

## Response ID ANON-PYJC-FRH4-A

Submitted to Sign Language Bill - Call for Evidence  
Submitted on 2025-05-02 20:42:10

### Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

[REDACTED]

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I have read the privacy notice

Do you consent to your submission being published on the Committee's website and included in the Committee's report?

Yes, publish but with my personal information and any content that could be used to identify me redacted.

### Clause 1

Do you feel Clause 1 goes far enough in formally recognising BSL and ISL as languages of Northern Ireland?

Yes

Please give details to support your answer.

Text box to enter additional details:

It was already formally recognised in 2004, so this clause could provide further information as to why this recognition was not enough and why further legislation is now necessary.

In EFM it states "as known by that name" next to BSL and ISL - no clarity around what that means and so requires further explanation.

### Clause 2

Do you feel Clause 2 goes far enough in promoting the use of BSL and ISL and developing deaf culture?

No

Please give details to support your answer.

Text box for entering additional information:

Although this clause states it is placing a duty on DfC to promote the development of Deaf culture, it then places the responsibility firmly back into the hands of the Deaf community in the 3rd point. This is inadequate as the Deaf community currently does not have a strong enough infrastructure to enable this action, and possibly does not have the wherewithal to be able to take this forward. Although there is a strong 'feeling' of community, the community itself is quite fragmented, which was exacerbated by covid, and rarely has the opportunity to come together as a region, so to expect a fragmented community to come together in this fashion is quite unrealistic. In addition, although covid did provide the opportunity for many members of the Deaf community to become familiar with technology such as zoom, there is remains wide section of the community who remain isolated, and for a variety of reasons do not 'embrace' technology, leading to 'digital exclusion' but these people could have a role to play - most plans, ideas and consultations are conducted by social media, hereby excluding this sector of the Deaf community.

I do want to applaud the DfC for the classes they have funded for families of Deaf children, as this is unique to NI, and very valuable in terms of language acquisition which helps prevent longer-term problems which can occur in education, employment and mental health.

In the EFM it states DfC will promote as "appropriate" - how will the appropriateness be decided and by whom? Will there be consultation around the appropriateness of the promotion, and twill there be consultation around the degree of promotion?

In the EFM it states classes will be taught by "accredited teachers or other suitable persons" - this could be a red flag as who decides whether a person is "suitable"? This is an area where Deaf people (more than one person!) needs to be consulted as there is a high level of knowledge and awareness within the community, and Deaf people are not always outspoken for fear of being brow beaten by other members of the Deaf community who are seen to have a higher standing - we need to prevent a monopoly situation arising as there are people capable of being tutors who currently are being made to feel inadequate. Also, tutors who have been working for years may have a good reason for not having gained professional qualification (which this may be referring to), but there needs to be some sort of monitoring mechanism in place to ensure they are teaching appropriate signs within the correct context etc., have updated knowledge re the culture expected by Signature etc.

I have a slight cynicism that the wording "to improve proficiency" could be manipulated in such a way that hearing non-Deaf family members gain qualifications leading to a level whereby they can become interpreters, bypassing the need to pay to receive such a qualification.

Are there any other approaches (apart from providing for the availability of classes) that could help to meet the objective of the greater use and understanding of BSL and ISL?

Yes

Please give details to support your answer.

Text box to enter additional details:

This is linked to classes, but not in the way indicated above:

There is currently a monopoly on sign language courses in NI, with many potential students only having one tutor available to them. More encouragement needs to be given to potential Deaf tutors, and not purely in the form of funding.

I will go into greater detail under the tutor section, but my main point is that although I agree BSL/ISL is better taught face-to-face, there needs to be more online options available for potential students. It could be a course delivered 90% online, and 10% in person, and this would be more attractive to both students and tutors - for logistical reasons (time, location etc) as well as choice.

[REDACTED] have Deaf family members [REDACTED] not covered by this provision, but obviously wish to communicate with my family. They have all self-funded, and have passed their Level 2 and/or 3 and wish to proceed to the next level but are currently unable to do so, due to the factors listed above ie they have been taught by a variety of tutors and have seen the difference in quality and commitment. If they wish to progress, they know specifically who they do NOT want to teach them, but if they wish to avail of a different tutor they would need to travel for approx. 1 hour and this would not allow them to arrive on time to the class due to work commitments. An online provision would allow them the opportunity for further study, and this would improve their skills, allowing them more free and direct communication with their family.

To clarify, online tuition should not only be available for the family of CODA's but for everyone, as I know of others who were in their class who faced the same dilemma - I was demonstrating how online courses could "help to meet the objective of the greater use and understanding of BSL and ISL".

### Clause 3

Do you think the duty placed on prescribed organisations to make the information and services accessible to members of the deaf community is sufficient?

No

Please give details to support your answer.

Text box for entering additional information:

There needs to be greater clarity around "accessible", as this can be interpreted in a variety of ways. For example, an organisation may actually make the effort to provide their information in an "accessible" format, but the translation itself must be easily accessible - if it requires navigation through a convoluted path of several links and pages, this is not accessible given that these links and paths will be in written English which is not a Deaf persons 1st language.

Deaf people are unaccustomed to organisations making their information accessible, and so an onus should be placed on the organisation to promote and advertise the steps they have taken, and where the information can be found.

Deaf people need to be included in the discussion around what needs to be accessible, and it must be meaningful discussion ie not asking 1 Deaf person their thoughts, as this would not be representative of the views of the Deaf community as a whole.

In relation to the 2nd point, there needs to be very clear and detailed guidelines around this - it is not enough to say "book a qualified interpreter/note-taker" etc. It is vital that organisations realise the importance of taking responsibility for this, [REDACTED]

[REDACTED] I know of many CODA's who agree to interpreter because they have been asked and it is the easiest option - this is neither ethical nor appropriate, and organisations need to be made aware that it is their responsibility to learn and follow the appropriate protocol.

It is vital that robust monitoring measures set in place around the provision of communication support (not just BSL/ISL provision). Questions need to be asked around:

1. when/how were you made aware that Communication Support was required
2. when did you formally request communication support be put in place
3. If communication support was unavailable, what alternative arrangements were offered (rather than the appointment proceeding without communication support)

And statistical reports need to be provided to reflect the outcomes.

Too often requests are made with inadequate notice given, therefore communication support is not available. There should always be an offer to rearrange so that information is fully accessible, and clear accountability provided ie inadequate time, potential consequences etc. This is vital as it often leads to the blame being laid at the doors of interpreters when this is not the case.

## Clause 4

Do you support the approach taken by Clause 4?

No

Please give details to support your answer.

Text box for entering additional information:

Whilst it is useful to have a list of prescribed organisations that are subject to the duties, it highlights the fact that areas in which Deaf people have been struggling for years will continue to be struggle - namely those services provided by non-public bodies.

It will be beneficial to know which organisations are specifically covered, but as this legislation actually has no power ie people cannot be taken to court for not following it, things may not change much. HSC are aware of their duties and obligations, but this knowledge does not filter down and the same barriers still exist for Deaf people. Having this legislation will not change anything, as it does not give legal footing with which to 'fight back' - there appear to be no penalties for not adhering to this legislation, so Deaf people will still be dependent on disability legislation.

Some public bodies outsource functions to private sector organisations, so is there the potential for private bodies to be included? If private bodies refuse to do so, and potentially refuse to carry out these functions (citing affordability, resources etc), this could lead to public bodies lobbying to have their names removed from the list citing this as a reason, and the list could soon become defunct.

Deaf people I speak with would consistently say it is the private sector which is notoriously difficult to access eg solicitors, counselling via charities, leisure activities (such as hairdresser, personal trainer) etc unless they are willing, and knowledgeable enough to be able to challenge this. Inevitably this ends with defeat as they meet the claim lack of appropriate funding/budget to cover interpreting costs.

██████████ it is typically the weddings and funerals which are most difficult to charge for - how do you tell someone they have to pay to understand the minister detailing their vows, or talking about their deceased loved one? ██████████ never charged for a funeral ██████████ it too ethically difficult to discuss money at such a time, ██████████

None of the above situations will be alleviated by the Bill.

## Clause 5

Do you support the approach to consultation required in Clause 5?

No

Please give details to support your answer.

Text box for entering additional information:

"At least one person" is a definite red flag to me.

Any consultation which impacts the Deaf community must be meaningful, and this level of consultation would not be meaningful! ██████████ ██████████ Deaf user does not actually use their services (ie communication support) - how is this meaningful? It is a purely tokenistic gesture, ██████████ does not have lived experience of the barriers the majority of Deaf people face. Many "Deaf professionals" do not use interpreters in health settings due their concerns around confidentiality linked to their 'role' in the Deaf community - this is understandable but results in the ethics of interpreters being called into questions (what about their Code of Conduct? Does it mean nothing?); and actually breaches trust policy as family members are not permitted to interpret, but the health professionals will rarely query this and therefore allow the breach to happen, especially when it makes their life easier.

The 2nd point may be referring to the SLPG, and Deaf members who participate. This, again, would be mostly tokenistic. It would appear that many of the Deaf organisations participating represent the views of their organisation firstly, and then the views of their members. And the member views would be those that are easiest to gather, such as those contactable by social media (excluding those who can't/don't want to be on social media), and those who

speak loudest. The quieter, less confident members of the Deaf community, those who live rurally, those who are older, or more isolated will be less likely to be represented by those representing Deaf organisations as they are more difficult to reach, but potentially are those who would benefit most by this Bill. Any Deaf organisation will request additional resources (namely funding) as they are limited by what they can provide with already stretched resources if they truly aim to consult meaningfully; so this will rarely occur, only when it is a policy which is going to be in the public view (ie Deaf people will become aware of it!). DfC have stated they plan to invite individuals onto SLPG, but again they must be appropriate, and not invited purely because they are in the 'spotlight' in the Deaf community - such individuals come with their own agenda, and are very happy to attempt to control the narrative to ensure their own goals are achieved. They may state that they are representing the Deaf community after consulting with them, but historically have chosen to consult those who hold the same views, thus supporting their chosen narrative.

There is apparently a lack of trust for SLPG within the Deaf community, as typically the Deaf organisations participating are the same organisations which have previously received funding through the SLPG (and continue to do so).

## Clause 6

Do you support the approach taken in this clause?

No

Please give details to support your answer.

Text box for entering additional information:

It is a good 1st step in educating the prescribed organisations, but without sight of these guidelines prior to publication, it is difficult to judge how effective they will be.

Will they detail the need to allow sufficient time to source communication support?

Will they detail the need to allow for an event to be rescheduled if appropriate communication support cannot be sourced?

Who decides "reasonable"? One person? A team? Will the team include a Deaf person?

Will they contain 'reasonable' consequences if these 'reasonable steps' aren't adhered to?

What happens when action plans are not actioned? What are the consequences? "Naming and shaming" is inadequate, as who will name them, where will they be named, will it actually shame them or will everything carry on as usual with no actual changes due to no tangible consequences? Will there be a way for the Deaf community to challenge or report those who don't follow these guidelines?

In the new era of online communication, such as VRS/VRI it should be made clear that this is not suitable, nor appropriate for everyone, and should not be relied upon as the main type of communication support. If a Deaf person takes the initiative in indicating a willingness to communicate via this method, and not because it is presented as the only, or preferable option, then this is fine; but it most definitely is not going to suit everyone.

Do you feel there is anything else this Clause should include?

Yes

Please give details to support your answer.

Text box to enter additional details:

Reassurance that the guidelines will be consulted on by the Deaf community prior to publication. It was stated in a recent DfC communities livestream during a Call for Evidence that this publication will come from a Deaf organisation - has this organisation consulted with its members regarding what should be contained within the guidelines? Bearing in mind the majority of Deaf professionals (ie those working within the Deaf organisations) are not direct users of this service, and so may not have the same experiences as grass-roots Deaf people, this would be imperative.

It should detail the consequences of not complying. In Clause 5 it stated the organisations needed to "have regard" to the guidance, so I would expect the guidance to explain potential consequences of non-compliance. This could be in terms of the impact this will have on the Deaf person (as they are human and not just a name or statistic), but also for their organisation. This is where the Bill falls short as it doesn't have rights attached to the languages it claims to be protecting, and this guidance will highlight that. So the guidance could essentially become another piece of information circulated through the Civil Service that is left to gather dust on a shelf (or be put in a folder on a computer to be looked at later).

## Clause 7

Do you support the provision for the Department for Communities to make regulations detailed in Clause 7?

No

Please give details to support your answer.

Text box for entering additional information:

There is no explanation as to what this "different form of law" is, and what consequences are attached to them for noncompliance. What level of impact assessment will be attached to these regulations and/or subsequent changes. Will there be any monitoring and evaluation related to the outcomes of these new or changed regulations? The great hope is that these regulations will have enforcement potential ie they cannot be ignored or there will be consequences. Without this potential for enforcement or sanctions, the Bill will become meaningless, as the power should lie in the Act being passed and

accepted by all Departments. DfC will have the power, but in reality this could change in accordance with whichever political party is in power, and change along with the staff within the Sign Language Team. [REDACTED] is the person with the fullest understanding and experience, but when [REDACTED] moves on there is the potential for this clause to be manipulated and maybe even cause the Bill to become meaningless. This clause could be extremely meaningful - creating budgets, resources, rights etc - or detrimental - leaving the Bill as it stands, resulting no real change for the Deaf community.

A further concern would be around DfC's ability/power to "assign responsibilities to public bodies, charities, or groups working with the deaf community". It does later mention that DfC can "limit or adjust requirements for certain organisations based on their resources", but there would be a concern around how these responsibilities are to be allocated - for example, if a specific piece of work needs to be carried out will this be tendered, or just allocated to the organisation DfC feels is most appropriate? If the organisation can't perform a task based on their resources, will they subsequently receive funding to enable this? Which would then be favourable treatment over other organisations, or even individuals who may have been keen for an opportunity. If DfC assigns responsibility and a group doesn't want this responsibility, are they in a position to refuse?

Much more clarity and detail required, as we cannot be left hoping for what these regulations could cover.

Do you support the approach to consultation detailed in Clause 7?

No

Please give details to support your answer.

Text box to enter additional details:

Consultation with the Deaf community is only mentioned in relation to making changes (3rd paragraph), and does not mention consultation in relation to creating new legislation, which is a huge red flag. It even states that DfC will "make provision" in "the interests of the Deaf community, as the Department considers appropriate" in 7 (1) - without consultation?? The Deaf community are living in hope the regulations will supply what is missing in the Bill, but if the regulations do not have to be consulted upon in the first instance, this is a vain hope! It does state in Clause 8 that draft regulations must be consulted upon, but why isn't this included in Clause 7, as it makes it appear to be an afterthought, and it mentioning the potential for it to be with one person highlights how minimal or tokenistic it could potentially be. Meaningful, transparent consultation should be built in at every stage of the process, and stated clearly so it cannot be missed.

Another concern would be around the level of consultation as it is not specified within this clause. As stated in previous comments, it would need to be meaningful and not tokenistic (ie not just the SLPG as they will have their own agenda).

This Bill as it stands is being presented to the Deaf community as the only way to ensure it passes through the Assembly ie if the Deaf community fight for specific items (such as education) to be specifically mentioned, it will hold the Bill up as then there will be arguments and it will never be passed. The Deaf community are being assured that the regulations will achieve everything they raised through the roadshows and previous discussions. Without sight of these regulations, it is impossible to know if Deaf people's needs will ever be met - and for this to be left in the hands of a very small team (which will change due to retirement and temporary promotions) which is controlled by whichever political party is in power is extremely irresponsible, especially as they hold the power to ensure consultation is not rigorous enough given the potential consequences.

## Clause 8

Do you feel the level of consultation required in Clause 8 is sufficient?

No

Please give details to support your answer.

Text box for entering additional information:

Same concerns as with Clause 5, so have cut and paste the relevant part:

"At least one person" is a definite red flag to me.

Any consultation which impacts the Deaf community must be meaningful, and this level of consultation would not be meaningful! [REDACTED] Deaf user does not actually use their services - how is this meaningful? It is a purely tokenistic gesture, [REDACTED] does not have lived experience of the barriers the majority of Deaf people face. Many "Deaf professionals" do not use interpreters in health settings due their concerns around confidentiality linked to their 'role' in the Deaf community - this is understandable but results in the ethics of interpreters being called into questions (what about their Code of Conduct? Does it mean nothing?); but actually breaches trust policy as family members are not permitted to interpret, but the professionals will rarely query this and therefore allow the breach to happen, especially when it makes their life easier.

This may be referring to the SLPG, and Deaf members who participate. This, again, would be mostly tokenistic. It would appear that many of the Deaf organisations participating represent the views of their organisation firstly, and then the views of their members. And the member views would be those that it is easiest to consult with, such as those contactable by social media (excluding those who can't/don't want to be on social media), and those who speak loudest. The quieter, less confident members of the Deaf community, those who live rurally, those who are older, or more isolated will be less likely to be represented by those representing Deaf organisations as they are more difficult to reach. Any Deaf organisation will request additional resources (namely funding) as they are limited by what they can provide with already stretched resources if they truly aims to consult meaningfully; so this will rarely occur, only when it is a policy which is going to be in the public view (ie Deaf people will become aware of it!). DfC have stated they plan to invite individuals onto SLPG, but again they must be appropriate, and not invited purely because they are in the 'spotlight' in the Deaf community - such

individuals come with their own agenda, and are very happy to attempt to control the narrative to ensure their own goals are achieved. They may state that they are representing the Deaf community after consulting with them, but historically have chosen to consult those who hold the same views, thus supporting their chosen narrative.

There is a lack of trust for SLPG within the Deaf community, as typically the Deaf organisations participating are the same organisations which have previously received funding through the SLPG (and continue to do so)."

There is too much riding on these regulations for consultation to be so tokenistic.

## Clause 9

Do you think evaluating the impact of the Bill in a report every five years is an appropriate length of time?

No

Please give details to support your answer.

Text box for entering additional information:

This does not specify who the report will be submitted to, and who will/can have sight of it. It additionally does not state what level of detail will be required - it is essential these are quantitative as well as qualitative, and will need to demonstrate details such as I outlined in Clause 3 ("It is vital that robust monitoring measures set in place around the provision of communication support (not just BSL/ISL provision). Questions need to be asked around:

1. when/how were you made aware that Communication Support was required
2. when did you formally request communication support be put in place
3. If communication support was unavailable, what alternative arrangements were offered (rather than the appointment proceeding without communication support)

And statistical reports need to be provided to reflect the outcomes...")

Five years is too long to wait and see if it is being implemented, and if there proves to have been issues resulting in delays, to wait another 5 years (or even the 3 years I've heard this will be changed to) before preparing another report could result in a wait of 8-10 years before any tangible results are achieved.

Five years could seem to be an appropriate time to provide a full report when compared to the BSL Act in Scotland, as it could be stated that time is needed to allow for plans to be drawn up after meaningful consultation takes place and for actions to be implemented, but that Act followed a different route to implementation. This Bill has been in the pipeline for almost 10 years (originally consulted on in 2016), so this Bill is not a surprise - departments have already had a considerable amount of time to contemplate their next steps, as they have had representatives on the SLPG since it was established 2004/05. The Bill will not happen overnight, but 5 years seems generous, so potentially three years could be considered, with shorted periods of time after - potentially 18 months to 2 years. There would need to be an additional system of annual interim reports submitted to an authority that has the power to challenge any delays which cannot be fully justified, and appropriate Deaf community representatives need to be involved at this level.

## Clause 10

Do you support the creation of a scheme for accrediting BSL and ISL teachers?

Yes

Please give details to support your answer.

Text box for entering additional information:

There is nothing in place in Northern Ireland, but before accreditation scheme can be established, a basic infrastructure needs to be created to support BSL and ISL teachers in working towards accreditation.

More encouragement needs to be given to potential Deaf tutors, and not purely in the form of funding. As teaching standards and accreditation have changed over the years, to ensure they are in line with the standards that would be expected of any language qualification, many Deaf people have been put off by the amount of written paperwork which is required. English is a 2nd or 3rd language to most Deaf people, and support needs to be provided to ensure Deaf people understand the actual paperwork, and then guidance on how to ensure their students achieve the required elements as stated and required by the associated paperwork.

As stated previously, there is currently a monopoly on BSL courses provided to the community, and although students look for a variety of tutors at a higher level, they are very restricted.

I have been told of a general reluctance to teach at the higher levels (Level 3-Level 6), both because of the English-based paperwork, but additionally due to the lack of appropriate role models (teachers working at an appropriate standard) to shadow and learn from.

Interpreters have traditionally had funding provided to enable them to achieve a professional qualification. Consideration must be given to a similar scheme enabling and supporting BSL and ISL tutors. Interpreters have previously been funded to attend a course in the UK, but it would be more efficient to have a rota of qualified, experienced tutors organise residential weekends in NI, where teaching and support can be provided, along with ideas around

resources, sharing of strategies, and potentially shadowing and observation opportunities. This could aid in establishing a support network, both nationally and locally, and provide reassurance to local tutors that they are on a par with other tutors and so deserve a national accreditation. Accreditation pathways could be discussed as an integral element of the training, forming the necessary consultation required and providing a basis to work forward.

In time, this should not be maintained by the government, but by an independent regulatory organisation, and a fee levied (similar to the current interpreter system).

Do you support the creation of a scheme for accrediting BSL and ISL interpreters?

No

Please give details to support your answer.

Text box to enter additional details:

NRCPD already provide accreditation, so there is no need to duplicate the wheel and confuse matters, especially when many interpreters work nationally with the advent of online working.

If required due to local legislation being formed, it should be that once accredited with NRCPD, this leads to an automatic accreditation locally. If this were to occur, one thing which is very lacking within the current accreditation system is the requirement for mandatory observations to be carried out on an annual basis. Many years ago, when RNID were the only agency and supplied the vast majority of the interpreting support across NI, they employed a Senior Interpreter, and one of their roles was to carry out an observation (within an appropriate setting) for all interpreters (both staff and freelance) and provide written feedback afterwards. This pointed out where areas where improvement may be required and offered solutions such as CPD or training events, or could state if there were strengths indicating the interpreter may be suitable for specialised domains such as legal or mental health. Since this role no longer exists, once an interpreter becomes qualified there are no such opportunities unless a supervisor or mentor is approached. This can be problematic as then it can be difficult to arrange for observation to take place as agencies, funders/suppliers, and both Deaf and non-Deaf participants need to be approached for permission, leading for this to be a very rare occurrence. If a local scheme were to be established providing this service, this could vastly improve the interpreting service provided on a number of levels.

## Clause 11

Do you agree with the definition of the deaf community provided for in the Bill?

Yes

Please give details to support your answer. Please outline what people or groups you think should be included or excluded and why.

Text box for entering additional information:

I agree with the definitions provided in a, b and c but have no understanding of what is meant by the final paragraph. It is impossible to agree with this, when no explanation or example is provided.

## Clause 12

Do you agree with the definition of BSL and ISL provided for in the Bill?

Yes

Please give details to support your answer. If you think there are any aspects missing, please outline what you think should be included.

Text box for entering additional information:

## Clause 13

Do you agree with the definition of "everyday reliance" provided in the Bill?

Yes

Please give details to support your answer. If you think there are any aspects missing, please outline what you think should be included.

Text box for entering additional information:

I agree with the words 'everyday reliance' as it shows that BSL and ISL are usually not used by choice but through necessity - sign language users are reliant on it.

## Any other comments

Is there anything which you expected the Bill to make provision for which has not been included in the Bill?

Yes

Please give details to support your answer.

Text box to enter additional details:

When the Framework was consulted on in 2016 the Deaf community were asked to feed back their priorities, and there were high levels of feedback. I have heard that it was proportionately high for any consultation, but exceptionally high for Deaf people to feed back at the level they did. I applaud DfC (DCAL) for ensuring an accessible means of consultation, ensuring Deaf people could feed back in sign language, and they were keen to use this opportunity.

I don't feel this Bill reflects the discussions which took place, or the expected outcomes of those discussions. Deaf people were passionate and shared deeply personal stories of lived experiences, and they were promised they would be listened to.

This Bill is being presented to the Deaf community as if the only way to ensure it passes through the Assembly is to leave it as it stands ie if the Deaf community fight for specific items (such as education) to be specifically mentioned, it will hold the Bill up as then there will be arguments and it will never be passed. The Deaf community are being assured that the regulations will achieve everything they previously raised through the roadshows and previous discussions. Without sight of these regulations, it is impossible to know if Deaf people's needs will ever be met - and for this to be left in the hands of a very small team (which will change due to retirement and temporary promotions) which is controlled by whichever political party is in power is extremely irresponsible, especially as they hold the power to ensure consultation is not rigorous enough or is purely tokenistic, given the potential consequences.

As it stands the Bill is too vague with too much reliance on the regulations, and too much reliance on [REDACTED] DfC, the Assembly, and many key stakeholders, including the Deaf community, are relying on [REDACTED]'s experience and knowledge to create appropriate regulation, and if [REDACTED] remains this could be effective. There is confidence from the Deaf community that [REDACTED] would use the Henry VIII powers to ensure certain departments, such as Education, implement tangible changes which will have tangible consequences in all areas of Deaf people's lives, but if [REDACTED] moves on or retires (which is likely given how long it has taken to get to this stage and the regulations needing developed), then there is little recourse for the Deaf community, and no way to fight for appropriate regulations (to support what they were fighting for) to be created - thus Deaf people will be rendered powerless once again.

If you have any other comments in relation to the Bill please tell us here.

Text box to enter additional details:

It is much too vague to make an impact as it stands.

Deaf people were very passionate about many aspects which were reflected in the Framework consultation, and this is a vastly watered-down and powerless document as it stands.

I don't remember all the points highlighted, but I KNOW education is something that needs an overhaul, and that an early years pathway designed to give deaf babies access to sign language in the home needs to be developed as a matter of urgency. Language deprivation amongst Deaf people is specifically researched because it is only now becoming known to be a reality - it very rarely occurs in non-Deaf families - but nothing is done and the impacts throughout life are huge. [REDACTED] I have real-life experience of this, and I cannot stress enough how urgent this is.

The health service and their contract is held up as a shining example to other govt depts to aspire to, but [REDACTED] I have seen little proof of this unless I have fought - and I mean fought - for [REDACTED] right to an interpreter. On the rare occasion I have been successful, it has usually because I have threatened formal complaints and litigation, and this is only because [REDACTED] and have knowledge of the system. [REDACTED] [REDACTED] at times I have had a literal queue of Deaf people asking advice on how to achieve something health-related [REDACTED] I have resorted to turning my mobile phone off at night due to phone calls from Deaf people asking similar questions. This is not a system which is working, especially for the older, more vulnerable Deaf community.

There are some fabulous social workers who create initiatives to support their clients, especially those who are isolated, and then cuts are made and these clients are left in a worse situation than before. I feel so sorry for these social workers who have seen the positive impact and outcomes and are then left to tell their clients that they can no longer avail of this service - it is very demoralising for everyone.

I am not saying there is an easy answer, but as it stands, I have no faith that this Bill will resolve any of these issues, and I am greatly saddened and disheartened by what I have read.