

## Response ID ANON-PYJC-FRHT-A

Submitted to Sign Language Bill - Call for Evidence  
Submitted on 2025-04-30 09:54:48

### Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

RNID

Please confirm you have read the Northern Ireland Assembly's Committee privacy notice by clicking the button below.

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 in full.

### 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:

RNID supports the legal recognition of both British Sign Language and Irish Sign Language. This clause will bring Northern Ireland in line with the rest of the United Kingdom and is an important step in recognising the Deaf community and their contribution to society. Although the clause does not affect the operation of any other legislation, it will give more legitimacy to sign languages in Northern Ireland.

### Clause 2

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

Yes

Please give details to support your answer.

Text box for entering additional information:

We hope that the increased availability of classes to learn BSL and ISL for deaf people and their close family members, guardians and carers, will mean more deaf people are able to benefit from using sign language in their everyday life, but especially within their homes.

These classes should be available for free, to ensure that cost is not a barrier. Additionally, a mix of ways of learning, including in-person and online, should be available to ensure that people can access the classes in a way that fits around their lifestyle.

We would welcome any commitment from the Department for Communities to engage with the Deaf community on the implementation of Clause 2- to ensure that any schemes designed to deliver this Clause are built with the needs of the Deaf community in mind.

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:

RNID's It Does Matter research (2024) found that 82% of deaf BSL users believe that there is still a stigma towards deaf people and people with hearing loss and 71% of BSL users believe that most people hold negative attitudes towards deaf people and people with hearing loss. While providing a greater availability of BSL classes to deaf people and their close families and carers will help increase the use and understanding of BSL, it alone will not address the wider stigma felt by deaf BSL users in society.

Our research asked deaf BSL users what they thought needed to change to address these negative attitudes. Our research found that 78% of respondents thought that if more people were aware of how best to communicate with people who are deaf or have hearing loss then attitudes would improve, and 71% felt attitudes would improve if more people learnt basic BSL signs. We also undertook public polling to understand why the public were not deaf aware, and 54% of respondents said that they would like to learn basic words and phrases in BSL and 41% said they would like information about how to communicate well with BSL users. This shows that both the deaf community and the public believe that greater awareness of BSL and access to resources to learn basic phrases would help deaf awareness and improve people's confidence communicating.

In order to improve greater understanding of BSL and ISL in Northern Ireland, RNID believes that the Government should also consider:

- Signposting members of the public to free resources, such as the RNID's It Does Matter tips, on Government websites and communications.
- People who are employed by the Northern Irish Government should receive deaf awareness training help improve their deaf awareness and the delivery of public services to deaf sign language users.

We would also like to acknowledge that the accreditation scheme for teachers will also give people more confidence in signing up for classes and that the duty places on prescribed organisations to take reasonable steps to ensure information and services are made accessible to members of the deaf community should also improve the greater use of BSL and ISL as we hope it will help to increase the availability of public services in sign language.

### 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?

Yes

Please give details to support your answer.

Text box for entering additional information:

We think that this clause is sufficient if the guidance (included in Clause 5) provided by the Department for Communities to the prescribed organisations is robust in setting out what are considered 'reasonable steps' they must take to meet the duties expected of them. This guidance is necessary to ensure that prescribed organisations understand what they are expected to deliver to meet their obligation and where exceptions of affordability and practicality would allow them to not meet them. This guidance could also be strengthened if it is framed as a measure of compliance with the Disability Discrimination Act (1995), and if organisations are not meeting their duty under Clause 3 they would be failing to make reasonable adjustments for deaf sign language users.

We would like to see prescribed organisations take steps to improve their provision of services and information in sign language before the guidance is published too but understand that it will take time for the guidance to be developed in partnership with the deaf community to ensure it meets their needs. In the interim, prescribed organisations should consider:

- Ensuring that services that can be accessed over the phone also have alternative methods of contact, including a Video Relay Service, where interpreters can translate phone calls into sign language over a video call.
- In person services should ensure that staff receive deaf awareness training.
- New information particularly relevant to the deaf community should be translated into BSL and ISL and published at the same time as mainstream versions.

RNID want the Department for Communities to make it clear in their guidance that information should be made available in both sign languages at the same times as mainstream versions to ensure that members of the deaf community do not have to wait for equal access.

We are particularly supportive of the fact that the clause emphasises that the availability of accessible services for sign language users should be free at no extra cost to individuals in the deaf community. Research by the University of Loughborough (Additional costs of living for people who are deaf, Centre for Research in Social Policy, January 2015) found that in 2015 deaf BSL users faced at least £163 extra costs per week to meet the cost of their disability (adjusted for inflation using the Bank of England inflation calculator this would be £221.07 in 2025). Loughborough's report found that interpretation was the biggest additional cost deaf people faced, and this was made necessary where services failed to meet their duty to make reasonable adjustments.

### 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:

The Department for Communities should ensure that they are consulting with organisations representing and individuals within the deaf community to ensure that the prescribed organisations cover the organisations that deaf people engage with- while also bearing in mind that deaf people should be able to engage with any public body.

## Clause 5

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

Yes

Please give details to support your answer.

Text box for entering additional information:

We are strongly supportive of Clause 5, (as previously stated in our answer on Clause 4) we believe the provision of guidance is crucial for ensuring that prescribed organisations understand what are considered 'reasonable steps' to meet the duties placed on them and where exemptions may be allowed.

RNID support the obligation for the Department for Communities to consult with the prescribed organisations themselves, as well as at least one person or group acting on behalf of the deaf community. We believe that the Sign language Partnership could be an appropriate forum to consult to represent the deaf community's needs.

Prescribed organisations should consider appointing an internal champion to both feed into the guidelines development and to implement them internally. This would help to ensure that there was a coordinated effort to implement the guidance within organisations and mean there is greater accountability.

## 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:

We support all of the above to be included in the guidance provided by the department of communities. It is particularly important to us that the guidance includes what is viewed as 'reasonable steps' as we often find with reasonable adjustments there lacks clarity around what should be included.

RNID support the inclusion of Sign Language Action Plans, which we hope will increase transparency and accountability for increasing the provision and promotions of sign language within prescribed organisations. In Scotland, the BSL Plans required of public bodies helped to structure activities around promoting and expanding provision of BSL and the 2021 British Sign Language- National Plan Progress Report found that there had been progress in raising the profile of BSL among public bodies- including the provision of interpretation during Covid 19 Briefings during the pandemic and their landscape review of interpreter provision. Additionally, the Minister for Disabled People, Stephen Timms MP, recently reiterated the Government's commitment for Government Departments to publish BSL plans to support in their planning for increasing the amount of BSL provision in their communications. This was not originally covered in the BSL Act 2022.

We would like to see the representative or representatives of the deaf community being central in providing the advice around what the best practice for interacting with people who rely on communication on BSL or ISL. Additionally, organisations representing members of the deaf community will be able to support with supplementary advice in this area- including how both remote and in-person services can be made accessible.

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:

This Clause could be strengthened by adding in a legal obligation on the Department of Communities to publish their guidance publicly for departments in both Irish Sign Language and British Sign Language as well as text formats, so that the deaf community know what to expect from departments and hold prescribed organisation to account where they feel that they have not been able to access a service or information in sign language.

For members of the deaf community where their first language is ISL or BSL, reading long, complex documents can be difficult, especially as sign languages are not direct translations of English into signs, but have their own syntax and grammar. In order for the guidance to be fully accessible, the department should consider having a summary in sign language, alongside a more detailed translation with chapters so that sign language users can navigate through the videos easily.

## 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:

We support the Department for Communities being able to have the power to strengthen regulations around how public services should provide sign language access and how organisations should support sign language users.

It's sensible to include provision for consultation where further regulations are made to ensure that they meet the needs of the deaf community and relevant organisations.

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:

## Clause 8

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

Yes

Please give details to support your answer.

Text box for entering additional information:

## Clause 9

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

Yes

Please give details to support your answer.

Text box for entering additional information:

We support introducing a statutory requirement to evaluate the impact of the Bill, this will help ensure accountability and ensure that it is meeting its policy aims.

The Westminster British Sign Language (BSL) Act 2022 requires that a report of how many ministerial department communications have been made accessible in British Sign Language, be published every three years, but both the previous and current Governments have committed to publishing a report every year for the first five years to incentive faster adaption of BSL in government communications.

Furthermore, in Scotland, progress reports in relation to BSL are published three years following the first publication of a National Plan and then have no longer than six year intervals between reports. The reports have to include an account of measures taken and outcomes attained, examples of best practice and examples of poor performance.

In both the BSL Act 2022 and the BSL (Scotland) Act 2015, there is prescriptive list of what should be expected to be in the report. The Department for Communities may consider including a similar list some specifics that would be helpful to ensure are reported on in particular this could include:

- The progress that the Department for Communities has made in making sign language classes available for deaf people and their families, guardians or carers.
- The progress made by prescribed organisations in making their services and information accessible in sign language.
- Best practice in delivering services in sign language and examples, if there are any, of poor performance.

RNID would like to see an interim report sooner than the 5 years proposed in the bill, similar to the committed made by the British Government in relation to the BSL Act 2022, to report annually for the first five years. This is seen as important for delivering increased transparency and support further increases in accessibility. We expect this will be the period where there is the most change that will occur, and will be important for being able to see which prescribed organisations are taking action to meet their obligations and which need to be held to account.

## 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:

We use the term 'sign language tutors' to differentiate between educational specialists who teach deaf children and people who are qualified to teach sign languages as a subject.

We are strongly supportive of an accreditation scheme for sign language tutors because, unlike for interpreters, there is no registration body for people who teach BSL or ISL.

RNID hope an accreditation scheme set up by the Department of Communities will help ensure high standards of teaching and that people have confidence in taking up lessons as they will be able to be aware of how good quality their teaching will be. This will be particularly important for ensuring that the Department of Community is using its funding well as it meets its legal obligations under the Bill to provide sign language lessons to deaf people, their family members, carers or guardians.

From our It Does Matter Campaign polling, we know that 54% of members of the public would like to learn basic words and phrases in BSL and 41% would like information about how to communicate well with BSL users. An accreditation scheme for sign language tutors could help to address this need for wider information about communicating with deaf people among the public too.

The accreditation scheme should be accessible to sign language users who want to join and have a clear and affordable pathway for sign language users to become accredited to teach their own language. Furthermore, information about joining the accreditation scheme should be available in sign languages.

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:

There are accreditation schemes in the UK, but none that are specific to Northern Ireland. A register would allow the Department for Communities to understand the interpreting landscape in Northern Ireland and address any shortfalls. As highlighted by the Minister for Communities, Gordon Lyons, increasing the supply of professionally trained and appropriately accredited interpreters is "one of the most pressing issues to ensure accessibility, and fuller social integration for the Deaf Community in Northern Ireland." (20th February 2024).

Interpreters from both Ireland and mainland Britain who are registered under other accreditation schemes or registration bodies should be recognised as equally qualified. This is particularly important as some deaf sign language users may be getting interpreters remotely for video calls or interpreters may travel to Northern Ireland for work.

In Ireland, the Register of Irish Sign Language Interpreters recognises two qualifications that are currently offered by Universities, and a further five that are no longer offered by educational providers that people can use to join the register. The Irish Sign Language Act 2017, states that public bodies and courts can only use sign language interpreters who are verified by an accreditation scheme funded by the Minister for Social Protections.

UK wide there is the NRCPD, which is a voluntary regulator for language service professionals. They have both BSL and ISL interpreters on their register, and in order to join you must have completed an approved course, which could be through a university or alternative education provider. To join the register you must also have to agree to abide by their Code of Conduct, have a standard disclosure from the Disclosure and Barring Service, and have a valid professional indemnity insurance.

Additionally in Scotland, the Scottish Register of Language Professionals with the Deaf Community, commonly known as the Scottish Register, requires registrants to confirm they hold relevant qualifications, are members of the Protecting Vulnerable Groups (PVG) Scheme and have appropriate Professional Indemnity Insurance. They also interview applicants as part of the application process.

The register should be free to join, and the Department for Communities should consider how the pipeline for interpreters can be made more appealing to potential candidates by having choice in how you undertake your training- including remote and in-person training options across a variety of providers.

## 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:

## 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:

### Any other comments

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

No

Please give details to support your answer.

Text box to enter additional details:

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

Text box to enter additional details: