



for deaf and hard of hearing people

**Employment for all: assisting people with  
health problems and disabilities into work**

**Submission by RNID to the Work and Pensions  
Committee**

**January 2003**

## Summary of recommendations

- **Jobcentre Plus offices should be given specific targets for helping people who cannot work obtain their full benefit entitlements.**
- **Jobcentre Plus offices should comply with the RNID's *Louder Than Words* standard.**
- **All forms of employment should be covered by the Disability Discrimination Act (DDA). There should be no exempted occupations.**
- **Voluntary workers should be brought within the scope of the DDA.**
- **The concept of indirect discrimination should be introduced into the DDA.**
- **Employment tribunals should be given the power to order employers to employ or reinstate a disabled person.**
- **There should be a statutory duty on public bodies 'to eliminate unlawful discrimination', mirroring the provisions of the Race Relations (Amendment) Act 2000.**
- **The Government should pilot the use of financial incentives, such as tax exemptions, to encourage employers to recruit and retain disabled people.**
- **The Government should do more to actively promote awareness of the Access to Work scheme amongst employers and disabled people.**
- **The Access to Work scheme should be extended to cover voluntary work and work experience placements.**
- **In order to reduce the risk of people with progressive hearing loss taking early retirement or losing their jobs, the maximum waiting time should be 4 weeks for a hearing test and a further 12 weeks for a hearing aid to be fitted.**

## 1. The employment situation of deaf and hard of hearing people

- 1.1 There are an estimated 9 million deaf and hard of hearing people in the UK, of whom over 3 million are working age (16-65). There are estimated to be 153,000 severely and profoundly deaf people of working age in the UK. Research evidence shows that deaf and hard of hearing people are at a substantial disadvantage in the labour market:
- The unemployment rate amongst severely and profoundly deaf respondents to an RNID employment survey was 20%, four times higher than the national unemployment rate (5%).<sup>1</sup>
  - The unemployment rate was higher amongst respondents with additional disabilities (32%) and those aged under 25 (34%).
  - 57% of respondents who were unemployed and seeking work had been out of work for over a year. Forty-two per cent had been out of work for 2 years or more and 20% had been unemployed for 5 years or more.
  - According to the Labour Force Survey the employment rate amongst people with hearing impairments is 68%, significantly lower than the employment rate for non-disabled (81%).<sup>2</sup>

## 2 Hidden unemployment

- 2.1 In its press release the Work and Pensions Committee asks whether '*the high numbers claiming Incapacity Benefit represent hidden unemployment?*' Research evidence indicates that a substantial proportion of incapacity benefit claimants want to work. Thirty-seven per cent of respondents to the RNID employment survey who were officially classed as economically inactive were, when probed, actually looking for work. However, we have reservations about classifying this group as the '*hidden unemployed*'. Given that, in order to qualify for incapacity benefit claimants have to undergo a very strict test of incapacity – the all work test - RNID believes that the term '*hidden unemployment*' is misleading and unhelpful.
- 2.2 Both the current Labour Government and the previous Conservative administration have cited the threefold growth in the invalidity benefit (IVB) caseload during the 1980s as evidence that people who could work were claiming incapacity benefits. The implication, and one that has been readily seized upon by the media, is that many incapacity benefit claimants are not really incapacitated, i.e. they are either fraudulent, malingerers or else opting to remain on benefit.
- 2.3 The reality, as the Government has acknowledged in the *Pathways to Work* green paper, is somewhat more complex. Christina Beatty and Stephen Fothergill from

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<sup>1</sup> Bradshaw W, (2002) *The employment situation and experiences of deaf and hard of hearing people*, RNID

<sup>2</sup> Smith A, and Twomey B, *Labour market experiences of people with disabilities*, Labour Market Trends, August 2002

Sheffield Hallam University, noting that IB claimants were concentrated in areas of high unemployment, concluded that around 750,000 IB claimants could be classed as the '*hidden unemployed*'.<sup>3</sup> Beatty and Forthergill stressed that the ailments of this group were not fictitious but argued that these claimants would have been working under different labour market conditions.

- 2.4 Richard Berthoud has pointed out that the increased incapacity caseload was not caused by a rise in the number of new claimants (the inflow), which actually fell overall during the 1980s, but by reduced numbers leaving benefit (the outflow).<sup>4</sup> In other words fewer people were returning to work after a spell on benefit. He concludes that the growth was '*part of a much wider shift in employment patterns*' and was probably caused by two interacting factors:
- As the demand for labour contracted relative to the growth in supply, employers have been less inclined to recruit disabled workers;
  - Conventions about who should be expected to work have changed.
- 2.5 Whilst many incapacity benefit recipients could, given the right support, re-enter the labour market, we are wary of the coercive policy measures that logically flow from a crude interpretation of the '*hidden unemployment*' thesis, e.g. making incapacity testing stricter or forcing disabled people to undertake job-seeking activities.

### 3 Jobcentre Plus

- 3.1 Jobcentre Plus combines benefit administration with employment services in a *work-focused* service. Therefore the service should have a dual function:
- helping those who can work move into employment or nearer the labour market.
  - supporting those who cannot work by ensuring that they are receiving their full benefit entitlements.
- 3.2 Whilst Jobcentre Plus targets have been designed to create incentives for advisers to work with disabled people, there are no explicit targets for supporting those who cannot work (e.g. by providing full benefit checks). RNID and other disability organisations have raised this issue on the now defunct Jobcentre Plus Stakeholder Forum but the targets remain exclusively focused on work. **We recommend that Jobcentre Plus offices be given specific targets for helping people who cannot work obtain their full benefit entitlements.**
- 3.3 RNID shares the Work and Pensions Committee's concern about the '*the uncertain employment outcomes emerging from the ONE pilots*'. We agree with the committee that the evidence from the ONE evaluations '*raises worrying questions about the effectiveness and timing of the strategy being rolled out in*

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<sup>3</sup> Beatty C, and Fothergill S, (1999) *Incapacity Benefit and unemployment*

<sup>4</sup> Berthoud, R, (1998) *Disability Benefits: a review of the issues and options for reform*

*Jobcentre Plus*'.<sup>5</sup> We would like to see clear evidence that work focused interviews make a positive difference in employment outcomes for disabled people before the work-focused interview regime is further extended.

- 3.4 RNID is also keen to ensure that the Jobcentre Plus service is fully accessible to deaf and disabled people. RNID currently sits on a Jobcentre Plus access sub-group, which is looking at how to ensure that the service is fully accessible to disabled people and other disadvantaged groups. RNID is also in discussion with Jobcentre Plus about a video interpreting pilot in 6 job centres starting in April 2002. Video interpreting is a remote interpreting service using video telephony that would enable deaf sign language users to walk into a Jobcentre Plus office and communicate with staff without having to book an interpreter in advance.
- 3.5 However, despite the willingness of officials to discuss access issues with us, we are very concerned that the Jobcentre Plus Board has decided not to endorse the RNID's *Louder than Words* Charter, thus reversing a commitment made by its predecessor the Benefits Agency. A recent DDA case illustrates why Jobcentre Plus offices should meet the *Louder Than Words* standard. In July 2002 a court ruled that the Department of Work and Pensions (DWP) had discriminated against Alistair Appleby, a deaf man from south London who had visited a DWP office to apply for a national insurance number. The court ordered the DWP to pay £850 damages, ruling that the treatment received by Mr Appleby had been discriminatory because:
- Mr Appleby's request to be interviewed in a room without a screen, which impeded his ability to lipread, was refused.
  - Mr Appleby was made to feel isolated and humiliated by the offhand and disrespectful way he was treated by the civil servant.
  - The office had no visible signage about the availability of an induction loop system for deaf and hard of hearing clients.
- 3.6 The Appleby case is not an isolated incident. Fifty per cent of deaf respondents to an RNID survey rated the Benefits Agency's ability to communicate with deaf people as '*less than satisfactory*' or '*very poor*'.<sup>6</sup> **RNID recommends that all Jobcentre Plus offices should comply with the *Louder Than Words* standard.**

#### **4 Mainstream employment programmes**

- 4.1 RNID employment research shows that mainstream employment services are not accessible to deaf people
- Sixty-one per cent of deaf and hard of hearing respondents said they were unable to communicate with job centre or careers service staff. A quarter of

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<sup>5</sup> Work and Pensions Committee, (2002), '*One*' pilots: *Lessons for Jobcentre Plus*, First Report of Session 2002-2, HC 426

<sup>6</sup> Allirajah, D, (2001) *Can't Hear, Can't Benefit: a survey of deaf people's experiences of claiming Disability Living Allowance*, RNID

respondents (24%) said that the service provided by disability employment advisers or other job centre staff was not helpful.<sup>7</sup>

- Twenty-nine per cent of respondents who had undertaken a Government employment or training scheme said that it had helped very little and they would not recommend it.

4.2 The RNID Employment, Learning and Skills Service (ELSS) was set up precisely because mainstream employment programmes were failing deaf people. In the year 2001-2 RNID employment advisers helped to place 94 unemployed deaf people into work and secured work experience placements for 91 clients. It is our long-term objective to ensure that mainstream employment programmes are made accessible and deaf-friendly. However, in the short and medium term we recognise that interpreter shortages and lack of deaf awareness amongst providers of employment programmes necessitates deaf-specific employment services.

## 5 The interaction between benefits and work

5.1 The tax and benefit system is complex but it does not necessarily follow that its complexity deters disabled people from working. Although there are many potential disincentives to work within the benefit system the actual influence of these on labour market behaviour varies from group to group. For example, the research literature suggests that unemployed men are less responsive to financial disincentives than married women. The research evidence, as Eithne McLaughlin has pointed out, indicates that *'people, including long term unemployed people, want a job and give only peripheral consideration to whether that job pays more than out of work benefits'*.<sup>8</sup> Andrew Shaw and Robert Walker point out that *'despite the salience of the poverty trap there remains great doubt as to whether its existence really affects the labour supply decisions of current workers. Many people have no choice over their hours or wages and workers are not necessarily in a position to calculate their marginal tax-benefit rate'*.<sup>9</sup>

5.2 There is some research evidence on the relationship between benefit rules and the labour market behaviour of disabled people. Government-commissioned evaluation of the old Disability Working Allowance (DWA) concluded that the work incentive effect of the scheme was negligible.<sup>10</sup> Richard Berthoud, who co-authored the evaluation, has said that: *'The failure of DWA suggests that disabled people are not much affected by incentives. To the extent that they cannot work, or cannot get a job, there is not much that extra money can do to persuade them'*.<sup>11</sup>

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<sup>7</sup> Bradshaw W, (2002) op cit

<sup>8</sup> McLaughlin E, (1994) *Flexibility in Work and Benefits*, IPPR

<sup>9</sup> Shaw A, and Walker R, *Disjointed interaction: the labour market and the benefits system*, in P. Meadows (ed.), *Work Out - or Work In?*, Joseph Rowntree Foundation, 1995.

<sup>10</sup> Rowlingson K, and Berthoud R, (1996) *Disability Benefits and Employment*, DSS Research Report No

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<sup>11</sup> Berthoud (1998) op cit

- 5.3 The Government has introduced a number of measures designed to remove disincentives or improve work incentives within the benefit system. These include a 52 week incapacity linking rule, a £15 incapacity earnings provision pilot, access to the Work Trials scheme and the Jobfinders Grant, and new permitted work rules from April 2002. It is too early to evaluate the impact of the new permitted work rules but an evaluation report on the other work incentives concluded that: *'To the extent that people faced different barriers and obstacles in moving towards work, some measures were relevant to them, and others not'*.<sup>12</sup> One of the problems that the researchers discovered was limited awareness of these incentives, which necessarily reduced their incentive effect.
- 5.4 The research evidence suggests that the external barriers to work within the labour market, i.e. shortage of job vacancies and discrimination by employers, have a much stronger influence on the employment rate of disabled people than disincentives within the benefit system. If benefit disincentives exist it is very difficult to assess their influence. Nonetheless there is still a strong case for *easing the transition* from benefits to work by changing the benefit rules.

## 6 Discrimination in employment

- 6.1 Deaf and hard of hearing people encounter widespread discrimination in the workplace ranging from lack of deaf awareness and failure to provide communication adjustments to outright harassment and bullying. Seventy per cent of respondents to an RNID employment survey said that they have been prevented from getting a job due to their deafness.<sup>13</sup> The RNID casework service was established in September 2000 in order to support deaf people who have suffered discrimination. In the period from April 2001 to the end of December 2002 the casework service handled 721 complaints about employment discrimination from deaf and hard of hearing people. In the year 2002 alone the service handled 206 employment complaints.
- 6.2 The following case studies are typical of the most common complaints made by deaf people contacting the RNID casework service:
- *A profoundly deaf man applied to transfer from his current post in a factory to work in the warehouse. He was refused on the grounds that he was believed to be a risk to himself and colleagues.*
  - *A hard of hearing woman applied for an administrative post. She was initially offered the job but this offer was later retracted when the employer realised that the woman could not use a voice telephone - although the woman had informed the employer about this during her job interview.*
  - *A profoundly deaf man applied for the post of tutor at a local college. Although he had requested a sign language interpreter on his application*

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<sup>12</sup> Corden A, and Sainsbury R (2001), *Incapacity Benefits and Work Incentives*, DSS Research Report No.

<sup>13</sup> Bradshaw (2002), op cit

- form, no interpreter was provided at the interview. Instead the panel tried to communicate with the applicant through written notes and consequently the applicant could not fully understand or participate in the interview.*
- *A female secretary with a progressive hearing loss, whose hearing had deteriorated to the point that she could not longer use a voice telephone, was told by her employer that they would 'have to let her go' as she could no longer fulfil the duties of her job. As it transpired she was able continue to do her job with the aid of an amplified telephone.*
  - *A profoundly deaf man who worked in a supermarket complained that he was being bullied by one of the shift supervisors. The supervisor had said that he was lazy and falsely alleged that he had been harassing a female colleague. RNID helped the man lodge an official complaint, which resulted in a formal investigation being carried out and the suspension of the supervisor.*
  - *A profoundly deaf man was made redundant from his job at a factory. The redundancy selection criteria used meant that employees with greater supervision needs were at higher risk of redundancy. However the redundancy process was not adjusted to take account of the fact that the deaf man required a higher level of supervision due to his communication requirements.*

## **7 The Disability Discrimination Act**

- 7.1 The Disability Discrimination Act 1995 (DDA) has been instrumental in raising awareness of discrimination of disabled people. The creation of the Disability Rights Commission (DRC) has led to higher visibility of disability discrimination and stronger enforcement of the DDA. Having said that, we also note that the DDA has had a limited impact on recruitment of disabled people. DWP analysis of DDA cases found that 93% of employment cases were dismissal/reasonable adjustment cases and only 7% of were recruitment.<sup>14</sup> This does not mean that there is little discrimination in recruitment of disabled people, but that it is very difficult to prove discrimination by the employer. It may also mean that deaf and disabled people are not familiar enough with the DDA, and how it can help them.
- 7.2 Whilst, it may be intrinsically difficult to prove discrimination in the sphere of recruitment, the DDA can potentially help to change employer attitudes towards deaf people. There is evidence that employer awareness of the Act is increasing. A recent survey of employers found that 75% of employers had heard of the DDA. However, there is still much more to be done to promote compliance with the Act. Fifty-nine per cent of employers surveyed said they did not know if the employment provisions applied to them. Only 8% of employers had sought information/advice about the Act and 6% had a written policy on employing disabled people. Alarmingly, two-thirds of employers had made no adjustments to

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<sup>14</sup> Leverton S, (2002) *Monitoring the Disability Discrimination Act 1995 (Phase 2)*, DWP In-house report  
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accommodate disabled employees, though 63% of larger employers had made adjustments.<sup>15</sup>

7.3 The RNID is committed to raising awareness amongst employers of their duties under the DDA. The RNID's Employment Learning and Skills Service is active in advising employers about how to accommodate deaf and disabled employees, while RNID Training Services provide advice on DDA compliance to businesses as part of deaf awareness training courses. The RNID is working with the DRC and the British Deaf Association to publish guidance on the duties of employers and trade organisations to provide sign language interpreters under the DDA.

7.4 However, raising awareness alone is not enough, as a number of problems lie in the DDA provisions:

- The scope of the employment provisions is too narrow. Although the draft regulations to amend the DDA in 2004 will bring about a large improvement, (e.g. deletion of the small-employers exemption, broadening of the scope to fire and police services and inclusion of some statutory office holders) we do not think these changes go far enough. **RNID recommends that all forms of employment should be covered by the DDA and there should be no exempted occupations.**
- Voluntary work is an important stepping stone back in employment for disabled people. At a time when the Government is actively encouraging volunteering and voluntary work itself is becoming increasingly professionalised (e.g. volunteers being required to sign contracts) it is wrong that that voluntary workers are not afforded any of the protection enjoyed by paid staff. RNID was recently approached by a deaf person who had had to give up working as a voluntary adviser because of the discrimination he believed he had faced. **RNID therefore recommends that voluntary workers are brought within the scope of the DDA.**
- A major weakness of the DDA is that cases can only be challenged on an individual basis: employers are not required to adapt policies, procedures and practice as is the case with service providers. This means that an employer can maintain a (potentially) discriminating environment for all its other employees, as long as they provide a reasonable adjustment to an individual disabled person who has taken out a DDA complaint. **RNID supports the introduction of a concept of indirect discrimination in the DDA which would remedy this weakness.**
- Employment tribunals also lack important enforcement powers, such as the power to order reinstatement. A recent DDA recruitment case - *Mark Keane v United Lincolnshire Hospital NHS*<sup>16</sup> - illustrates the need to strengthen the enforcement powers of tribunals. Mr Keane, who is deaf, had been refused a job as a medical records clerk because he was unable to answer telephone

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<sup>15</sup> Stuart N, Watson A, and Williams J (2002), *How employers and service providers are responding to the Disability Discrimination Act 1995*, DWP In-house report 96

<sup>16</sup> Nottingham Employment Tribunal, reference 2601176/2001

calls. The tribunal ruled that the employer had failed his duty to make reasonable adjustments as the work could easily have been rearranged so that the man would not have had to take telephone calls. Unfortunately the tribunal could not order that this job or a similar job be offered to the deaf man, as they can in sex discrimination cases. **RNID recommends that employment tribunals be given the power to order employers to employ or reinstate a disabled person.**

- Anti-discrimination legislation in itself does not in itself bring about change. It must be supplemented by the introduction of a statutory duty on public bodies to promote equality. This duty would go further than active encouragement and dissemination of good practice and would require active measures, such as disability action plans, to redress disadvantage. **RNID recommends that there should be a statutory duty ‘to eliminate unlawful discrimination’, mirroring the provisions of the Race Relations (Amendment) Act 2000.**

## 8 Pathways to Work

- 8.1 The DWP green paper *Pathways to work: Helping people into employment* was published after the Committee announced its inquiry. The green paper makes a number of proposals for piloting new approaches to helping disabled people return to work. These include:
- More frequent work-focused interviews in the early period of an IB claim and a mandatory requirement to draw up return-to-work action plans
  - A £40 a week ‘*return to work credit*’ payable for 52 weeks for IB claimants who move into full-time work and earn less than £15,000
  - New multi-disciplinary teams of specialist personal advisers
  - Rehabilitation programme for claimants with back pain, heart conditions and mental health problems
  - Changing the name of IB something less negative (e.g. capability assessment allowance)
- 8.2 RNID welcomes the recognition in the green paper that the barriers to work facing disabled people are complex. However, whilst the analysis of the problem is good, one of the key recommendations - intensification of the work-focused interview regime – is open to question. In light of the evidence from the ONE pilots we would question work-focused interviews - whether compulsory or voluntary - actually help disabled people find jobs. Moreover, compulsion does appear to be stealthily increasing for sick and disabled people – first it was mandatory work-focused interviews - now more frequent interviews and mandatory job plans. RNID is concerned about creeping compulsion within the incapacity benefit system.
- 8.3 RNID welcomes the proposed £40 return to work credit, which would certainly make it easier for disabled people to understand the financial implications of

returning to work. Given the limited success of previous work incentive measures it is difficult to predict the impact of this credit. The lessons from the evaluation of previous incapacity work incentives suggest that the credit must be well-publicised in order for its full incentive effect to be realised.<sup>17</sup> However, the incentive is still aimed at the individual disabled person and not at the employer. **RNID recommends that the Government should pilot the use of financial incentives, such as tax exemptions, to encourage employers to recruit and retain disabled people.**

## 9 Access to Work

- 9.1 The Access to Work (AtW) programme is crucial to helping deaf and hard of hearing people move into work. We welcome the fact that the number of AtW beneficiaries has more than doubled since 1997. Yet, despite the increased take-up of AtW too many employers and disabled people are still unaware of the scheme. RNID research shows that:
- 57% of companies and half of those employing deaf or hard of hearing people had not heard about the AtW scheme.<sup>18</sup>
  - Sixty-seven per cent of unemployed respondents to RNID's employment survey were unaware of the AtW scheme.<sup>19</sup>
- 9.2 In their evaluation of the programme the Social Policy Research Unit found that:<sup>20</sup>
- Only 3% of users heard about AtW through promotional literature. Most users heard about AtW through work or public agencies
  - 36% of AtW users felt they had missed out by not having applied earlier.
  - Better publicity was the top suggestion from users for improving the scheme
  - Users are unaware of the full range of services provided through AtW.
- 9.3 The lack of awareness about Access to Work amongst employers and disabled job-seekers constitutes a major barrier to the employment of disabled people. **We recommend that the Government should do more to actively promote awareness of the AtW scheme amongst employers and disabled people.**
- 9.4 One of the gaps in the Access to Work (AtW) scheme is that it does not cover voluntary work or work experience placements which serve as a gateway to employment for disabled people. For deaf people who need sign language interpreters or other forms of communication support, the absence of AtW funding for work placements constitutes a substantial barrier to work. RNID's Employment Learning and Skills Service (ELSS) has obtained money from the

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<sup>17</sup> Corden A, and Sainsbury R (2001), op cit

<sup>18</sup> Bradshaw, W, (2002) *The experiences of employers: Research into deafness and employment*, RNID

<sup>19</sup> Bradshaw W, (2002) *The employment situation and experiences of deaf and hard of hearing people*, RNID

<sup>20</sup> Thornton P, Hirst M, Arksey H, Users' (2001) *Views of Access to Work: Final Report of a Study for the Employment Service*, SPRU/ES

European Social Fund (ESF) to pay for communication support for deaf people on work placements. Without this funding employers would be unwilling to take on deaf people in work placements. **RNID therefore recommends that Access to Work scheme should be extended to cover voluntary work and work experience placements.**

## 10 Job retention

10.1 Although the Committee is looking specifically at '*assisting people with health problems and disabilities into work*' we feel that the scope of the inquiry should extend to the issue of job retention. Apart from a very small number of people incapacitated in youth, virtually all IB recipients have previously been in employment. It has been estimated that 70% of economically active disabled people became disabled while in work.<sup>21</sup> Yet the Government's employment strategy has been predominantly focused on getting disabled people into work with very little emphasis on preventing people who become disabled dropping out of the labour market. Whilst RNID welcomes both the job retention and rehabilitation pilots that are due to start in 2003 and the rehabilitation initiatives announced in the *Pathways to Work* green paper, job retention requires far greater prioritisation of Government resources.

10.2 Around two-thirds of the 3 million deaf and hard of hearing adults of working age in the UK are aged 50-65. The vast majority of older people with hearing impairments will have lost their hearing gradually due to the effects of ageing. Prolonging the working lives of people with progressive hearing loss depends on the modernisation of NHS audiology services. The following case study illustrates how digital hearing aid provision can facilitate job retention:

*A language teacher with a progressive hearing loss contacted RNID about the increasing problems she was having at work. Although she had an old analogue hearing aid, her hearing had deteriorated to a level where she found classroom work difficult. Having obtained funding from the Access to Work scheme she was able to purchase a digital hearing aid and, as a result, she was able to retain her job.*

10.3 RNID does not think that using the Access to Work scheme to buy digital hearing aids from private suppliers is a cost-effective use of public funds. We are campaigning for digital hearing aids to be available free of charge on the NHS throughout the UK. Currently digital hearing aids are only available in 50 NHS Trusts in England, with a further 15 Trusts providing digital aids from April 2003.

10.4 RNID also wants increased investment in audiology services to reduce unacceptably long waiting times. A 2001 RNID report found that the average waiting time for a hearing test in England was 13.5 weeks.<sup>22</sup> One in eight audiology departments reported waiting times of 6 months or longer. An earlier

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<sup>21</sup> *Code of Practice on the Employment of Disabled People* (1993), Department of Employment

<sup>22</sup> *Audiology in Crisis: Still waiting to hear* (2001) RNID

RNID survey had found that the average waiting time for a hearing aid to be fitted in England was around 20 weeks, but in some areas it could take as long as 19 months.<sup>23</sup> **In order to reduce the risk of people with progressive hearing loss taking early retirement or losing their jobs, we recommend that the maximum waiting time should be 4 weeks for a hearing test and a further 12 weeks for a hearing aid to be fitted.**

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<sup>23</sup> Waiting to hear? (1999), RNID