

## Response ID ANON-PYJC-FR1E-4

Submitted to Sign Language Bill - Call for Evidence  
Submitted on 2025-05-09 09:32:29

### Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

AdaptNI

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?

Yes

Please give details to support your answer.

Text box to enter additional details:

Clause 1 is a solid starting point for formal recognition, but on its own it is largely symbolic. It needs to be supported by strong implementation duties, funding, and rights-based measures in subsequent clauses and regulations to fully meet the aspirations of Deaf BSL and ISL users in Northern Ireland. An additional DeafBlind section would fully strengthen given the numbers who will use either BSL and ISL as their first and preferred language.

### 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:

While Clause 2 is a positive and welcome step in recognising and promoting BSL and ISL — particularly by placing a statutory duty on the Department for Communities — there are still some important limitations worth considering:

Strengths:

Mandated access to BSL/ISL classes for Deaf children and their families is a major development.

Explicit recognition of Deaf culture and its development through language use is progressive.

The general entitlement to use BSL/ISL affirms linguistic rights for Deaf people in public life.

Limitations:

The clause doesn't guarantee access to services in BSL/ISL, only promotes understanding and use.

It is focused on cultural and educational promotion, not on structural areas like health, justice, or employment.

There is no enforcement mechanism or accountability if progress is slow or patchy.

So, while Clause 2 is a strong starting point, its effectiveness will likely depend on implementation, funding, and ongoing political will.

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:

To fully realise the aims of Clause 2 and promote greater use and understanding of British Sign Language (BSL) and Irish Sign Language (ISL), the following could be considered -

#### 1. Integration into Education

Introduce BSL and ISL into the curriculum at primary and post-primary levels as recognised modern languages. Early exposure will normalise their use, reduce stigma, and foster inclusion from a young age.

#### 2. Deaf Awareness in the Workplace

Provide funded Deaf awareness and basic BSL/ISL training for public sector staff, health and social care workers, and employers. This would support both customer-facing roles and workplace inclusion for Deaf employees.

#### 3. Employment and Economic Inclusion

Ensure that employment programmes (e.g. JobStart / Pre employment, WorkableNI, and apprenticeships) include permanent support for Deaf BSL and ISL users - AdaptNI set up to continue employment support and have been fighting for funding for 3 years. This should include accessible recruitment processes, funded interpreters for interviews and workplace training, and promotion of Deaf-friendly workplaces. Greater sign language visibility in employment helps challenge misconceptions and supports long-term economic participation.

#### 4. Public Campaigns and Visibility

Support public-facing campaigns, including billboards, media ads, and social media, featuring Deaf BSL and ISL users. Promote Deaf role models and encourage wider public engagement with sign language.

#### 5. Strengthen the Interpreter Workforce

Develop the pilot into a long-term strategy to train and retain BSL and ISL interpreters in Northern Ireland. This could include bursaries, regional training hubs, and structured career pathways.

#### 6. Accessible Digital Services

Require public bodies to offer key information in BSL and ISL through videos, apps, and websites. Encourage innovation through grants for tech solutions supporting real-time signed communication.

#### 7. Monitoring and Accountability

Mandate public bodies to publish annual reports on how they are fulfilling Clause 2 duties, with input from the Deaf community and clear performance indicators.

### 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:

Partially, but not fully.

While Clause 3 acknowledges accessibility and the need to offer BSL/ISL support at no cost, allowing public bodies to weigh cost and practicability weakens the obligation. This could result in inconsistent implementation or continued barriers in key services (e.g. healthcare, employment, housing, education, justice).

#### Define 'Reasonable Steps' More Clearly

Clarify that financial constraints should not be the sole factor in denying access. Services with statutory responsibilities must ensure BSL/ISL access regardless of cost.

#### Mandatory Baseline Standards

Set out minimum access requirements for sectors such as health, education, housing, and justice — for example, guaranteed on-demand BSL/ISL access in emergency care or GP appointments.

#### Dedicated Accessibility Budgets

Require all prescribed organisations to allocate ring-fenced funding for BSL/ISL communication support, rather than relying on third-sector organisations

to fill the gap.

#### Regular Monitoring for Effectiveness

Introduce routine checks and audits to assess whether services are genuinely accessible to Deaf individuals — including reviewing barriers such as Video Relay Service (VRS) access in the health service and identifying recurring issues.

#### Support for Not-for-Profits and Community Organisations

Recognise that organisations like AdaptNI are often relied upon to bridge gaps in access, yet face financial pressures when covering costs for interpreting or Deaf awareness. Public sector services should not depend on not for profits to fight for funding to deliver what should be core statutory responsibilities.

#### Deaf Awareness and Internal Training

All prescribed organisations should deliver regular Deaf awareness and inclusive communication training to frontline staff and service planners.

### 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:

**Clear Accountability:** By listing prescribed organisations, Clause 4 ensures that there is no ambiguity about which public bodies are responsible for implementing the duties outlined in Clause 3. This clarity is crucial for effective enforcement and compliance.

**Focused Implementation:** Identifying specific organisations allows for targeted guidance and support from the Department for Communities. This focused approach can help these organisations better understand their obligations and the best practices for promoting accessibility for the Deaf community.

**Enhanced Accessibility:** The duties in Clause 3 aim to make information and services provided by public bodies as accessible to individuals in the Deaf community as to those who are not. Clause 4 supports this goal by ensuring that the relevant organisations are explicitly tasked with these responsibilities, promoting a more inclusive environment.

**Consistency Across Public Bodies:** Listing prescribed organisations helps maintain consistency in the implementation of the Bill's provisions across different public bodies. This uniformity is essential for ensuring that all members of the Deaf community receive equitable access to services and information

### 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:

**Limited Representation:** The requirement to consult "at least one person or group" representing the Deaf community is insufficient. The Deaf community is diverse, with varying needs and perspectives. Consulting only one person or group does not adequately capture this diversity and may result in guidance that does not fully address the community's interests.

**Need for Broader Consultation:** A wider approach to consultation is necessary to ensure that the guidance reflects the views and experiences of a broader segment of the Deaf community. This could include multiple advocacy groups, organisations, and individuals from different backgrounds within the Deaf community.

**Enhanced Inclusivity:** By consulting a larger and more varied group of representatives from the Deaf community, the Department for Communities can develop more inclusive and effective guidance. This approach would better ensure that the guidance addresses the full range of issues and concerns faced by the Deaf community.

**Improved Accuracy and Relevance:** Broader consultation can lead to more accurate and relevant guidance. Multiple perspectives can provide a more comprehensive understanding of the effects of the Bill's provisions, leading to better-informed decisions and recommendations.

**Strengthened Trust and Cooperation:** Engaging with a wider array of representatives from the Deaf community can foster greater trust and cooperation between the community and the Department for Communities. This collaborative approach can enhance the legitimacy and acceptance of the guidance issued.

### 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 provides clear guidance on what constitutes reasonable steps for prescribed organisations. This clarity is essential for ensuring that public bodies understand their obligations and can effectively implement measures to support the Deaf community.

**Structured Action Plans:** The requirement for prescribed organisations to develop sign language action plans ensures a structured and systematic approach to promoting accessibility. These plans can help organisations set specific goals, track progress, and make continuous improvements in their services for the Deaf community.

**Best Practice Advice:** Offering advice on best practices for interacting with people who rely on BSL or ISL is crucial for fostering effective communication and inclusivity. This guidance can help public bodies develop better communication strategies and improve their interactions with the Deaf community.

**Enhanced Accessibility:** By providing comprehensive guidance, Clause 6 supports the overall goal of the Bill to enhance accessibility for individuals who use BSL and ISL. This can lead to more equitable access to public services and information for the Deaf community.

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:

**Training:** The guidance should include recommendations for training programs for staff within prescribed organisations. These programs can help staff develop the skills and knowledge needed to effectively communicate with and support individuals who use BSL and ISL.

**Monitoring and Evaluation:** The guidance should outline methods for monitoring and evaluating the effectiveness of the sign language action plans. This can help organisations assess their progress and identify areas for improvement.

**Community Engagement:** The guidance should encourage prescribed organisations to engage with the Deaf community regularly. This engagement can provide valuable feedback and ensure that the needs and preferences of the community are continuously considered. Celebrate Deaf culture, history and specific dates.

**Resource Allocation:** The guidance should include advice on allocating resources to support the implementation of the sign language action plans. This can help organisations ensure they have the necessary tools and support to achieve their goals.

**Educational Support:** Given the historical educational under attainment of Deaf students in Northern Ireland, the guidance should include specific recommendations for improving educational outcomes for Deaf students. This could involve collaboration with educational experts and organisations like AdaptNI. Including consideration of a shared space or hub.

## 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:

Clause 7 allows the Department for Communities to create regulations that can adapt to changing needs and circumstances. This flexibility is crucial for ensuring that the provisions of the Bill remain relevant and effective over time.

**Consultation with the Deaf Community:** The requirement to consult with the Deaf community and relevant organisations ensures that the regulations are informed by those directly affected. This inclusive approach helps to create regulations that are practical and beneficial for the Deaf community.

**Scrutiny and Approval:** The need for regulations to come before the Assembly for scrutiny and agreement provides an additional layer of oversight. This process ensures that the regulations are thoroughly examined and approved by elected representatives, enhancing their legitimacy and accountability.

**Resource Considerations:** Clause 7 allows the Department for Communities to limit or adjust requirements for certain organisations based on their resources. This consideration is important for ensuring that the regulations are feasible and do not impose undue burdens on organisations with limited resources - but should consider this on a case by case basis or offer VRS minutes to smaller organisations in exchange for other agreements for eg annual BSL and ISL or Deaf awareness training - employment opportunities.

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:

As stated previously, consideration for a wider advisory group / board which is both voted onto on an annual basis and regularly reviewed.

## 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:

As noted previously this could have limitations. The requirement to consult "at least one person or group" representing the Deaf community is insufficient. The Deaf community is diverse, with varying needs and perspectives. Consulting only one person or group does not adequately capture this diversity and may result in regulations that do not fully address the community's interests.

**Need for Broader Consultation:** A wider approach to consultation is necessary to ensure that the regulations reflect the views and experiences of a broader segment of the Deaf community. This could include multiple advocacy groups, organisations, and individuals from different backgrounds within the Deaf community.

**Enhanced Inclusivity:** By consulting a larger and more varied group of representatives from the Deaf community, the Department for Communities can develop more inclusive and effective regulations. This approach would better ensure that the regulations address the full range of issues and concerns faced by the Deaf community.

**Improved Accuracy and Relevance:** Broader consultation can lead to more accurate and relevant regulations. Multiple perspectives can provide a more comprehensive understanding of the effects of the regulations, leading to better-informed decisions and recommendations.

**Strengthened Trust and Cooperation:** Engaging with a wider array of representatives from the Deaf community can foster greater trust and cooperation between the community and the Department for Communities. This collaborative approach can enhance the legitimacy and acceptance of the regulations issued.

**NI-Wide Agreement:** Instead of consulting just one person or group, the Department for Communities should seek NI-wide agreement on a voted-for group representing the Deaf community. This approach ensures that the consultation process is democratic and that the representatives truly reflect the interests and needs of the broader Deaf community. For example, an agreed representative group could be voted for annually, ensuring ongoing representation and accountability.

## 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:

Although this is a long Interval Between Evaluations, we appreciate this is in fact lower than in Scotland. A five-year interval between evaluations is too long to effectively monitor and address any issues or challenges that may arise from the implementation of the Bill. More frequent adhoc evaluations would allow for timely adjustments and improvements.

**Need for More Frequent Monitoring:** Evaluating the impact of the Bill more frequently, such as every two to three years, would provide a better understanding of its effectiveness and allow for quicker responses to any shortcomings. This would ensure that the Bill's provisions are being implemented effectively and that the needs of the Deaf community are being met.

More frequent reporting would enhance accountability by ensuring that the Department for Communities regularly reviews and reports on the progress and impact of the Bill. This would help maintain a continuous focus on improving accessibility and support for the Deaf community.

More frequent evaluations are often conducted to ensure that legislative measures are effective and responsive to the needs of the community. Aligning with best practices from other regions can help ensure that the Bill remains relevant and effective. In Scotland, the BSL National Plan covers a six-year period, with progress reports published periodically.

More frequent evaluations would provide additional opportunities for consultation with the Deaf community and relevant organisations. This would

ensure that their feedback is regularly incorporated into the evaluation process and that their needs are continuously addressed.

## 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:

Establishing an accreditation scheme for teachers and interpreters of BSL and ISL ensures that there are clear professional standards. This helps maintain the quality and consistency of sign language education and interpretation services.

Consideration of the historical educational attainment of Deaf BSL and ISL users should be aligned with experience of their own language. All teachers should be Deaf BSL / ISL users.

Accredited teachers will provide higher quality services, which can significantly benefit the Deaf community. This ensures that individuals relying on BSL and ISL receive accurate and effective communication support. This will also increase life and employment opportunities NI wide for those who may not hold historical exams for eg maths and english.

Accreditation provides formal recognition and validation of the skills and qualifications of teachers and interpreters. This can enhance their professional status and career opportunities, encouraging more individuals to pursue these roles.

An accreditation scheme ensures that all teachers and interpreters meet the same standards, leading to more consistent and reliable services across different providers and regions.

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:

as above.

## 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:

**Technological Adaptations:** The definition could include a reference to the use of technological adaptations that facilitate BSL and ISL communication, such as video relay services and tactile devices. This would ensure that the Bill recognises the evolving nature of communication technologies.

**Regional Variations:** Acknowledging regional variations and dialects within BSL and ISL could be beneficial. This would ensure that the Bill recognises the diversity within the languages themselves and supports all users effectively.

## 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:

Ambiguity in "Substantially": The term "substantially" is somewhat ambiguous and may lead to varying interpretations. It would be beneficial to provide clearer criteria or examples to ensure consistent understanding and application.

Necessity vs. Convenience: The inclusion of both "necessity" and "convenience" could be seen as too broad. While it is important to recognise that some individuals may use BSL or ISL for convenience, the primary focus should be on those who rely on these languages out of necessity for effective communication.

Lack of Specificity: The definition could benefit from more specific examples or scenarios that illustrate what constitutes "everyday reliance." This would help in better understanding and applying the definition in practical contexts.

### 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:

I believe the Bill should include provisions related to employment and personal life choices.

The Bill should include specific provisions to support the employment of BSL and ISL users NI-wide. This could involve measures to promote the hiring of Deaf employees, provide workplace accommodations, and ensure that Deaf individuals have equal access to employment opportunities. Employment is of great importance for the Deaf community, as it provides financial independence and social inclusion.

The Bill could require employers to provide awareness and sensitivity training for their staff. This training would help create a more inclusive and supportive work environment for BSL and ISL users, while ensuring ATW meets the needs of BSL and ISL users NI wide in parity with rest of UK.

AdaptNI, the only provider of specialist employment and training support for the Deaf community in Northern Ireland, can play a key role in the development and implementation of these employment provisions. AdaptNI was set up on 1st July 2022 when RNID closed all services. Initially self-funded, this team of five works NI-wide from home due to financial constraints. Their expertise can help ensure that the employment needs of the Deaf community are met comprehensively. The Bill should ensure the permanent provision of employment and training support for BSL and ISL users NI-wide. This would provide ongoing assistance and resources to help Deaf individuals achieve their career goals and maintain employment until such support is no longer needed.

Transitions and Learning of Deaf History: The Bill should include provisions for supporting Deaf individuals during transitions, such as from education to employment. Additionally, incorporating the learning of Deaf history can help raise awareness and understanding of the Deaf community's contributions and challenges.

Personal Allowances for Interpreter Use or VRS: The Bill should include provisions for personal allowances for interpreter use or Video Relay Services (VRS). This could involve setting a specific number of minutes per month or an allowance for individuals to independently book their own interpreters. This would ensure that BSL and ISL users have the necessary support to communicate effectively both in the workplace and in their personal lives.

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

Text box to enter additional details: