

Response ID ANON-PYJC-FRHD-T

Submitted to Sign Language Bill - Call for Evidence
Submitted on 2025-05-09 23:57:18

Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

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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:

Clause 1 is a step forward in acknowledging BSL and ISL in law, giving both equal recognition. However, this symbolic recognition does not create any rights or duties, so its impact is limited unless supported by the other clauses that follow. It sets the tone, but real change depends on implementation elsewhere in the Bill.

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:

The Department is given wide discretion ("to such extent (and in such manner) as it considers appropriate"), creating ambiguity and risking weak implementation. Without minimum standards, timelines, and accountability, the duty may become symbolic.

There is little detail on funding, resources, or monitoring. Real promotion requires measurable outcomes and regular review to avoid tokenism.

The term "other suitable persons" alongside accredited teachers is unclear. Teaching BSL/ISL, especially to families and children, must be quality-assured and regulated.

Restricting class provision to under-19s excludes adult family members, carers, and hearing allies - undermining family communication and inclusion.

Promotion cannot rely solely on formal classes. [REDACTED] I remember deaf hubs in NI where language, culture, and community thrived naturally. These spaces are now absent. Despite holding Level 1 BSL and strong community ties, opportunities for natural use and learning have declined. Deaf youth are particularly affected. Community-led hubs must be supported to ensure BSL/ISL promotion is practical, not theoretical.

The Bill must also address education. Jordanstown School has very few deaf teachers despite availability. This weakens cultural identity and limits role models. A teacher merely "knowing BSL" is not enough. Deaf schools must follow criteria reflecting cultural and linguistic needs.

Recruiters must be trained to understand deaf learners' needs. Currently, key decision-makers often lack real-world insight into deaf education, risking poor appointments and harming long-term development.

The Department should consult the deaf community and experts to develop inclusive recruitment standards.

Sign language access must be embedded in early years pathways - such as audiology, newborn hearing screening, and health visiting which currently reflect a medical model. Spoken language is often prioritised while sign language is delayed or discouraged.

This risks language deprivation even when deafness is known. Sign language should be offered immediately as a primary and equal option - not as a fallback. Early sign exposure aligns with best practice and child development research. Guidance must treat BSL/ISL as a natural and essential first language.

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:

While classes are essential, they are not enough to achieve greater use and understanding of BSL and ISL. Other approaches must include support for deaf community hubs, where deaf and hearing people can naturally interact using sign language. These hubs would provide opportunities for informal learning, social connection, cultural events, and allow natural language development beyond formal education.

Public awareness campaigns should be used to increase understanding of BSL/ISL and deaf culture among the wider public, reduce stigma, and promote positive attitudes towards sign language users.

Integration of BSL/ISL into public services and workplaces is key. Public bodies and employers should offer staff training and normalise the use of sign language in customer and public interactions, not just as an adjustment but as standard practice.

Community-based learning opportunities such as workshops, family-friendly sessions, and peer-to-peer learning networks should be developed to meet the needs of different age groups and abilities.

Digital and media access is vital, including supporting BSL/ISL content on online platforms, in government communications, and mainstream media to increase visibility and normalisation.

Finally, promotion strategies must be community-led. The deaf community should be fully involved in planning and delivering these approaches to ensure they are responsive to real needs and preferences.

It is my belief that the deaf community should be fully involved in the planning and delivering of these approaches.

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:

The "reasonable steps" requirement is unique within UK sign language legislation and marks progress towards enforceable duties. The guarantee that access must come at no extra cost to deaf individuals strengthens this further, exceeding what is currently offered under the DDA 1995.

However, there are key concerns. The affordability and practicability wording give public bodies too much discretion. Without clearer minimum standards or benchmarks, "reasonable steps" could be interpreted narrowly or inconsistently, risking only minimal compliance.

Other UK laws, such as section 109 of the Equality Act 2010, show that "reasonable steps" should mean proactive actions: policies, staff training, complaint systems, and enforcement. Similar expectations must apply here, or the duty risks becoming symbolic rather than practical. These 'reasonable steps' should also be linked to minimum standards that should be met in guidance or regulation.

The Bill also does not define what "access" really means. Does it include full participation, the provision of interpreters, accessible formats, or culturally appropriate services? This ambiguity should be addressed through clearer Clause 5 guidance.

There is no requirement for prescribed organisations to consult the deaf community about what reasonable access should look like. Access must reflect real-world needs and lived experience—not assumptions made by public bodies.

Crucially, there is no enforcement or reporting mechanism. Without accountability, some organisations could fail to meet their duties with no consequences.

As I highlighted in my Clause 2 response, deaf community hubs could support organisations by providing training, cultural advice, and helping to define "reasonable access" in practice. This would improve consistency and accountability across the public sector.

Finally, the lack of sufficient access to services currently places an unrealistic burden on hearing children of deaf adults (CODAs), who are often forced to act as interpreters from a young age. This should never happen. Affordability must not be used as an excuse to continue this unacceptable practice.

Any "reasonable steps" duty must be linked to the requirement for sign language action plans (Clause 6) to ensure consistency and to monitor progress across all prescribed organisations. Deaf community consultation must be built into the planning stage of accessibility measures.

Clause 3 duties should apply to not-only to in-person services, but also digital and remote service provision.

Clause 4

Do you support the approach taken by Clause 4?

Yes

Please give details to support your answer.

Text box for entering additional information:

Clause 4 does not require consultation with the deaf community before changes are made. Community input is essential to ensure that all relevant bodies are covered and that access decisions reflect the needs of the deaf community and lived experience. Consultation with deaf-led organisations should be required before any changes are made.

Finally, the Bill does not set out any clear criteria for how the Department will decide which bodies to include or remove, and for determining which organisations should be prescribed. Without this, the list may lack consistency or omit important public bodies.

Alongside periodic reviews of the bill in general - periodic reviews of the prescribed list could be beneficial to maintain the relevance, especially in today's rapidly changing society.

If criteria isn't transparent, there is a risk of omitting key services such as education, healthcare or the justice system.

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:

While the duty for the Department to issue, consult on, review, and publish guidance is positive, the scope of consultation is too narrow and may not provide adequate representation. Requiring consultation with only "at least one person or group" acting on behalf of the deaf community is insufficient. The deaf community in Northern Ireland is diverse, with varying experiences across regions, languages (BSL and ISL), ages, and cultural backgrounds.

This approach does not meet the standards of Article 4(3) of the UN Convention on the Rights of Persons with Disabilities (UNCPRD), which requires governments to consult and actively involve disabled people, including children, through their representative organisations in the development and implementation of laws and policies. Limiting consultation to one group or person risks tokenism and excludes wider community input.

A possible replacement could be "a representative cross-section of deaf-led organisations" to meet UNCPRD standards, instead of 'one person or group'.

The guidance itself will not be legally binding and will rely heavily on political will and community pressure to be implemented. Without clear mechanisms for monitoring and accountability, there is a risk that guidance may be ignored or inconsistently applied by prescribed organisations.

Regional, linguistic (BSL/ISL), and generational diversity must be reflected in the consultation process.

The phrase "as the Department considers appropriate" gives the Department wide discretion, which could further weaken the practical impact of the consultation and guidance process.

Finally, penalties or enforcement mechanisms should be considered if prescribed organisations fail to comply with the guidance or consultation duties. Clearer minimum standards and broader, meaningful consultation are essential.

Clause 6

Do you support the approach taken in this clause?

Yes

Please give details to support your answer.

Text box for entering additional information:

Clause 6 sets out the need for guidance on reasonable steps, action plans, and best practices. This is essential to help prescribed organisations interpret and meet their duties. However, the clause is significantly weakened by the non-binding nature of the guidance.

Without any enforcement mechanism, reporting requirement, or independent oversight, there is a risk that the guidance will be ignored, inconsistently applied, or treated as optional. The impact of this clause therefore depends entirely on how rigorously it is developed, implemented, and monitored.

To be effective:

- The guidance must be co-produced with deaf-led organisations.
- There must be clarity about what constitutes compliance.
- Monitoring and accountability structures are needed.
- Organisations should be required to report on implementation.

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:

The clause should explicitly require that guidance is co-produced with deaf-led organisations, in line with Article 4.3 of the UNCRPD (as also mentioned by the BDA in their in-person Call for Evidence). Without this, guidance risks lacking legitimacy or cultural relevance.

There is no requirement for organisations to report on how they apply the guidance. A duty to review and publish compliance—alongside independent oversight—would increase transparency and impact.

The clause should require regular review of the guidance (e.g. every 3–5 years) to ensure it remains current and reflects technological, linguistic, and societal changes.

The guidance should be required to set out core minimum expectations (e.g. for interpreter access, training etc). for all prescribed organisations. Without this, standards will vary widely.

The phrase “advice on best practice” has a potential to be too weak. The clause should be revised to indicate that best practice is expected to be followed unless a clear, justified reason is provided.

If guidance is systematically ignored, there should be recourse to corrective action or sanctions. The Bill should link guidance with obligations under Clause 3 and any future regulations under Clause 7.

Can there be a duty to review and update guidance every 3–5 years to ensure relevance?

Possible corrective mechanisms to avoid passive disregard?

Clause 7

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

Yes

Please give details to support your answer.

Text box for entering additional information:

Yes, the flexibility offered by Clause 7 is important. It allows the Department to introduce regulations when new needs arise or when further detail is required to support the Act.

However, I think the Bill should include some requirement for the Department to conduct a formal review of whether regulations are necessary within a defined timeframe—such as 18 or 24 months from commencement.

Following this review, the Department should be required to publish a statement to the Assembly outlining:

Whether it plans to introduce regulations,
What issues they would cover,

If no regulations are planned, why not.

This would ensure transparency, prevent drift, and provide a basis for public and community accountability.

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

Yes

Please give details to support your answer.

Text box to enter additional details:

Consultation is welcome, but the standard set—"any person or group appearing to be acting on behalf of the deaf community"- remains too low. This language risks tokenism and lacks safeguards to ensure wide, representative, and UNCRPD-compliant engagement.

Consultation must go beyond a single group or individual and reflect the diversity of the deaf community across Northern Ireland, including different regions, language users (BSL and ISL), and lived experiences (e.g., CODAs, deafblind people, sign language users with additional disabilities). Deaf-led organisations must lead or co-lead consultation processes.

Clear timelines, public reporting of responses, and explanations of how views were incorporated would strengthen confidence and transparency.

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:

"At least one person or group" is far too narrow to reflect the diversity, regional spread, and lived experience of the deaf community in Northern Ireland. Effective consultation must be inclusive, involving multiple representative organisations, as defined by the UNCRPD, including those led by deaf signers and covering both BSL and ISL communities.

The clause lacks detail about how consultation will be conducted. It should require that consultation processes are transparent, accessible in BSL and ISL, and allow for a public record of responses and how they were considered.

Assembly approval provides a layer of oversight, but in practice may be a soft check unless the draft regulations are fully scrutinised with input from deaf organisations. Without robust consultation, even well-meaning regulations risk being misaligned with community needs.

To improve on this, a few things:

- Replace "at least one person or group" with "a broad and representative range of deaf-led organisations and stakeholders."
- Include a requirement for publishing a summary of consultation responses and how they informed the regulations.
- Mandate accessible formats and timelines for responses in both BSL and ISL.

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:

While statutory reporting is welcome, five years between reports could result in lost momentum and limited oversight. An initial report within two or three years (or even sooner) is more appropriate, followed by five-year cycles.

There is no requirement for what the report must include, how it will be evaluated, or whether there will be follow-up. Without these, reports risk becoming box-ticking exercises.

Deaf-led organisations should be involved in the reporting process to ensure it reflects lived experience. Reports should include data on implementation, accessibility outcomes, education, interpreter provision, and community feedback - not just departmental summaries. Possibility for deaf-led organisations to co-produce report for legitimacy, and for understanding better the needs of the deaf community and sign language users.

Reports should also trigger scrutiny by the Assembly and invite public feedback to support ongoing progress.

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:

Yes, I support the creation of an accreditation scheme for BSL and ISL teachers - but only if it is robust, community-informed, and properly resourced. There is strong potential to raise the quality and consistency of BSL and ISL teaching across Northern Ireland.

Points to consider to improve on the proposed scheme for accrediting BSL and ISL teachers:

- Must actively support deaf applicants to become accredited teachers. The process must not privilege hearing teachers who only have basic BSL skills over culturally fluent deaf signers.
- Cultural and linguistic immersion is critical, especially for deaf children. Teachers should ideally be embedded in the deaf community to provide a culturally rich learning environment.
- Criteria must be clear and inclusive, ensuring that experienced but informally trained deaf tutors aren't excluded from accreditation without access to upskilling pathways.
- Early-years deaf education needs targeted standards. BSL/ISL teachers working with young children and families should meet specialised criteria aligned with language acquisition needs.
- Teacher supply may be an issue. The Department should assess whether enough qualified candidates exist and invest in training and development to meet demand.
- Multiple accreditation tracks may be needed, distinguishing between:
 - Teachers in formal education settings
 - Community-based tutors
 - Family support/early-years sign language educators
- Clear progression routes should be offered, enabling aspiring BSL/ISL teachers to move from entry-level to full accreditation.
- Regular review of the accreditation scheme is essential to reflect the evolving needs of learners and the deaf community.

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

Yes

Please give details to support your answer.

Text box to enter additional details:

Yes, I support the creation of a scheme for accrediting BSL and ISL interpreters, provided it is rigorous, community-informed, and adequately resourced.

A formal accreditation scheme offers a vital mechanism to raise and standardise the quality of interpreting provision across Northern Ireland. This is especially urgent given the current shortage of qualified BSL and ISL interpreters. The scheme must ensure that interpreters are not only linguistically fluent but also culturally competent and trusted by the deaf community.

Accreditation should also include support for Deaf Relay Interpreters, particularly for deafblind individuals or those with additional access needs. The scheme must accommodate a range of interpreting contexts - including in-person, remote, healthcare, legal, and public services - with clear standards tailored to each.

It is essential that the scheme builds pathways into the profession, supporting training, mentoring, and continuous professional development. Re-accreditation processes should be built in, and only accredited interpreters should be employed by public services.

A transparent and publicly accessible register of accredited interpreters is also necessary to ensure accountability, choice, and confidence in the system.

Key to the success of the scheme is deep consultation with the deaf community and deaf professionals throughout its design, implementation, and review.

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 am unsure.

██████████ I have a deep connection to the deaf community and I understand the diverse ways people engage with BSL and ISL - whether through daily

use, cultural ties, or family relationships. However, I do not feel fully confident in stating what should or should not be included in this clause.

The current definition in Clause 11 aims to be broad and inclusive, which is important. It acknowledges deaf signers, deafblind people, hearing children of deaf parents, and those who communicate effectively in sign language even if they are not deaf.

One group which I am not sure the bill affects is hearing parents / carers of deaf children who are new to the deaf community and learning BSL/ISL. Including hearing parents/carers who are actively learning or using BSL/ISL would strengthen the impact of this legislation. It would also reflect the reality that deaf children do not develop in isolation, but within family systems that must be resourced and recognised. If excluded from this definition, they may not be properly accounted for in consultations, guidance, or support planning - creating a risk of language deprivation and developmental delays for the children themselves.

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:

Including reference to regional variation and the community-led evolution of BSL and ISL would make the definition more representative, inclusive, and future-proof.

Clause 13

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

No

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:

The current definition is too vague and mirrors outdated disability law language by referencing "everyday activities" without clarification. It fails to recognise that BSL and ISL are first or primary languages for many users, not simply tools used out of necessity or convenience. This risks framing sign language as an aid rather than as a full language right.

The clause should instead define reliance more broadly to include anyone who uses BSL or ISL habitually, culturally, or as a matter of identity. It should clearly list what "everyday activities" include—such as education, employment, healthcare, civic participation, and access to public services—and recognise both deaf and hearing users (like CODAs and multilingual signers). Without this, the definition may exclude key groups and weaken protection of linguistic rights.

Missing elements:

-Recognition of BSL/ISL as primary or preferred languages.

-Clear examples of "everyday activities" e.g. including but not limited to:

- attending school or higher education,
- accessing employment or vocational training,
- using public services including health, transport, and welfare,
- civic engagement such as voting, meetings, and consultations,
- participating in cultural, family, and community life,
- receiving or providing information through media, technology, or communication platforms.

-Possible inclusion of cultural, educational, and civic domains.

-Possible inclusion of CODAs and other regular sign language users.

-Alternative of ambiguous terms like "convenience."

A better alternative may be: "...individuals who use British Sign Language or Irish Sign Language as part of their primary or habitual means of communication in daily life."

This keeps the focus on real-world use, not medical status or subjective reasons. It protects those for whom sign language is linguistically and culturally central, not just "necessary" under a narrow definition.

Any other comments

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

Yes

discriminatory, demeaning, and entirely preventable. The NI Assembly must act to eliminate these outdated policies by requiring organisations to implement secure, accessible alternatives. This is an issue of dignity, equality, and basic communication rights. The Bill should commit to addressing this through regulations or statutory guidance, requiring all organisations to offer accessible verification pathways.

The Bill marks a significant and long-awaited step, but its strength will depend on meaningful implementation. For sign languages and the deaf community to thrive, the legislation must have enforceable rights, representation, and cultural recognition. A meaningful Bill must mandate early years access, grow the interpreter and deaf teacher workforce, fund deaf community hubs, and prioritise deaf leadership in planning and delivery. Without these, the Bill risks repeating past patterns of tokenism rather than transformation.

The Northern Ireland Assembly, MLAs, Department for Communities, and the deaf community have a unique and historic opportunity to deliver global leadership. This Bill, if strengthened and co-produced, could set a new international standard for sign language rights, early language access, deaf education, and cultural recognition. The impact made here in Northern Ireland could echo far beyond these shores - if we get it right.