

## Response ID ANON-PYJC-FRRH-8

Submitted to Sign Language Bill - Call for Evidence  
Submitted on 2025-05-09 21:38:57

### Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

[REDACTED]

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?

No

Please give details to support your answer.

Text box to enter additional details:

While I welcome the formal recognition of British Sign Language (BSL) and Irish Sign Language (ISL) in Northern Ireland, I believe this clause falls short. Symbolic recognition without legal rights or obligations does little to change the day-to-day barriers faced by the Deaf community. By preserving the current legal framework, the Bill maintains a status quo that already excludes many Deaf people from equal access to public services, education, and healthcare.

True recognition should mean more than words—it should lead to action. That includes enforceable rights, properly funded interpreting services, Deaf awareness training, and full inclusion in society. Without these, this clause risks being a hollow gesture rather than a meaningful step forward.

### 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 step in the right direction, I believe it lacks the strength needed to create real change. Promoting BSL and ISL is not enough without clear legal rights and enforcement. An obligation to provide classes is welcome—but these must be free, ongoing, and truly accessible to all, including rural communities and marginalised families.

The phrase “general entitlement” to use BSL or ISL is too vague. It should be a clearly defined legal right to use these languages in all public services. Similarly, supporting Deaf culture must go beyond words—it requires sustained funding and leadership from the Deaf community itself.

For real impact, Deaf people must be at the centre of shaping and delivering these duties—not just included as an afterthought.

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:

Schools, introducing the use of GCSE and ALevels and potentially university degree here in NI

### 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:

Clause 3 sounds positive, but it falls short in practice. The phrase “reasonable steps” is too vague and risks allowing organisations to do the bare minimum. Allowing cost and practicability to influence decisions means that budget concerns could override the rights of Deaf people.

Without clear legal accountability or enforcement, organisations may ignore these duties without consequence. Accessibility must be defined by Deaf people’s lived experience—not by what hearing organisations assume is good enough.

While it’s welcome that services should be free to the Deaf community, this means little if those services aren’t actually provided. Equal access should be a guaranteed right, not just a suggestion.

### 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:

Clause 4 allows the Department for Communities to decide which public bodies must follow the duties in Clause 3. This creates a serious risk that important services—like healthcare, education, or justice—could be left out of the list and avoid their responsibilities to the Deaf community.

Equality should not depend on whether a public body is included or not. Deaf people need consistent access across all public services. This clause gives too much power to the Department without clear criteria or transparency. All public-facing bodies should automatically be included under these duties, not left to chance.

### 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:

Clause 5 is too weak to ensure meaningful Deaf involvement. Simply requiring the Department to consult “at least one person or group” from the Deaf community is not enough. It risks tokenism and allows the Department to choose whoever is convenient, rather than genuinely representing the diversity of the Deaf community.

Consultation must be broad, inclusive, and led by Deaf people, not just organisations acting on their behalf. Guidance on Deaf access should not be written about Deaf people without Deaf people.

The Department should be legally required to work in partnership with Deaf-led organisations, not just consult them once during the process.

### 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:

While guidance on best practice is useful, Clause 6 places too much reliance on non-binding advice rather than enforceable standards. Terms like “may” and “should” allow organisations to ignore or water down responsibilities, making Deaf access optional rather than essential.

Sign Language Action Plans are a good idea, but without legal force, they may become tick-box exercises with little real impact. Deaf people must be involved in writing, reviewing, and monitoring these plans.

Best practice for communicating with BSL and ISL users must come from the Deaf community, not imposed by hearing-led bodies with limited understanding.

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:

## 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:

Clause 7 places too much power in the hands of the Department for Communities, with little guarantee that the regulations will be meaningful or enforceable. Giving them the ability to create new regulations without clear limits or guidelines could lead to inconsistent implementation across different sectors and organisations.

While consultation with the Deaf community is mentioned, the process must be transparent, inclusive, and genuinely reflect the voices of all Deaf people, not just a few representatives.

The clause also allows organisations to adjust or limit their responsibilities based on resources. This could mean that larger, well-funded organisations get away with offering minimal support for BSL and ISL users, while smaller, under-resourced organisations may be given a pass. Equal access should not depend on an organisation's resources.

Finally, the need for Assembly approval of these regulations is good for scrutiny, but without clear deadlines or guidance on what's required for approval, there's a risk that progress will be slow or delayed.

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?

No

Please give details to support your answer.

Text box for entering additional information:

While Clause 8 requires the Department for Communities to consult stakeholders before laying draft regulations, there are several key concerns that must be addressed to ensure a meaningful and inclusive process.

### 1. Representation of the Deaf Community:

The clause states that the Department must consult at least one person or group representing the Deaf community. However, the criteria for determining which groups or individuals represent the community are unclear. There is a risk that the process could favour certain organisations over others, potentially leaving out diverse voices within the Deaf community, including those from different regions, age groups, or experiences.

### 2. Inclusivity and Diversity in Consultation:

The consultation should go beyond consulting a single group. To be truly effective, the process must be inclusive and reflective of the entire Deaf community. This includes ensuring that smaller, grassroots organisations or less prominent groups are given equal opportunity to provide feedback.

### 3. Sufficient Time for Consultation:

The clause does not specify how long the consultation process will take. A short consultation period may prevent stakeholders, particularly smaller organisations, from providing comprehensive feedback. Adequate time must be allocated to allow all stakeholders to fully review and respond to the proposed regulations.

### 4. Handling Disagreements and Conflicting Views:

In cases where there are disagreements among Deaf groups or other stakeholders, it is unclear how the Department will manage these differences. A clear, transparent process is needed to ensure that conflicting feedback is addressed in a way that reflects the needs of the entire Deaf community.

### 5. Ongoing Consultation and Feedback:

The consultation process should not end once the regulations are implemented. There needs to be a mechanism for ongoing consultation to assess the effectiveness of the regulations over time, and to ensure that the Deaf community continues to have a voice in future changes or updates.

### 6. Transparency of the Consultation Process:

For the consultation to be meaningful, it must be transparent. All feedback gathered during the consultation process should be publicly available, and the Department should demonstrate clearly how it has used the feedback to shape the final regulations.

## 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:

5 years tends to be a long time, I would adapt the approach for 2-3 years, once we get comfortable- then we can extend to 5 years

## Clause 10

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

No

Please give details to support your answer.

Text box for entering additional information:

It's important that sign language is kept Deaf-led or someone who's coda with understanding of deaf culture.

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:

Same as above

## Clause 11

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

No

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:

### 1. Clarity and Consistency in Terminology:

The definition of the deaf community in Clause 11 includes individuals with varying degrees of hearing ability, including those who can hear with the aid of auditory devices. However, the term "deaf" is not always clearly defined in this context. It is important to establish consistent language that can accommodate the wide spectrum of hearing loss and ensure that people who identify as Deaf or deafblind are appropriately included.

### 2. \*\*Inclusion of People with Limited English Proficiency:

While the clause ensures that individuals with limited or no understanding of spoken or written English are included, it does not clarify whether this includes people who may have cognitive disabilities that affect their understanding of spoken or written language. It is important to ensure that people with cognitive impairments who can communicate effectively in BSL or ISL are explicitly included in this definition.

### 3. Children of Deaf or Deafblind Individuals:

The clause includes children of Deaf or Deafblind people who use BSL or ISL. However, it is unclear if the definition includes children who do not use BSL

or ISL but are part of a Deaf or Deafblind family and may benefit from such communication methods in the future. The definition could be broadened to ensure that children have the right to access BSL and ISL regardless of their current communication methods.

#### 4. Potential for Ambiguity in Implementation:

While the definition is broad, the practical implications of the term “deaf community” may vary across services and legislation. There may be discrepancies in how public bodies or organisations interpret the term, especially in cases where individuals have a combination of hearing loss and other disabilities. Further clarification on the operational use of the definition will be important to ensure consistency in service provision.

#### 5. Cultural and Linguistic Considerations:

The definition does not address the cultural identity of the Deaf community. Being part of the Deaf community is not only about communication, but also about sharing a common cultural heritage and language. The Bill could benefit from more explicit recognition of the Deaf community as a linguistic minority with a rich cultural identity, which may have implications for education, social services, and cultural preservation

### 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?

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:

While Clause 13 of the Bill attempts to define “everyday reliance” on British Sign Language (BSL) or Irish Sign Language (ISL) as relying wholly or substantially on these languages out of necessity or convenience during daily activities, we believe this definition raises several concerns that require further clarification and revision.

Firstly, the terms “wholly” and “substantially” are vague and open to interpretation. Without clear definitions or practical examples, this language risks inconsistent application, potentially excluding individuals who rely on BSL or ISL in significant but not full-time ways.

Secondly, the distinction between reliance by “necessity” versus “convenience” is problematic. For many Deaf individuals, the use of BSL or ISL is not merely a matter of convenience, but a core part of their identity and the most natural and effective way to communicate. Reducing this to a convenience undermines its cultural and linguistic significance.

Moreover, tying access to services or recognition under the Bill to this definition may unintentionally exclude those who use BSL or ISL in specific contexts—such as at home, in work, or during medical appointments—but still require full access to interpretation and communication support when needed.

The definition also lacks acknowledgment of the wide diversity within the Deaf community, including individuals who are bilingual or who use BSL or ISL alongside spoken or written language, depending on the situation. These individuals must not be overlooked or denied support based on a narrow reading of “everyday reliance.”

Lastly, the Bill should ensure that all forms of reliance on BSL or ISL—whether consistent, occasional, or situational—are respected and supported to guarantee inclusive access to public services and legal protections.

Recommendation: We urge the Department to revisit and refine this definition to ensure that it is inclusive, clearly explained, and reflective of the real-life communication needs and rights of the Deaf and deafblind communities.

### 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:

Statement of Support for a Deaf Community Hub

I would strongly support the establishment of a Deaf community hub in Belfast and surrounding areas such as Derry. This is urgently needed, as research

shows that mental health issues in the Deaf community are three times more common compared to the hearing population.

A hub would provide a safe and inclusive space where Deaf people can come together, access support, and feel a sense of belonging—rather than experiencing isolation or exclusion. It would also promote greater accessibility in everyday environments such as churches, events, cinemas, and public spaces.

Currently, Deaf individuals often have to fight for access. A hub would help shift the experience from one of constant struggle to one of equal participation, where accessibility is the norm rather than the exception.

This space would not only serve practical needs but also strengthen the identity and unity of the Deaf community, providing opportunities for connection, learning, and cultural celebration.

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

Text box to enter additional details:

It's our time that our voice needs to be heard and thank you for taking that time to listen to us. I'll be praying for this for wisdom on how we can overcome this hurdle. Thank you ☺☺☺