

# Response ID ANON-PYJC-FR1S-J

Submitted to Sign Language Bill - Call for Evidence  
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## Consent and introduction

What is your name?

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## 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:

- Symbolic Recognition: The Bill does formally acknowledge BSL and ISL, which holds importance for the deaf community's identity and recognition.
- Legal Foundation: It establishes a legal basis for promoting and protecting these languages, which can be used as a foundation for future advancements.
- Parity: The Bill aims to give BSL and ISL equal status, acknowledging Northern Ireland's bilingualism in sign languages.

Clause 1 is a starting point. It provides a foundation for recognizing BSL and ISL in Northern Ireland. However, its effectiveness will depend heavily on:

How the Department for Communities uses its powers.  
Whether sufficient resources are allocated.  
The content of future guidance and regulations.

## 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:

Promotion of Use and Understanding: The clause explicitly mandates the Department for Communities to promote the greater use and understanding of BSL and ISL. This signals a commitment to raising awareness and facilitating the languages' broader adoption.

Emphasis on Education: The requirement to provide for the availability of classes, particularly for deaf children and their families, guardians, and carers, directly addresses a critical need for language acquisition and development.

Providing BSL and ISL classes to deaf children, their families, guardians, and carers directly addresses a fundamental need: communication. This empowerment can have cascading effects on a deaf child's development, self-esteem, and ability to engage with the world around them.

Family Inclusion and Cohesion: Offering classes to families promotes inclusion and strengthens family bonds. When hearing family members learn to sign, it breaks down communication barriers and allows for more meaningful interactions and shared experiences.

Early Intervention: Access to sign language from an early age is crucial for deaf children's language acquisition and cognitive development. 'At no cost' classes facilitate this early intervention, setting a strong foundation for future learning and social integration.

Potential Challenges and Considerations:

Resource Allocation: The effectiveness of providing classes hinges on adequate resource allocation. This includes appropriate funding for 'qualified' teachers / tutors, which is still not currently mapped out formally or agreed with the existing pool of Tutors / Teachers..

Teacher / Tutor Availability: There needs to be a sufficient number of 'qualified' BSL and ISL Teachers/ Tutors to meet the demand for classes. Workforce planning and teacher training are essential to ensure the availability of skilled instructors.

Cultural Development: The inclusion of a duty to promote the further development of deaf culture acknowledges the importance of language in shaping and preserving cultural identity

In conclusion, Clause 2 has the potential to bring about significant positive change, its success depends on addressing the potential challenges ahead and ensuring adequate resources and long-term commitment.

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:

There are a wide range of approaches that could be used:

#### 1. Community-Based Immersion Programs:

Instead of solely relying on classroom settings, organize events and activities where families can use sign language in natural, everyday contexts.

Examples:

Sign language story time at libraries or community centers.  
Deaf-led family outings to parks, museums, or cultural events.  
Sign language coffee mornings or support groups for parents.

#### 2. Technology-Enhanced Learning:

Utilize digital tools and platforms to make learning fun and accessible.

Examples:

Develop or promote interactive sign language apps and games for families to use at home.  
Create online Children stories featuring native signers.  
Offer online sign language courses or webinars for families who cannot attend in-person classes.

#### 3. Mentorship and Role Models:

Connect deaf adults with families to provide mentorship and guidance.

Examples:

Pair deaf mentors with hearing families who are learning sign language.  
Invite deaf role models to speak at family events and share their experiences.  
Create opportunities for deaf and hearing children to interact and learn from each other.

### 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:

This is unfortunately not a Yes or No answer due to the following:

- **Clear Objective:** The clause establishes a clear objective: to ensure that deaf individuals have the same access to information and services as hearing individuals. This principle of equality is fundamental.
- **Addresses Cost Barrier:** The stipulation that accessibility measures must be provided "at no extra cost" to deaf individuals is crucial. It prevents service providers from passing on the financial burden of accessibility to those who need it most.
- **Flexibility for Organizations:** By allowing organizations to consider "affordability" and "practicability," the clause acknowledges that there is no one-size-fits-all solution to accessibility. This flexibility enables organizations to tailor their approach to their specific circumstances.

Concerns and Potential Weaknesses of Clause 3:

- **"Reasonable Steps" is Vague:** The term "reasonable steps" is inherently subjective and open to interpretation. This lack of a clear definition could lead to inconsistencies in how different organizations implement the clause, potentially resulting in unequal access across prescribed organisations for deaf individuals.
- **Emphasis on Cost and Practicability:** While considering cost and practicability is important, there's a risk that these costs factors could be prioritized over the needs of deaf individuals. This could lead to organizations choosing the cheapest or easiest solutions, which may not be the most effective.
- **Lack of Enforcement Mechanism:** The clause doesn't specify how compliance will be monitored or enforced. Without clear accountability measures, there's a risk that some organizations may not take their obligations seriously. Without metrics being built into the five year review there is no effective measure of Progress.

To further qualify this:

- The effectiveness of Clause 3 will heavily depend on the guidance provided by the Department for Communities. Clear, detailed guidance is essential to ensure consistent and effective implementation.
- It's important to consider the potential for conflict between the needs of deaf individuals and the financial constraints of prescribed organizations. Striking the right balance is potentially problematic for this clause to be effective.

In conclusion, Clause 3 lays the groundwork for ensuring equal access for deaf individuals, but its success hinges on clear guidance, a commitment to meaningful implementation, and effective oversight via metrics.

## 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:

The Department for Communities has demonstrated a clear commitment to advancing Sign Language recognition and accessibility, making it well-suited to take the lead in providing regulations for prescribed organizations. The department has been instrumental in developing the Sign Language Framework, actively engaging with the Deaf Community through various avenues such as the cross-departmental/Deaf sectoral Sign Language Partnership Group, which it chairs. This sustained involvement and leadership, coupled with its policy remit for cultural and linguistic matters, positions the Department for Communities as the appropriate body to formulate and oversee the implementation of regulations that will ensure prescribed organizations effectively fulfil their duties under the Sign Language Bill.

Clause 4 establishes the process for determining which public bodies must comply with the Bill's provisions. While it offers flexibility and mandates consultation, there are valid concerns about the use of the negative resolution procedure and the potential for inconsistent implementation.

The actual impact of Clause 4 will depend significantly on how the Department for Communities exercises its power to make regulations. The specific organizations that are included, the clarity of the regulations, and the guidance provided to organizations will all be critical factors.

There's a potential risk of inconsistency in how different public bodies implement their duties under the Bill. This could arise from variations in the interpretation of "reasonable steps" (as mentioned in Clause 3) or from differences in the resources and capacity of different organizations.

## 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:

Arguments for the Consultation Process in Clause 5:

- Ensures Stakeholder Input: The clause mandates that the Department for Communities seek input when creating or revising guidance. This is a positive step towards ensuring that the guidance is informed by the perspectives of those who will be affected by it.
- Consultation with Prescribed Organizations: Requiring consultation with "each of the prescribed organisations" ensures that the guidance is practical and workable for the bodies that will be responsible for implementing it.

Concerns and Potential Weaknesses:

- Limited Representation: The requirement to consult with "at least one person or group appearing to the Department to be acting on behalf of the deaf community" is concerning. This wording is very narrow and may not adequately represent the diversity of the Deaf community.
- Risk of Exclusion: Consulting with only one person or group risks excluding other important perspectives within the Deaf Community, such as those of BSL users, ISL users, Deaf Blind individuals, or individuals from different cultural backgrounds.
- Alternative Approach: A more robust approach would be to mandate consultation with a representative body or a working group that includes individuals with a range of expertise and lived experience within the deaf community.

Here's where the Sign Language Partnership Group (SLPG) becomes relevant:

- The SLPG, chaired by the Department for Communities and comprising representatives from various departments and the wider Deaf Community, could serve as a more appropriate consultation body.
- Given its existing structure and purpose, the SLPG is better positioned to provide a more comprehensive and balanced perspective on the guidance.
- Using the SLPG as a primary consultation mechanism would align with the principle of "nothing about us, without us," ensuring that the Deaf Community / Organisations has a meaningful voice in shaping the guidance that affects their lives.

In conclusion, while the consultation requirement in Clause 5 is a positive step, it needs strengthening.

Consulting with the SLPG or a similar representative body would be a more effective way to ensure that the guidance reflects the diverse needs and perspectives of the Deaf Community in Northern Ireland.

## 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:

The Department for Communities is the appropriate body to provide guidance to prescribed organisations on "reasonable steps," Sign Language Action plans, and interacting with BSL/ISL users due to its existing responsibilities and expertise in this area. The department has demonstrated a commitment to advancing Sign Language recognition and accessibility through its work on the Sign Language Framework and its chairing of the cross-departmental/Deaf sectoral Sign Language Partnership Group. This ongoing engagement with the Deaf Community and its understanding of the relevant policy landscape equip the Department for Communities to offer informed and practical advice to prescribed organisations.

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:

While Clause 6 mandates guidance on developing Sign Language Action Plans, it does not explicitly state whether these plans should be published by the prescribed organisations. This raises several important questions:

Should Prescribed Organisations Sign Language Action Plans publication be mandatory?

- o Would mandatory publication of Sign Language Action Plans increase transparency and accountability?
- o Would it facilitate monitoring of metrics implementation by each of the prescribed organisations that inevitably feeds towards the five year reviews?
- o Are there considered reasons why publication might not be appropriate in all cases and is this explained?

Clarity in Guidance:

- o Should the Department for Communities' guidance specify whether publication is expected or required?
- o If publication is recommended, should the guidance provide details on how and where the plans should be published (e.g., on the organisation's website)?

#### Accessibility of Plans:

- o If plans are to be published, should there be requirements for them to be made available in accessible formats, including BSL and ISL?

#### Monitoring and Review:

- o How will the prescribed organisations' implementation and effectiveness of sign language action plans be monitored and reviewed?
- o Is there effective internal monitoring mechanisms towards the five year plan that would determine the success of the 'journey' towards stated goals?

In summary, while Clause 6 is important in directing the Department to provide guidance on creating Sign Language Action Plans for each of the prescribed organisations, it would benefit from further clarification on the issue of Publication of the Sign Language Action Plans for each of the prescribed organisations, Monitoring & Evaluation mechanisms.

## 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:

The Department for Communities is positioned as the appropriate body to provide guidance and advice to prescribed organizations.

This aligns with the idea that the same body should also be able to create regulations that give that advice the force of law, ensuring consistency and coherence.

The Department's ongoing engagement with the Deaf Communities and its strategic Sign Language Framework provides a robust foundation for creating regulations that are practical, relevant, and effective.

The Assembly will naturally have the capacity and willingness to thoroughly examine the proposed regulations prior to approval, ensuring they align with the Bill's intent and scope.

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

No

Please give details to support your answer.

Text box to enter additional details:

While the consultation approach in Clause 7 has positive aspects, it also presents some concerns that need to be addressed.

The requirement to consult with those receiving new functions is certainly a strength.

The phrase "at least one person or group" outside of prescribed organisations is too limited and does not adequately represent the diversity of the Deaf Community.

Relying on a single representative risk:

- Inadequate Representation: One person may not fully represent the varied perspectives of BSL users, ISL users, Deaf Blind individuals, and those from different cultural backgrounds.
- Skewed Priorities: A single representative might unintentionally prioritize one language or set of needs over others.
- Lack of Expertise: An individual might not possess sufficient expertise in all areas relevant to the regulations.

To ensure effective and equitable consultation, Clause 7 should be amended to mandate consultation with the Sign Language Partnership Group (SLPG).

• The SLPG, chaired by the Department for Communities and comprising representatives from various departments and the Deaf Community, is better equipped to provide comprehensive and balanced input into proposed regulations.

• This would formalise a process for diverse representation and ensure that regulations are informed by a collective understanding of the Deaf Community's needs.

## 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 consulting with those receiving new functions is essential, the consultation approach with the Deaf Community is concerning. The phrase "at least one person or group" is too narrow and fails to acknowledge the diversity within this community.

- **Inadequate Representation:** One person may not fully represent the varied perspectives of BSL users, ISL users, deafblind individuals, and those from different cultural backgrounds.
- **Skewed Priorities:** A single representative might unintentionally prioritize one language or set of needs over others.
- **Lack of Expertise:** An individual might not possess sufficient expertise in all areas relevant to the regulations.

To ensure effective and equitable consultation, Clause 8 should be amended to mandate consultation with a representative body such as the SLPG that accurately reflects the linguistic and cultural diversity of the Deaf Community in Northern Ireland.

## 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:

There is a For / Against argument in this case but also how the evaluation takes place:

For

- **Accountability:** Regular reporting ensures accountability and transparency in the implementation of the Bill. It compels the Department for Communities to actively monitor the Bill's effects and demonstrate progress to the Assembly and the public.
- **Evaluation of Action Plans:** The reporting process necessitates the Department's review and evaluation of the Sign Language Action plans developed by prescribed organisations. This can drive improvement in the quality and effectiveness of these plans.
- **Identification of Needs:** Regular reports can help identify ongoing needs and challenges faced by the Deaf Community, allowing for adjustments to policies and practices to better address those needs.

Effective Reporting:

- o Clear metrics (if it is implemented in Sign language Action Plans) is essential for the Department to produce accurate, objective, and evidence-based reports on the Bill's impact.
- o A robust internal monitoring and evaluation mechanism provides the Department with the data and analysis needed to demonstrate the effectiveness of the Bill's implementation.
- o This can lead to better use of public funds and ensure that resources are directed towards the most impactful initiatives.
- o By systematically tracking progress and identifying challenges, the Department can refine its approach and enhance the long-term effectiveness of the Bill.
- o This approach enhances the credibility of the reports and ensures they provide meaningful information to the Assembly and the public.

Against

- **Potential for Superficial Review:** There's a risk that the reports may become merely administrative exercises, focusing on compliance rather than substantive impact. To mitigate this, clear guidance on the scope and depth of the evaluation is essential.
- **Subjectivity of Evaluation:** Without clear and measurable metrics, the evaluation of the Bill's impact can be subjective. This could lead to disputes about the effectiveness of implementation and make it difficult to compare progress across different prescribed organisations.
- o Some of the benefits of sign language legislation, such as cultural change, may take time to manifest and may not be fully captured within the 5-year reporting cycle.
- **Resource Intensive:** The preparation of comprehensive evaluation reports can be resource-intensive for the Department for Communities. It's important to ensure that sufficient resources are allocated to this task and that it doesn't detract from other important implementation activities.

## 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:

The Disparity in Accreditation Pathways:

- While there are well-defined pathways for the accreditation of interpreters, the pathway for Sign Language teachers is less clear and massively underfunded .
- The accreditation, regulation & professional development of interpreters is well established with a professional body and a long history of training, assessment & continuing professional development.
- However, the route to qualify as a teacher of BSL/ISL is less straightforward, with scant training, assessment and continuing professional development.

Concerns Regarding PGCE and Teacher Training:

- There is a critical gap in the current Sign Language teacher training framework.
- The standard Postgraduate Certificate in Education (PGCE) for Modern Foreign Languages (MFL) is not designed to equip Sign Language teachers with the specific skills and knowledge needed to teach sign language as a language.
- The PGCE delivery in the 1990s for Sign Language Tutors lacked relevant & necessary training content, and this issue persists to some extent today.
- This means that teachers entering the field may lack specialized training in Sign Language pedagogy, Deaf Culture (to a lesser degree), and effective communication strategies for Deaf / Hearing learners.

The Reliance on Tutors:

- The current situation necessitates a reliance on Sign Language Tutors, who may have strong sign language skills but not necessarily formal teaching qualifications or pedagogical training.
- While Tutors play a valuable role in the current scenario, a more standardized and comprehensive pathway for teachers is needed to ensure quality and consistency in Sign Language education especially if they are required to register as a Sign Language teacher with a Registration Body.

Need for Review and Development:

- There's a clear need for a thorough review of teacher training and accreditation for Sign Language.
- This review should involve collaboration with Queens MA Academic Staff delivering the MA in Interpreting and Translation, Sign Language pedagogy, and teacher training institutions.

The goal should be to establish a clear and robust pathway for Sign Language Teachers, potentially involving:

- o Dedicated PGCE modules for Sign Language Teaching
- o Alternative certification routes for experienced signers (Tutoring)
- o Ongoing professional development requirements

By addressing these issues, the Department for Communities can ensure that the accreditation scheme for teachers / Tutors effectively supports the provision of high-quality sign language education in Northern Ireland.

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:

Regarding British Sign Language (BSL), there is already a clearly defined pathway for interpreters, supported by a registration body, the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD). This existing framework provides a good foundation for ensuring the competence and professionalism of BSL interpreters.

However, the situation with Irish Sign Language (ISL) is different. The pathway for ISL interpreters is more regionalized and inconsistent within NI. There's a recognized need for more fully qualified ISL interpreters to meet the demand and ensure equitable access to services for ISL users.

Therefore, the accreditation scheme proposed in the Bill is particularly crucial for ISL. It can help to:

Standardize training and qualifications for ISL interpreters.

Improve the quality and consistency of ISL interpreting services.

Increase the number of qualified ISL interpreters to address the current shortage.

While the BSL interpreting community has a well-established system, the Bill's accreditation scheme can provide further assurance and potentially

harmonize standards across both languages.

## 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:

The definition of the Deaf Community in Clause 11 is commendable for its inclusivity and comprehensive approach. It goes beyond a purely medical or audiological definition by encompassing individuals who "rely for communication on British Sign Language or Irish Sign Language," recognizing the centrality of sign language in their lives.

The inclusion of Deaf or Deaf Blind people who use sign language, "including such people who can obtain some or better levels of hearing when assisted by auditory devices," acknowledges the diversity within the community and avoids excluding individuals based on their varying levels of hearing.

Furthermore, the explicit inclusion of "children of Deaf or Deafblind people who habitually or occasionally use British Sign Language or Irish Sign Language for communication" is significant. This recognizes the importance of Sign Language within families and the cultural transmission of language and identity.

Finally, by including "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 British Sign Language or Irish Sign Language," the definition addresses the linguistic needs of individuals who rely on sign language as their primary means of communication.

## 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:

This definition is commendable because it demonstrates an awareness of the diverse needs within the Deaf Community.

I agree with the definition in Clause 12(a) of the Sign Language Bill, which defines BSL or ISL as "the visual form of the Language as commonly used and understood by deaf people".

This part of the definition is crucial because it:

Acknowledges the primary modality through which Sign Languages are used and understood by the majority of Deaf people.

Establishes a clear linguistic standard for BSL and ISL, recognizing them as distinct languages with their own grammar, vocabulary, and cultural context.

Provides a foundation for ensuring that services, information, and communication are accessible to Deaf people in their native languages.

In addition:

By explicitly recognizing "the common tactile or non-visual forms of the Language as used and understood by some Deafblind people," the Bill ensures that the legislation is inclusive of individuals who rely on tactile Sign Language due to combined hearing and vision loss. This recognition is crucial for ensuring that Deafblind individuals have equal access to information, services, and communication.

## 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:

I agree with the definition in Clause 13 of the Sign Language Bill, which defines "everyday reliance" on BSL or ISL as "relying (wholly or substantially) on BSL or ISL by necessity or for convenience in the course of everyday activities".

This definition is important because it:

Acknowledges that reliance on sign language can arise both from necessity (e.g., for individuals who are Deaf) and from convenience (e.g., in situations where it's a more effective or preferred mode of communication).

Focuses on the practical use of Sign Language "in the course of everyday activities," highlighting its relevance to real-life situations and the need for accessibility in various contexts.

### Any other comments

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

No

Please give details to support your answer.

Text box to enter additional details:

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

Text box to enter additional details:

The introduction of the Sign Language Bill (Northern Ireland) 2025 represents a significant and positive step towards recognizing and supporting the Deaf Community in Northern Ireland.

This Bill acknowledges the unique linguistic and cultural identity of BSL and ISL users, moving beyond a purely disability-focused perspective.

The Northern Ireland Assembly's approach to the Bill, including the call for evidence and emphasis on consultation, demonstrates a commitment to inclusivity and ensuring that the voices of the Deaf Community are heard in the legislative process.

By placing duties on prescribed organizations to provide accessible information and services, the Bill has the potential to dismantle communication barriers across all government departments and promotes greater equality for Deaf individuals.

This legislative effort signals a positive shift towards a society that values linguistic diversity and actively works to create a more inclusive environment for all its citizens.

Thank you.