

Written evidence submitted by the Hearing Loss and Deafness Alliance
Health and Care Bill 2021

About us

The Hearing Loss and Deafness Alliance represents 32 organisations spanning the voluntary and independent sectors and professionals working in the NHS. The Alliance seeks to represent the needs of children, young people and adults with hearing loss, deafness and tinnitus across the UK on issues related to audiology, hearing services and public health.

We are submitting this written evidence to Members of the House of Commons Bill Committee to support their scrutiny of the Bill.

Summary

- One in five adults in England (over 9 million people) currently have some form of hearing loss and, with an ageing population, this is expected to increase to over 13 million by 2035.
- There are more than 45,000 deaf children living in England¹. Delays in assessment and treatment has a lifelong impact, given the rapid development of babies' and toddlers' brains and the consequent impact of slower development of communication and language skills.
- Both age and hearing loss are protected characteristics under the Equality Act 2010 and unequal access to hearing care exacerbates health inequalities for these protected groups.
- The Alliance raised concerns about how these reforms might impact on people with hearing loss in pre-legislative consultations.
- NHS England acknowledged these concerns in its "Implementing the NHS Long Term Plan – Proposals for possible changes to legislation" and committed to undertake a "full equalities impact assessment [...] in relation to any Bill introduced in Parliament". This impact assessment should have included how these proposed reforms might affect people with sensory impairments (including hearing loss). To the best of our knowledge that assessment has not yet been carried out.
- **We are calling on members of the Bill Committee to seek assurances from the Government that hearing loss will be specifically referenced and assessed in the EIA accompanying the Bill.**

The need to recognise hearing loss in the equality impact assessment (EIA)

- Alliance members support goals set out in the NHS Long Term Plan, including strategic priorities to tackle health inequalities and support ageing well.
- These NHS reforms however risk overlooking the needs of over 9 million people in England who have a hearing loss, and especially the needs of those with childhood or age-related hearing loss.

- Unaddressed hearing loss increases the risk of social isolation and loneliness, depression, cognitive decline, dementia and other mental health issues². Early diagnosis and management of hearing loss can reduce these risks³. This is why NICE has recognised hearing loss as a major and growing public health challenge and recommended that the NHS do more to diagnose and manage adult hearing loss sooner⁴.
- With both age and hearing loss (disability) being protected characteristics, the Alliance raised concerns about how these reforms might impact on people with hearing loss in pre-legislative consultations.
- NHS England acknowledged these concerns in its “Implementing the NHS Long Term Plan – Proposals for possible changes to legislation” and committed to undertake a “full equalities impact assessment [...] in relation to any Bill introduced in Parliament”⁵. This impact assessment should have included how these proposed reforms might affect people with sensory impairments (including hearing loss)⁶. To the best of our knowledge that assessment has not yet been carried out.
- There are also long-standing concerns over the quality of children’s hearing services. The Rapid Review into Paediatric Audiology in England, led by professional and charity groups, identified a number of priority recommendations to address these.⁷
- **When performing the equality impact assessment, we would ask that hearing loss be given special consideration. We are calling on members of the Bill Committee to seek assurances from the Government that hearing loss will be specifically referenced and assessed in the EIA accompanying the Bill.**
- For more information contact: Brian Lamb, Chairman, Hearing Loss and Deafness Alliance brian.publicaffairs@gmail.com

¹ Consortium for Research into Deaf Education (CRIDE). 2019 England Summary: CRIDE report on 2019 survey of educational provision for deaf children. www.ndcs.org.uk/CRIDE. 2020.

² Department of Health and NHS England, NHS Action Plan on Hearing Loss, <https://www.england.nhs.uk/wp-content/uploads/2015/03/act-plan-hearing-loss-upd.pdf>; NICE, Hearing loss in adults: assessment and management, <https://www.nice.org.uk/guidance/ng98>; Directors Of Public Health, LGA, Public Health England and NHS England, Joint Strategic Needs Assessment Guidance. Guidance for Local Authorities and NHS commissioners on assessing the hearing needs of local populations <https://www.england.nhs.uk/wp-content/uploads/2017/09/joint-strategic-needs-assessment-guidance-jul19.pdf>

³ NICE, Hearing loss in adults: assessment and management, <https://www.nice.org.uk/guidance/ng98>

⁴ NICE, Hearing loss in adults: assessment and management, <https://www.nice.org.uk/guidance/ng98>

⁵ NHS, The NHS’s recommendations to Government and Parliament for an NHS Bill, page 80, paragraph 350

⁶ NHS, The NHS’s recommendations to Government and Parliament for an NHS Bill, page 79, paragraphs 344 and 345

⁷ NDCS et al., Rapid Review into Paediatric Audiology in England, October 2020, https://www.ndcs.org.uk/media/6378/rapid_review_into_paediatric_audiology_2020.pdf