcome consideration of how awareness of DSA could be improved among young disabled people applying for university places;
- call for parents to have an active role in deciding how their child will be educated;

- call for disabled children to have the appropriate educational support to reach their full potential, including participating in extra-curricular activities as well as access to career advice, transport and post 16 education;
- concern about the lack of accessible play areas – call for a strengthened action for Welsh Government to work with Local Authorities to increase accessible play spaces;
- call for a more creative approach to learning in Wales that allows for flexibility and an individualised approach to learning;
- call for more to be done to integrate children in mainstream and special education schools at an early stage so that disabled children are not viewed as being ‘other’, but rather are accepted as part of society;
- call for continuous training and funding to be provided for all members of staff in education, to ensure that societal barriers are not put in place that demean or otherwise frustrate disabled students in realising their potential;
- recommendation that ‘Action 2- Children and Families’ should be amended to include updating the toolkit (which would necessarily reflect that cutbacks have meant some services referenced in the toolkit are no longer in existence), and promoting awareness of the toolkit;
- claim that in relation to ‘Action 3- Children and Families’ the qualification ‘so far as is reasonably practicable’ regarding the provision of sufficient childcare to meet the needs of parents undertaking education, training or employment is not acceptable – call for the Action Plan to contain a commitment to support local authorities to ensure the provision of sufficient childcare;
- call for ‘Action 4 - Additional Learning Needs (ALN) Transformation Programme’ and the ALN Programme to recognise the value of the use of integrated hubs, providing specialist services and with advice;
- call for ‘Action 10 - Equality’ to take the opportunity to utilise the ‘lived experiences’ of people with a range of disabilities.

#### United and Connected:

- support for the petition ‘P-05-806’ and call for all premises in Wales to be awarded an Access Certificate number similar to the Food Hygiene Certificate;
- claim that the lack of accessible public transport is preventing disabled people from living independently and contributing to loneliness and isolation;
- call for full commitment to implement the Accessible and Inclusive Public Transport Objectives policy statement published by Welsh Government in 2018;
- claim the framework and action plan does not include measures to address barriers faced by disabled people using private hire vehicles and taxis – call for improved access to taxi and private hire vehicles, as well as call for all drivers to receive Disability Equality Training, designed and delivered by disabled people;

- concern that the lack of funding for support is a barrier to disabled people running for and maintaining public roles – reference to Wales being the only nation in Great Britain not to have an Access to Elected Office scheme, putting disabled people interested in political participation at a disadvantage compared to their peers elsewhere in the UK;
- claim disabled people are still being excluded from tourist sites across Wales and that a lack of accessibility is an issue – call for a ‘Scores on the Doors – Access Ratings’ Scheme’;
- call for Welsh Government to set more specific targets on Local Authorities to ensure that accessible toilet and changing places facilities are made available for disabled people to use.

### Other Comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 1: Do you agree with the actions within the Welsh Government's Action on Disability: the Right to Independent Living? Please explain the reasons for your answer in the further comments box provided.**

37 respondents indicated they agreed with the actions within the Welsh Government's Action on Disability: the Right to Independent Living, with 5 respondents signifying that they did not agree. A further 5 respondents did not indicate whether they agreed or disagreed, whilst 20 respondents provided no answer to this question.

39 respondents provided a comment in relation to this question. The following sections look at the comments by theme.

Definition of Independent Living

Several respondents queried the definition and meaning of independent living within the new framework and action plan.

*"While we recognise the phrase 'Independent Living' comes from the UN Convention (UNCRPD) article 19, we are not entirely sure that the phrase remains a helpful one today, especially given the more modern definition provided within the proposed Welsh framework. The phrase already has a particular meaning attached to it for disabled people and professionals that relates principally to a place to live and support to do so, as referenced in the box on page 10 of the document. That connotation is not always positive or in keeping with the principles of the current Welsh legislation or policy and we wonder if the wording 'Action on Disability: Disability and Equality', better reflects the ambition, the definition, the legislative and political context and maybe is less pejorative."*

Actions within the new action plan

Multiple comments indicated that the new action plan would be strengthened if the actions included specific indicators, timescales and targets, with some respondents claiming certain actions were too broad and set at too high a level, and others citing the need for responsibility for actions to be clarified.

*"it does not feel like an action plan - some of the actions are too broad, there are no timescales attached to each action, responsibility is vague, (e.g. action no.11 of Healthy and Active) and there are no measures for success."*

*"In order to feel assured that robust mechanisms are in place to ensure that those responsible will be able to scrutinise and establish if the plan is having the desired and indeed positive impact on disabled people and particularly children and young people I would have liked to have seen further details than those provided in the consultation document including the action plan. I would ask for consideration to be given to:*

- *Including timescales against each of the actions*
- *Reviewing the broader actions in the plan with the view to either refining them or being clearer on what outcomes this should achieve*
- *Ensure there is a robust and potentially consistent mechanism in place that can be utilised by those responsible to assess the progress of this plan over time and the outcomes achieved. This could include data sets and qualitative information. I would also advocate for the information that is going to be used to monitor this plan to be publically available."*

There was a call for more actions to be included in the final plan.

*“The plan helps to bring together a wide range of actions from across the education and training system that contribute to the delivery of a holistic support system for disabled people in Wales. However, there is scope for additional actions to be included in the plan. For example, including work to reform and create an inclusive schools’ curriculum.”*

According to one respondent the new action plan is not ambitious enough, whereas another respondent referred to the action plan as being both ambitious and forward thinking.

#### Stakeholder engagement

A couple of respondents indicated how they welcomed the stakeholder engagement that was undertaken prior to the production of the new framework and action plan.

*“We also welcome the approach that has been taken to develop the Framework with extensive stakeholder engagement shaping it and ensuring that the issues identified by disabled people are addressed and aligned with the priorities of Welsh Government.”*

*“We also note that the framework has been put together with input from disabled people and disability focused organisations, something we believe is essential.”*

However one respondent queried how disabled people would be engaged, plus another called on the Welsh Government to work co-productively with disabled people as opposed to just ensuring they have a voice.

*“We would also suggest adding in an action about how each section is monitored and reviewed, and how people with disabilities are engaged.”*

*“We would suggest there is the need to work co-productively with disabled people rather than ‘ensuring they have a voice’ as in action 4 (Healthy and Active).”*

In addition, one respondent questioned the engagement with children and young people through the course of developing the new framework and action plan and suggested a specific version of the consultation materials for children and young people should have been developed.

*“I am pleased to read that some disabled young people took part in specific engagement event/s. However it would have been beneficial if the CRIA and/or Chapter 3 of the document itself provided further information in respect of this work including; the number of young people involved and age range. For the reasons outlined in the paragraph above, of more concern is that it is challenging to establish from the information available whether the comments provided by the young people have had a direct impact on the content of the action plan to date or will be fed into the relevant existing programmes to which they are most relevant. I would have also liked to have seen other views gathered from children and young people from additional sources considered.”*

#### Joined up working

A number of comments referenced the need for future joined up working to ensure the success of the new framework and action plan.

*“We note that action 9 (Prosperous and Secure), to carry out a review of the systems for accessing ‘aids and adaptations that support disabled and older people to live*

*independently in their own home' is located with housing. It should be noted that most of the assessment and provision of this work lies with occupational therapists located in local authority social care/social work teams or occasionally within health settings and will require not only joint involvement from these services in that review, but better integration of services across health, social care and housing to make real change."*

*"We are delighted to see the Welsh Government continue to lead the way with this Independent Living Action Plan and we would encourage Welsh Government to continue to work with other devolved administrations as well as the UK Government to share best practice and promote this Action Plan."*

*"We very much agree that improvements need to be made in housing, education and health and wholeheartedly support a joined up and more connected way of working across all sectors that work with disabled people."*

### Social Model of Disability and UNCRPD

Several respondents cited their support for Welsh Government's adoption of the Social Model of Disability. However, one respondent called for the social model to be evolved and extended to the human rights based model, plus there was disappointment that the new framework and action plan referred to the social model as being new.

*"Action 10, we would agree with the centrality of the social model of disability. The introductory chapter appears to present the social model as a relatively new concept, when it has been around in the UK since the early 1970s. To that extent it is perhaps a little disappointing that a programme of awareness and training has to be included for government officials and others, but in terms of our leadership role in social care, we would see this model now extending or evolving to the human rights based model as well, and would like to see that more prominently featured in the framework. We believe this better sits with the current social care legislation in Wales as well as the Well-Being of Future Generations (Wales) Act 2015 and policies such as Prosperity for All, and reflects the rights based approaches suggested in both UN conventions. This would be one way for Wales to address some of the recommendations in the UN Committee's Concluding Observations around UK compliance with the UKCRDP in 2017, which goes beyond the social model."*

*"there is an implication that the Social Model is a new approach and we should give public bodies time to get to grips with this 'new' way of operating..... the Social Model was developed [by Vic Finkelstein and friends] 40 years ago, named [by Mike Oliver] 35 years ago, adopted by Welsh Government 16 years ago, enshrined in law in the UK 13 years ago and in the UN Convention 12 years ago, so it is unacceptable for Welsh Government to still be discussing how to respond to the Social Model and to still be pretending that Medical Model language is in any way acceptable..... the Social Model must be written into legislation and regulation..... so that citizens can assert their rights with the assurance that local bodies cannot refuse to act simply because they are not legally compelled to do so."*

Furthermore, one respondent questioned whether the Social Model of Disability should be used at all.



*"We are cautious in the use of the social model of disability however as we feel this is an outdated model that needs review and does not fully represent disabled people."*

Some comments were also made supporting links to the UNCRPD in the new framework and action plan, with one respondent calling for the convention to be written into legislation and another calling for clarification on the relationship between this convention and the United Nations Conventions on the Rights of the Child (UNCRC).

#### Rights of Children and Young People

One respondent indicated a concern that the lives and experiences of children and young people are not adequately reflected in the new framework and action plan, leading to a call for a specific plan for children and young people that identified their rights.

*"Whilst some provisions will apply to all ages, I feel that children's lives and experiences may not be adequately reflected within the plan, leading to a risk that their views and outcomes may not be captured strongly or acted upon..... Ultimately I would like Welsh Government to produce a specific plan for children and young people in Wales, including those with disabilities."*

#### Mental Health

Mental health was referenced in a couple of the comments provided in answering this question, with one respondent suggesting that the new action plan was an opportunity to address mental health problems and tackle associated stigma/discrimination.

*"This Action Plan is a real opportunity to make sure that people with mental health problems get the support they need to stay well and live a full life. To achieve this, the needs and experiences of people with mental health problems has to be embedded throughout the plan..... We would welcome a specific action aimed at tackling the social stigma and discrimination experienced by people with mental health problems."*

Another comment referenced the treatment of mental ill health calling for the Welsh Government to:

*"Specifically address the fact that the model used for people with lived experience of mental distress (mental health problems) remains clinical in the sense that it rests on psychiatric diagnoses and that non-clinical service options and user-led and culturally appropriate services tend to be far out-numbered by clinical resources."*

Together with focusing:

*"on the need to bring an end to substitute decision-making, detentions in psychiatric hospitals and involuntary treatment for people with mental health diagnoses, so that, in line with Article 19, the latter have the same right to independent living and the same right to make their own choices as members of the public in general have. In the General Comment on Article 19, paragraphs 27 and 48 are amongst the material particularly relevant to these issues."*

#### Learning Disabilities/Difficulties

A couple of respondents referred directly to learning disabilities/difficulties.

*"Hard to disagree with motivation and general direction. But throughout, actions are rarely relevant for people with learning disabilities. I am aware that Improving Lives*

*specifically addresses learning disability, and is extremely welcome, but it does feel as though once again LD is being put in a silo"*

*"Although legislation, policy, and the action plan combined seem comprehensive in terms of addressing barriers for disabled people, according to our members' feedback and in our experience, there are differences in terms of barriers to independent living for people with learning disabilities compared with other impairment groups. The nature of learning disability makes adapting the environment in line with the social model of disability, very different to that of other impairment groups..... The action plan needs to ensure that people who work with people with learning disabilities are both encouraged and educated about empowering people with learning disabilities in both a safe and progressive way."*

#### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 2: We want to ensure that other organisations and communities across Wales take action to support the concept of the Right to Independent Living. How can we best work with others to achieve this?**

A total 43 comments were made by respondents in relation to this question. The following sections look at the comments by theme.

Co-production

A number of respondents indicated the importance of co-production and joined-up working, with this taking place nationally/regionally/locally and involving disabled people, private/public sector organisations and communities.

*“The removal of silo working needs to take place by embracing more collaborative and co-productive ways of working between not for profit, business and public sector. If we are to truly create Independence for disabled people we need to look at how the reality of this framework is adopted by organisations such as local government and social services. Just as the Social Services and Well-being Act has struggled to see full potential at local government level the same is a concern for this framework.”*

*“We would suggest that all actions around this area of work be undertaken co-productively with disabled people (including with young people), organisations of disabled people etc, being equal partners in the process. Coproduction does go some way beyond the position described in the framework of ‘engagement guiding the production’, and ‘taking views of disabled people into account’. We would hope that the principle of coproduction, so central to the Social Services and Well-being (Wales) Act 2014 and the Well-Being of Future Generations (Wales) Act 2015, would be delivered in practice and will drive these developments and the subsequent implementation. Consideration should be given to co-designing of strategies and services and the co-delivery of the same and the wording in any framework should more closely reflect those ambitions.”*

Communication

Multiple comments advocated exploring different ways of communicating the new framework and action plan, with suggestions including developing an awareness campaign, sharing best practice, arranging open days/community events and advertising.

*“A sustained comms plan: using networks: meaningful engagement with organisations: producing regs/guidelines.”*

*“We recommend that Welsh Government develop a comprehensive and accessible awareness campaign and engagement plan, to ensure that all relevant organisations and communities are encouraged to take action to support the “Right to Independent Living” framework.”*

*“Communication and support for public sector organisations to implement and support adjustments for disabled staff – also for Voluntary and Third Sector organisations and encourage private sector to introduce initiatives.”*

In addition, a couple of respondents indicated the need to communicate information on the Social Model of Disability to organisations and communities, plus it was suggested there was a need to ensure disabled people are aware of and understand their rights.

*“It will be important at the outset, to ensure that all organisations and communities understand and fully engage with the principles and practices required within of the social model of disability and/or the human rights models.”*

*“Our experience suggests that not all disabled people are aware of or understand their right to have reasonable adjustments made to ensure they are treated fairly and equally. Rights also create responsibilities and not all organisations understand the social model of disability or discharge their responsibilities to plan and deliver services in an accessible and inclusive way. Any opportunities for developing the awareness of communities and organisations of the new Framework and the actions they can take to support its aims should help to make the right to independent living a reality for disabled people in Wales.”*

### Involvement of Disabled People

A number of respondents called for the greater involvement of disabled people, with one respondent arguing for the creation of a steering group made up of disabled people and another claiming that people with as many different disabilities as possible should be included given they each have very specific needs.

*“Ensure the work is led by people with disabilities, including LD (learning disabilities), in their communities. Paid work, properly resourced.”*

*“Greater involvement through all stages of people with as many disabilities as possible due to each disability having quite specific needs.”*

*“The voice of disabled people at all levels and all stages of this process is essential and this is not to be done through “organisations” who say they represent disabled people but to gather the direct views of disabled people themselves. For too long in Wales the same organisations have been trusted and funded to represent disabled people and it is evident from the lack of outcomes on their part and progress that they are not in touch with the very people they say they represent.”*

### Enforcement, Accountability and Incentives

Several comments referenced the need for enforcement, accountability and incentives to ensure other communities and organisations across Wales support the new framework and action plan.

*“Organisations should be subject to robust scrutiny and monitoring in this context and required to evidence how they are promoting and protecting the right to independent living.”*

*“Unfortunately most organisations are reluctant to make the necessary changes so enforcement may be necessary.”*

*"We would suggest joint accountability is one way to secure greater buy in and this should be clear in the plan."*

*"Consideration should be given to incentives for employers and organisations who adhere to the plans and are compliant."*

### Involvement of the Third Sector

Including the Third Sector in all future discussions was cited as necessary in several of the comments.

*"The third sector across Wales are experts in developing citizen co-production models and can lead the way and facilitate greater citizen involvement in the design and delivery of public services..... We advocate for the important role the third sector can and should play in supporting disabled people into work. We know through our own delivery of employment services, that charities can deliver the same, if not stronger performance, on employment supports contracts than the private sector. Additionally, charities invest the surpluses they make back into the communities and services they support, enhancing value for money for the taxpayer."*

### Funding

The importance of funding was referenced in several of the responses received

*"funding is an increasing problem with smaller charities losing experienced and trained staff as the uncertainty of jobs increases. Spot funding in particular is to be avoided at all costs as it can result in increased charity closures and a lack of quality service."*

*"It will also be important to provide adequate funding for user-led organisations and disabled individuals which both enables them to participate in discussions about services and means that they are paid for their participation at fair rates."*

### Well-being Plans

Two respondents called for well-being plans to incorporate actions to support independent living.

*"It is also important that actions to support the right to independent living are mainstreamed within the priorities, strategies and action plans developed by organisations to meet their statutory responsibilities. Actions to support the right to independent living for disabled people should be explicit in the Wellbeing Plans of public bodies and public services boards and in strategic equality plans to meet the Public Sector Equality Duty in Wales."*

### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 3: With reference to chapter 2 in particular, are you aware of any other developments since the previous framework was published in 2013 that you think should be included?**

33 respondents provided comments in relation to this question. The following sections look at the comments by theme.

Transport

Developments in transport were cited by several respondents.

*“You make no reference to the current work being carried out by Transport for Wales in respect of bus services, including integrated responsive transport services. There has also been some work around improving taxi services, including proposals to make training mandatory, which is outlined in the current Welsh Government consultation ‘Improving Public Transport’.”*

*“Access to taxis and private hire vehicles- Under the Equality Act 2010, it is an offence for any operator or driver (unless they carry a medical exemption certificate) to refuse to carry assistance dogs or to charge more for the fare or booking. On conviction for such an offence, drivers can be fined up to £1,000 and have their licence removed. Mandatory disability awareness training for taxi and private hire vehicle (PHV) drivers - following extensive work by Guide Dogs Cymru, Welsh Government accepted a recommendation that new national standards being drawn up should include a requirement for all taxi and Private Hire Vehicle drivers in Wales to complete general disability awareness training. Developing accessibility awareness training for staff will be included in the Welsh Government’s accessible transport objectives, to be published by the end of 2018. Local licensing authorities will be expected to make sure that all drivers operating in their areas undertake the training.”*

Education

Multiple comments referenced the Additional Learning Needs and Educational Tribunal Act. One respondent additionally mentioned other education related legislation.

*“Section 123 of the Learning and Skills Act 2000: Places a duty on local authorities to provide, secure or participate in the provision of youth support services that enable or assist young people to participate effectively in education or training, take advantage of opportunities for employment and participate effectively and responsibly in the life of their communities; and, The Learning and Skills Measure (Wales) 2009: Places a duty on schools and further education colleges to ensure learners have access to a broad and balanced curriculum and learning support services.”*

Social Services

The Social Services and Well-Being (Wales) Act was cited by a few respondents.

*“(We) recommend Chapter 2 is updated to include details of the impact policy and legislative developments have had on the lives of disabled people. For example, the Social Services and Wellbeing (Wales) Act 2014 has been a key development, particularly the inclusion of the UNCRPD in the Code of Practice but there is no*

*evidence provided as to whether the Act is improving independent living in practice, or whether service providers are complying with the Code of Practice. The Welsh Government should include details of any evaluation of the impact of the Social Services and Wellbeing (Wales) Act 2014 in the Framework document."*

The Regulation and Inspection of Social Care (Wales) Act 2016 and the Regulated Services (Service Providers and Responsible Individuals) (Wales) 2017 were also mentioned.

### Accessibility

Several comments were made referencing developments in accessibility. One respondent referred to the Accessible Information Standard in NHS England, and another mentioned the Accessibility Certificate for businesses. Access to information was also cited.

*"We also feel strongly that since the commencement of the Accessible Information Standard in NHS England which is mandatory, the Standards in Wales should also be mandatory with either sanctions or inducements and not be voluntary as is the case at present. Our feedback from the Welsh BSL user community is that the Standards have made no difference to accessibility of health establishments throughout in Wales. However we do note that one or two Health Boards are making some creditable improvements."*

### Financial

Financial related developments were commented on by multiple respondents. For example, the changes to the WILG were mentioned, as was Welfare Reform more generally. The flexible use of Direct Payments was referenced as was the breakdown that followed the introduction of employee pensions, whose funding was uncertain for months. The case for pooled budgets was also proposed which it was felt would serve to demonstrate that health and local authorities will be working together and show that there will not be arguments between agencies which delay the provision of equipment or services.

### Specific Disabilities

Learning disability related developments were mentioned by some respondents.

*"The WG Learning Disability – Improving Lives Programme was launched in 2018 and its implementation will be overseen by the Learning Disability Ministerial Advisory Group, co-chaired by Sophie Hinksman and Gwenda Thomas .....The National Commissioning Boards new commissioning framework and guidance for learning disability services (due to be published March 2019) is also relevant."*

*"The third sector can also assist by encouraging the Safe Places schemes which allow people with learning disabilities places of refuge in their local communities if they are feeling vulnerable or distressed.....We also encourage and welcome the opportunities presented to key stakeholders in the third sector through the Learning Disability Ministerial Advisory Group (LDMAG)."*

Several respondents referred directly to autism, with one commenting on the Autism Spectrum Disorder (ASD) action plan, another mentioning the creation of the Caldwell Autism Foundation in response to a lack of action in the state sector and a third respondent

indicating their concerns regarding a lack of development in relation to this specific disability.

*“We wish to comment that we do not feel that action and service provision for late diagnosed adults on the autism spectrum has developed in the way it had promised. We continue to struggle to get access to the resources that would be of benefit to our health and well-being.”*

Welsh Government investment to support people with learning disabilities/difficulties and autism spectrum conditions was cited.

*“We welcome the investment that the Welsh Government made from the Getting Ahead 2 grant that funded the Engage to Change project which aims to secure employment for 16-25 year old people with learning disabilities and autism spectrum conditions. We would encourage the Welsh Government, to use the findings from this work once completed, to extend employment opportunities to all people with learning disabilities and autism spectrum disorders in the future.”*

A comment was also made in relation to British Sign Language (BSL).

*“We noted that a search for either 'BSL' or 'sign language' in any of the legislation quoted in Chapter 2 did not identify those two phrases. Similarly in the All Wales Standards for Accessible Communication and Information for People with Sensory Loss a search found three instances of BSL and 2 of 'sign language'. The paucity of references needs to be addressed and BSL given a much greater prominence in order to enable Deaf BSL users achieve independent living.”*

#### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.



**Question 4: Our aim is that everyone will have the opportunity to reach their full potential and lead a healthy, prosperous and fulfilling life, enabling them to participate fully in their communities and contribute to the future economic success of Wales. Looking at the Action Plan, how could we better achieve this for disabled people?**

Comments on this question were provided by 41 respondents. The following sections look at the comments by theme.

Involvement of Disabled People

Involving disabled people in the engagement process was a common theme throughout the comments provided.

*"It is no good having abled bodied people making decisions on behalf of the disabled, they cannot understand all the problems."*

*"Continue to engage with people living with a disability and their families throughout the process of delivering on this action plan and not only in the creation of the plan. To work with professionals and local businesses to act as informal advocates for people with disabilities to ensure that the voice of people with disabilities becomes part of general conversations. Ensure people with disabilities are empowered to be part of the solution, part of the decision making. Have a greater voice within public services and business – real co-production. Greater inclusion in communities and decision making."*

Funding

A number of respondents referred to funding challenges and how these need to be resolved in order to ensure the new framework and action plan can be implemented effectively.

Reference was made to both current austerity measures faced by local authorities and the need for funding in the community.

*"While a laudable intention, it needs to be undertaken within the context of the austerity that local authorities have been dealing with for the past decade. The impact of this means that many of the services and support available to people with disabilities has been cut and eligibility criteria have been introduced that give priority to people in greatest need or urgent care and support."*

*"The public sector could support community initiatives by enabling easier access to often low levels of funding for community groups."*

A comment was made in relation to funding post Brexit.

*"Employment support continues to play a key part in helping disabled people lead prosperous lives. A key area of concern for.....the employment services sector more broadly, regarding the support for disabled people facing the greatest barriers, is what follows the European Social Fund (ESF) following Brexit."*

Two respondents cited funding in relation to advocacy services.

*"Statutory obligations to fund one to one advocacy under the Independent Professional Advocacy Grant has forced many local authorities to pool their self-advocacy budget to*

*provide one to one advocacy services only. This has already started to have a detrimental effect on self-advocacy and other forms of advocacy... If we lose self-advocacy we force people with learning disabilities to rely on others to speak for them. This would disempower people with learning disabilities and would undo many years of progress made by the self-advocacy organisations and self-advocates themselves. This would have a detrimental effect on their ability to live independently."*

*"The action around advocacy needs to acknowledge the capacity of small, local, well established, good quality advocacy providers, who may well struggle with a regulation and inspection, as they do not have the 'back office' functions needed. Locally, we are concerned that without support, these providers will cease to exist if/when inspection and regulation is introduced, and that this will have an impact on the people they support."*

Concern regarding the absence of any specific detail on funding in the new framework and action plan was also mentioned. In addition, there was a call for the NHS to be supported to provide Direct Payments for Continuing Healthcare (CHC).

### Measures of Success

Several comments cited the need for timelines, achievable goals, measures of success and monitoring.

*"We would suggest that a timeline is included for the achievement of the actions. This would help to measure progress and demonstrate improvement year on year. A set of outcome measures would give a narrative to disabled people about what they can expect the Framework to achieve for them. Monitoring arrangements that focus attention on the achievement of actions and their impact on disabled people would hold different departments to account, demonstrate and inform disabled people of progress and demonstrate that the Government is taking the right to independent living seriously."*

### Co-production and Collaboration

A common theme among many of the comments provided concerned the importance of collaboration and co-production.

*"All of this speaks to the need to move to a co-productive model rather than an engagement model. We believe it will be best achieved when dealt with through equality and diversity processes rather than creating separate services which require disabled people to access different services, thus our suggestion of changing the name from 'Independent Living' to 'Equality and Disability'."*

*"A continuing joined up approach across all disciplines is essential. Removal of meetings where all that is achieved is conversations and the culture of "look what we've achieved" must cease. Education must liaise with social services and healthcare providers. Social services but recognise the role of third sector in delivering action plans and cease to work in a silo approach to delivering services....By engaging with businesses and third sector organisations who already work with disabled people there can be a better use of resources. We feel that current Acts and Frameworks are currently short sighted by only seeing resources in a financial perspective and not*

*looking at the contribution businesses can make in terms of volunteering and sponsorship of programmes.”*

### Employment of Disabled People

A number of respondents referred specifically to employment. For instance, there were several references to the Access to Work scheme.

*“We note that the Action Plan includes a specific action to increase the take-up of Access to Work in Wales (Prosperous & Secure: Action 2). We recommend that this action also includes promotion of the Access to Work Mental Health Support Service. Despite the introduction of the Access to Work Mental Health Support Service, the number of people with mental health problems who benefit from the service each year remains low. Several reports including the 2011 Sayce review and a 2014 Work and Pensions Committee inquiry have found that the service is under promoted, particularly to healthcare professionals. New awareness raising activity is needed to highlight the service to employers, employees and healthcare professionals.”*

There was support for the Welsh Government’s Employability Plan.

*“We welcome the Welsh Government’s Employability Plan, which includes an action to provide an individualised approach to employability support that is responsive to an individual’s needs. This Action Plan compliments the Employability Plan and will act as a key enabler in helping disabled people get and stay in work by identify the wide range of factors that can impact disability employment.”*

Some comments were made in relation to the Disability Confident initiative.

*“we think that the UK government’s commitment to develop a ‘one stop shop’ information portal for Disability Confident provides an opportunity to provide resources on AT (Assistive Technology), and to raise employer and employee awareness of its benefits. The Action Plan speaks of developing a Welsh disability award scheme for employers which might either build on Disability Confident or be a new scheme to encourage employers to aspire to be more supportive of disabled people. We would encourage the Welsh government to progress with this improved or successor scheme and recommend that included in this scheme is information for employers on AT.”*

In addition to the above, respondents also referenced the employment of disabled people by calling for.

- continued Welsh Government funding for the supported employment model used by the Engage to Change project;
- equitable access to training and sustainable employment opportunities for disabled people;
- the removal of all barriers to employment faced disabled people;
- employers to not discriminate against disabled people;
- encouraging professionals and local businesses to act as informal advocates for disabled people;
- support to be provided for disabled people to access the job centre;

- a change in the tendency to only offer disabled people unpaid voluntary work;
- workshops to be offered to disabled people on issues such as access to work, personal independence payments, disabled students allowance and assistive technologies;
- the removal of short-term employment schemes given they can interfere disabled people's benefits and can be problematic for disabled people who want to work;
- the disability employment gap to be addressed;
- a consideration of supplementing wages with benefits;
- further development of autism champions;

### Assistive Technology

One respondent called for more action to be taken on the area of Assisted Technology (AT).

*"One area we think the Action Plan could focus on more is the benefits that Assistive Technology (AT) can bring for disabled people as well as boosting Welsh productivity and the economy more generally.....We believe that AT can have a significant impact on the ability of disabled people in Wales to reach their full potential and lead a healthy, prosperous and fulfilling life.....We would suggest that the Action Plan has a greater focus on AT and the role it can play helping disabled people lead prosperous lives."*

### Specific Disabilities

Several specific disabilities were referenced in some of the comments provided, including learning disabilities/difficulties, autism, deafness and mental health.

*"The action around mental health services needs to include reference to individuals with a learning disability and /or autism who also experience mental health issues, who can find it particularly difficult to access MH services."*

*"We feel that in addition to income poverty and material deprivation there should also be clearly identifiable measurements of poverty of information and knowledge. These severely impact on the ability to obtain gainful employment, integrate with the local community and ability to make appropriate use of social care and health services. We have noted that many of our BSL users have poorer jobs (or none), are less skilled, are less able to use health services and have a higher incidence of mental health issues (No.13). The impact on wellbeing and emotional intelligence is considerable leading to a cycle of dependency that lasts a lifetime. This stems from a poverty of knowledge and information. We would also like a much stronger emphasis on employing Deaf BSL users than is currently practised."*

*"We welcome the aim of this Framework to ensure that everyone has the opportunity to participate fully in their community and contribute to the economic success of the country. We want to see this aim made reality for people with mental health problems.....the Framework and Action Plan could be strengthened and developed with a greater focus on people with mental health problems, including in the sections on prosperity and security."*

### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 5: Every person should be equipped with the education and skills they need to get a job and the opportunity to develop new skills through their working life. Looking at the Action Plan, how can we better achieve this for disabled people?**

A total of 36 comments were received for this question. The following sections look at the comments by theme.

Education

A common theme across many of the comments provided in relation to this question concerned education. One respondent argued for more emphasis on schools in the new action plan, whilst another called for actions relating to developing an inclusive schools' curriculum to be included in the action plan.

A reference to post-16 education was made.

*"(We) welcome the commitment to improve disabled access to post-16 education and independent living. However, it is difficult to determine from the proposed Action Plan how the Welsh Government will realise this.....(we) would welcome further detail in the Action Plan that takes account of our recommendations to improve the information, advice and guidance given to learners about the full range of post-16 education and training available to them."*

*"Whilst your action plan states that you will support young people with learning disabilities to access post 16 education, I am aware that our local 'post 16' college has recently closed and adults with learning disabilities now have to travel from the rural parts of mid and south Denbighshire to the coastal strip for post 16 college based education. I am not aware of any WG intervention to prevent the closure. I am not clear therefore what the WG can or will do to support post 16 learners, given this recent experience. The action needs to be clearer and realistic about what can and will be done to support young people to access post 16 education, especially in rural /semi-rural, welsh speaking areas."*

Work around additional learning needs was cited by several respondents.

*"We believe that the Additional Learning Needs reforms will assist equipping every person with education and skills, given that the IDP will be up to the age of 25 years."*

*"The Welsh Government should ensure that in implementing the Additional Learning Needs and Education Tribunal (Wales) Act 2017 that attainment gaps between disabled and non-disabled pupils do not widen."*

A comment was made citing concerns in relation to adult education.

*"Again, better links with adult education. If disabled adults are already working then full time college may not be an option so there must be a better understanding of the funding structure of part time learning, the WG priorities for how this money should be spent and long term goals to develop part time learning so that they can meet the needs of disabled adults. Part of the issue with this is also a physical one, for instance many local authority buildings are old schools (reallocated to new departments after school closures) which do not have full disabled access. The closure of many*

*community centres and libraries mean that venues for delivering part time education is a continuous challenge, especially when considering disabled access."*

There were calls to be more inspiring when teaching disabled young people and to build confidence.

*"At an educational system level, disabled children need to receive more inspiring and motivating support to reach for bigger dreams and goals in terms of careers."*

*"We think it is vital that young disabled people's aspirations are raised in education and that they have an equal opportunity to achieve the qualifications they need to reach their potential."*

Changes to the educational system were also suggested.

*"(We) feel that the education system does not always meet the needs of disabled people; for example disabled people require access to a range of learning styles, such as tactile, auditory or visual. Hour long lessons are generally too long but short bursts of learning is more effective. A one to one person centred package that is tailored to the individual needs is required. This could include the individual learning how to note take, how to identify their learning style, recognise how their disability affects their learning, support the individual to understand their strengths and weaknesses as well as improving their strategies to enhance their practice/ education etc. This will enable disabled people to articulate their needs. In primary school there is a move away from "labelling" a child according to their diagnosis. However, in higher education you cannot access support without diagnosis and proof of that."*

*"Inclusivity league tables for schools and colleges might allow disabled people and their guardians to make an informed choice about where to study or train."*

*"A quicker response to move a disabled child to a more vocational programme if it is identified that academia is a barrier for them is essential in order them to still find a passion and to find a way of entering the world of work once education is completed. Too many young disabled people move to DLA to PIP and then with a pot of money and no aspirations get stuck in a benefits system that will not encourage them to find meaningful work but to just tick boxes and work through the system."*

Educational funding was also referred to.

*"Funding and support for all of the aids to learning – tablets, smartphones, computers, courses, webinars, colleges etc. and relevant career coaching and advice for employers and prospective employees. Community learning should be funded – at present the local authority in Carmarthenshire only funds literacy, numeracy and Welsh classes."*

### Apprenticeships

Multiple respondents commented on apprenticeships. Reference was made to the Estyn report investigating barriers to disabled people accessing apprenticeship programmes, including the recommendations in the report. A concern was raised that the new framework and action plan does not reference Welsh Government's new Inclusive Apprenticeships Plan.

*"We know that disabled people face difficulties in accessing apprenticeship programmes. In 2014, Estyn published a thematic report investigating these barriers.....the report found that further work was needed to address the under-representation and recruitment of disabled learners into apprenticeship programmes."*

*"One policy initiative that the Welsh Government has promoted and on which it has demonstrated leadership on in recent months is its Inclusive Apprenticeships: Disability Action Plan 2018-21. The links to this policy initiative and Right to Independent Living Action plan are clear. It therefore seems a missed opportunity that no mention is made of it in either the Framework or the Action Plan. The embedding of the commitments made by the Welsh Government in its Inclusive Apprenticeships policy would strengthen the Action Plan."*

One respondent welcomed the focus in the new action plan on increasing the number of disabled young people on apprenticeship schemes, whilst another welcomed the Welsh Government's Inclusive Apprentice Forum and resultant Inclusive Action Plan to increase apprenticeship opportunities for disabled people, which they considered to increase apprenticeship opportunities for disabled people.

#### Disability Employment Schemes

The development of Disability Champions was referred to in a couple of the comments received.

*"We need to ensure that the network of Disability Champions includes people with learning disabilities because their employment access needs are often quite different to those with physical or sensory impairments"*

*"More job coaches and champions in the work place all help to improve work place for people with disabilities. We would like to see a clear plan about this. We have three Learning Disability Champions in Pembrokeshire and feel that is a positive step forward."*

Several respondents referenced a proposed disability award scheme in a positive light.

*"We would strongly endorse the need for a more robust Welsh disability award scheme for employers with external assessment. A scheme which has a high reputational impact similar to the Stonewall Employers Index could go a long way to making the workplace more accessible to disabled people. It would demonstrate that employers are taking disability equality seriously and not just completing a tick box exercise. This is important in creating safe and supportive environments for managers and staff and achieving attitudinal changes towards disabled people and diverse and inclusive work spaces."*

Although a concern was raised about how the scheme would be monitored.

*"The disability award scheme is interesting but again this needs to achieve real results, and we wonder how you will find out if employers are continuing to be positive employers, and not just completing a form or short course to get an award."*



## Availability of Data

Ensuring the availability of data was cited as important.

*“(We) would welcome more information in the Framework about the indicators and data Welsh Government intends to use to measure the progress of disabled people’s wellbeing. It is important that the Welsh Government draws on a wide range of data sources (including Population Needs Assessments by the Social Services and Well-being (Wales) Act 2014) and that it captures the lived experiences of disabled learners seeking to access education and training. It is also important to note that the dataset underpinning the National Survey for Wales does not include the views of children and young people aged between 0-15. It will be particularly important for Welsh Government to consider how intends to capture, analyse and measure the views/experience of learners, particularly for those disabled learners preparing to make the transition beyond Key Stage 4.”*

*“We would ask the Welsh Government to help address the inequality of outcomes in education by collecting and publishing attainment data for school-leaving age by impairment type, including children and young people who use British Sign Language (BSL). This would demonstrate any improvement in outcomes, highlight where further action may be required and help to ensure local authorities are held to account for meeting the additional learning needs of disabled children and young people.”*

## Targets

Several respondents were keen to see specific targets incorporated into the new framework and action plan.

*“We would ask the Welsh Government to have targets for increasing the number of disabled people in employment and on apprenticeships and to ensure that any initiatives, including its own employability plan and Working Wales has targets and reports regularly on progress by impairment group.”*

*“Task a local authority to take on 5 disabled apprenticeships.”*

## Training

The need for training was recognised by a number of respondents.

*“Employers need to receive training to change their attitude towards welcoming and up-skilling disabled people in the work place.”*

*“The first place to begin to with employers, not only should they be informed of schemes like Access to Work but they must be fully trained on areas of employment such as reasonable adjustments, disability confident and more needs to be done to remove the barriers for the employer.”*

## Transition

A few of the comments focused on the transition period into work for young disabled people.

*"There also needs to be more work done to improve transition for young disabled people, raise aspirations and ensure they have the skills to gain employment including travel training, self-confidence and social skills as well as job-specific skills."*

*"Some disabled young people find difficulty navigating the system and a smoother transition to adulthood by focusing on employment skills and educating employers about the benefits of employing disabled people, would increase the future economic success of Wales by supporting people as opposed to setting them up to fail. Not every disabled person will be able to work, but may be able to volunteer and input to society that way."*

### Co-production / Collaboration

The need for co-production and collaboration was cited on several occasions.

*"There is clearly a balance needed where this does not compromise the support workers' or care services legally. We believe the key to this equilibrium is through meaningful co-production. The SSWB Wales Act goes some way to driving changes around co-production, but we are not yet seeing this happening seamlessly for all people with learning disabilities on a pan Wales basis."*

### Information Provision

A number of respondents suggested that the lack of available information on disabilities to employers, plus the lack of available information to disabled people on their options going forward, serve to act as a barrier to employment.

*"Information needs to be better and in different formats. People do not know of all projects, if they do not have any connection with their communities....Employers need to be informed, where to get help to employ people with learning disabilities. Non-disabled people need to learn how to communicate with us."*

*"More education needs to take place in relation to employing people with disabilities so that employers are fully aware of the positives and there is a removal of the myths. Access to work scheme allowance is actually for the disabled person rather than for the employer and therefore the onus is upon the disabled person to apply for it and to know what they need in terms of support. There is not enough support for the disabled person to understand what is available and the type of support they could arrange. Employers tend to default to external organisations to undertake access to work which then often becomes a money making exercise for those companies. Better understanding of the scheme is essential for both employee and employer or alternatively Welsh Government create its own version of access to work and create a better application process."*

*"We would also suggest there is a need for disabled young people to receive specialist careers advice from the age of 14. This advice should be delivered on a face to face basis and should be focused on their abilities and aspirations, rather on what they cannot do. Young disabled people should be encouraged to not just think about progressing into college, but should be given wider careers advice regarding Apprenticeships, employment opportunities and progressing to University. We also think it is important that young disabled people leaving school or college should be*

*formally signposted to specialist disability employment support available in their local communities. This can include support delivered by Jobcentre Plus or other employment support programmes.”*

#### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 6: We want everyone to live in a home that meets their needs and supports a healthy, successful and prosperous life. Looking at the Action Plan, how can we better achieve this for disabled people?**

39 respondents commented on this question. The following sections look at the comments by theme.

Accessible Housing

Multiple comments highlighted the importance of accessible housing.

*“One of the biggest barriers in terms of housing and preventing many disabled people from realising their right to independent living is the chronic shortage of accessible housing. This is not addressed in the Action Plan. Action 11, which relates to the Innovative Housing Programme and using it to stimulate new thinking in terms of the design and delivery of affordable housing, makes no mention of accessible or adaptable housing. A commitment that sets out how the Welsh Government might address the provision of accessible housing would be welcome, for example a commitment to consider how to maximise accessible housing supply as part of the current Affordable Housing Supply Review.”*

*“Accessibility and sustainability should be at the heart of the planning process.....Accessible housing needs to be provided faster.”*

Several proposals were suggested by respondents as a means to increase the availability of accessible housing, including incentives and enforcement.

*“There needs to be greater investments and incentives to build a diverse range of accessible social housing, with varying levels accommodation and support, with improved access to community facilities.”*

*“We support the recommendations of the Equality and Human Rights Commission set out in its report, ‘Is Wales Fairer? - The state of equality and human rights 2018’ and would suggest that to better achieve independent living for disabled people, the Action Plan should include actions to ensure an adequate supply of accessible and adaptable housing and related support by: ‘Imposing requirements that all new homes are built to Development Quality Requirements (which incorporate the Lifetime Home Standard) and that 10% of new homes are built to wheelchair-accessible standards.”*

*“Implementation is key and perhaps it's time to compel house-builders through building regulations to ensure compliance with inclusive design, for example having a level access entrance and wide doors.”*

Accessible Housing Registers (AHRs) were referenced on several occasions.

*“The Welsh Government’s Independent Living Framework (2013) included a commitment to encourage the adoption of Accessible Housing Registers (AHRs). It is disappointing that the commitment to AHRs has been dropped in the new Action Plan. Our inquiry found some good practice around AHRs in Wales and recommended their adoption across Great Britain.”*

There was also a recommendation that the RNIB Cymru Visibly Better principles are adopted in the accessible design of homes.

### Financial

Some respondents referred to the lack of availability of affordable housing.

*“The acknowledged shortage of affordable housing includes a lack of supported living accommodation. This prevents people with a learning disability from moving out of the family home and contributes to the large numbers of adults living with elderly parents. Far more needs to be done to address this shortage and ensure that disabled people have the same opportunities to choose where and with whom they live. Disabled people, especially those with learning disabilities, too often have little or no choice in who they live with, for example in supported living. This can cause significant issues including mental health problems, challenging behaviour and ultimately loss of independence.”*

*“One issue is that housing described as ‘affordable’ is frequently far from that. Another is rents which are difficult for disabled people to afford.”*

Concern was raised regarding the levels of funding available.

*“Provide additional funding to disabled people’s organisations and advice agencies to increase the supply of independent advice and information about housing options, including adaptations, with a particular focus on the private-rental sector.”*

*“We question how some aspects of your plan can be funded.”*

One respondent sought clarity on the bedroom tax specifically, with another calling for it to be scrapped. A point was also raised concerning carers of disabled people being the lowest paid professionals and not having any security.

### Adaptations

Consideration of adaptations to support disabled people to live independently was mentioned, with one respondent calling for a removal of bureaucracy and another citing the need to include people with mental health problems.

*“Together with local authorities and housing providers, urgently address the bureaucratic hurdles and delays within the adaptations system, to ensure that low-cost, minor adaptations in particular can be installed quickly.”*

*“We would like to see any revision of aids and adaptations systems include aids and adaptations needed by people with mental health problems. Too often such adaptations are focused purely on physical needs.”*

### Co-production

Several comments were made in relation to co-production, involving both disabled people and carers.

*"I believe that a co-production approach is needed where real disabled people and their carers are involved from start to end in the design and implementation of real changes to housing within our communities."*

#### Availability of Data

There was a call for more data to be made available.

*"Local authorities told us that poor data makes challenging developers to provide additional accessible and adaptable housing difficult. A commitment to tackle the data gaps on accessible and adaptable housing would help the evidence on which the Welsh Government and Local Authorities base their housing decisions."*

*"Provide statistics to Housing associations and private landlords of those not living where they would choose to live, to encourage that they build accessible properties in the right areas with the right number of bedrooms, i.e. one bedroom properties for all ages not just the over 55's."*

#### Information Provision

The need for an improvement in the provision of information was cited by multiple respondents.

*"Make sure information on housing options and benefits is up to date. Make sure information is easy for people to understand and access."*

*"Supporting local letting agents/ landlord associations and estate agents to be better informed about the needs of people with disabilities and how they can support individuals in their own home, and support people with house searches. Map housing needs and use within housing developments."*

*"We suggest that provision of high quality, understandable information about housing of all tenures, and how housing impacts mental and physical health, be enshrined in the plan alongside housing related support."*

#### Holding Landlords to Account

The need to hold landlords to account was raised in the comments provided.

*"A fundamental part of providing high quality homes is ensuring there is a simple and robust method of regulation and an independent, accessible complaints process. We would like to see an additional action added to the Action Plan, to review current regulation and complaints processes to empower disabled people to better hold landlords to account."*

#### Impact of Different Disabilities

Several comments were made referencing the importance of considering the needs of people with different disabilities.

*"High quality, stable housing is key to maintaining good mental health and is important for recovery if someone has developed a mental health problem. And yet,*

*people with mental health problems are much more likely to live in poor quality accommodation. We're pleased to see housing included in the Action Plan, but more consideration needs to be given to the needs of people with non-physical disabilities when it comes to housing."*

*"Our members with learning disabilities tell us that people with learning disabilities are often placed in accommodation where they have had little or no choice about location or suitability to meet their needs. Some members feel or have felt unsafe to go out and travel independently as a result of being housed in an area where crime, particularly hate related crime is problematic. We encourage a process of meaningfully consulting people with learning disabilities about where they would like to live, and to help them feel safe about where they live. Fear certainly restricts people with learning disabilities from making choices about independence."*

*"Social services need to be trained better into how decisions should be made. Disabled people have differing needs and cannot be lumped into one category, they need to be treated as individuals."*

#### Other Comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 7: We want the Welsh social care sector and health services to support people to lead independent lives. Looking at the Action Plan, how can we better achieve this for disabled people?**

Comments were received from 42 respondents in relation to this question. The following sections look at the general comments provided by theme.

Co-production and Collaboration

Multiple suggestions were made in relation to co-production and collaboration between the health and social care sectors.

*“Remove barriers between health and social care to facilitate more streamlined working together.”*

*“Social care and health services need to be more integrated to support the need of disabled people. Interagency working with education and other services such as employment, housing and the third sector is also required.”*

A number of respondents called for the pooling of budgets between health and social care.

*“A single funding stream for Health & Social Services is urgently needed to bring an end to wasteful and harmful territorial squabbles. To make this a practical reality there also needs to be tax reform so that both health and social services are fully funded by a single national risk pool, whether a dedicated tax, national insurance or some new model of funding stream.....Just one example of the unnecessary friction caused by Health and Social Services remaining separately funded is that, despite government efforts to promote integration and fund pooling, there is a disconnect between the realms of housing aids & adaptations [Social Services] and posture & mobility support [Health] which leads to money being spent on costly adaptations to buildings that could be avoided by much less costly choices in wheelchair provision.”*

Technology

Support for the utilisation of technology was referenced in several comments.

*“Technology is part of our modern landscape. We use it for work, leisure, at home and on the move, it makes our lives easier. Disabled people should share that experience, benefitting from the advantages that tailor-made technological support can bring. This can include both specialised and mainstream technology and digital inclusion. There are many benefits of personalised technology including increased choice, control and independence for the disabled person. It can help commissioners and providers in running cost effective services. There needs to be higher levels of investment in personalised technology. It should become part of the commissioning pathway where the benefits and impact of personalised technology are measured. There needs to be more awareness for disabled people, their families and support staff on what is available and how it can help people’s lives. A longer term approach is needed beyond current local authority and health financial restraints so long term savings may be seen to be possible.”*



*“With regard to the action to create an accessible online digital platform for citizens to give people greater control and enable them to become more active participants in their own health and well-being, it is important that the platform is accessible in its broadest sense and inclusive of the different communication and language needs of all citizens. Our experience shows that there is still limited health information in British Sign Language (BSL) and a low level of awareness of the much lower English literacy levels of people whose first language is BSL. There is also a lack of health information in other accessible formats. A digital platform offers a great opportunity to provide health information in audio format to make it more accessible to people who are blind or have significant sight loss and to add subtitles to video clips to make information accessible to people with hearing loss.”*

Concerns however were also raised in relation to ensuring disabled people are not left behind should technology become more widely used.

*“We should be able to access health and social care in a range of ways, some people struggle with technology so that should not replace human contact.”*

*“Ensure that people who are less familiar with modern technology have the opportunity to learn and/or have alternative means of accessing information and services so that they have a choice in how they access information and services.”*

### Funding

Some of the responses to this question cited funding as an important issue to consider.

*“Concerns have been raised about how challenging it can be to access funding for continuing needs, and how this uncertainty could impact on some citizens. For example, agreeing on funds to access equipment, which may be vital to a person’s well-being and mobility. The person’s wellbeing should come first, and any decisions, which are taken, should be transparent and open to challenge, with the person having support to challenge in some circumstances.”*

*“The Welsh Government has faced criticism for its decision to close the Welsh Independent Living Grant (WILG) and transfer responsibility to Local Authorities. Neither the Framework nor the Action Plan mentions this important policy decision or the likely impact on people previously in receipt of the WILG. The Action Plan should set out commitments for how the Welsh Government plan to ensure that disabled people continue to receive the support they need to live independently in the community. An action to evaluate the impact of the decision in 2016 should be considered in the Action Plan.”*

*“Funding will always be the most restrictive issue.”*

### Advocacy

The importance of advocacy was raised on several occasions.

*“Greater use of advocacy should be supported. Many of our members prefer to have an advocate alongside us when we access health and social care support. This should be seen in a positive way.”*

*“Advocacy for Deaf BSL users is essential to achieve independent living. The type of advocacy needs to be one of empowerment and support rather than representative which disempowers Deaf BSL users as often representatives use language that is not compatible with that of the Deaf BSL user.”*

### Information Provision

A number of comments regarding information provision were provided.

*“Make sure local information on services available is up to date and available in a range of formats. Make sure information is easy for people to understand and access.”*

*“it is unclear from the Together for Mental Health Progress Report whether guidance and supporting information for Health Boards and local authorities on supporting service users with protected characteristics has been produced. If this has not been completed, we recommend that this action is also incorporated into this Action Plan.”*

### Employment and Training

Several respondents referenced employment in their responses.

*“Promoting social care as a career could be a priority – individuals often need trained and skilled staff, and they need consistency. The sector finds it difficult to recruit and retain staff.”*

*“Apart from the existing services currently provided I think we need to initially provide a support coach where there is a good possibility for an individual to work. However these decisions should be made by people who really understand a person’s disability and what that individual may be capable of. Some people who have a disability may never work through no fault of their own and we should be working with them to help them integrate into society. Which organisation or public office would be responsible for this I am afraid I do not know.”*

*“One of the negative consequences of the persisting Medical Model approach across the public sector and across public attitudes is that those staff who are employed to support disabled people are not seen by society as doing something of any great value and are therefore both treated and paid appallingly badly. Obviously there are fundamental financial reasons for all levels of government finding it difficult to fund the Minimum Wage or even the Living Wage or better, but a more respectful, positive public attitude towards older and disabled people would make it easier for Welsh Government to at least make the argument.”*

Training was also cited in some of the comments provided.

*“Joint training and qualifications together with greater understanding in health professionals of the social models of disability and moving away from the medical (or diagnosis model) or the biopsychosocial models are important ways to deliver the proposals.”*

*“We know from the most recent Together for Mental Health Progress Report that 86% of NHS staff had completed the Treat Me Fairly equalities training in 2017. In order to*

*ensure continued uptake, we recommend that uptake and monitoring of this training is included as a specific action within this Plan."*

#### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

### **Question 8: Looking at the Action Plan, what else can we do to improve the accessibility of public transport and venues for disabled people?**

A total of 41 comments were submitted for this question. The following sections look at the general comments provided by theme.

#### Training

A number of respondents commented on the need for more training to be provided.

*"We would also suggest the Welsh Government encourage all staff working on public transport in Wales to undertake disability equality training with guidance from disabled people and specialist disability organisations on what should be included in the training."*

It was suggested that a range of people with different roles and responsibilities require training, including drivers, all employees with a customer facing role, plus disabled people and their families. There were also calls for training to be focused on specific disabilities.

*"We must ensure that disability awareness training includes specific training on the needs of people with a learning disability and autism, not just physical or sensory impairments."*

#### Public Campaign

The need for a public campaign to be delivered was cited by a couple of respondents.

*"This is a mindset issue perhaps here more than elsewhere. The positive impact of accessibility for everyone is huge and needs to be 'sold' more. The whole approach that in essence accessibility is for one group needs to be turned on its head. Through a comms strategy or through nudge theory but certainly needs more thinking."*

*"We think there is an opportunity for Wales to lead the way on this agenda by launching a public campaign to tackle the discrimination disabled people experience when using public transport. There is scope for this campaign to be widened out as well to promote wider understanding of the Social Model across Wales."*

#### Enforcement and Incentives

Some comments called for greater enforcement and holding transport providers to account.

*"It would be helpful if the Welsh Government had devolved powers over transport so that they can make sure that transport providers are accountable for the services they provide and for their responsibilities to disabled people."*

*"The Welsh Government should set enforceable specific disability access requirements for all planning and transport infrastructure projects and services."*

Incentives were also discussed as were alternative initiatives to encourage transport services/venues to be more accessible.

*"Co-ordinating and incentivising community transport solutions, with suitably adapted provision. This could be done through low cost car hire, reduced tax etc."*

*"Name and review good and bad services/venues maybe like food hygiene scores on the doors."*

### Financial Assistance

Several respondents cited the importance of concessionary travel given the high cost of public/community transport.

*"Continuation of the concessionary bus fare scheme, which is of significant benefit to the one in three people with sight loss who live in poverty in Wales."*

*"We would encourage a more consistent approach to the way local authorities assess applications for free disabled bus passes. For those in rural areas, extending the use of the bus passes to local rail services would also make an enormous difference to their travel experience."*

### Involving Disabled People

The need to involve disabled people was raised on a few occasions.

*"Understand the barriers and take measures to address issues of access and connectedness using the direct experience of disabled people to reach this understanding."*

*"This needs involvement of people with a range of disabilities along with all public transport and venue groups meeting together."*

### Problems in Rural Areas

Problems associated with travelling in rural areas were identified by several respondents.

*"The issue in Denbighshire, for adults with learning disabilities, is the availability of public transport, especially in rural areas, and in the evenings. This is often a real barrier to them accessing activities in their area. An action around monitoring the availability of transport in rural areas (especially in the evenings) would be helpful in terms of promoting independence."*

*"The rural nature of Wales means that public transport accessibility for disabled people can be a major issue. For example, in Devil's Bridge, public transport is not available every day, has to be booked in advanced and is not suitable for some disabilities. As laid out in the Transport Strategy, Community Transport plays an especially important role in helping older and disabled people with accessibility needs. 84% of Community Transport organisations in Wales stated that their service users include disabled people. It is therefore vital Welsh Government continue to support Community Transport initiatives."*

### Communication

Several comments referenced the need to ensure that information is communicated to disabled people effectively, with better audio and visual information called for.

*"We would like to see all new buses with the capability to display audio-visual information so that people who have hearing or sight loss will be able to independently use them. Bus and train stations should have step-free access, information in braille and guidance in different accessible formats.....Operators should ensure that any daily changes to train services are communicated in ways that are accessible and prevent disabled passengers from missing announcements and having their journeys delayed unnecessarily."*

*"A simpler timetable system for public transport, such as an Easy Read format, would be accessible for all and would make a big difference to travel accessibility for people with learning disabilities.....Public signage in Easy Read or simple to use language would also be very beneficial to people with learning disabilities in public places."*

#### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

### **Question 9: What other issues affecting disabled people do you think should be a priority for the Welsh Government?**

36 comments were provided in answering this question. The following sections look at the comments provided by theme.

#### Social Isolation and Loneliness

Issues such as social isolation and loneliness were raised by several respondents.

*“Loneliness and social isolation is an issue, and a link to the Welsh Government’s Connected Communities: Tackling Loneliness and Social Isolation consultation could be a potential action to take forward as part of the ‘United and Connected’ section of the Action Plan.”*

*“Communities isolate people with disabilities sometimes intentionally often unintentionally. As a consequence, loneliness is a significant issue for people with a disability and subsequently has a massive impact on their mental wellbeing. Helping people to connect with their communities and others with similar interest can help to alleviate the problem.”*

#### Poverty /Benefits

Multiple comments referenced the problems disabled people face in terms of poverty and benefits.

*“The benefits system and its link to austerity and hardship has to be considered within any action plan that aims to support people to live more independent lives.”*

*“Review the impact of the Welsh Independent Living Grant being scrapped with funding and responsibility having been transferred to Welsh Local Authorities.”*

*“Poverty, and the impact of legislative changes in relation to Benefits... Most adults with learning disabilities are reliant on means tested benefits, so welfare change has a disproportionate impact on them. Restrictions on Housing Benefit, and reductions in funding for social housing projects, for example can have a significant impact on their ability to live independently in their own home. This is touched on in action 13.”*

#### Employment

Concerns regarding the employment of disabled people were referenced.

*“With the widening employment gap for disabled people, it is critical that organisations who seek to represent the interests of a particular community should actively recruit and develop staff with lived experience of the issues they are seeking to address. There should be greater opportunities for disabled people to develop roles at all levels within their own organisations.”*

*“In order to close the disability employment gap, negative attitudes and stigma in the workplace towards disabled people, and those with mental health conditions must be*

*addressed, and disabled people should be supported to stay in work, and return to, work after periods of illness."*

### Education and Training

A number of respondents called for improvements in education and training.

*"Focus on education for all age groups, suitable training and apprenticeships to allow individuals to develop new skills, opportunities for employment and independent living."*

*"In schools people should learn about ways of preventing abuse, exploitation and discrimination! Young children should be educated in order to learn to identify grooming techniques, as these are techniques that manipulators and perpetrators often use. Children should be taught to respect everyone (including people with disabilities), as only in this way, they can become man of peace! Parents should also be educated by schools for the same subject matters that I just mentioned above. A special meeting every year could be held in order to educate them! Parents' lack of knowledge can lead them to expose their own children to perpetrators. If adults and children are not educated to prevent abuse and discrimination, we end up with a society of exploitation, and it is a never ending cycle of abuse!"*

### Legislation

Comments in relation to legislative changes were made on several occasions.

*"(We) are calling for the UK Government to strengthen the Equality Act to ensure that disabled people's rights are protected when they look to find, stay and progress in work. We want to see the Equality Act strengthened to better protect the rights of disabled people and workers with mental health conditions; by incorporating the UN Convention on the Rights of Disabled People into UK law, protecting people from discrimination on the grounds of more than one protected characteristic, and discrimination because of a short term one off or recurring health condition. We are pleased to see the action plan draws on and links to the Equality Act and takes on principles of the UNCRPD. We would like to see this approach reflected in UK domestic law. We would also welcome working with Welsh Government and EHRC Wales to consider ways in which the Act can be further strengthened in Wales."*

*"The Welsh Government should enact Section 1 of the Equality Act 2010 – the Socio-Economic duty to reduce the inequalities linked to socio-economic disadvantage."*

*"The establishment of a BSL Act along the lines of the Scottish Parliament's BSL Act. The paucity of BSL being mentioned in current legislation makes it virtually impossible to enforce the legislation for Deaf BSL users. A stand alone Act appears to be the only way forward to enable Deaf BSL users achieve the goal of independent living and not be reliant on services to obtain access to mainstream service providers."*

### Advocacy

The benefits associated with advocacy were highlighted by a couple of respondents.



*“The lack of specialist advocacy services is a serious concern for disabled people in Wales, especially people with a learning disability. We have lost many of these services in recent years due to lack of funding. Local authorities are often commissioning generic advocacy services but without specialist knowledge and understanding of the specific needs of people with a learning disability, these services are often highly ineffective. This is particularly important for parents with a learning disability as they need advocates who not only have a good understanding of the needs of people with a learning disability but also specialist knowledge about the child protection process and the ability to accompany them in court. The Right to Independent Living should include the right a family’s right to access advocacy and the support to do so safely and adequately.”*

*“We want more support for self-advocacy so that we can advocate ourselves and others.”*

### Healthcare

Healthcare related proposals were suggested in some of the comments provided.

*“We are conscious of the fact that disabled people cannot continue to receive direct payments when they become eligible for continuing healthcare. Whilst appreciating that unlike England, Welsh Government are not currently pursuing personal health budgets, we would invite consideration being given to the Welsh Government making it an action that Health Boards are encouraged to consider options like Independent User Trusts, where a disabled person is eligible for continuing healthcare, in order that the disabled person and/or their family can continue to have control over making arrangements for their care.”*

*“Improving access and speeding up diagnosis are vital to ensure eye care services are fit for the future. We welcome the new system change for eye care in Wales, where patients are prioritised according to their risk of irreversible sight loss. We recommend Welsh Government ensures that these are fully implemented and monitored in all health boards so that people have access to timely treatment and do not lose their sight unnecessarily. We encourage Welsh Government to bring forward new patient pathways to prevent sight loss which better support people to live independently in the community. New models of care, supporting prudent health care and ‘A Healthier Wales’ and care closer to home will ensure the service works firstly to preserve sight through the early detection of eye disease and then to provide help to those who have visual impairment for which further treatment is not appropriate.”*

### Other comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 10: We would like to know your views on the effects that Action on Disability: the Right to Independent Living would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

Comments on this question were provided by 30 respondents. The following sections look at the general comments provided by theme.

#### Support for Welsh Language

Many respondents indicated their support for the Welsh language in general.

*"We welcome the inclusion and explicit reference to the Welsh language in this consultation. Asserting and supporting the right of disabled people to live independent lives should have a positive effect on the Welsh language as meeting the different language needs of individuals is fundamental in enabling autonomy and independence."*

*"All information must be bilingual and people should not need to ask to get their information in Welsh."*

#### Education and Training

The importance of opportunities to benefit from Welsh education was referenced in several comments.

*"To support this, measures need to be put in place such as ensuring that learning opportunities are fully accessible, that learning venues can be easily reached and that travel considerations are in place."*

*"As a bilingual household, access to Welsh-medium education is very important to us. While there are 2 English primary schools within easy walking or scooting distance, we have to travel 4 miles to the closest Welsh language primary. This obviously puts me at a disadvantage, as a disabled parent who wishes her children to be taught bilingually. Perhaps a grant to enable inclusive travel would help ensure that disabled parents could offer a Welsh medium education to their children."*

*"Support should be provided for professionals to learn Welsh so the services they provide are bi-lingual."*

There was also a call for training materials to be fully accessible.

*"We recommend that all training materials are provided in accessible formats and follow guidelines recommended in the All-Wales Standards for Communication and Information for people with Sensory Loss."*

### Funding

It was suggested that in order for the Welsh language to be adopted there was a need for funding to be made available.

*“As with all publicly funded issues available finance needs to be guaranteed, without it nothing changes.”*

*“If this framework is to be realised from a Welsh Language perspective, then we anticipate that there will be greater cost in ensuring all training, material and physical changes consider the welsh language and where appropriate are produced in the Welsh language.”*

### Other Comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

**Question 11: Please also explain how you believe the proposed policy Action on Disability: The Right to Independent Living could be formulated or changed so as to:**

- **have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language,**
- **and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language**

11 individuals provided a response to this question. A selection of the specific comments provided are listed below.

*“One of the biggest challenges in the social care sector is recruitment, and for Providers locally, recruiting welsh speaking support staff is particularly difficult. The policy does not really acknowledge or address this challenge.”*

*“There is no explicit reference in the main document to the Welsh language or to ‘More than Just Words’, the Welsh Government’s Strategy for bilingual service provision in health and social care. It is important for bilingual service provision to be embedded in the overall framework for action and for Welsh language needs to be considered where relevant across the different themes within the Action Plan. We would like to see an explicit reference to ‘More than Just Words’ in the main document and a demonstrable understanding of the important link between language, service delivery and health and wellbeing.”*

*“Providing a range of opportunities for disabled people to learn Welsh would encourage uptake of the Welsh language, and support inclusion as it would enable disabled people to access the same opportunities as their non-disabled peers learning Welsh. It would also fulfill requirements under the Equality Act.”*

*“No-one should be disadvantaged by their language. There is a need to recognize the importance of providing services in the Welsh Language especially for older people for whom Welsh will probably be their first language, and this is particularly so for people living with dementia. Proper and funded support should be provided to organisations so they can operate bilingually, especially in the third sector.”*

*“The greatest impact both positively and negatively are financial. Without the funds nothing happens.”*

*“One thing that I think that the Government should do is to publish Welsh and English on the same page so that we can pick up vocabulary from context, without having to constantly turn booklets over and find the equivalent page.”*

**Question 12: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

18 responses to this question were received. The following sections look at the general comments provided by theme.

Specific Needs for Certain Disabilities

Several different types of disabilities were referenced, along with the differing needs associated with these.

*"It's vital that Welsh Government is aware of the differences between 'conventional' and 'visible' disabilities, where reasonable adjustments may be relatively straightforward to accommodate, and those with chronic / recurrent illness, whether that be physical or mental..... We would like to see a much greater public appreciation of the various forms disability can take, so that those with chronic, invisible conditions do not encounter as much prejudice and misunderstanding as they do currently."*

*"Living Independently in the community is dependent on a joined-up approach which sees people with learning disabilities as active and equal citizens who can make a genuine contribution to society. Housing, employment, education and independent living skills must work in symbiosis to make this succeed."*

*"The autism actions reference assessment, diagnosis, training and support for families. But for adults with a diagnosis themselves...? All too frequently, adults who define as high functioning autistic fall completely through the cracks."*

*"We feel that treating deaf/hard of hearing people as a homogeneous group has drawbacks. There is a gulf between BSL users who identify themselves primarily as a linguistic and cultural group while hard of hearing people often see themselves as disabled through having hearing loss usually acquired in adulthood or later life. Their perceptions are usually very different and while we, as an organisation, fully support any measures that improve access for people with all types of deafness/hearing loss, we are also specifically concerned for our beneficiaries - Deaf BSL users. They miss out on information, the acquisition of knowledge and struggle to gain access to services. We are concerned that this document does not really address this issue and that the authors have not sufficiently understood the extent to which Deaf BSL users are disadvantaged by the lack of access to education and the wider community. We would very much welcome a much closer engagement with those responsible for the implementation of the strategy for Equality in Wales."*

Welfare Reform and Benefits

A couple of comments were made in relation to welfare reform and benefits.

*"The effect of the UK government's welfare reform and austerity ideology could be referenced in the document. There is no recognition of the fear and stress created by closing the Welsh Independent Living Grant."*

*"It is very important that Welsh Government be mindful of how the focus on work can compound the negative experiences of those citizens unable to work due to their health. There is very much a sense that disabled people on benefits are scapegoated"*

*for the current climate of austerity, which has both the potential to make them victims of public derision and abuse, and also impact on their well-being / prognosis.*

*It is also important that Welsh Government look closely at the impact fear of benefit sanctions is having on people's desire / ability to either volunteer or do any type of permitted work. In addition to this, many disabled or unwell people report feeling afraid to try to return to work in case they relapse and have to re-claim. The roll-out of Universal Credit has meant that some people may be worse off financially if they have to embark on a new claim. This situation has made some too afraid to even attempt a return to employment, particularly those with chronic / recurring illness. Welsh Government needs to do all it can to provide financial and psychological support for these people. Many of our members report finding the benefits application process extremely distressing in itself, even when they have considerable medical evidence from their healthcare providers.*

*Recent and on-going cuts to benefits, such as the Severe Disability Premium for those with significant ill health / impairment who live alone, and the bedroom tax for those who require a spare bedroom to house equipment associated with their condition, or a visiting relative / carer need to be addressed as a matter of urgency by Welsh Government."*

### Health and Social Care

Health and social care considerations were cited by several respondents.

*"We believe that patients with complex health needs should have readily offered, timely, access to a dedicated healthcare navigator / facilitator / advocate who can co-ordinate care with / for that person.*

*Given the lack of knowledge of referral pathways, we also believe that an online 'catalogue' or encyclopaedia of referral pathways, including tertiary / specialist services for every condition, and open to both medical professionals and patients should be implemented across Wales.*

*A cost / benefit analysis of complementary therapies might be useful, especially in comparison to the costs accrued by the public purse in terms of more conventional provision (doctors' appointments, lost employment opportunities, etc) when access to the former isn't provided. We wonder if it might be worth exploring a system similar to social services direct payments, where patients are given the opportunity to organise elements of their own care. For patients with particular needs, formal advocacy / assistance in budgeting and using the funds appropriately should be available."*

### Education

Different aspects of education were referenced in a comment provided by one of the respondents.

*"We would like to see more investment in school nurse provision, so that there is always someone with medical knowledge to approach for help and assistance, in a secure and private space.*

*We would like to see menstrual well-being education sessions being designed and delivered by people with lived experience. This is a better alternative to expecting classroom teachers, with whom pupils may not feel comfortable (and who may him / herself not feel equipped) to handle such delicate topics.*

*We would like to see disabled people / people with lived experience of a variety of health conditions being routinely invited into schools to deliver sessions on their lives, achievements and / or obstacles they've encountered, as well as any practical advice they may wish to offer. It is vital that pupils encounter and become familiar with diversity, so that we can start to build a more cohesive society where there is less prejudice and misunderstanding. We would ask that the individuals delivering these sessions not necessarily be volunteers but, instead, paid for their contributions, as per the direction of travel indicated in Section 1 'Prosperous and Secure' of this consultation."*

### Funding

A number of respondents raised the issue of funding and the challenges this brings.

*"We would like to see Welsh Government diversify its funding recipients. The third sector is made up of a variety of groups, not all of which are large charities able to apply for tenders, for example. As a patient-led, voluntary organisation, we would like to see Welsh Government being more flexible in how it disseminates funding; sustainability will become a real issue as social prescribing policy takes effect, so it is vital that funders, including Government, take measures to ensure the long-term existence of groups providing services for disabled people."*

*"The effect of the UK government's welfare reform and austerity ideology could be referenced in the document. There is no recognition of the fear and stress created by closing the Welsh Independent Living Grant."*

*"During this period of austerity, lack of funds seems to be used as an excuse in cuts. It would be useful to have some accountability for denial of rights. As it is already proper for disability needs to be taken from all departments lack of funds should not be an excuse. Perhaps then authorities would look towards Westminster and those responsible for Wales' level of funding to be addressed, rather than effected families being denied their rights."*

### Other Comments

Numerous additional comments were received that are not associated with any of the above themes. These are listed in full in a supplement to this report which can be found at Annex A.

### **Next Steps**

The Welsh Government is grateful to all those who contributed to the consultation on the new framework for Action on Disability and its accompanying Action Plan. Following the consultation substantial changes have been made to both documents. Some key changes are summarised in the final version of the framework. In addition, this report will inform ongoing development of the action plan which will remain a living document. The final version of Action on Disability: the Right to Independent Living will be published in August 2019 and this report will be published simultaneously.



**Additional comments not related to themes identified in the summary of responses to the Action on Disability: the Right to Independent Living consultation document**

Numerous additional comments were made by respondents to the Action on Disability: the Right to Independent Living consultation that are not associated with a particular theme identified in the summary of responses main report. These additional comments and the consultation questions they relate to can be viewed below.

**General Comments**

In addition to the general comments received a number of comments were provided that did not identify with a particular theme, including references to:

- a call for Welsh Schools, Colleges and Universities to be working along the lines of providing degrees in Business Studies, post graduate certificates in Mentoring, Coaching & Empowering Communities and other work experiences, rather than taking a more traditional Medical / Social Model Approach to Health, Social and Community Care, etc.
- the need for service provision in relation to housing, work / benefits, finances, education / healthcare, leisure and pleasure / entertainment options, etc to be improved.
- a claim that the Communities for Work programme is not helping people with learning disabilities get into work because there is a need for specialist organisations.
- calls for staff to be trained in supported employment and negotiating with employers.
- the need for the new framework to mention that all social involvement by disabled people is welcomed in order to avoid falling into narratives of self-reliance and economic productivity that are currently so damaging to many disabled people.
- there being a need to address social care in the action plan, and for social care services to provide the basic services that people are entitled to.
- a need for more info to be made available to newly diagnosed patients and better signposting to support.
- a claim that disabled people need to have access to occupational therapy, speech and language therapy, physiotherapy and dietary therapy to support them in living with their conditions, and that there is a shortage of therapists.
- the requirement for financial support to be available to disabled people and their families to allow disabled people to live independently.
- monitoring and picking up potential best practice from the Accessible Canada Act.
- the need to ensure each Well-being Plan produced by Public Service Boards includes the actions to support the concept of the Right to Independent Living and captures the needs of local disabled people.
- calls for a greater focus on Assistive Technology and the role it can play in helping disabled people lead prosperous lives.
- Welsh Government leading a campaign to tackle the discrimination disabled people experience when using public transport.
- Welsh Government leading a disability and mental health awareness and anti-stigma campaign, targeted at large, medium and small employers, as well as employees
- Welsh Government best placed to administer the UK Shared Prosperity Fund in Wales.

- a call for disabled young people to receive specialist careers advice from the age of 14 , plus a call for young disabled people leaving school or college to be formally signposted to specialist disability employment support available in their local communities.
- the need for the Welsh Government to research the impact Universal Credit is having on disabled people in Wales and to consider whether there is administrative action they can take to help mitigate any impacts found.
- a call for the framework and action plan to reflect the number of recommendations made in the EHRC report *Is Wales Fairer?* 2018.
- Welsh Government addressing the data gaps that exist for disabled people across areas of public service.
- Welsh Government implementing the recommendations of the *Housing and Disabled People: Wales' hidden crisis* report.
- independent living to be accorded higher priority and appropriately resourced.
- concerns about no reference to Brexit in the framework or action plan  
*"There appears to be no reference to Brexit in AoD despite the significant impact it will have on disabled people. Together with Disabled People's Organisations across the UK, we are concerned at the lack of engagement with disabled people regarding planning for Brexit. To our knowledge no impact assessment has been carried out regarding disabled people or mitigating actions identified"*.
- a claim barriers to housing make it difficult if not impossible to live independently. Call for the section on Housing to include examples of other barriers that prevent people with a wide range of disabilities from accessing and maintaining housing - eg location of housing can have an enormous impact on whether someone with a severe and enduring mental health problem is able to live independently.
- the need for Welsh Government's work on independent living to seek to influence the Affordable Housing Review to encourage the provision of housing that enables and supports independent living.
- new suggested text was proposed by one of the respondents:  
*"We have the following suggested additions:*  
*Firstly, we suggest the following addition, possibly after (9):*  
*Utilise mechanisms such as the new Housing Support Grant guidance and other planning processes to ensure that new supported housing, sheltered housing and independent living schemes are developed close to health services, social services, third sector support services, services to reduce social isolation, family/friends/support networks, and transport links to ensure that housing is sustainable for people with physical disabilities, long term health problems, mental health problems and learning disabilities.*  
*Secondly, suggest the following addition to action (10):*  
*Continue to provide housing related support, supported accommodation and supported living schemes to help disabled people to live independently in their own home, including people with physical disabilities, learning disabilities, mental health problems, chronic illness and autistic spectrum disorders.*  
*Thirdly, we suggest a new action after (10):*  
*Ensure that housing-related support is trauma-informed and psychologically informed. Evidence from Public Health Wales demonstrates that individuals who have experienced trauma in their childhood are much more likely to be engaging in services as they are older. Therefore it is vital that services at all levels are trained to recognise that people*

*with some disabilities such as mental health problems may have experienced trauma, and so services need to be psychologically informed to minimise negative impact.*

*Ensure that Positive Behavioural Support as a methodology is encouraged and adopted for learning disability services where challenging behaviour is seen more often.”*

- Support for the definition of Independent Living used in the new framework and action plan, and support for it to also include reference to the right to choose the type of support required and how and by whom it is provided – call for the revised definition to be reflected within all relevant policy documents published by other Welsh Government departments.
- Engagement with disabled people to continue once the new framework is adopted.
- How the communications strategy related to the new framework and action plan must include measures to engage existing and new stakeholders in the independent living movement. Consistent and accessible language and terminology must be used, plus it is vital communication is delivered through a variety of inclusive communication methods including digital formats, easy-read and British Sign Language videos.
- a call for sufficient financial and human resources to be made available for this document to be effective. Disabled people’s right to independent living can only be achieved if public and third sector organisations receive adequate and sustained funding.
- the new framework and action plan being weakened in terms of its housing commitments, in comparison to the previous framework - may lead to a regression in how the right to adequate housing and to independent living is realised in the future.
- calls for incorporation of Lifetime Homes standards across all tenures (it only applies to Welsh Government grant funded social housing now) and setting a target of at least 10% of all housing built to wheelchair accessibility standard - while there currently is a commitment to use the Innovation Housing Programme to stimulate thinking on affordable housing, this does not mention accessible and adaptable housing - Would welcome a commitment that sets out how the Welsh Government might address the provision of accessible housing, for example a commitment to consider how to maximise accessible housing supply as part of the current Affordable Housing Supply Review.
- a disconnect that exists between current Welsh Government principles relating to improving independent living for disabled people and the reality of disabled people accessing services in Wales. Call for the new document to address these gaps in service delivery and improve the lives of disabled people in Wales.
- the need for an annual progress report to be published and laid before the National Assembly for Wales.
- the action plan making no mention or provision for unpaid/ family carers – call for the Welsh Government to consider access to breaks, financial support and enable carers to remain in the workplace where they wish to in order to avoid the financial hardship that many carers face.
- a call for the action plan to refer to and reflect the findings of the recent consultation on Loneliness and Social Isolation – Connected Communities.
- a recommendation that the section on other policies and programmes should refer to the EHRC Housing and Disabled People: Toolkit for Local Authorities in Wales
- Welsh Government committing to include, as part of its data on new and current stock, data on accessible or adaptable housing.
- a commitment to encourage the adoption of Accessible Housing Registers (AHRs) which was included in the previous framework but is missing from the new framework and

action plan – call for developing standards and/or guidance which would define what Accessible Housing registers are and how they should operate.

**Question 1: Do you agree with the actions within the Welsh Government’s Action on Disability: the Right to Independent Living? Please explain the reasons for your answer in the further comments box provided.**

Additional comments received in response to question 1 that are not associated with any particular theme include references to:

- the need for more work around attracting additional workers and apprentices with disabilities to work in sectors of social care, child care and mental health, and support the Communities for Work programme.
- there being little read across to the Fair Work agenda contained within the new framework, with the point made that if true equality is to be achieved then this should be fundamental to all actions in the new action plan.
- the new action plan having a tendency to default to specialist services or toolkits to bridge gaps, and a call for this to be reworded to reflect the social and/or human rights models principle.
- a call for Action 13 (in Prosperous and Secure section) around tackling poverty and data sets to draw on the reports required under Part 9 of the Social Services and Well-being (Wales) Act 2014 on the population assessments and social services director’s reports.
- the emphasis in Action 1 to “upskill mainstream professionals” being welcomed, rather than creating separate professionals, services or skills, with this being more in keeping with the social and human rights models of disability.
- the need for tackling disability hate crime to be located in the Prosperous and Secure section as opposed to the Ambitious and Learning section.
- the actions contained within United and Connected being disappointing in scope and leading only to limited improvements.
- an observation that most actions relating to public transport will result in only relatively minor improvements, with there being no recognition of current limitations in public transport as a whole.
- disappointment that neither the consultation nor action plan mention improving community transport services or taxi services, both of which are important modes of transport for disabled people.
- the action plan needing to include the work Transport for Wales is doing to improve the provision of responsive transport services across Wales.
- the actions in the plan being dependent on organisations working together and being properly funded.
- the need for more emphasis to be placed on addressing the major trauma disabled people are experiencing as a result of austerity measures and benefit changes - findings from UN Special Rapporteur for Extreme Poverty and Human Rights were cited as being relevant here.
- links to ‘Prosperity for All’ being welcomed.
- the recommendations from ‘Is Wales Fairer? 2018’ report and UN Committees recommendations in its Concluding Observations report, and how these need to be incorporated into the action plan.

- how an increase in practitioners time to invest in the new action plan will be required and how this will most likely lead to an increased cost to services.
- a call to cite Equality Act 2010 and Social Services and Wellbeing (Wales) Act 2014 alongside UNCRPD and Wellbeing of Future Generations Act as the key pieces of legislation to empower disabled people to achieve independent living.
- the new framework and action plan in its current form being entirely service-centric whereas the 2013 version arose from the disabled people's movement.
- the new framework and action plan acknowledging that to some extent the rights of disabled people are already established in law and that it is the lack of useful interpretation that stops disabled people accessing what are already their rights.
- Welsh Government working in an authority centred manner, with communication through the system to individual clients not improving.
- the lack of appreciation of the importance of BSL in the new framework and action plan.
- concerns regarding the use of disabled people terminology within the new framework.
- a lot of ideas and plans currently being disseminated by Welsh Government and a concern that it may not be able to deliver on them all.
- some of the wording used in the new framework and action plan being problematic, particularly the emphasis on prosperity and its seemingly direct link to paid employment or employment productivity.

**Question 2: We want to ensure that other organisations and communities across Wales take action to support the concept of the Right to Independent Living. How can we best work with others to achieve this?**

Additional comments received in response to question 2 that are not associated with any particular theme include references to:

- the statutory sector having a duty to employ disabled people and that this should be put as a request to service providers.
- duties being placed on public bodies, like Health Boards, similar to those already embedded into social work practice due to Social Services and Wellbeing Act 2014 (Section 6 and Section 5) - particularly in terms of promoting independence.
- Welsh Government monitoring and picking up best practice from Accessible Canada Act.
- the need for Welsh Government to encourage Welsh businesses to complete the framework recently published by UK Government to support employers to voluntarily report on disability, mental health and well-being in the workplace.
- a call for local, specialist and national focused organisations to be utilised on employment support programmes to give participants the most holistic and tailored support possible.
- support for the social model of disability.
- how Welsh Government must engage with people with sight loss and organisations that help people with sight loss. All communication and information needs to be accessible for people with sight loss.
- the need for Welsh Government to identify appropriate organisations at national level and support them with sign posting and funding and that this is mirrored at local government level.
- communities benefiting from being encouraged to consider the difficulties that individuals face when coping with impairments of sight, hearing, mobility etc. – and being prepared to engage with those people with consideration in social and other situations.

- it being helpful to clarify that people 'who represent' disabled people and disabled people themselves are not necessarily one and the same and so to specify when disabled people/user-led organisations are meant and when the reference is to third sector organisations in general.
- creating opportunities for organisations and communities to meet together.
- Welsh Government having a vital leadership role, in terms of providing advice or guidance, case studies and good practice examples on what it is doing to support independent living and embedding the Social Model of Disability across its work.
- the need for Welsh Government to embed actions on the Right to Independent Living into its next Strategic Equality Objectives under the Public Sector Equality Duty, in 2020.
- a call for organisations and agencies to adopt the Children and Young People's National Participation Standards.
- organisations, agencies and communities needing to support disabled people to access their rights under The United Nations Convention on the Rights of the Child and The United Nations Conventions on the Rights of Disabled People – Welsh Government could encourage this by commissioning training which highlights best practice.
- how training should be provided for disabled people so they understand their rights in order for them to fully access them. A network made up of disabled people, professionals, community groups and organisations could be developed with the support of Welsh Government to share best practice.
- Welsh Government to publish annual reports on progress on meeting actions.
- consideration being given to establishing a disabled people's commissioner
- the new action plan being clearer about what 'new' actions other organisations and communities are expected to undertake.
- ensuring that links with health and housing are robust .
- ensuring that there is not a post code lottery because different local authorities prioritise different areas of spend or go about the same issue in different ways unnecessarily.
- the need for Welsh Government to make clear decisions before taking action.
- a call for tWelsh Government to undertake as much of the delivery as possible "in house" without involving third parties who are only responsible for part of the process.
- a more formal involvement with the British Deaf Association being initiated to reach Deaf people who use a different language from Welsh or English.
- educating children that a person with a disability requires the same respect as those without a disability.
- organisations and communities across Wales needing to come together to ask as many people as possible their own personal views on what they believe the plan should be and how to work together to make sure that the plan is carried out.

**Question 3: With reference to chapter 2 in particular, are you aware of any other developments since the previous framework was published in 2013 that you think should be included?**

Additional comments received in response to question 3 that are not associated with any particular theme include references to:

- the newly published EHRC Toolkit for Local Authorities in Wales which was cited as a good resource to refer to when considering how to effectively engage with disabled residents related to housing.

- the Together for Mental Health Action Plan.
- the parliamentary review of CHC arrangements and the related challenge and work of the Equality and Human Rights Commission.
- Welsh Government Eye Care Delivery Plan.
- “A Healthier Wales: our Plan for Health and Social Care”.
- Welsh Government’s Improving lives Strategy.
- the implementation of the International Convention on Economic, Social and Culture Rights (ICESCR).
- well-being impact assessments which look at the impact of a proposal on the ‘social, economic, environmental and cultural well-being of Flintshire, Wales and the world’.
- the links that need to be made between the Engage to Change Project and the Employability Plan.
- an evidence submission to the Welsh Parliamentary Review of Health and Social care in 2017, which covers evidence for how exercise can improve physical and mental health, and how solutions exist through technology, training and adaptation of public facilities (attitudinal and institutional change).

**Question 4: Our aim is that everyone will have the opportunity to reach their full potential and lead a healthy, prosperous and fulfilling life, enabling them to participate fully in their communities and contribute to the future economic success of Wales. Looking at the Action Plan, how could we better achieve this for disabled people?**

Additional comments received in response to question 4 that are not associated with any particular theme include references to:

- linking some of the work to Tier One measures to help organisations re-prioritise.
- the importance of accessible occupational therapy services, which may range from signposting people to appropriate community resources, services and technology to working with residents in care homes with complex and end of life care needs.
- supporting communities to take more responsibility for support around social care - this will not only increase community resilience and capacity but provide important activity and value for people who are or feel marginalised, together with greater integration, physical and mental health benefits and improved self-concept (self-awareness, self-confidence, resilience).
- the new action plan needing to say more about the importance of social value, social enterprise and co-operatives to support much of the work. These receive support in the Social Services and Well-being (Wales) Act 2014, and a recent report published by the Wales School for Social Care Research looking at the potential for some of the initiatives.
- need to understand that many disabilities come to people through the ageing process.
- the need for architects to properly embrace disabled access.
- the need for a big noise with multi-channel publicity focusing on the practical actions that are being taken by Welsh Government, Local Authorities, etc. and the practical things everyone can do to engage and include those people with a disability.
- the action plan being strengthened further if it included more comprehensive coverage of actions related to people with protected characteristics.
- a call for the contact details of all regional partnership boards to be published in one place, including their sub-structures, together with a call for there to be more disabled people represented on these boards.

- the difference between rural and urban areas in terms of getting the support, services and public transport necessary to live independently.
- the fact that in Swansea the new commissioning strategy which limits the amount of regions any one care provider can deliver services in, is in danger of denying people the choice of the services they use. Although some have been offered direct payments to help overcome this by paying a provider of their choice, many people with learning disabilities in Swansea may not be able to access this.
- the importance of Care Inspectorate Wales (CIW) encouraging services to increase independent living and that care services are held to account in relation to how well they are improving the independent living skills of those they represent.
- reviewing Universal Credit arrangements.
- looking at how the different 'passports' and 'cards' can work together to make using transport easier.
- ensuring venues for social and leisure activities are fully accessible by tightening legislation and monitoring compliance.
- creating incentives for public & private organisations to provide Changing Places facilities.
- refreshing and strengthening the All Wales Standards for Accessible Communication and Information for People with Sensory Loss.
- how Welsh Government intends to incorporate the UNCRPD into Welsh law and policy.
- provision of training focused on developing positive attitudes towards disabled people.
- how the transport infrastructure (and staff understanding how to assist people with disabilities) is often key to people participating in their communities.
- the action plan not addressing the slow access to CAMHS, where one discovers that there is no funding for the most effective treatments such as play therapy, and the lack of early assessment for Special Educational Needs (SEN), when parents finally fund assessment privately there is never a proper level of support then given despite years of appealing .
- the Bercow report which advises on the utmost importance of early diagnosis and support of language difficulties in young children.
- access to GP appointments that are more flexible to allow for public transport, or an easier booking telephone line.
- the section on prosperity in the Easy Read version being so vague as to be meaningless.
- the need for better links with adult education - needs to be a whole category of funding for adult education which is specific to improving health so that those who are at risk can be identified by health care/social services staff and signposted to education with knowledge of the needs of the individuals referred shared with education partners so that courses provided can serve their purpose efficiently and effectively.
- the need for more disability access.
- how access to self-managed exercise is a key part of allowing disabled people to participate fully in their community and achieve their full potential.
- affordable transport solutions (like VEST) and inclusivity in community fitness facilities like leisure centres being essential to allow disabled citizens to get out and join their community and manage their own physical and mental well-being.
- the need for accountability at local government level to see the action plan realised.
- the need to help rural communities.
- opportunities for delivering a national training programme, co-produced, designed and delivered by experts with real experience of living and working with a disability or with high functioning autism and in some instances social anxiety, and how this would help



develop an understanding of the challenges and unique needs and also gifts of adults on the autism spectrum.

- the preference to use of the term 'economic stability' rather than 'success' and 'flourishing' rather than 'prospering'.
- the need for more support in houses to make them accessible.
- the need for a community coordinator that could encourage disabled people to get involved more in their community, as well as pass on information.
- giving disabled people opportunities to have access to healthy and nutritious food(s) so that they can have as balanced a diet as possible, plus giving disabled people access to leisure facilities and workshops so that they are more likely to have the best possible life they can.

**Question 5: Every person should be equipped with the education and skills they need to get a job and the opportunity to develop new skills through their working life. Looking at the Action Plan, how can we better achieve this for disabled people?**

Additional comments received in response to question 5 that are not associated with any particular theme include references to:

- the need for all occupational therapy posts to have employment as a key responsibility within their job specifications  
*"Occupational therapists should be employed to lead vocational services. Agreements should be put in place to support direct working between occupational therapists and the local Job Centre Plus, in particular with Disability Employment Advisers. Employing occupational therapists to support young people with their learning opportunities will ensure that providers are better placed to fulfil their duties in line with the Well-being of Future Generations (Wales) Act, including making reasonable adjustments. If young people's mental health problems are better addressed at this stage, they are more likely to complete their courses, apprenticeships and internships. This is of benefit to both the provider and the student".*
- the new framework not referring to the Welsh Government's consultation to updating the Respecting Others Anti-bullying Guidance or its intentions to make healthy relationships education a mandatory part of the new schools curriculum. Including these in the proposed action plan for disability would help to create synergy between cross-government actions.
- the National Youth Work Strategy for Wales, which came into force in December 2018, and the need for commitments made in the action plan to complement any forthcoming revision of a new Youth Work Strategy in order to avoid any potential duplication of information services.
- the section 'Encouraging and supporting people to learn, develop and participate in society' of the Annual Director of Social Services Reports, where much of the focus was around how people were supported to connect with their communities. The vast majority of reports referred to community support through groups or day opportunities that aim to improve wellbeing and keep people connected. These included.
  - work based projects and opportunities, such as horticulture
  - skills and special interests, such as photography, knitting or arts projects

- day opportunities for people with learning disabilities, older people and people experiencing mental health issues
- befriending
- consideration of having an underpinning rationale for the actions in the new action plan:
 

*“Consideration should be given to having an underpinning rationale for these actions. Whilst the actions themselves are laudable, they should link towards a specific set of outcomes or a series of progressive aims. There should also be a rationale as to why these actions have been prioritised, what the expected outcomes are, and what subsequent action may be required, as well an analysis of any barriers to achieving these outcomes or aims i.e. austerity, the fact Welsh Government does not have control over certain matters like the welfare system”*
- the role of public sector employers:
 

*“There is no reference in the Action Plan to the role of public sector employers. Public sector employers are the biggest employers in Wales and as living wage employers are often able to offer greater employment security and better terms and conditions of employment. It is important that the public sector (health and local authorities in particular) actively engage in programmes to create job opportunities for disabled people”.*
- how sight loss impacts on ability to access education:
 

*“Sight loss impacts on every aspect of a person’s life, including their ability to access education. Since 80 per cent of learning comes through our sight, it is essential that the needs of students with sight loss are recognised and that there is the right support in place. The potential impact of even relatively moderate vision impairment is significant. For children and young people with vision impairment, this is through the provision of a Habilitation specialist, and a Qualified Teacher in Vision Impairment, who is specially trained to enable children and young people to access and learn about the world around them and who have experience in supporting their holistic development”*
- how employers should be more proactive in recruiting blind and partially sighted people.
- the need for Welsh Government to continue to support the Communities for Work Employability Grant as well as support the recruitment of disabled apprentices
- how community learning should be funded.
- the main barriers to employment for people with learning disabilities being “the negative attitudes of some employers and co-workers”.
- businesses having a key role in challenging negative disability stereotypes through affording people with learning disabilities real opportunities to do meaningful paid jobs.
- the importance that Welsh Government continues to support the Engage to Change project, and the need for further investment to meet an ongoing demand for supported employment opportunities for people with learning disabilities who wish to access and maintain employment.
- how self-advocacy plays a crucial role and how these skills should be taught to children as soon as possible, and developed throughout adulthood.
- the importance that people who work in the area of learning disability are educated to understand their roles and responsibilities in developing independent living skills, including attitudinal change.
- the need for Welsh Government to monitor and evaluate programmes aimed at addressing attainment gaps.

- whether the Welsh Government has employed anyone with a learning disability
- the need for Welsh Government to work with employers to:
  - - place more focus on nurturing and utilising the gifts that disabled people have, and
  - - examine where they/society are creating barriers to utilising a talented workforce.
- the use of technology (internet) as a way of making life easier for people with disabilities to get the education they need.
- the need for people with different disabilities to be involved during all stages, since being disabled does not give a person a true perspective on other disabilities
- the lack of emphasis on Articles 21 and 30 from the UNCRPD.
- the issue of information access being paramount for Deaf BSL users and the continuing failure of so many service providers across all Wales to accommodate this, effectively ensuring the marginalisation of Deaf BSL users from their local communities.
- the lack of places where a disabled person can go to develop working skill in rural areas.
- some of the wording in the action plan being directive and negative, and not taking account past experience of education, training and employment.

**Question 6: We want everyone to live in a home that meets their needs and supports a healthy, successful and prosperous life. Looking at the Action Plan, how can we better achieve this for disabled people?**

Additional comments received in response to question 6 that are not associated with any particular theme include references to:

- changing the phrasing to 'their own home' as this policy may be interpreted as promoting institutional care.
- Occupational therapists can act as catalysts for addressing housing issues, given their experience across sectors and expertise across physical and mental health.
- the Annual Directors' Reports which focussed on issues such as suitable homes and preventing homelessness.
- the action around providing housing related support being too vague.
- public transport links on new housing estates, given the importance for disabled people to be able to easily access bus routes to and from where they live.
- the toolkit by Access Design Solutions, entitled "Housing for disabled people: A toolkit for local authorities in Wales", which is aimed at local authority councillors in Wales, particularly those involved in housing and planning.
- including an action which sets out Welsh Government's ambition and plan to tackle non-decent homes.
- including an action which sets out Welsh Government's ambition and plan to address the issue of discrimination by private sector landlords against applicants for tenancies who are in receipt of benefits.
- the need for set design standards in care and residential homes and thought given to the practical layout.
- the importance of self-advocacy groups, such as regional people first groups, in nurturing confidence and growing independence skills for many people with a learning disability, and how Local Authorities' must continue to fund these local groups.
- the action plan not addressing many of the key issues that the EHRC inquiry into housing and disabled people highlighted, leading to the new framework and action plan being referred to as a step backwards from the original Framework in 2013.

- the need for Welsh Government to incorporate the recommendations made in the 'Housing and disabled people: Wales' hidden crisis' report into the action plan.
- early support for parenting skills, such as inclusive parent support groups.
- how Welsh Government will influence local authorities and who will lead on this.
- basic skills and independent living skills being essential.
- the need for there to be personal commitment to real people.
- the personal relationship carers build with disabled people meaning that if a carer leaves it can have a major impact on the disabled person.
- the need for better training of social services around how decisions should be made.
- the fact that in rural areas such as Pembrokeshire there are even less opportunities to secure accommodation and a home that meets needs, with a call for Welsh Government to mandate against second home ownership in rural areas.

**Question 7: We want the Welsh social care sector and health services to support people to lead independent lives. Looking at the Action Plan, how can we better achieve this for disabled people?**

Additional comments received in response to question 7 that are not associated with any particular theme include references to:

- the person's wellbeing coming first, and any decisions taken being transparent and open to challenge, with the person having support to challenge in some circumstances.
- the need for all public services to balance public protection with a need to promote voice, choice and control, as positive risk taking is a key aspect of personal growth and development, as well as rights as human beings.
- a lack of detail about how the action plan will be enacted.
- services being designed to enable occupational therapists to widen their approach in order to meet the varying needs within their local communities, which means:
- resourcing occupational therapy services sufficiently so that they can take referrals from all sections of society, including hard to reach groups.
- providing access points to occupational therapy advice for community teams such as home care and reablement providers.
- clarification being required in relation to the use of the terms 'independent living', 'living independently' and 'independence'.
- the 22 Directors' of Social Service Annual reports (required under the Social Services and Well-Being (Wales) Act 2014) which cover many of the areas within the framework.
- the promotion of well-being, as defined under the Social Services and Well-being (Wales) Act 2014, being replicated for legislation governing other public bodies particularly Health Boards.
- the action to monitor the use of the All Wales Standards for Accessible Communication and Information for People with Sensory Loss, and the support for the effective implementation of the Standards, as well as support for the need for a set of national targets similar to those for the Welsh Language Standards that would identify key priorities and enable greater scrutiny of progress and impact.
- the uptake of annual health checks among people with a learning disability in Wales:  
*"The recent EHRC 'Is Wales Fairer' research highlighted that the majority of people with a learning disability in Wales do not receive an annual health check. A programme to monitor the take up of health checks was funded by Welsh Government*

*between 2007 and 2011 and undertaken by the then National Public Health Service (NPHS). We are not aware of any current or recent monitoring data to indicate the number of health checks being carried out or their quality. A substantial variation in uptake was found across Wales during the life of the monitoring project. We would suggest that it would be beneficial to revisit the monitoring project and produce current research to understand the level of uptake and why people with learning disabilities are not accessing their health checks with a view to addressing the issues”.*

- Welsh Government ensuring that rehabilitation and habilitation services can be readily accessed to support people to live independent lives.
- concerns that many blind and partially sighted people are failing to receive the vision rehabilitation support they need to develop and maintain independence.
- the need for Welsh Government to establish plans for future workforce development and encourage people into the Rehabilitation Officer for the Visually Impaired (ROVI) role. Ultimately, Welsh Government needs to make sure that people have timely access to rehabilitation services no matter where they live, to enable them to live as full and independent lives as possible.
- a recommendation that Action 10 of the revised Eyecare Plan replaces Healthy and Active Action 5 within this action plan.
- linking this action plan to the cross-government 10-year Together for Mental Health strategy, with specific reference to Chapter 2.
- requiring, as an action in this Plan, the collation and publication of data on service users in secondary services across Wales who positively rated (strongly agreed or partly agreed) that they were satisfied / felt involved with their care and treatment plan equitable across different groups including ethnicity and disability, as originally stated in action 3.1 of the Together for Mental Health 2016-19 Delivery Plan.
- launching a more detailed survey than is possible through this consultation (about issues which disabled people are experiencing) and to use the survey data as a tool for resolving these, in partnership with disabled people.
- removing barriers faced by homeless people to accessing primary care and social care health services.
- making the 2014 Social Services and Well-being Act a practical reality, including citing this as underpinning legislation in the Framework part of the document.
- Welsh Government embedding the UNCRPD into healthcare strategy and delivery.
- Welsh Government fully evaluating progress made under the Mental Health (Wales) Measure 2010 and the Together for Mental Health strategy, including the extent to which services are meeting the needs of people sharing different protected characteristics.
- extending the “All Wales Standards for communication and information for people with sensory loss in secondary care settings” to include anyone with communication needs and monitor the implementation of this.
- item 12 under ‘Healthy and Active’, and whether Disability Sport Wales funding will also enable athletes with learning disabilities to take part in the Special Olympics?
- there being no mention of special care dentistry.
- the Social Services and Well-being (Wales) Act 2014 identifying eight aspects of well-being and how it is important that these are addressed together instead of separately.
- the primary focus of Action to Disability being on Article 19, of the United Nations Convention on the Rights of Disabled People – the right to independent living and the fact the remaining articles receive only limited attention:

*"The primary focus of Action to Disability is on Article 19, of the United Nations Convention on the Rights of Disabled People – the right to independent living. The remaining articles receive only limited attention. The approach taken in Action on Disability therefore provides an incomplete account of how the Welsh Government will go about meeting its obligations to disabled people even though the Action on Disability claims to represent a new Framework which sets out how the Welsh Government is fulfilling its obligations under the Convention"*

- more needing to be done in terms of 'preventative support' that could be put in place prior to a crisis point that requires input from the social care sector/health services
- the need for care to go back to being managed by social services who have an incentive to improve independence.

*"Care should go back to being managed by social services who have an incentive to improve independence. The current system of outsourcing care packages to private agencies has a negative impact on independence, they have no incentive to increase independence as doing so would lose the contract"*.

- the need for reablement care calls to be long enough to allow carers to encourage independence. If care calls are too short, carers have no option but to provide full care rather than allowing the person to do it themselves.
- seeking the opinion of disabled individuals on a regular basis, giving them access to their long term care plan which will be re-assessed based on need, on an annual basis.
- accountability for the social care and health sector to actually work from a basis of what matters for disabled persons and not from what can we afford as a service.
- more being required in relation to action 12 in the 'Healthy and Active' section:
 

*"(We) consider more is required in the action plan in relation to action 12 in the 'Healthy and Active' section. Action 12 identifies work to be taken forward by Disability Sport Wales to enable people with disabilities to take part in sport. (We) support this but suggest that more must be done to improve access for disabled people to leisure facilities in order for them to take part in regular exercise. There are examples around Wales where leisure centres have improved access specifically for people with long term conditions such as multiple sclerosis and stroke but this needs to be scaled up and requires collaboration between sport, health and social services. (We) would like to see this as an additional action."*
- the need for at least a yearly assessment for health and social needs.

#### **Question 8: Looking at the Action Plan, what else can we do to improve the accessibility of public transport and venues for disabled people?**

Additional comments received in response to question 8 that are not associated with any particular theme include references to:

- the new framework and action plan needing to consider where relevant sections of Part M of the Building Regulations 2010 could be incorporated
- the orange wallet scheme.
- whether public transport could be a link to safer places.
- only allowing trains with functioning toilets to operate.
- Welsh Government staff involved in transport policy and commissioning attempting a 'walk through' of public transport with organisations who can help them to simulate what

it is like for different disability groups to use these services, to develop understanding of the issues and facilitate working with disabled people to find effective solutions.

- Welsh Government continuing to work with the Department for Transport (DFT) to share best practice and learn from each other:

*"We support the list of transport policy actions in the Action Plan. We would suggest Welsh Government continue to work with the Department of Transport (DFT) to share best practice and learn from each other. In particular, the DFT's Accessibility Action Plan, which we fed into, and led to the Government's Inclusive Transport Strategy, has many positive aspects. Furthermore, the Office of Rail and Road is currently consulting on improving assisted travel and changes to guidance for train and station operators".*

- monitoring success of the new framework and action plan being important
- there being an opportunity in Wales to improve awareness of the Passenger Assistance scheme (currently out for consultation).
- the design of taxi ranks, stations, transport interchanges, facilities and vehicles being accessible and safe for blind and partially sighted passengers.
- RNIB Cymru Visibly Better principles being adopted in the accessible design of environments as this can minimize barriers for blind and partially sighted people.
- the patchy coverage of the Bbwcabus service.
- the need to consider the psychological travel barriers for people in mental distress
- the need for public consultations prior to cuts in transport spending

*"Transport cuts, especially in North Wales and rural parts of Wales often happen without public consultation or notice. These have caused further limitations on our members' ability to access the services they need to fulfil their own well-being needs, as promoted in the SSWB (Wales) Act"*

- promoting the Changing Places scheme, with public toilet closures having an adverse effect on disabled people's ability to feel confident about getting out.
- the fact that across all sectors venues are routinely booked with no regard whatsoever for accessibility and when disabled people object, they are frequently treated as nuisances.
- the belief that there is effectively no public transport for people with mobility impairments.

*"If you consider the cumulative barriers – from decline in bus services, to rarity of wheelchair-accessible buses, to poor attitude of some drivers, to ongoing lack of accessible taxis, to limited number of rail stations with level access or accessible toilets, to lack of accessible train services, to the need to book assistance in advance etc. it quickly becomes apparent that people with mobility impairments must either afford their own transport or resign themselves to very limited mobility".*

- the new action plan reflecting how Welsh Government is using its 'Community Benefits' approach and meeting its own procurement duty under the Welsh Public Sector Equality Duty to drive improvement.
- the need for Welsh Government to act on its earlier commitment to review and republish the Accessible Venues Guide and follow this guidance to ensure that meetings are accessible and held in accessible venues.
- the need for improvements to the physical infrastructure associated with public transport (eg dropped kerbs placed in such a way that disabled people are able to get to bus stops, steps at train stations, buses only being able to accommodate 1 wheelchair user at a time, lack of disabled toilets on planes).

- the need for public transport services to be preserved and not be cut.
- the fact that it is not just disabled people who need buses but their carers do as well.
- every public building to have an walk through 3D map that allows disabled people to view it online and visit as many times as needed before physically arriving.
- Welsh Government must act on discrimination of disabled people, not just talk about it.
- increasing funding for community transport services, or working with businesses to sponsor such services.
- the need for public transport providers to be chosen in accordance to a business plan, which provides services for disabled people.

**Question 9: What other issues affecting disabled people do you think should be a priority for the Welsh Government?**

Additional comments received in response to question 9 that are not associated with any particular theme include references to:

- the need for the new framework and action plan to reflect in greater detail those who are 'doubly disadvantaged' and experiencing dual discrimination, including specific actions on how Welsh Government plan to support those who experience discrimination based on more than one protected characteristic.
- encouraging Welsh Government to lead a disability and mental health awareness and anti-stigma campaign, targeted at large, medium and small employers, as well as employees. It should be developed in close consultation with mental health and disability charities and representative bodies.
- the need for Welsh Government to put in place measures to ensure that the external environment is accessible, including the safeguards that can be built into planning policy, pre-consultation and engagement.

*"Welsh Government need to put in place measures to ensure that the external environment is accessible, including the safeguards that can be built into planning policy, pre-consultation and engagement. Inclusive design should be at the heart of these processes. We are concerned in particular about the design concepts around "shared space". Shared spaces involve removing kerbs so that a space is shared by vehicles, pedestrians and cyclists. This creates an uncertain and often frightening environment for pedestrians with sight loss".*

- prejudice, negative attitude and discrimination being major issues.
- people in communities benefiting from being encouraged to consider the difficulties that individuals face when coping with impairments of sight, hearing, mobility etc. – and being prepared to engage with those people with consideration in social and other situations.
- the possibility of introducing an award scheme for disabled youngsters, plus the identification of good and bad practice by organisations and institutions.
- placing a duty on CVCs to provide enhanced services for disabled groups.
- lack of services and support as identified by the Populations Needs Assessments, having a detrimental effect on the ability of people with learning disabilities to live independently.
- Welsh Government targeting its tax and spending decisions on minimising and reducing disadvantage experienced by different groups, including a Cumulative Impact Assessment of the impacts of all fiscal events on people with different protected characteristics.
- a call for Welsh Government to promote positive images of disabled people; do more to support carers (both professional and volunteer carers); implement more community-



based initiatives to combat isolation and loneliness; and use language that is accessible, and easy to understand, to ensure disabled people can engage with different issues.

- the need for Welsh Government to stop reducing budgets and then offering "new" funding to different services, with the need instead to look at what is being provided already and building on those services as required.
- providing short-term additional funding to cut waiting lists within social services
- investigating costs that 'Care and Repair' are charging; some charges are extortionate.
- providing Lifeline and Falls monitors free of charge to those who are at risk.
- the fact that respite can be difficult:  
*"respite can be difficult. when it is health it is given however i am aware of families in wales who have been told they may have to wait up to 2 years for respite that is not acceptable as without them as carers the individuals would not be able to live in the community and would cost the government and tax payer considerably more money"*
- the need for consultation on other areas of specific learning disabilities.  
*"It is wonderful to see an integrated autism strategy but what about those with dyspraxia, ADHD, dyslexia, dyscalculia and so on. Many of these adults have masses of untapped potential and face barriers to employment due to lack of awareness, social stigma, lack of knowledge of the Access to Work programme, etc."*
- not introducing changes until funding is firmly in place.
- choosing 'partners' on proven quality of service rather than the cheapest quote.
- calls for better and more affordable access to fitness facilities in the community.
- sharing Welsh Government practice with Local authorities, in terms of the training offered to staff, the literature shared with staff and the internal practices and processes that help a disabled employee.
- this being a very ambitious plan and the desire for Welsh Government to be honest about what it can really do to support disabled people to lead independent lives.
- differences in access depending on where you live .
- disabled people not being disadvantaged in politics and a call for the Welsh Government to champion ideas that make it easier and more accessible to vote.

**Question 10: We would like to know your views on the effects that Action on Disability: the Right to Independent Living would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

Additional comments received in response to question 10 that are not associated with any particular theme include references to:

- the need for the Welsh language to receive more consideration in the new framework and action plan  
*"We were rather surprised not to see the Welsh language receive more consideration in the framework document. The good work around Mwy nau Geriau could have been cited in chapter 2 and the increasing access to the Active Offer are important contributions. This is now enshrined in the secondary legislation supporting the implementation of the Social Services and Well-Being Wales Act 2014. We would like to*

*see the use and access to Welsh language fully integrated across all of the final policy and practice”.*

the difficulties associated with finding suitable Welsh speaking support staff.

*“People who need care and support often have difficulty finding suitable welsh speaking support staff. There is a lack of experienced welsh speaking support workers in the workforce. In order to have an effect, Action on Disability needs to look at actions that could stimulate growth in the workforce, especially in relation to welsh speakers”.*

- asserting and supporting the right of disabled people to live independent lives having a positive effect on the Welsh language, as meeting the different language needs of individuals is fundamental in enabling autonomy and independence.
- the evidence demonstrating that meeting the language needs of individuals who may have mental health issues or lack capacity to communicate in any other language other than their first language, is essential to promoting good health and wellbeing.
- ensuring that the use of Welsh language braille and Welsh language audio are adopted and utilised as this will encourage take-up of the language in the blind and partially sighted community, and ensure parity of opportunity to use Welsh.
- the need for capturing language preference as well as capturing an individual’s preferred communication format (eg. Large print, audio, braille, BSL etc) to become best practice.
- whether there has been a consultation on the number of disabled people who wish to use Welsh and what form they wish this to take.
- the opportunities for people to use the Welsh Language to be extended to Deaf BSL users, as there is currently no such provision whatsoever for that group.
- liaising with North Wales colleagues on this issue
- the need for easy read Welsh language options to be available in all documents.

**Question 12: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

Additional comments received in response to question 12 that are not associated with any particular theme include references to:

- the definition of independent living used in the new framework.

*“A point of particular confusion relating to independent living is the conflation of the ideas of independent living and independence. Disabled people have made it clear that independent living is not connected to the ability to do things for oneself, or to live alone, or with the minimum of support. In independent living ‘independence’ refers to self-determination, and the ability to lead the life of one’s choice, with support in day-to-day life that is under one’s own control and management. This explicitly embraces the use of support provided by the social care system. This distinction is noted in the definition of independent living provided in the consultation document, although it would be helpful to remove the word ‘necessarily’ from this definition. Elsewhere in the document, however, the terms ‘independent living’, ‘living independently’, and ‘independence’ are conflated, confused or used interchangeably. The final document should be clear throughout as to the distinction between independent living and other meanings of ‘living independently’ or independence. If these are confused, there is a risk that independent living will be confused with the idea of not requiring or using support in day-to-day life”.*
- Continuing Health Care and the needs of people with learning disabilities.

*“Reviewing the work undertaken by the UN (2017) Convention on the UK’s compliance with the UNCRDP, there is no separation in its findings or recommendations in respect of disability and intellect. Therefore, the question of the existence of a separate and distinct policy based on intellect risks obfuscating and marginalising the learning-disabled population needs to consideration. That said, neither Policy addresses this current omission for disabled people with Continuing Health Care needs to live independently....The learning-disabled population is increasing and consequently so is the need for commissioned services to provide long-term care and support in community settings. Further concerns in the form of delayed discharges have also been highlighted through Freedom of Information requests indicating that there is on-going concerns for this service user group in how on-going support is provided within Wales”.*

- the 2016 National Inspection of Learning Disability.
 

*“The 2016 National Inspection of Learning Disability services was undertaken by Social Care (CSSIW) or Health Care (HIW) Inspectorates whom expressed concerns about the deficits in the CHC policy implementation. However, their conclusions merely repeated previously articulated concerns yet offered no interrogation of any concerns: ‘inspectors found that staff were spending increasing amounts of time on funding applications, on assessments that were needed purely for this purpose rather than clinical need and in gathering evidence for processes that felt unclear to them’”.*
- the need for financial assistance towards costs such as internet, television, and basic utilities, particularly for the house / bed-bound.
- the fact that the cost of privately rented accommodation makes the prospect of ever owning one’s own home almost impossible, especially when one is chronically ill / disabled with limited employment prospects.
- Welsh Government needing to do more to assist disabled people with accruing a deposit for a home, as well as managing mortgage payments, given rental costs do not compare favourably with the cost of mortgages.
- a call for Welsh Government to approach / be open to approaches from all sorts of advocates and groups, to gain a more complete understanding of what types of ‘activity’ are appropriate for the various communities. Not all conditions / disabilities are the same; neither should the interventions offered be.
- supporting the provision of more face-to-face support and advice agencies being made available to disabled people, which could include independent advocacy, as per Part 10 of the Social Services and Well-being Act. In addition, there were calls for this to be offered to patients when they enter clinical settings (or care in the community / at home), including at the point of discharge where it becomes even more vital that there be a joined-up, continuous care package available to reduce chances of re-admission.
- calls for Welsh Government to value and reward far more highly support workers, in all of their forms:
 

*“As the nature of our economy in Wales changes, we need to be looking to make the care sector something in which people aspire to work – not necessarily making it more ‘academic’ but simply valuing inter-personal skills, empathy, kindness, and caring as human qualities and paying people in those roles an attractive salary”*

*“Often there can be no independent living for the disabled without adequate support to their families who are often unpaid carers. It seems unfair to penalise unpaid carers by making their paltry remuneration means-tested. A decent basic income paid to unpaid carers would show that their tireless work is valued in our society rather than taken for*

*granted. It would also alleviate poverty suffered by families where one breadwinner can no longer work due to disability”.*

- the difficulties some disabled people face in using the internet and ensuring the views of these hard to reach groups are considered so they too can shape policy.
- the need for both Welsh Government and local councils to become a lot more accessible in terms of creating mechanisms so that individuals / groups can easily make contact with the right people to alert them to issues and co-produce solutions. Suggestion that every public body create a ‘map’ of their organisation, including named personnel, job roles, and contact details, so that citizens know who to contact on any given issue.
- successful outcomes being more likely to be achieved if Local Authorities mirror the Welsh Government Action Plan .
- a call for specific targets to be set as opposed to the issuing of guidelines which can be interpreted differently by different organisations.
- a suggestion that Local Authorities should set up Cross Party Disability For a.
- a concern that the actions in the new framework and action plan also reflect the Well-being of Future Generations [Wales] Act of 2015 and the Social Services and Well-being [Wales] 2014.
- the need for a further analysis of the Action on Disability document over against the UNCRPD, the General Comment on Article 19 and the parts of the Committee’s Concluding Observations which specifically relate to independent living – in partnership with disabled people .
- more needing to be done to tackle disability-related hate crime and online abuse
- the age limit for free post graduate degree courses being extended at least to age 70
- there being no specific action in the new framework or action plan relating to bullying.
- the need for Welsh Government to be strong and forceful to ensure bodies such as Local Authorities take action given the abundance of cuts to their funding they are facing.
- the need for Easy Read Welsh language options need to be available in all documents.