

# Response ID ANON-PYJC-FRRX-R

Submitted to Sign Language Bill - Call for Evidence  
Submitted on 2025-05-09 18:33:19

## Consent and introduction

What is your name?

Name:

What is your email address?

Email:

What is your organisation?

Organisation:

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:

Fantastic to formally recognise BSL and ISL as languages of Northern Ireland but to strengthen the protections it would be good to consider adding to the clause the recognition of BSL and ISL as part of the cultural and linguistic heritage of Northern Ireland, with protections similar to those for Irish and Ulster Scots. For example, by establishing a sign language commissioner. N.B This sign language commissioner should be a deaf and native sign language user.

## 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:

Whilst continuing to fund sign language classes for deaf children and their families is beneficial, and should be continued as well as promoting sign language classes for children with deaf parents. I benefitted from attending [REDACTED] sign language classes funded by DfC and personally witnessed [REDACTED] [REDACTED] having had no knowledge of sign language, and therefore no relationship [REDACTED] to now [REDACTED] enrolled in DfC-funded BSL Level 6 class which has allowed [REDACTED] relationship to flourish.

However, any language is primarily learned through the modelling and use of that language in natural settings, such as deaf clubs. If you consider how many children in Northern Ireland are taught second languages in school settings at GCSE or above, yet have no ability to fluently use that language. This is because to adequately acquire and maintain skills within a new language - linguistically rich environments are required. Promotion of language through the establishments of deaf clubs, or deaf cultural hub would not only increase and encourage language use, but would also provide opportunities for deaf children and their families to have access to successful deaf role models which positively impacts well-being, self esteem, identity development, cultural competence and much more. Additionally, in order to create cohorts of appropriately skilled BSL and ISL interpreters - there needs to be spaces where natural use of language occurs. So promoting language through the establishment of deaf centres would not only achieve the aim of equipping parents to adequately communicate with their deaf children, but would also achieve the goal to ensure there are enough appropriately skilled people with the language level required to interpret.

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:

Creating appropriate funding to establish a deaf cultural centre/ deaf clubs run by deaf people and staffed by deaf people at all levels as mentioned above.

Creating employment opportunities for deaf people within various workforces by addressing the cap on Access to Work. In addition to exposing the general public to deaf people using sign language in a range of settings, this would also create opportunities for deaf professionals to establish businesses / work on a self-employed basis to provide and deliver BSL and ISL tuition, or deaf awareness training, or any other services such as in sports, the arts, child care provision, and others.

By enabling deaf people with the correct access, the opportunities are endless

### 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:

It is concerning that the list of prescribed organisations has not been published yet.

"In considering what is reasonable, prescribed organisations may take account of cost and practicability." This consideration completely weakens the entire clause. It should be removed. Just as other services are enforced for a business to operate such as fire safety regulations and other access regulations, deaf people should have the right to access services as a natural course of their every day lives.

The wording of this clause concerns me as it does not explicitly say that they need to take reasonable steps to provide Sign Language Interpretation - rather, it says to offer or facilitate the use of BSL or ISL.

The term 'reasonable steps' is also included in the DDA and does not appear to be strong enough to ensure that prescribed organisations have a mandatory obligation to provide access through sign language interpreters.

The requirement should extend to all services, in the same way that services must make their services accessible for wheelchair users through the installation of a ramp, etc. Private businesses must also be considered within this clause. For example the likes of SSE Airtricity, or Virgin media, or call centres in general often discriminate against deaf people, quoting GDPR as a justification. For example, a deaf person calls the company to speak to someone about their electricity bill. If these companies do not acquire remote interpreting services as part of their business, the deaf person is forced to have another person named on their account to discuss matters on their behalf. However, this puts deaf people at significant GDPR risk as it forces deaf people to have to share sensitive data with another person which they may not feel comfortable to do, yet they have to discuss the account. There needs to be provision made that both public and private sector companies cannot get away with not providing access to the deaf customer.

### 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:

This is hard to comment on without the full details of who the prescribed organisations should be, however I do not feel that Department for Communities should create the list of who the bill should apply to and this should be directed back to appropriate representation from the deaf community, including a suitable amount of people from a range of backgrounds, expertise, skillsets, knowledge areas and lived experiences who can consult on these issues and ensure that the list is exhaustive and extensive enough to cover basic needs of deaf people

### 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:

Again, I do not feel that Department for Communities should hold such power, and rather this should be diverted to the deaf community through the establishment of a deaf advisory board made up of people who are not professionals working in projects which are funded by DfC. The advisory board should be made up of neutral parties who come from a wide and diverse background including deaf people from the older generation, younger generation, deaf blind people, and deaf people who have a range of knowledge and skillsets from a range of areas to adequately represent all sections of the deaf community. The advisory group should have an obligation to be transparent and open with the wider deaf community to ensure that the community feels adequately informed about updates, changes, discussions that are ongoing within the advisory group meetings if they so choose. I also feel that there should not be a conflict of interest where deaf professionals stand to have their projects funded, or may not be able to be as frank as needed because their work is being funded by DfC.

"at least one person or group appearing to the Department to be acting on behalf of the deaf community."

One person or group - is not enough to appropriately reflect all sections of the community  
'appearing to the Department to be acting on behalf of the deaf community' - this is wording that could be potentially dangerous to the deaf community who has been historically oppressed and marginalised by the hearing world. People may appear to act on behalf of a disempowered group for a range of reasons such as academic background, hearing privilege, etc.

The representatives who consult on such issues regarding the legislation should be nominated and voted in by the deaf community to establish and maintain trust and there should be a clearly defined process whereby the deaf community can issue a vote of no confidence if they feel that the people who are being consulted with are not acting with fidelity, care, trust, and with the best interests of the deaf community as a whole.

## 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:

No - again this should all be consulted on with the deaf community. As in my previous response, the people who are consulted with should be nominated and voted in by the community and clearly represent a range of viewpoints from various backgrounds and not be influenced by any conflicts of interest which may disrupt the trust in their position.

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 establishment of a Deaf Advisory Board made up of deaf people who represent a range of viewpoints, knowledge, skillsets, and diversity. These people should be nominated and voted in by the community, and have clear expectations to consult with the deaf community and keep the community informed and keep information transparent and clear with regards to discussions around legislation, amendments, updates. They should have an obligation to declare any conflicts of interest and appear to the community to be acting with trust, fidelity and care towards the aims of the community.

## 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:

Again, the power of decision-making, for creating new regulations, should fall back on the deaf community to be able to consult on. Nothing about us without us. As far as I am aware, nobody within the Department for Communities can even sign - so giving DfC these huge powers is scary.

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:

Yes- with all decisions, there should be a mandatory consultation with the deaf community. Of course, this would need to be managed and as my previous responses have indicated that by establishing a deaf advisory group in order to consult on these issues who have a clear obligation to consult with the wider community and represent the views of the wider community, while not being influenced by any other factors or hold any conflicts of interest, they should also be people who the community trust and feel that represent them

## 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:

No - the wording of this is incredibly dangerous, especially for an already oppressed and marginalised community who quite literally have their voices taken from them at every turn within society.

'appearing to the Department to be acting on behalf of the deaf community' is not clearly defined and has the potential to be really harmful. There are overwhelming numbers of hearing professionals who are misinformed about Sign Languages and the deaf community who 'appear to represent the deaf community' who most certainly do not. They may appear to represent the community because they hold certain qualifications, or they hold certain job positions, or they use sign language, or may be sign language interpreters - on paper - they may 'appear to represent the deaf community' yet they are incredibly harmful and perpetuate misinformation and cause continuous and ongoing oppression towards the deaf community.

This clause MUST clearly define that consultation with the deaf community should be with an established advisory group of people who are trusted within the community and represent a wide range of views within the deaf community. This could be achieved by nominating and voting in an advisory board with very clear roles to consult with the wider deaf community, and include representation from all sections of the community such as older people, young people, deaf blind people, academics, deaf interpreters, deaf professionals, grassroots deaf people, etc. There must be an obligation to declare any conflicts of interests, and be transparent and informative to the deaf community regarding any discussions being held on their behalf.

## 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:

Initially, the reporting period should be shorter and then potentially every 5 years after a set period of time to review once things have been established.

The more important thing to consider though is what are the measures by which the report will need to look at? This needs to be clearly defined

## 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:

No, Northern Ireland do not currently have the infrastructure to support the creation of a new scheme for accrediting BSL and ISL teachers. There are already established schemes that work, and the resources that would be needed to support this could be put to better use elsewhere.

However, if this goes ahead -The creation of a scheme would need to be deaf-led by industry experts both from Northern Ireland and from other jurisdictions (because Northern Ireland do not have many leaders within this field to consult on about this and until this is established, consultation would need to be sought from elsewhere). The most important aspect of this would be that it is led by deaf people and deaf experts. I will repeat this for clarification - under no circumstances should this be led by hearing people with no consultation with deaf experts.

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:

No - under no circumstances should this be led by hearing people with no consultation with deaf experts. The current QUB course, which has been established to promote the creation of new BSL and ISL interpreters, is currently not mapped with NRCPD, with no information as to when this will be completed. As far as I know, there has been no consultation with the Northern Ireland Deaf community about the establishment of this course. [REDACTED] the course has been oppressive towards deaf people by the way it has been run, there is also currently no DSA in place for deaf students, [REDACTED] at the end of the course, deaf students will acquire a qualification as a qualified translator, and hearing students will acquire a qualification as a qualified interpreter, despite it being the same course, with the same assessments, modules, and teaching involved. [REDACTED]

[REDACTED] This is all because there has been no consultation with deaf experts in the establishment of the courses aims and practices. [REDACTED] no practical interpreting training within the first year, and no requirement to use Sign Languages within the class setting. Some students have been admitted without acquiring the mandated Level 6 qualification. The establishment of this course should have been in consultation and collaboration with deaf experts in this field. In theory and on paper, it might look as though the course is achieving a lot and looks impressive, but in reality, the course is not preparing students for the reality of the requirements of a sign language interpreter within Northern Ireland.

Any establishment of any new schemes for accreditation for both BSL and ISL teachers and BSL and ISL interpreters should be deaf-led. Led by deaf people.

## 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:

I am not sure what the purpose is for the definition of the members of the deaf community however, if this definition is to be used to justify/establish who can be consulted with to make amendments or create legislation I don't feel this definition is appropriate to define who can be consulted on with regards to legislative changes.

I do not feel that this definition protects the deaf community:

Clause 11 also provides that people who (whether or not they have some or full hearing) have little or no understanding of spoken or written language in English but are able to communicate effectively in BSL or ISL, are to be regarded as if members of the deaf community for the purposes of the Bill.

## 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:

I have no comment

## 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?

Yes

Please give details to support your answer.

Text box to enter additional details:

There was no inclusion or mention of rights to education in sign language for deaf children

There was no mention that all parents who have deaf children SHOULD be made aware, without bias about the benefits of sign language and how to access the classes provided by the act

There was no mention of private businesses such as SSE, Virgin Media or charities that deaf people may need access to via the provision of a sign language interpreter

There was no mention of Access to Work caps - these need to be increased to allow deaf people the same employment opportunities as deaf people

There was no mention of funding for a deaf club/ sign language cultural centre

The Bill should explicitly support Deaf-led initiatives

Deaf schools could and should be considered by the same lens as Irish medium schools providing access to education through the medium of British and Irish Sign Language

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

Text box to enter additional details: