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Our ref: GM 1187-2025
Date: 9 December 2025

Ms Emer Boyle
Communities Committee Clerk
Room 430
Parliament Buildings
Ballymiscaw
Stormont
Belfast
BT4 3XX

Dear Emer,

Thank you for your letter of 24 November 2024 (your reference CC/25/401) requesting confirmation that documentation requested by the Committee would be available within the timelines advised by officials at the Committee hearing on 23 October 2025. The Department would stress that the information and documentation supplied are works in progress and will be subject to consultation and to refinements or amendments to the Bill.

Draft of co-designed best practice in guidance

Clause 6 'Best practice to be in guidance' clarifies what Guidance is to give advice on. For example, as described at 6(1)(b), 6(2) and 6(3), this may include recommendations on how to offer or facilitate communication in BSL and ISL, and it may refer to arrangements through which people can avail of accredited interpreters.

Therefore, the Department has committed to a co-designed approach to developing Best Practice as the foundation for developing statutory Guidance. A first draft of Best Practice from the British Deaf Association (BDA) has been prioritised and shared with the other Deaf organisations represented on the Sign Language Partnership Group and a broad outline is included in the attached **Annex A**. Officials are considering feedback and amendments for inclusion in an updated version which will be forwarded to other departments for consideration and comment.

Officials will build on this draft in the creation of the statutory guidance specified by Clause 5 'Department to issue guidance' and Clause 6 of the Bill, working closely with other departments and Sign Language users through the Sign Language Partnership Group. We will provide the Committee with a further draft once consideration by the Partnership Group is complete. We have included in Annex A draft material on the subject of reasonableness. This has previously been provided by the Committee, but it is included in Annex A for completeness.

The Branch is a small team which is progressing multiple workstreams as described in our previous response to the Committee; the Branch will deliver greater focus to the area of guidance after the issue of amendments to the Bill. To help with this, the Department is in the process of appointing a Deaf signer and can provide updates to the Committee as work on guidance evolves to hopefully provide the assurances it seeks on the introduction of guidance in a timely fashion.

Costs associated with the Bill (current interpreter costs)

Officials carried out an exercise to quantify costs incurred for the provision of interpreters for BSL and ISL users across public bodies including Executive departments, Health and Social Care, benefits, district councils and other assorted public bodies in 2024/25 financial year. It should be noted that we have used a consolidated figure for all respondents to respect requests for commercial in confidence sensitivities from some of the respondents. The total cost is in the region of £1,419,000 which includes both face to face and remote interpreter support, and in some instances notetaking and lipreading. Although we anticipate an increase in demand for interpreters post enactment, it is difficult to provide an estimate for such an increase with confidence. As a working assumption to allow consideration of budget requirements, and the number of interpreters required, as well as potential translations i.e. written information to BSL and ISL, we have doubled the current cost and rounded the figure up to £3 million.

Draft list of prescribed organisations

Officials have compiled an initial draft list of prescribed organisations for the purposes of the Bill. The list was drafted in consultation with Executive departments which provided lists of the public bodies and ALBs under their respective ambits. It should be noted that the Department must

consult each of the public bodies before making regulations to create or amend this list (all departments must be listed but they do not need to be consulted). Therefore, this list may change subject to that process. The Department is carrying out an additional exercise to confirm the legal name of those organisations listed for the purposes of the final regulations (**Annex B**).

Draft regulations for interpreters

Clause 10 of the Bill refers to regulations to make a scheme for the purpose of the accreditation of BSL and ISL interpreters. Officials have previously advised the Committee that the regulations for the accreditation of interpreters will seek to ensure that interpreters must have membership of a registration body such as the National Register of Communication Professionals working with Deaf and Deafblind People (NRCPD), Scottish Register of Language Professionals with the Deaf Community (SRLPDC) and the Register of Irish Sign Language Interpreters (RISLI).

However, we have been made aware that the BSL Advisory Board, which was established following the BSL Act in 2022 to advise the UK Government on matters of importance to Deaf people, launched its Health and Social Care Report on 27 November. We understand that this report may raise concerns about the self-regulatory nature of some interpreter registration bodies run by interpreters themselves, which may create a potential conflict of interest. Officials will consider the report and its recommendations to give this issue further consideration and will, of course, update the Committee.

I trust this is helpful.

Yours sincerely,



Laura Coffey

Departmental Assembly Liaison Officer
Private Office

Annexes:

Annex A **Best practice in guidance**

Annex B **Draft list of prescribed organisations**

SIGN LANGUAGE BILL - DRAFT GUIDANCE

The Department considers that the Guidance to be issued under clauses 5 and 6 of the Bill will consist of two connected sets of material.

The first of these will be the statutory guidance under clause 6(1)(a), and the second will be a range of best practice material under clauses 6(1)(b). Both of these will be developed in close collaboration with the Deaf community and Departments, working through the Sign Language Partnership Group. Both elements will be subject to consultation with prescribed organisations and the Deaf community as per the requirements of clauses 5(3).

We expect the key areas of the Bill which will be the focus of the guidance under clause 6(1) guidance will be:

- Material on the implications for prescribed organisations of the recognition of BSL and ISL
- The meaning of reasonable steps
- Developing Sign Language Action Plans
- Inputting to and issuing 5-yearly reports
- The meaning of the term 'other suitable persons' in clause 2(2)

We anticipate that the style and content of 6(1)(a) and 6(1)(b) material will be different. We have already provided an example of some draft material on reasonable steps to the Committee, and include it here for ease of reference

Clause 3 Requests for access to services and information through British Sign Language (BSL) and Irish Sign Language (ISL) – considerations for prescribed organisations

It is a key public law principle that a public body cannot act unreasonably in the performance of its public functions. The meaning of "reasonable steps" originates in case law which has established an additional layer of common law oversight for public bodies beyond the ensuring of compliance with a public body's statutory powers. Not only do decisions have to comply with the relevant statutory framework, but decisions must also not be so unreasonable that no reasonable decision-maker could have come to them. For example, is a request from a Deaf signer for a BSL or ISL interpreter reasonable? The answer is yes.

A requirement on a prescribed organisation to undertake "all reasonable steps" will broadly entail it exploring reasonable paths and actions to satisfy the request made by the deaf community without requiring the prescribed organisation to overlook or adversely prejudice its own interests. This is however on the strict proviso that the subject organisation has undertaken "reasonable steps" and ideally (in anticipation of future challenge) fully

documented the steps it has taken, including advising the deaf signer of the reason(s) for refusal and outlining the organisation's appeals or complaints procedures to follow.

The inclusion of the words "affordability" and "practicability" require a prescribed organisation to focus its mind in a particular way, imposing a stronger duty than simply being reasonable as it adds another layer to its decision-making process which in turn is another avenue for potential challenge.

'Practicability' means, when referring to a task, plan or idea as practicable, people are able to carry it out - it is capable of being effected, done or put into practice. For example, has the deaf signer's request for an interpreter for an appointment at short notice failed due to the unavailability of an interpreter.

'Affordability' is not an automatic opt-out for prescribed organisations to deny accessibility to services and information through BSL and ISL. Clause 3 provides a statutory duty that prescribed organisations must take all reasonable steps so as to ensure that information and services provided by the organisation are as accessible to individuals in the deaf community as they are to individuals who are not in the deaf community through the offering or facilitation of the use of BSL and ISL in accessing information and services..

Prescribed organisations should consider the availability of existing contracts or the establishment of pooled resources for economies of scale to provide for such access to services and information.

The potential content of the best practice material includes the sections below. Some of these may sit better as publicly accessible information on websites etc, which is referenced from the guidance. A first draft of material has been developed by the British Deaf Association but needs further refinement.

Deaf Community's Insights

This section will provide an insight to how the Deaf community perceive the Best Practice Guideline and the Sign Language Act.

Inclusive Communication: Action Plan development

A suggested process to ensure an Action Plan is fit for purpose

Communicating with Sign Language Users

Culture and Language

Interpreters/ translators & ways of working

Tips for Communication

Information/Resources

Terminology & Definitions

Statistics

Training

Challenges and Best Practice: Case Studies from Deaf Individuals

2025 No.

SIGN LANGUAGE

Sign Language (Prescribed Organisations) regulations (Northern Ireland) 20XX

Made - - - - *******

Coming into operation *******

The Department for Communities **(a)**, makes the following regulations in exercise of the powers conferred by section 4 of the Sign Language Act (Northern Ireland) 2026 **(b)**

Citation and commencement

1. These Regulations may be cited as the Sign Language (Prescribed Organisations) regulations (Northern Ireland) 2026 and shall come into operation on xxxx

Prescribed organisations

2. The bodies listed in the Schedule are deemed prescribed organisations in accordance with section 4 of the Sign Language Act (Northern Ireland) 2026.

Sealed with the Official Seal of the Department for Communities on xx 2026

(L.S.)

IAIN GREENWAY
A senior officer of the Department for Communities

(a) The Department for Social Development was renamed the Department for Communities in accordance with section 1(7) of the Departments Act (Northern Ireland) 2016 (c. 5 (N.I.))
(b) 2008 c.12 (N.I.)

SCHEDULE

Prescribed organisations

Insert list

NOTE THAT THIS IS A DRAFT LIST WHICH REQUIRES FURTHER REFINEMENT. IT IS PROVIDED TO THE COMMUNITIES COMMITTEE AS A WORK IN PROGRESS

We will also seek to future proof the list where we can, for instance seeing if formulations such as 'All Northern Ireland Departments' and 'All district councils' can be used

The Executive Office
Department of Agriculture, Environment & Rural Affairs
Department for Communities
Department of Education
Department for the Economy
Department of Finance
Department for Infrastructure
Department of Health
Department of Justice

Antrim and Newtownabbey Borough Council
Ards and North Down Borough Council
Armagh City, Banbridge and Craigavon Borough Council
Belfast City Council
Causeway Coast and Glens Borough Council
Derry City and Strabane District Council
Fermanagh and Omagh District Council
Lisburn and Castlereagh City Council
Mid and East Antrim Borough Council
Mid Ulster District Council
Newry, Mourne and Down District Council

The Agricultural Wages Board for Northern Ireland
The Agri-Food Biosciences Institute
Armagh Observatory and Planetarium
Arts Council of NI
Attorney General for NI
Belfast Harbour Commissioners
Belfast Health and Social Care Trust
Belfast Metropolitan College
Business Services Organisation
Catholic Schools' Trustee Service
Charities Commissioner NI
The Children's Court Guardian Agency for Northern Ireland
Civil Service Appeals Board
Comhairle na Gaelscolaíochta

Commission for Victims and Survivors
Commissioner for Older People NI
Commissioner for Public Appointments NI
Commissioner for Survivors of Institutional Childhood Abuse
Commissioner for the Ulster Scots and the Ulster British tradition
Community Relations Council for NI
Construction Industry Training Board–Northern Ireland
Consumer Council for Northern Ireland
Controlled Schools Support Council
Council for Catholic Maintained Schools
The Council for Nature Conservation and the Countryside
Council for the Curriculum, Examinations & Assessment
Criminal Justice Inspection NI
The Drainage Council for NI
Driver and Vehicle Agency
Education Authority
Equality Commission for NI
Fiscal Council
Foras na Gaeilge
Forensic Science NI
General Teaching Council for Northern Ireland
Health and Safety Executive for Northern Ireland
HIA Redress Board
Historic Buildings Council
Historic Monuments Council
InterTradeIreland
Invest Northern Ireland
The Irish Language Commissioner
Labour Relations Agency
Legal Services Agency
Legal Services Oversight Commissioner
Libraries NI
The Livestock and Meat Commission for Northern Ireland
Local Government Staff Commission for NI
Londonderry Port and Harbour Commissioners
The Loughs Agency of the Foyle, Carlingford and Irish Lights Commission
Maze Long Kesh Development Corporation
Middletown Centre for Autism
Ministerial Advisory Group
National Museums NI
NI Building Regulations Advisory Committee
NI Children & Young Persons Commissioner
NI Civil Service Pension Board
NI Forest Service
NI Judicial Appointments Commission
NI Local Government Officers' Superannuation Committee
NI Museums Council
NI Police Fund

NI Policing Board
NI Water
Northern Ireland Transport Holding Company / Translink
Northern Health and Social Care Trust
Northern Ireland Ambulance Service Trust
The Northern Ireland Assembly Commission
Northern Ireland Blood Transfusion Service
Northern Ireland Council for Integrated Education
Northern Ireland Courts & Tribunals Service
The Northern Ireland Environment Agency
Northern Ireland Fire and Rescue Service
The Northern Ireland Fisheries Harbour Authority
Northern Ireland Housing Executive
Northern Ireland Medical Dental Training Agency
Northern Ireland Practice Education Council for Nursing & Midwifery
Northern Ireland Prison Service
Northern Ireland Public Services Ombudsman
Northern Ireland Screen
Northern Ireland Social Care Council
Northern Ireland Tourist Board - trading as Tourism Northern Ireland
Northern Regional College
North West Regional College
The Office of Identity and Cultural Expression
Office of Industrial Tribunal and Fair Employment Tribunal
Office of the Police Ombudsman for Northern Ireland
Open University
Patient and Client Council
Police Rehabilitation and Retraining Trust
Police Service of Northern Ireland
Prisoner Ombudsman for Northern Ireland
Probation for Northern Ireland
Public Health Agency
Queen's University Belfast
Regulation, Quality Improvement Authority
Royal Ulster Constabulary George Cross Foundation
South Eastern Health and Social Care Trust
South Eastern Regional College
South West College
Southern Health and Social Care Trust
Southern Regional College
Special EU Programmes Body
Sport NI
St Mary's University College
Statistics Advisory Committee
Stranmillis University College
Strategic Investment Board
Tourism Ireland
Ulster Supported Employment Limited
Ulster University

Ulster-Scots Agency
Victims and Survivors Service;
Victims' Payments Board
Warrenpoint Harbour Authority
Waterways Ireland
Western Health and Social Care Trust
Youth Justice Agency



**Northern Ireland
Assembly**

COMMITTEE FOR COMMUNITIES

Room 430
Parliament Buildings
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24 November 2025
Our ref: CC/25/401

Laura Coffey
Departmental Assembly Liaison Officer
Department for Communities
Level 9
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Dear Laura

Sign Language Bill Documentation

At its meeting on 20 November, the Committee was briefed by an Assembly Legal Advisor on the Sign Language Bill.

Members agreed that I write to you to ensure that previously requested documentation, which you advised would be with Committee in 4-6 weeks in your briefing and at your appearance at Committee on 23 October, would be with Committee either:

- (a) in advance of your appearance next week (which represents 4 weeks)
- (b) or a week in advance (4 December) of your appearance at Committee on 11 December (representing 6 weeks).

For reference, these documents, as outlined in your written briefing to Committee (Ref: GM 0910-2025) are:

- Draft of co-designed best practice and guidance
- Costs associated with the Bill (current interpreter costs)
- Draft list of prescribed organisations
- Draft regulations for interpreters

You advised that a draft of the updated Sign Language Framework would be provided to Minister by 31 March 2026, and we look forward to receiving this ahead of the public consultation.

I would be grateful for a prompt response regarding whether you intend to submit this information ahead of your appearance on 27 November or 11 December.

Yours sincerely

Emer Boyle

Clerk to the Committee for Communities