

Response ID ANON-PYJC-FRHX-E

Submitted to Sign Language Bill - Call for Evidence
Submitted on 2025-04-11 10:06:32

Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

British Standards Institution (BSI) Northern Ireland

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 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?

Not Answered

Please give details to support your answer.

Text box to enter additional details:

This is outside the remit of the organisation to provide a view.

Clause 2

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

Not Answered

Please give details to support your answer.

Text box for entering additional information:

This is outside of the remit of the organisation to provide a view.

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?

Not Answered

Please give details to support your answer.

Text box to enter additional details:

We do not have a view.

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?

Not Answered

Please give details to support your answer.

Text box for entering additional information:

BSI would like to make the following comments in relation to the provision of duties on prescribed organisations - which as we understand are probably going to be in the public sector in Northern Ireland. We have recently made representations to the Senedd/Welsh Parliament in relation to a similar Bill.

In Northern Ireland, we understand the intention is to place a duty on prescribed organisations to take all reasonable steps to ensure that the information and services provided by them are as accessible to members of the deaf community as they are to individuals who are not in the deaf community, and to offer or facilitate the use of BSL or ISL for the benefit of individuals in the deaf community in accessing information and services provided by the organisation.

We would advise that in order to achieve this it is important to remember the need for appropriate building inclusivity of these prescribed organisations. Whilst having access to BSL or ISL services and facilitating their use, the physical facilities also need to provide an inclusive environment.

We would advise Assembly Members to consider BS 8300 and PAS 6467 to support the implementation of the Bill. These standards are relevant to these prescribed organisations to improve the use of BSL and ISL when accessing public buildings in Northern Ireland.

Clause 4

Do you support the approach taken by Clause 4?

Not Answered

Please give details to support your answer.

Text box for entering additional information:

In prescribing public bodies. We would advise to look closely at two standards and consider these are part of this process.

BS 8300 'Design of an accessible and inclusive built environment' is in place to ensure that a built environment is developed with all levels of ability in mind. All users should be able to enter, use, and exit a building easily, comfortably, and independently – particularly the disabled, less abled, or elderly.

In addition, BS 8300 conforming buildings contribute towards social inclusion and reduce the risk of physical harm to those using the facility. BS 8300 was most recently updated in 2018 when the document was expanded into two parts. Part 1 focuses on building exteriors and approaches, while Part 2 remains focused on building interiors.

Previous versions of the British Standard have focused on the provision of accessibility solutions specifically for the disabled. The most recent version, BS 8300-2:2018, however, goes into greater detail on how developers can build inclusive environments for all people, right from the beginning of a project. This ensures that the whole environment is accessible, rather than the topic of accessibility becoming a latter thought within a project.

BS 8300-2:2018 is the first standard to specifically address the needs of neurodivergent people. Another major addition is guidance on design strategy and the integration of design principles into the development process, which features in both parts. BS 8300-2 also does mention specifically about designing spaces to allow for a sign language interpreter to operate effectively. For example, ensuring they are suitably lit when low lighting is used for a performance.

BS 8300's guidelines are wide-ranging, covering almost every aspect of building design you can think of that might impact accessibility. Key aspects of accessible design addressed include the following:

- Entrances
- Door fittings
- Steps, stairs, and ramps
- WCs
- Corridors and passageways
- Surface finishes
- Visual signs
- Lighting

The key element of the revision to BS 8300 is to offer "equal access to services and buildings". As an example, this includes hearing aid wearers no longer only having access to only one designated interaction point – such as a bank counter or checkout, they now can use as they all offer induction loop systems or other alternative assistive hearing systems.

Given the progress of innovation and planning, individuals should never again be excluded due to their disability and should be incorporated into the environment in a fully inclusive manner. In order to promote and facilitate BSL/ISL – but it is important to consider the physical surroundings – such as lighting in buildings are part of this process.

Clause 5

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

Not Answered

Please give details to support your answer.

Text box for entering additional information:

Closely following on from the previous answer, consideration should be given to people who are neurodivergent.

PAS 6463 Design for the mind – Neurodiversity and the built environment – Guide provides guidance to the built environment on how to accommodate for neurodiverse needs, including incorporating suitable lighting when designing for people with dementia, autism and learning difficulties. It makes suggestions on lighting features such as glare, shadow, reflection, and flicker that can have an impact on a person's wellbeing. The guidance cross-references other standards, including the BS EN 12464 series (for indoor and outdoor workplaces), and BS EN 17037 (daylight in buildings). Clause 11.10 of the guidance covers the benefits of adaptational (circadian) lighting for therapeutic benefits.

PAS 6463 also addresses acoustics and noise management, in terms of zoning and layout, background noise, room acoustics, and controls. The guidelines make a reference to BS ISO 22955, which covers acoustic quality in open offices.

Within BSI's catalogue there are other accessible inclusive building standards that also foster good access and make provision for disabilities which can be deployed to complement this Bill. We would advise to consider these aspects as part of the Bill and consideration of this standard.

Clause 6

Do you support the approach taken in this clause?

Not Answered

Please give details to support your answer.

Text box for entering additional information:

We have no specific view.

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

No

Please give details to support your answer.

Text box to enter additional details:

We have no specific view.

Clause 7

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

Not Answered

Please give details to support your answer.

Text box for entering additional information:

Please see previous answer on standards that can support this legislation.

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

Not Answered

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?

Not Answered

Please give details to support your answer.

Text box for entering additional information:

We have no further comment on this consultation.

Clause 9

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

Not Answered

Please give details to support your answer.

Text box for entering additional information:

N/a

Clause 10

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

Not Answered

Please give details to support your answer.

Text box for entering additional information:

Outside our remit.

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

Not Answered

Please give details to support your answer.

Text box to enter additional details:

Outside our remit.

Clause 11

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

Not Answered

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:

This is outside our remit.

Clause 12

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

Not Answered

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:

N/a to our remit.

Clause 13

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

Not Answered

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:

N/a to our remit.

Any other comments

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

Not Answered

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: