

**Royal Blind and Scottish War Blinded response to COVID-19 Committee Call for Evidence**

29 May 2020

**Introduction**

Royal Blind is Scotland's largest visual impairment charity. We support people of all ages - from babies and toddlers at our pre-school playgroup; children and young people at the Royal Blind School (including residential support) and Kidscene after school club; young adults through our residential services and respite care; and older people in our care homes. We also run the Scottish Braille Press. Our sister organisation Scottish War Blinded gives free support to over 1200 to ex-service men and women, no matter if they lost their sight during or after service.

Our vision is for Scotland to be a place where blind and partially sighted people, including those who have other disabilities, are fully included. We work towards this goal for people with visual impairment at every stage of life.

Our submission focuses on three questions the Committee has set out in its call for evidence. We have outlined several impacts of the Covid-19 pandemic for blind and partially sighted people and highlight **3 key priorities**:

* Visual impairment impact assessments on easing restrictions, conducted in consultation with blind and partially sighted people
* The need for public health information to be available in accessible formats
* A public awareness campaign on visual impairment and social distancing.
* **The approach being taken by the Scottish Government in its COVID-19 Framework for Decision Making**

We support the approach taken in the Framework to underpin any changes to the current measures with the premise that there is no such thing as ‘acceptable loss.’  Achieving this balance is particularly important for nearly 180,000 people living with significant sight loss in Scotland.  Royal Blind and Scottish War Blinded works with people with a wide range of visual impairments as well as other health conditions, many of whom will be at most at risk of Covid-19. At the same time, many people with visual impairment, already at an increased risk of isolation1, face significant challenges as a result of social distancing and shielding, and are unable to access support and attend groups which are normally a key part of their life.

We wish to provide comment on three sections of the framework:

Section 2, Harms from Covid-19;

Section 4, Framework for Decisions;

and Section 7 – Renew – Adjusting to a New Normal of Living with the Virus

Section 2 states: “Just as we have sought to shield those most at risk, we must continue to provide additional support for those who need it and seek to advance equality and protect human rights in everything we do.” We support this approach strongly but believe the document should recognise the challenges which many vulnerable and disabled people have faced because of the withdrawal of services including local authority care provision during the pandemic. The framework should set out clearly the need for social care provision to continue during shielding and social distancing and for the Scottish Government to work with local authorities and the third sector to ensure that disabled people are not impacted by the withdrawal of care provision which can and should continue at this time.

We believe that blind and partially sighted people should be included in the list of vulnerable groups to ensure they receive the support they need, for example priority access to supermarkets for food and essential supplies. Royal Blind has published a blog written by Vicky Haylott on the impact of this situation for her and her family:

<https://www.royalblind.org/campaigns/blog>

Section 4 states that, in moving towards potential easing of restrictions, the Scottish Government “will consider how our decisions impact on all parts of society.” The Assessment Framework states “broader considerations also include equality impacts and consideration of tailoring measures, for example to specific geographies and sectors.”

We believe striking a careful balance on easing restrictions is particularly important for blind and partially sighted people. This is vital so they can benefit from changes to necessary measures which have increased their risk of isolation. It is also vital that any easing of restrictions addresses specific challenges for people with visual impairment. They face significant practical difficulties in observing social distancing, which can result in them being at higher risk of infection particularly as more people leave their home more often and communities become busier. We have heard concerns about how accessible public transport will be for people with visual impairment as we emerge from lockdown, given that many rely on public transport services. There are also concerns over an increase in the number of people cycling and the potential for additional risks to blind and partially sighted people as pedestrians. For people living with sight and hearing loss, increased use of face masks creates new communication barriers. These and other issues means that it is imperative that any new or measures or relaxation of current restrictions are the subject of equality impact assessments which take account of the specific potential impacts for blind and partially sighted people, and people affected by other sensory impairment conditions. There should be consultation with disabled people’s organisations, including directly with blind and partially sighted people, in drafting new guidance and carrying out impact assessments.

Section 7 sets out the Scottish Government’s commitment to rebuild Scotland’s economy, overcoming inequality and advancing human wellbeing. A range of evidence of the experience of lockdown and its economic impact shows that it has resulted in growing inequality in our society. The key role of charities and social enterprises in tackling inequality means the third sector must be fully included in taking forward work to address this. The framework should also recognise the burdens placed on charities by the pandemic, including those providing social care to disabled people and those with complex needs. Royal Blind was already heavily subsidising our specialist care homes for older people and residential care services for blind and partially sighted young people. Like other providers, the charity now faces the financial costs of staff absences and empty rooms as part of health protection measures. Covid-19 has shown the crucial role of third sector social care services in our society and action must be taken now to secure they receive sustainable funding.

Government action on employability for people with sensory impairment will also be vital in rebuilding the economy and ensuring the Scottish Government’s goals to close the disability employment gap can still be achieved. Two thirds of people with visual impairment of working age are not in paid employment. Those who are seeking employment, including people who have lost jobs because of the pandemic, will find the new employment market even more challenging. There is a lack of employability schemes for people with sensory impairment, so it is vital the Scottish Government’s Coronavirus working group on employability considers how more specialist employability support services can be made available for people with visual impairment.

Specialist education has a key role in ensuring blind and partially sighted pupils have fairer opportunities in education and employment. The lockdown has been particularly challenging for pupils with additional support needs and specific action is required to ensure this does not result in a widening of the attainment gap for these pupils, including an increasing number of children and young people with visual impairment.

* **How should different interests in civic society and the economy be involved in the decision-making process about amending restrictions and what would enable the final decisions to be widely supported despite any necessary trade-offs that may require to be made.**

There may be unintended consequences for people with visual impairment of what might otherwise look like reasonable proposals to rebalance the health and wider risks of lockdown. As people are allowed to leave their home and travel more, this makes it more challenging for everyone to observe social distancing, but particularly for people who are blind and partially sighted who are not able to observe how far they are away they are from someone else.

Social distancing measures currently in operation in a variety of settings have already shown how difficult or impossible they can be for blind and partially sighted people to manage. Supermarkets are now inaccessible for many blind and partially sighted people due to social distancing. The majority of blind and partially sighted people do not have a guide dog and often rely on touch and guiding from another person to navigate the shop. Under social distancing measures, this is no longer possible. For people with visual impairment who can shop, social distancing markers on floors and the introduction of one-way routes around supermarkets cannot easily be navigated by either long cane or guide dog users. In moving gradually away from a ‘stay at home’ message, this will involve more and continuing measures to observe social distancing in additional settings. From the outset, how these measures will be practical and accessible for people blind and partially sighted people will be crucial to ensure that wide support for them includes people from the visual impairment community.

At Stage 3 of the Coronavirus (Scotland) (no.2) Bill debate it was agreed by Parliament to extend the maximum duration for Temporary Traffic Regulation Orders (TTROs) from 18 months to 24 months. The intention of this amendment was so that TTROs can be used to authorise temporarily widened footways and “pop-up” cycle lanes to facilitate safe walking and cycling while social distancing requirements remain in place. There is considerable anxiety among many blind and partially sighted people about how this will affect them as pedestrians. While we would expect the great majority of cyclists will be responsible to allow for “safe walking” and respect the needs and safety of pedestrians, this cannot be guaranteed in every instance. Shared spaces schemes in urban centres have resulted in safety concerns from blind and partially sighted people. We have heard of a number of instances of people with visual impairment who have had negative experiences as pedestrians as a result of cyclists, and it is not always possible for blind and partially sighted people to identify a cycle lane. Any scheme to introduce TTROs must be the subject of comprehensive consultation with blind and partially sighted people and local disability groups.

At a national level, the third sector must be involved as a full partner with local and national government in developing policy in relation to amending restrictions. This is essential given the crucial role the sector has to play in supporting those most at risk from Covid-19, both its health and wider impacts. We have stated already adjustments to restrictions should undergo equality impact assessments which focus on the needs of disabled people and the specific potential impacts for blind and partially sighted people. This process should involve disabled people’s organisations and include blind and partially sighted people so there is wide support for new measures.

As well as involving key sectors in its own policy development on adjusting restrictions, we believe the Scottish Government should help facilitate discussion between different sectors in our society to find solutions to problems which have arisen as a result of social distancing. For example, there remain many people, including blind and partially sighted people, who are not within those groups defined as ‘vulnerable’ but who have faced continued challenges purchasing essential provisions from supermarkets. The Scottish Government should facilitate discussion between supermarkets and groups and individuals representing those affected to ensure a coherent and effective resolution to this problem.

* **How should the messaging strategy be developed by the Scottish Government as we ease parts of the current lockdown (and may potentially need to create other restrictions).**

We welcome the provisions on inclusive communication which were set out in the Coronavirus (Scotland) (No.2) Bill, and we believe it is vital that all information and messages for the public on Coronavirus are available in accessible formats. For people with visual impairment, it is essential that communications are available in braille, audio and large print formats, and when published online that they are accessible for screen reading software. While this should be the default position for all publications for all public services, we are concerned that major public information documents on coronavirus have not been available in accessible formats at time of publication, and in some instances there have been significant delays before accessible versions have been produced. As move forward with a messaging strategy, it is essential that it is genuinely inclusive and information is immediately available in accessible formats at time of publication.

We believe there needs to be a high-profile public awareness campaign on visual impairment and social distancing. This to ensure the public is aware of the specific challenges for blind and partially sighted people and the need for them to behave in such a way that assists them with social distancing. We suggest three key messages for this campaign:

* **It’s hard to socially distance if you can’t see what’s about you** – understand that blind and partially sighted people need you to be responsible in socially distancing around them and recognise their needs.
* **Visual impairment can be an invisible disability –** not all people living with sight loss have a guide dog or use a white cane. It is important to show understanding and not assume it will be obvious which people face visual challenges with social distancing.
* **If you can, offer help to people with visual impairment while social distancing when appropriate –** use clear verbal information to indicate to a person with visual impairment that, while observing social distancing, you can provide appropriate support if it is required or help them gain the attention of someone else who can help.

We believe it is important for an awareness campaign with these or similar messages to be developed in collaboration with sight loss charities, including directly with people with visual impairment.

**References**

1. [Social Connections and Sight Loss](https://www.royalblind.org/sites/www.royalblind.org/files/Royal%20Blind%20Loneliness%20Report%20Email_0.pdf)

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