

## Response ID ANON-PYJC-FR1M-C

Submitted to Sign Language Bill - Call for Evidence  
Submitted on 2025-05-08 00:22:50

### Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email:

[REDACTED]

What is your organisation?

Organisation:

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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:

Clause 1 formally recognises British Sign Language (BSL) and Irish Sign Language (ISL) as languages of Northern Ireland. However, it does not currently clarify that this recognition also applies to adapted forms of BSL and ISL used by the Deafblind community.

Without this clarity, there is a risk that Deafblind communication methods—such as hands-on signing, visual frame BSL, tactile fingerspelling, and the Deafblind Manual—will remain invisible in practice, despite being legitimate linguistic forms of the recognised languages.

Reason for Inclusion:

Deafblind sign language users often face serious barriers to access, and one of the root issues is the lack of legal and public recognition of their specific communication methods. If these methods are not clearly included under the legal recognition of BSL and ISL, organisations may fail to provide appropriate support, training, or interpretation.

Clarifying that the recognition of BSL and ISL includes all adapted forms used by Deafblind individuals would help ensure that legal rights apply equally across the full spectrum of users.

Proposed Wording Addition (Plain Language):

“In recognising British Sign Language and Irish Sign Language as languages of Northern Ireland, this Bill affirms that this recognition includes all adapted forms used by members of the Deafblind community—such as hands-on BSL, visual frame BSL, tactile fingerspelling, and the Deafblind Manual alphabet.”

### 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:

Clause 2 of the Bill rightly places responsibility on the Department for Communities to promote the use and understanding of BSL and ISL and to support the development of Deaf culture. However, for this to be fully inclusive, the clause must also address the needs of the Deafblind community, who are often overlooked despite being part of the wider Deaf population.

I strongly encourage that Clause 2 explicitly includes the communication methods used by Deafblind individuals, such as:

- Hands-on BSL
- Visual frame BSL
- Tactile fingerspelling
- Deafblind Manual alphabet

Reason for Inclusion:

There is currently a critical shortage of qualified Deafblind interpreters and communication support in Northern Ireland—almost none are available. Without urgent attention to this gap, the objectives of Clause 2 cannot be met for Deafblind people.

This shortage results in:

- Social isolation and communication barriers for Deafblind individuals;
- Inaccessible public services, education, and cultural life;
- Increased reliance on family members or untrained support, undermining autonomy.

Proposed Wording Addition (Plain Language):

“This duty must also include promotion and support for Deafblind communication methods such as hands-on BSL, visual frame BSL, tactile fingerspelling, and the Deafblind Manual. The Department must take steps to address the severe shortage of qualified Deafblind interpreters and ensure adequate training, awareness, and provision of these services across Northern Ireland.”

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:

I believe that the aims of the Bill—to promote greater use and understanding of BSL and ISL—must apply equally to the Deafblind community, who are an integral part of the Deaf community.

For Deafblind individuals, communication access often requires adapted forms of BSL and ISL—such as hands-on signing, tactile fingerspelling, and the Deafblind Manual. If these are not included, or if interpreter shortages are not addressed, then Deafblind people will remain excluded from the rights and recognition the Bill promises.

This must also include raising awareness within the wider Deaf community itself, where many still lack understanding of Deafblind communication methods and accessibility needs.

True inclusion means recognising that the Deaf community includes a wide range of communication needs, and ensuring that Deafblind signers are not an afterthought, but a visible and valued part of this change.

Summary of Concern:

While Clause 2 of the Bill provides for the availability of sign language classes, this alone will not be sufficient to achieve the broader objective of promoting the greater use and understanding of British Sign Language (BSL) and Irish Sign Language (ISL) in Northern Ireland. A wider set of approaches is needed to build public awareness, professional capability, and cultural inclusion.

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Reason for Inclusion:

Access to classes is only one step. Many individuals—including family members, service providers, employers, and the wider public—either lack opportunities or motivation to attend classes without broader systemic support. Deaf and Deafblind people often experience exclusion not just because others can't sign, but because their language and culture are not visible, normalised, or respected across society.

In particular, Deafblind individuals face additional exclusion due to the severe lack of trained interpreters and support in tactile and adapted BSL/ISL forms. Without inclusive strategies, the goals of the Bill cannot be fulfilled for the full Deaf community.

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Proposed Wording Addition (Plain Language):

"In addition to the provision of classes, the Department must take steps to promote greater use and understanding of BSL and ISL through:

- Public awareness campaigns highlighting Deaf and Deafblind sign language users;
- Inclusion of BSL and ISL in the education system;
- Mandatory Deaf and Deafblind awareness training for public services;
- Investment in the training and accreditation of interpreters, including those qualified in tactile and Deafblind sign languages;
- Support for community-led events and cultural activities that centre BSL, ISL, and Deaf culture."

This addition would ensure the Bill delivers lasting change by embedding sign language inclusion into everyday life, not just formal education.

### 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 places a duty on organisations to ensure their services and information are as accessible to Deaf people as they are to others. However, without clearer guidance, this may not fully protect Deafblind individuals who rely on adapted sign language or tactile communication, such as through a communicator guide or hands-on BSL.

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Reason for Inclusion:

Deafblind people often face barriers when accessing public services because appropriate support—such as qualified interpreter-guides or communicator guides—is not offered. In practice, many are expected to bring their own support, which creates inequality and places emotional, logistical, and financial strain on the individual.

The Bill should make clear that organisations must take all reasonable steps to provide accessible communication options, and that Deaf and Deafblind people should not be expected to arrange or fund their own interpreter or communicator guide in order to access essential services.

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Proposed Wording Addition (Plain Language):

"Organisations must ensure that Deaf and Deafblind individuals are not required to bring their own interpreter or communicator guide when accessing services. Reasonable steps to provide access should include support for hands-on BSL, tactile communication, and communicator-guide services where needed, without extra cost or inconvenience to the individual."

### 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 define which public bodies (called prescribed organisations) will be required to follow the duties set out in Clause 3. However, the Bill currently does not specify which types of organisations must be included—or how their responsibilities will meet the specific needs of Deafblind individuals.

Without clear inclusion of organisations that regularly interact with Deafblind people, access may remain unequal in areas that are essential for safety, independence, and health.

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Reason for Inclusion:

Deafblind people rely on clear, accessible communication across a wide range of services—not only healthcare and councils, but also in transport, emergency services, housing, education, and social care.

If these bodies are not explicitly listed or prioritised, Deafblind people may continue to face barriers to:

- Booking medical appointments,

- Understanding legal or housing documents,
- Receiving emergency information or home visits,
- Using public transport independently,
- Accessing education or employment support.

□

Proposed Wording Addition (Plain Language):

“In determining the list of prescribed organisations under Clause 4, the Department must include public bodies that are essential for ensuring the safety, wellbeing, and independence of Deaf and Deafblind people. This should include, but is not limited to:

- Health and Social Care Trusts
- Local councils and housing bodies
- Education and training providers
- Emergency services (police, ambulance, fire)
- Transport providers
- Public-facing government departments and benefits services”

“The list must reflect the communication needs of Deafblind individuals, including the right to tactile sign language and communicator-guide support across all relevant sectors.”

## 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 requires the Department for Communities to consult both prescribed organisations and at least one representative of the deaf community when issuing guidance about the Bill. However, the current wording may result in the exclusion of Deafblind individuals and organisations—as it does not guarantee that those consulted will reflect the full diversity of Deaf experiences.

In practice, many Deafblind people are underrepresented or misunderstood even within broader Deaf consultation, leading to gaps in accessibility and policy design.

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Reason for Inclusion:

Deafblind people face unique communication, mobility, and support needs that differ from those of other Deaf individuals. These needs include:

- Tactile and hands-on forms of BSL/ISL,
- Use of communicator guides or interpreter-guides,
- Different access strategies in public information, health, housing, and emergency response.

If guidance is created without input from Deafblind-led organisations or individuals, it risks repeating patterns of exclusion—even if unintentionally.

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Proposed Wording Addition (Plain Language):

“When consulting on the development or revision of guidance under this Act, the Department must ensure that consultation includes at least one person or organisation with lived experience or professional expertise in the communication and access needs of the Deafblind community.”

“Representation of the deaf community must reflect the diversity of Deaf sign language users, including those who rely on tactile or adapted forms of BSL and ISL.”

## 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:

Clause 6 requires the Department for Communities to issue best practice guidance for public bodies on what reasonable steps to take under the Bill, how to create sign language action plans, and how to interact with BSL/ISL users. However, the clause does not explicitly require this guidance to address the needs of Deafblind people, who rely on adapted and tactile forms of BSL and ISL.

Without specific inclusion, Deafblind communication needs risk being misunderstood or overlooked, even in well-meaning implementation.

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Reason for Inclusion:

Best practice must reflect the full spectrum of sign language use, including:

- Hands-on BSL
- Visual frame BSL
- Tactile fingerspelling
- Deafblind Manual alphabet

Public bodies also need guidance on:

- When and how to book communicator guides or Deafblind interpreters,
- How to engage with Deafblind people respectfully and accessibly,
- How to avoid assumptions that written or visual access is enough.

If these areas are not covered, organisations may unintentionally exclude Deafblind individuals from services, consultations, and everyday interactions.

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Proposed Wording Addition (Plain Language):

“Best practice guidance must include advice on meeting the communication needs of Deafblind people, including the use of hands-on BSL, tactile fingerspelling, visual frame BSL, and the Deafblind Manual. Public bodies should receive clear guidance on how and when to arrange appropriate support, such as communicator guides or Deafblind interpreters.”

“Sign language action plans developed by prescribed organisations must reflect the diversity of BSL and ISL users, including those who use tactile and adapted forms.”

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 6 focuses on providing best practice guidance to public bodies, but it does not currently require monitoring or review to ensure this guidance is followed—or that it leads to real-world accessibility for Deaf and Deafblind people.

It also does not mention the need for ongoing training, which is essential for meaningful change—especially regarding Deafblind communication, where awareness is often extremely low.

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Reason for Inclusion:

Even with guidance in place, many organisations will not know how to:

- Identify when a Deafblind person needs adapted support,
- Choose the correct type of interpreter or guide,
- Understand the difference between tactile BSL and visual BSL.

If staff are not trained and guidance is not followed up, Deafblind individuals will remain excluded. A clear framework for monitoring, evaluation, and mandatory training is needed to close this gap.

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Proposed Wording Addition (Plain Language):

“Clause 6 should also require that public bodies receive regular training in best practice for working with Deaf and Deafblind people, including training in communication methods such as hands-on BSL, tactile fingerspelling, and visual frame BSL.”

“Guidance should include tools for monitoring whether prescribed organisations are meeting their responsibilities, and for reviewing and improving sign language action plans over time, with input from Deaf and Deafblind users.”

## 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:

I support the need for future regulations to give practical effect to the Sign Language Bill. However, I am concerned that Clause 7 does not go far enough to guarantee the inclusion of Deafblind people in the development of these regulations, nor does it ensure that future duties will consider the distinct communication and support needs of this group.

There is a risk that, without clear safeguards, Deafblind people will continue to face systemic barriers due to:

- Lack of tactile BSL/ISL recognition in service provision,
- Inadequate training and resourcing of communicator-guides,
- Overreliance on cost-based exemptions by smaller organisations.

Recommendations:

1. The Department must be required to consult not just with “the deaf community” generally, but specifically include Deafblind individuals and organisations with expertise in Deafblind communication and access.
2. Future regulations must guarantee access to support such as communicator-guides and tactile BSL interpreters as essential—not optional.
3. Any adjustments to requirements based on resources must not result in Deafblind people being left without access to critical services.

□

Proposed Wording Addition (Plain Language):

“In making regulations under this Act, the Department must consult with representatives from both the Deaf and Deafblind communities to ensure that future regulations reflect the full range of communication needs. This includes ensuring that adapted forms of BSL and ISL—such as hands-on signing and tactile fingerspelling—are considered essential in access planning.”

“Any adjustment of requirements due to affordability or resources must not result in the exclusion of Deafblind individuals from vital services.”

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:

I support the principle of consultation before new regulations are introduced. However, the current wording in Clause 7—requiring consultation with “the deaf community and relevant organisations”—is too broad and vague, and risks excluding Deafblind people from meaningful participation.

In past consultations, the Deafblind community has often been underrepresented, even when issues directly affect them. Without specific inclusion, this pattern may continue—leading to future regulations that do not reflect the communication needs of people who rely on hands-on BSL, tactile fingerspelling, or communicator-guides.

□

Recommendations:

1. Consultation under Clause 7 must explicitly include organisations and individuals with expertise in Deafblind communication and access.
2. The Department must ensure that consultation materials are accessible in formats suitable for Deafblind people (e.g. tactile sign, braille, large print, audio, or one-to-one support).
3. Feedback from Deafblind respondents must be clearly acknowledged and reflected in regulatory decisions—not treated as an afterthought.

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Proposed Wording Addition (Plain Language):

“When consulting on regulations under this Act, the Department must ensure that the consultation process is inclusive of Deafblind individuals and organisations. This includes using accessible formats and engagement methods, and ensuring that Deafblind-specific communication needs and experiences are reflected in the development of regulations.”

## 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:

I don't think Clause 8 goes far enough to ensure that the consultation process is inclusive or representative of the full diversity within the Deaf community—particularly those who are Deafblind.

The requirement to consult only “at least one person or group acting on behalf of the deaf community” is too limited. It risks repeating a pattern where consultation is narrow, tokenistic, or dominated by voices who do not understand or represent Deafblind communication needs.

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Why This Matters:

- Deafblind people use distinct forms of BSL/ISL (e.g. hands-on signing, tactile fingerspelling) and face different access barriers than other Deaf signers.
- Without specific inclusion, new regulations may fail to provide for the use of communicator-guides, tactile interpreters, or accessible materials.
- These needs are often misunderstood—even by well-meaning organisations—so lived experience must shape policy at the earliest stage.

□

Recommendations:

1. Clause 8 should require consultation with a range of individuals and organisations, including those with expertise in Deafblind access and communication.
2. The language “at least one person or group” should be revised to reflect the need for inclusive and representative consultation, not minimal compliance.

□

Proposed Wording Addition (Plain Language):

“Before laying draft regulations, the Department must consult with a diverse and representative group of stakeholders, including individuals and organisations with lived experience and professional knowledge of Deafblind communication and access needs.”

“The consultation process must ensure that the full spectrum of BSL and ISL users, including those who use tactile or adapted forms, are meaningfully included and reflected in any resulting 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:

I support the requirement for regular evaluation of the Bill's impact. However, I am concerned that a five-year reporting cycle is too infrequent—especially in the early years of implementation when challenges, gaps, or unintended exclusions may quickly emerge and go unaddressed.

This is particularly important for Deafblind people, who already face systemic barriers due to a lack of trained interpreter-guides, limited public awareness, and poor access to tactile BSL/ISL. Without more frequent monitoring, these issues risk being overlooked or delayed for years before any corrective action is taken.

□

Recommendations:

1. Require an initial evaluation report within two years of the Bill's commencement, followed by five-year reports thereafter. This ensures early accountability and course correction.
2. Reports must include specific analysis of the Bill's impact on both Deaf and Deafblind communities, including:
  - Access to trained interpreters and communicator-guides,
  - Progress in public body compliance with tactile sign language access,
  - Feedback from Deafblind individuals on service experiences.
3. Reports should be made publicly accessible in multiple formats (e.g. large print, braille, audio, tactile summary on request).

□

Proposed Wording Addition (Plain Language):

“The Department must publish an initial report within two years of the Bill’s commencement, followed by subsequent reports every five years. Each report must include a clear evaluation of the impact of the Bill on Deaf and Deafblind individuals, including communication access, interpreter availability, and the effectiveness of public services in meeting the needs of tactile BSL and ISL users.”

## 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:

I fully support the creation of a formal accreditation scheme for teachers and interpreters of BSL and ISL. Accreditation ensures high-quality, culturally appropriate teaching and interpretation, and it is essential for building a more inclusive and linguistically accessible society.

However, Clause 10 must go further to guarantee that this scheme includes the training and accreditation of Deafblind interpreters and communicator-guides, who are currently in desperately short supply in Northern Ireland. Without specific mention, these professionals risk being left out of the system entirely.

□

Why this matters:

- Deafblind people rely on tactile BSL, hands-on signing, and other adapted methods that require highly skilled support.
- Most accredited interpreter training schemes do not currently include Deafblind interpreting pathways.
- Many Deafblind people cannot access public services, education, or community life due to the absence of qualified communicator-guides.

□

Recommendations:

1. The accreditation scheme must include a pathway for training and registering Deafblind interpreters (including hands-on BSL and tactile communication methods).
2. The Department must fund and promote specialist training programmes to grow this workforce, starting from a base of almost none.
3. Teachers of BSL/ISL must be trained to understand and include Deafblind learners, who may need adapted teaching methods and communication support.

□

Proposed Wording Addition (Plain Language):

“The accreditation scheme must include provision for Deafblind interpreters and communicator-guides, and ensure that teachers of BSL and ISL are trained to support learners who use tactile or adapted forms of these languages. Training and qualifications must reflect the full range of BSL and ISL users, including Deafblind people.”

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:

I would strongly support the creation of an official accreditation scheme for BSL and ISL interpreters. Formal accreditation will improve the quality, consistency, and professionalism of interpretation services, which are essential to Deaf people’s full participation in public life.

However, the current wording of Clause 10 does not make clear whether Deafblind interpreting—which includes hands-on BSL, tactile fingerspelling, and Deafblind Manual—is included in the scope of this accreditation. This must be addressed, as Deafblind people face some of the most severe access barriers, often going without any communication support at all.

□

Why Deafblind Interpreter Accreditation Is Critical:

- There is an extreme shortage of qualified Deafblind interpreters and communicator-guides in Northern Ireland—often none are available.
- Without accreditation, there is no recognised pathway for professionals to train or register in this field.
- Deafblind people often miss appointments, support, and essential information because no appropriate interpreter is available.

□

Recommendations:

1. The accreditation scheme must explicitly include training, standards, and recognition for Deafblind interpreters and communicator-guides.
2. The scheme should fund and promote specialist training programmes, recognising that Deafblind interpreting is not an optional extra—it is essential.
3. Interpreters working with Deafblind people must be assessed not only on language fluency but also on tactile communication skills, mobility awareness, and person-centred interaction.

□

Proposed Wording Addition (Plain Language):

“The interpreter accreditation scheme must include provision for Deafblind interpreters and communicator-guides, with specialist training and assessment in tactile communication methods. The scheme should ensure that Deafblind individuals have access to qualified professionals across all public services, without delay or additional cost.”

## 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 would welcome the inclusive intention behind Clause 11 and appreciate that it recognises deaf and deafblind individuals who use BSL or ISL, as well as CODAs (Children of Deaf Adults) and others who rely on sign language for communication. However, I believe the definition needs to be strengthened and clarified, particularly in relation to the Deafblind community.

□

Concerns:

- The definition uses broad terms like “deaf or deafblind people who normally use BSL or ISL,” but does not acknowledge that Deafblind individuals often use adapted, tactile forms of these languages.
- The phrase “normally use” may unintentionally exclude Deafblind people who use tactile BSL/ISL only in certain settings or who rely on communicator-guides due to fluctuating sensory or cognitive access.
- There is no explicit recognition of tactile communication methods, such as hands-on BSL, visual frame BSL, tactile fingerspelling, or the Deafblind Manual alphabet.

□

Recommendations:

1. Revise the definition to explicitly include adapted and tactile forms of BSL and ISL used by Deafblind individuals.
2. Ensure the definition allows for flexibility in communication methods—recognising that Deafblind people may use sign language in varying ways depending on environment, support, or progression of sight/hearing loss.

□

Proposed Wording Addition (Plain Language):

“For the purposes of this Act, references to BSL and ISL include all forms of adapted or tactile communication used by Deafblind people, such as hands-on BSL, tactile fingerspelling, visual frame BSL, and the Deafblind Manual alphabet.”

“Deafblind individuals who use tactile or adapted forms of BSL or ISL for some or all of their communication should be fully recognised as members of the deaf community under this Act.”

## Clause 12

Do you agree with the definition of BSL and ISL provided for 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:

I would welcome the inclusion of both visual and tactile/non-visual forms of British Sign Language (BSL) and Irish Sign Language (ISL) within the definition. This is an essential recognition of the communication methods used by Deafblind people, and a positive step toward inclusion.

However, I believe the current definition could be made stronger and clearer by:

1. Explicitly naming the tactile and non-visual forms used by Deafblind people (such as hands-on BSL, tactile fingerspelling, visual frame BSL, and the

Deafblind Manual).

2. Ensuring these forms are not seen as rare exceptions, but as equal and valid parts of BSL and ISL.

□

Why This Matters:

- Many services, interpreters, and public bodies are unfamiliar with what “tactile or non-visual forms” actually mean.
- If the Bill does not spell them out, they may be overlooked in training, planning, or funding.
- Deafblind people regularly experience exclusion due to this lack of understanding—even in services that claim to be “sign language accessible.”

□

Recommendations:

1. Amend the definition to include named examples of tactile BSL/ISL forms.
2. Affirm that these forms carry equal status with visual BSL/ISL.
3. Encourage all public bodies to understand and accommodate these forms in practice.

□

Proposed Wording Addition (Plain Language):

“For the purposes of this Act, BSL and ISL include all visual and tactile forms commonly used by Deaf and Deafblind people. This includes, but is not limited to, hands-on BSL, visual frame BSL, tactile fingerspelling, and the Deafblind Manual alphabet.”

“These forms are to be recognised as full and valid expressions of BSL and ISL and must be equally supported in service provision and interpreter accreditation.”

## 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:

I would support the inclusion of a definition for “everyday reliance” on BSL and ISL, as it helps clarify who the Bill is intended to support. However, I believe the current wording—referring to reliance “wholly or substantially” by “necessity or for convenience”—may create ambiguity, particularly for Deafblind people and those with fluctuating access needs.

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Concerns:

- “Substantial reliance” is open to interpretation and may be misunderstood by public bodies or service providers, who might incorrectly assume that occasional or adaptive use of BSL/ISL doesn’t count.
- Many Deafblind people rely on tactile BSL or ISL in specific contexts (e.g. medical appointments, banking, navigation), but may use gesture, braille, or personal support in other situations. This should not disqualify them from being seen as “everyday users.”
- Some sign language users rely on BSL/ISL more in public spaces than at home. The definition must reflect that “everyday” does not mean every moment of every day.

□

Recommendations:

1. Clarify that “everyday reliance” includes context-specific or situational use of BSL/ISL where it is the preferred or most accessible means of communication.
2. Ensure that Deafblind users of tactile BSL/ISL are clearly recognised under this definition, even if they combine other communication methods (e.g. braille, speech, or human support).

□

Proposed Wording Addition (Plain Language):

“For the purposes of this Act, ‘everyday reliance’ on BSL or ISL includes individuals who rely on any form of BSL or ISL—visual or tactile—for communication in daily or routine situations. This includes reliance in specific settings or contexts where sign language is necessary for access, regardless of whether other communication methods are also used.”

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:

Yes. While the Bill takes important steps toward equality for sign language users, there are several critical gaps that must be addressed to ensure Deafblind people are fully included and that the Bill's intentions are meaningfully realised.

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Key Areas Missing from the Bill:

1. Provision for Communicator-Guides and Deafblind Interpreters

- The Bill does not make specific provision for training, funding, or guaranteeing access to communicator-guides or tactile BSL/ISL interpreters, despite these being essential for Deafblind people to access public services, health care, education, and social life.
- Without this, Deafblind individuals remain systemically excluded, even when the law recognises their language.

2. Funding for Training and Capacity Building

- There is no clear commitment to fund the specialist training needed to grow the pool of qualified Deafblind support workers, interpreters, and educators.
- This is especially urgent in Northern Ireland, where provision is currently almost non-existent.

3. Safeguards for Consistent Access Across Regions

- The Bill allows for flexibility based on affordability (Clause 3), but it fails to include minimum standards or safeguards to prevent Deaf or Deafblind people in rural or under-resourced areas from being left without access.

4. Accessibility of the Bill's Implementation Process

- There is no requirement for consultation materials, guidance, or reports under the Bill to be published in accessible formats (e.g. tactile summary, large print, braille, audio, BSL/ISL videos).
- This undermines full participation from the very people the Bill is designed to protect.

□

Proposed Wording Addition (Plain Language):

"The Bill should make explicit provision for communicator-guides and Deafblind interpreters as essential support roles, with dedicated training, accreditation, and funding. It should also include minimum national standards for access and require all public guidance and consultation materials under this Act to be available in accessible formats for Deaf and Deafblind individuals."

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

Text box to enter additional details:

I would welcome the introduction of the Sign Language Bill and commend the commitment to recognising BSL and ISL in law. However, to ensure the Bill delivers real equality, it must move beyond symbolic recognition and commit to practical, resourced, and inclusive change—especially for Deafblind people, who are too often left behind even in Deaf-focused legislation.

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Key Principles for the Bill's Success:

1. Inclusion of the Deafblind Community Must Be Explicit

- The Bill must affirm that tactile and adapted forms of BSL/ISL (e.g. hands-on signing, tactile fingerspelling, Deafblind Manual) are not "optional extras," but equal forms of language deserving full legal protection, access, and support.

2. Equality Must Not Depend on Location, Budget, or Visibility

- The rights of Deaf and Deafblind people to access services, interpreters, and communication support must not vary based on where they live, what services they use, or how well-known their needs are.
- The Bill should ensure consistency, training, and national standards.

3. Nothing About Us Without Us

- The voices of Deaf and Deafblind people must be central to every part of the Bill's implementation—from consultation to training, from evaluation to regulation.
- Representation must reflect the full spectrum of communication needs, not rely on a single person or organisation to speak for all.

□

Final Proposed Action:

I ask the Assembly and the Department for Communities to co-produce an implementation framework alongside Deaf and Deafblind communities, ensuring that every clause of the Bill leads to real, measurable, and inclusive outcomes.