

# Consultation Response: Shaping Wales' Future: Using National Indicators and Milestones to measure our Nation's progress, 26 October 2021

Response on behalf of **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.

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## **Summary**

We welcome the opportunity to give feedback on this policy. We strongly support the establishment of benchmarks to measure progress in Wales. Learning Disability Wales has four main points to make in response to this consultation:

1. We have concerns around the accessibility of this consultation and have therefore decided to respond in a format that is more accessible to use and ask that the whole process is made simpler in the future.
2. We are concerned about the exclusive use of quantitative measures as these cannot capture the complexity of people's experiences and urge Welsh Government to add some more inclusive criteria.
3. We are concerned that measuring the number of healthy behaviours of adults and children alone is not a suitable measure of people's wellbeing and also sends a harmful message.
4. We are happy to see measures around employment that do not only look at overall numbers but also at equity in work. We would also like to urge Welsh Government to take this further and make sure everyone in Wales can profit from Wales prospering.

5. While we recognise the importance of having national benchmarks we also urge Welsh Government to integrate measurable outcomes into individual policies

## **1. Concerns around the consultation process**

Learning Disability Wales is happy to contribute to this consultation. Establishing reliable milestones to capture Wales' progress is important and contributes significantly to making Wales a fairer and more sustainable country.

However, we are concerned about the way this consultation is being conducted. Not only is there no easy read or plain language version available but we must also note that the consultation form seems very inaccessible to us. Asking very specific questions on individual elements of the consultation (and doing this completely unrelated to the order in which items are numbered in the consultation document) makes it disproportionately hard to fill in this form.

We have therefore decided to respond in free-text format and give feedback in a form that is accessible for us. We urgently suggest that future consultation documents are conducted in a way that makes it as easy as possible for people to respond.

## **2. General discussion on how milestones need to be qualitative not just quantitative**

While some of the milestone indicators seem suitable, it is important that milestones are not confined to quantitative measures. We appreciate that quantitative measures play an important role in terms of accountability and clear measurements. However, in order to really understand how the people of Wales are doing, Welsh Government must make sure different perspectives and subjective experiences are captured. One way this could be done is by establishing evaluation forums that include people from different backgrounds to make sure that people's subjective experiences are included. The lack of space for people's voices and subjective experiences is evident also in the type of priorities highlighted in this plan. It is noticeable, for example, that none of the measurements take into account how people experience their circumstances and their wellbeing. Do people feel included in their communities? Do they have access to what is important to them? Can they live life in a way that is meaningful to them?

This is especially important when it comes to people with a learning disability (and generally people who are marginalised in different ways). It is good that the plan works towards not only looking at overall numbers but also how people with different protected characteristics are doing within some of the criteria. However, in order to make sure the most vulnerable residents of Wales profit from changes in policy it is important that people from these groups are involved in evaluating these policies.

### **3. Wellbeing milestones**

We very strongly object to the year one milestones regarding wellbeing. We think it is very important to measure wellbeing in itself and we appreciate the strong focus on wellbeing within Welsh Government policy. However, measuring the number of “healthy behaviours” that both children and adults have is not only an inefficient way to measure wellbeing, it also sends a harmful message as it implies that it is mostly people’s behaviours that impact their wellbeing. If Welsh Government wants to gauge if their policies are working to improve Wales’ wellbeing goals, we suggest looking specifically at how policies are impacting those struggling the most. Reduction of poverty might be one measure to pursue. The number of disabled people reporting that they are living comfortably might be another one. Whatever alternative measure is pursued we strongly suggest replacing these measures with ones that come closer to measuring wellbeing outcomes.

### **4. Employment milestones**

We are very happy to see pay-equality, not just for gender but also for disability and ethnicity included as one of the measurements. We know that people with a learning disability in particular are keen to work but struggle to find employment due to various barriers. We agree that it is not just important to measure if people are in employment but also that they are treated fairly when they are.

We would like to offer some cautionary advice about measuring the percentage of young people who are in employment, education or training. For people with a learning disability in particular it is important that the training and education they are in will actually lead them towards employment. We know from our own work that too often people with a learning disability receive services that do not allow them to progress into paid work. It is important that Welsh Government makes sure that the quality of education, training and employment opportunities for everyone are as good as they can be.

## **5. Integrating measurements into individual policies**

We agree that it is vitally important that Welsh Government measures its success in making Wales a better place. But we would also like to emphasize the importance of integrating concrete outcomes and forms of evaluation within individual policy documents.