**Consultation Response Form**

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**Consultation Questions**

**Question 1 – Our Overarching Ambition**

The Disabled People’s Rights Plan has this overarching ambition

*“The Welsh Government is committed to promoting the rights of disabled people, and to ensure disabled people are included and able to participate in all communities in Wales. We want to make Wales an inclusive and accessible place for disabled people; a society where disabled people can participate without limits or restrictions and are empowered to lead fulfilling lives, where their individual and collective rights are recognised and upheld and where their contribution is recognised.”*

Please tell us what you think about our proposed ambition. Is this the right ambition to improve equality for disabled people in Wales? What, if anything, could be added to or removed from this ambition?

**Our response:**

We agree with the wide-ranging proposed ambition for the plan.

**Question 2 - Themes**

The Disabled People’s Rights Plan is split into 4 themes:

1. Neighbourhoods and Places
2. Employment, Income, and Education
3. Independent Living
4. Justice and Supporting Environments

Please tell us whether you think these themes are suitable for the plan. Do these themes cover the main issues or barriers that disabled people experience? Are there any missing areas that should be added to these themes? If yes, what are they?

**Our response:**

We agree with the proposed themes for the plan.

**Question 3 – Main topics**

The plan sets out the following main topics

* embedding and understanding of the Social Model of Disability
* access to services
* independent living: social care
* independent living: health
* travel
* employment and income
* affordable and accessible housing,
* children and young people
* access to justice and
* wellbeing.

Do these topics cover the main issues or barriers that disabled people experience? Are there any missing areas that should be added to these themes? If yes, what are they?

**Our response:**

We agree these are the main themes that require consideration. The Royal College of Speech and Language Therapists (RCSLT) actively engages with the UN Convention on the Rights of Persons with Disabilities (UNCRPD) to advocate for the rights of individuals with communication disabilities and has special consultative status at the UN Economic and Social Council, allowing us to participate in and contribute to UN discussions on disability rights.  We believe the plan needs to be strengthened with regard to protecting the rights of those with communication disability as highlighted in our response.

**Question 4 – Actions**

The ‘actions document’ sets out the short-term steps we are taking now. There will be more actions by future governments to support us to achieve the long-term outcomes.

Please tell us whether you think these short-term actions will help deliver the long-term outcomes? Will these actions help reduce the problems and barriers that disabled people face? Please give reasons for your answer if possible.

**Our response:**

We agree with many of the proposed actions but believe further short-term actions are required. In particular, we would like to highlight our recommendation that all public bodies and transport providers should commit to sign up to Communication Access UK. The importance of communication access training is discussed in further detail below. It is imperative that communication disability should not be the reason something is not understood or not carried out either by services or individuals'

**Question 5 - Outcomes Neighbourhoods and Places**

Will the proposed outcomes set out in ‘Neighbourhoods and Places’ help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible.

**Our response:**

Communication disability, difficulty, or difference is one of the most prevalent but least well-known barriers to opportunity affecting children and adults in communities across Wales.

Over 10% of children and young people have a long-term speech, language, and communication need (SLCN)[[1]](#footnote-1). 36.2% of children in Wales with Additional Learning Needs (ALN) have SLCN. SLCN is the most common type of learning need in Wales.[[2]](#footnote-2).

It is not just children and young people who are affected. Many communication needs are life-long, meaning children and young people with such needs become adults with communication disability, difficulty, or difference. In addition, speech, language and communication difficulties can result from many conditions such as stroke, head and neck cancer and dementia.

Research shows that;

* 50%-90% of the learning disabled population have communication difficulties.[[3]](#footnote-3)
* 64% of inpatient stroke survivors have some level of communication difficulties following a stroke.[[4]](#footnote-4)

The impact of communication disability, difficulty, or difference can be profound both for the individual and for society overall.

* **Youth justice** - 71% of children sentenced in the youth justice system in England and Wales have SLCN.[[5]](#footnote-5)
* **Children in care** - 90% of care leavers have below average language abilities and over 60% meet criteria for developmental language disorder.[[6]](#footnote-6)
* **Social, emotional, and mental health** - 81% of children with social, emotional and mental health needs have language difficulties.[[7]](#footnote-7)
* **Mental ill-health** - 80% of adults with mental health disorders present with language difficulties.[[8]](#footnote-8)
* **Prisons** - up to 80% of adult prisoners present with communication needs[[9]](#footnote-9).
* **Rough sleeping** - communication needs are highly prevalent amongst rough sleepers and significantly greater than for the general population.[[10]](#footnote-10)
* **Unemployment** - 88% of long-term unemployed young men have been found to have SLCN.[[11]](#footnote-11)

Communication disabilities, difficulties, or differences can have a huge impact on people’s lives and the lives of their families. They may make it difficult for people to communicate their ideas, thoughts, and feelings, or make people less confident in doing so, leaving people feeling anxious, frustrated, or that they do not have a voice. They can make it difficult for people to understand what is being said or asked of them.

Given that communication difficulties can affect every aspect of people’s everyday lives, it is essential that staff within public transport and public services are trained to support people with communication difficulties more effectively. This is key to help address the needs of disabled people and reduce communication barriers. The [Communication Access UK](https://communication-access.co.uk/dashboard/resources/) symbol and training supports inclusive communication for all. A Welsh language version of the training will be introduced later this year. We recommend that all transport providers and all public sector bodies in Wales sign up to the free scheme in addition to the other actions outlined within the plan.

**Question 6 - Outcomes Employment, Income and Education**

**Our response:**

As outlined in response to question 6, communication difficulties can have a significant impact on every aspect of people’s lives. This is particularly the case with regards to employment and education. SLCN in people with a communication disability can be a core barrier to accessing further education, training and employment opportunities.

People with SLCN may not understand vocabulary at a normal age level, their SLCN affects the ability to understand, express themselves and use social skills. Evidence shows that often employment intervention programmes are delivered at too high a level for most people and are verbally mediated, which may be a particular challenge for people with SLCN. When it comes to applying for jobs, people with SLCN are disadvantaged because they have problems with;

* Understanding the vocabulary to fill in application forms
* Time concepts, in particular sequencing time and reading the time– which will affect their ability to make an interview on time
* Difficulties with finding words at an interview so they may not come across as well as other candidates
* Have difficulties with relationships
* Difficulties asking for clarification etc so might just let things slide
* Organisational skills - need support to organise their day/time/tasks.

The impact of communication disability may be made even more devastating by a lack of awareness of what a communication disability means to the person concerned, and what adjustments could be undertaken to support and facilitate their entry or return to employment. A failure to make reasonable adjustments to meet communication needs will mean that those with communication disabilities will continue to be at a greater risk of being excluded from employment opportunities than their non-disabled peers.

As additional actions to those suggested in the proposed plan, RCSLT recommends that all services which aim to support people into work, back in to the work place and / or retain people in the workforce use mainstream, quality, inclusive communication approaches throughout their procedures. For example, all information on services should be communication accessible to the broadest population and front-line staff should be trained and provided with resources to be able to identify and adapt their own communication to the needs of people with SLCN. We recommend that services undertake [Communication Access UK](https://communication-access.co.uk/dashboard/resources/) training. We also recommend that speech and language therapists should be part of the core team working with individuals who are long-term unemployed. These measures would fit well with the proposed Medr review of support services for disabled adults who want to return to employment.

With regards to education, given that SLCN is the most common type of learning need in Wales, sustainable investment within the speech and language therapy workforce is essential to enable the profession to work in partnership with the education sector to achieve the best outcomes possible for learners. We need to ensure the workforce can offer support to settings at universal and targeted levels to enable best use of specialist resource.

Post pandemic, there is growing concern about pupil absence[[12]](#footnote-12) and an increase in the number of children and young people experiencing mental health difficulties.[[13]](#footnote-13) We are beginning to see greater understanding of the impact of unmet SLCN on mental health and school attendance and new roles developing within this space. It is welcome to see references to SLCN within the 2023 Welsh Government guidance on school attendance. The evidence is clear that more vulnerable groups of young people are far more likely to have unmet SLCN.[[14]](#footnote-14) RCSLT recommends targeted support for key groups such as care experienced young people, children and young people with mental health difficulties and more roles working directly with young people at risk of exclusion and within Pupil Referral Units. These elements should be key components of the proposed development of an education workforce plan which aims to understand workforce gaps and workforce planning, including the specialist workforce for disabled children and young people. They should also be considered in the proposed updated guidance on attendance, exclusions and behaviour management.

**Question 7 - Outcomes Independent Living**

Will the proposed outcomes set out in ‘Independent Living’ help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible.

**Our response:**

Given that communication difficulties may impact every area of a person’s life, we recommend that the proposed action for Welsh Government to work with cultural, heritage, arts, sport and leisure organisations to increase the availability and quality of accessible exhibitions, performances, matches and events should also include a requirement for organisations to undertake communication access training (as discussed in greater detail above).

We also recommend that the voice of those with communication difficulty, disability or difference is represented on the external advisory board to provide advice and support on the delivery of the cross-Government disabled people’s rights plan.

**Question 8 - Outcomes Justice and Supporting Environments**

Will the proposed outcomes set out in ‘Justice and Supporting Environments’ help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible.

**Our response:**

In addition to the proposed actions, we strongly believe that there should be specific reference to support for people with SLCN within the criminal justice system. There is strong international evidence that the incidence of SLCN is much more prevalent in the offending population than in the general population[[15]](#footnote-15) The most recent statistics reveal that 71% of children sentenced in the youth justice system in England and Wales (Apr 19 - Mar 20) had speech, language and communication needs (SLCN)[[16]](#footnote-16). Speech and language therapists (SLTs) work directly with young people with SLCN and/or support the staff and wider workforce around them.

The impact of SLCN on prison staff and the criminal justice environment is profound[[17]](#footnote-17) Where individuals cannot understand others and cannot express themselves, this can manifest as: -

• Behaviour that challenges

• Disruptive, aggressive and violent behaviour

• Self-harm

• Increased use of physical intervention and restraint

• Segregation

Specifically with regards to rehabilitation and education, if speech, language and communication difficulties remain unidentified or unmet, people with communication needs may have limited understanding of, and participation in, the legal process, and programmes designed to reform and rehabilitate them which are verbally mediated. They are also at risk of not being able to participate in verbally mediated physical and medical assessments. Evidence suggests that around 40% of young offenders find it difficult or are unable to access and benefit from rehabilitation programmes that are delivered verbally, such as drug rehabilitation courses[[18]](#footnote-18).

In December 2022, the Senedd Equality and Social Justice Committee held a spotlight inquiry on the SLCN of young people within the criminal justice system. The subsequent 60% Giving them a voice report, published in April 2023, made a key recommendation that; ‘the Welsh Government should work with local authorities to develop plans for embedding speech and language therapists within every Youth Offending Team in Wales.’ It is essential that the correct support is put in place to meet the needs of young people with SLCN within the criminal justice system. As a priority, there needs to be sufficient SLT time for direct intervention with young people to build their skills and reduce the risks related to unmet SLCN.

We urge Welsh Government to work closely with UK Government on this issue in line with the proposed action that the ‘The Welsh Government to ensure the rights and needs of disabled people are reflected in our broader representations to the UK Government on justice matters, especially on key issues that create barriers to accessing justice.’

**Question 9 - United Nations Convention on the Rights of Disabled People (UNCRDP)**

We have outlined in the Disabled People’s Rights Plan how the actions and outcomes support the principles set out in the UNCRDP. Do you think that the plan promotes the main principles of access to rights and inclusion within the UNCRDP? Please give reasons for your answer if possible.

**Our response:**

The Royal College of Speech and Language Therapists (RCSLT) actively engages with the UN Convention on the Rights of Persons with Disabilities (UNCRPD) to advocate for the rights of individuals with communication disabilities and has special consultative status at the UN Economic and Social Council, allowing us to participate in and contribute to UN discussions on disability rights.  We believe the plan needs to be strengthened with regard to protecting the rights of those with communication disability as highlighted in our response.

**Question 10 – Monitoring and Evaluation**

The final section of theDisabled People’s Rights Plan sets out the arrangements for the governance, monitoring, and evaluation of the plan. This means checking how the plan is working, making sure it is going well, and measuring how well the plan is improving the lives of disabled people.

Do you think any other governance, monitoring or evaluation mechanisms should be considered?

**Our response:**

We are content with the proposed governance, monitoring and evaluation mechanisms but as previously noted above, stress the importance of ensuring a voice for those with communication difficulty, disability or difference on the Expert Advisory board. We would also be keen to ensure representation at the Disability Equality Forum.

**Question 11 – British Sign Language**

What do you think the likely effects of the Disabled People’s Rights Plan will be on deaf British Sign Language (BSL) signers? We are particularly interested in its potential impact on opportunities to use BSL in Wales.

* How will the plan help to promote and strengthen the use of BSL in Wales?
* How will the Plan help to break down barriers for BSL signers in accessing information and services?

**Our response:**

No further comments.

**Question 12 – Welsh Language**

What, in your view, would be the likely effects of the Disabled People’s Rights Plan on the Welsh language? We are particularly interested in likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

* + Do you think that there are opportunities to promote positive effects in regard to Welsh Language in the plan?
  + Do you think that there are opportunities to reduce unhelpful effects on the Welsh language in the plan?

**Our response:**

No further comments.

**Question 13 – Further Comments**

We have asked you specific questions about the Disabled People’s Rights Plan. If you have anything else about any part of the plan you would like to tell us, please use this space to let us know.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here

**Our response:**

We warmly welcome the commitment within the plan to expand and renew the [**All-Wales Standards for Accessible Communication and Information for People with Sensory Loss**](https://phw.nhs.wales/services-and-teams/equality-and-human-rights-information-resource/all-wales-standards-for-accessible-communication-and-information-for-people-with-sensory-loss/). Given the high numbers of people living with communication difficulties, it is crucial that the update to the standards includes standards around this area. We would be very keen to work with Welsh Government in this regard.

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