

Consultation Response: Our draft Strategic Plan 2023-2026 (Public Services Ombudsman for Wales)

Submitted on behalf of Learning Disability Wales, Deadline 22.11.2022

About Learning Disability Wales

Learning Disability Wales is a national charity representing the learning disability sector in Wales. We work with people with a learning disability and their families, Welsh Government, local authorities, disabled people's organisations and the voluntary sector to create a better Wales for all people with a learning disability.

Contact

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Summary

The ombudsman fulfils an important function for the people of Wales and we are very happy to see a strategic plan on making complaints procedures more accessible and inclusive. We are also very happy to see you focusing on outreach and communications. We know that many people, including many people with a learning disability, do not know what their rights are and do not feel comfortable complaining, even when they know they have been treated unfairly.

You name as your strategic aims "to deliver justice for the people of Wales and to increase accessibility and inclusion". You also mention that you will be producing more detailed plans at a later time. In these plans we would like to see some specific actions to make the complaint's procedure more accessible to disabled people including people with a learning disability more specifically.

Being proactive about people's rights

It is important to understand that people with a learning disability often have a lot of experience of having other people make decisions for them and feeling helpless about being able to have control over their own lives. Therefore they may not be able to identify when they have been treated badly or believe that it is worth complaining about. Producing more easy read information about what the ombudsman is and what you do might be helpful here. It would also be good to produce some material that informs people of their rights and what kind of standard they should be expecting from public bodies. Apart from not knowing what rights they have or being able to recognise when services are treating them badly, people with a learning disability might not understand what is to be gained from complaining. Developing an accessible guide to the whole process would be helpful.

Website

You mention a planned overhaul of the website with ambitions to make it accessible. While we appreciate that it might not be possible to do a whole website in easy read it would be good to have a few summary pages in easy read format. These should have enough information on them for people to get an idea of what the next steps for them might be and how to get support in undertaking them. We do note that there is at least one easy read document on your resources page. This document itself is of good quality. However, it is important that the titles of documents make clear what they are about in easy language too. Also, it should be easier for people to find the documents that are accessible to them.

We would also like to see further documents in easy read, especially those that are aimed at making people more aware of their rights and what outcomes they can expect from complaining.

In order to make the website as accessible as possible, we would recommend using plain language throughout. The average reading age in Wales is estimated to be around age 9 and it is

therefore very important that the language used in any communications with the general public is aimed at this level of understanding. There are various tools available online that can help assess the accessibility of the language you are using. It is also important to follow other accessibility guidelines including colour contrast to ensure text is easy to read against the background, avoiding the use of all caps (eg IMPORTANT), avoiding text over images, including Alt-text for all images etc.

When developing the website, it is important that you test the website during the development stages with people with different impairments and conditions.