



Northern Ireland  
Assembly

## Committee for Communities

Sign Language Bill – Call for Evidence Citizen Space Survey Word  
Version

### **Overview**

The Sign Language Bill provides for:

- Official and equal recognition of British Sign Language (BSL) and Irish Sign Language (ISL) as languages of Northern Ireland.
- A statutory duty on prescribed public organisations to take reasonable steps to make their services and the information they provide as accessible to individuals in the deaf community as they are to individuals who are not in the deaf community.
- A commitment to promoting the use and understanding of sign languages, including greater access to sign language education for deaf children and their families.
- A framework for accrediting sign language interpreters and teachers, ensuring professional standards and capacity building within the sector.

Why your views matter:

- As part of the Assembly's legislative processes, the Sign Language Bill has been referred to the Assembly's Committee for Communities so that the Committee may consider and take evidence on the Bill and report its opinion to the Assembly.



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- The Committee is seeking views from stakeholders on the objectives, proposals and potential consequences of the Bill.
- Your views will help to inform the Committee's consideration of the Bill and any recommendations it may suggest as it moves to the next stage of the legislative process.

### How to respond:

- You do not have to complete the whole survey and can choose which sections to complete.
- You can use this platform to respond with written text.
- If you wish to respond using either BSL or ISL please click here to visit the Committee for Communities website for details on how to submit your views in sign language.

### Terminology used:

We note that some people prefer the use of the upper case 'D' when referring to the d/Deaf community to reflect its status as a cultural and linguistic group. In the Bill the lower case 'd' is used for deaf as a matter of ordinary language in the legislative context and for this reason we use this term throughout the survey.



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### Survey Questions:

Consent and introduction

What is your name?

Name: [REDACTED]

What is your email address?

Email: [REDACTED]

What is your organisation

Organisation: N/A

Please confirm you have read the Northern Ireland Assembly's Committee privacy notice by clicking the button below.

You can read the Northern Ireland Assembly's privacy notice at this link.

[Privacy Notice](#)

Please select only one item

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?



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(Required)

Please select only one item

Yes, publish in full.

Yes, publish but with my personal information and any content that could be used to identify me redacted.

### Clause 1

Clause 1 formally recognises BSL and ISL equally as languages of Northern Ireland, whilst preserving the architecture of existing disability and equality legislation.

Do you feel Clause 1 goes far enough in formally recognising BSL and ISL as languages of Northern Ireland?

Please select only one item

Yes

No

Please give details to support your answer.

Text box to enter additional details

### Clause 2



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Clause 2 places a duty on the Department for Communities to promote:

- the greater use and understanding of BSL and ISL (including an obligation to provide for the availability of classes BSL and ISL for deaf children, their close families, guardians and carers);
- the general entitlement of individuals in the deaf community to use BSL or ISL; and,
- the further development of deaf culture by the deaf community through the use of BSL and ISL.

Do you feel Clause 2 goes far enough in promoting the use of BSL and ISL and developing deaf culture?

Please select only one item

Yes

No

Please give details to support your answer.

Text box for entering additional information

The Clause is confusing. It is unclear whether promoting the use of BSL/ISL and developing Deaf Community is aimed at the general/mass population or for development of the language within the Deaf Sign Language community.

Teaching deaf children BSL/ISL will promote inclusion in the Deaf community but because the purpose/title of clause 2 is vague, it is difficult to know what it needs to go 'far enough' in doing.



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It is imperative that language education is delivered by trained/certified Deaf native Sign Language users, in order to convey/educate learners in culture and Deaf lived experience.

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?

Please select only one item

Yes

No

Please give details to support your answer.

Text box to enter additional details

A BSL/ISL GCSE on the school Curriculum is how the language will gain traction, recognition and use but people who are Deaf and who are not Deaf.

Funding teaching programmes without robust and adequate safeguards stipulating delivery by Deaf trained and certified tutors has created opportunities for people from the non-Deaf community to 'advance' as Sign Language Tutors, to the detriment of the language, culture and employment of native Deaf Sign Language users.

Funded programmes also need to be working to stipulated targets in order to align with best practice language teaching, regardless of whether the learning is offered in statutory or community settings.



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**Clause 3**

Clause 3 places a duty on prescribed organisations to take reasonable steps to:

- ensure the information and services provided by them are as accessible to members of the deaf community as they are to the people who are not in the deaf community, at no extra cost to them; and,
- offer or facilitate the use of BSL or ISL for the benefit of individuals in the deaf community in accessing information and services provided by the organisation.

In considering what is reasonable, prescribed organisations may take account of cost and practicability.

Further details are available in the Explanatory and Financial Memorandum included with the Bill which you can read here:

<https://www.niassembly.gov.uk/assembly-business/legislation/2022-2027-mandate/primary-legislation-bills-22-27-mandate/sign-language-bill/>

Do you think the duty placed on prescribed organisations to make the information and services accessible to members of the deaf community is sufficient?

Please select only one item

Yes

No



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Please give details to support your answer.

Text box for entering additional information

'Offer to facilitate the use of BSL/ISL for the benefit of individuals accessing information/services' is not stating that the prescribed organisations must work with certified professionals to ensure access is delivered safely and with regulation. This will lead to what already exists, where ill-advised organisations rely on unskilled, non-accredited people with minimal language skills to deliver access. For example, recent NI Fire Service video information and Virgin Airlines video presented by unqualified/unregulated staff member, parents/friends 'facilitating' communication. The clause needs to state that this is achieved with the provision of certified and regulated interpreters and translators.

Prescribed organisations are still unavailable to the public so unable to adequately verify this request.

Clause 3, 2(a) and (b) language is confusing in relation to 'them' in both parts so difficult to determine intention. Note, using language, such as, 'reasonable use', 'take into account cost and practicability' does not improve or change what is currently the case – where access can be denied by service provider on grounds of providing access is deemed too expensive/funds are not allocated or available/resource and time constraints/willingness of the organisation to consider alternatives. This clause enables this to continue.

#### Clause 4

Clause 4 provides for the Department for Communities to list the public bodies (known as the prescribed organisations) that are subject to the duties in Clause 3.

Do you support the approach taken by Clause 4?

Please select only one item



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Yes

No

Please give details to support your answer.

Text box for entering additional information

(4) ...'persons or groups exercising functions of a public character' is unclear

## Clause 5

Clause 5 states that the Department for Communities must issue guidance about the effects of the provisions in the Bill relating to BSL and ISL and the interests of the deaf community. This clause states that, when devising or revising guidance the Department for Communities must consult:

- each of the prescribed organisations; and,
- at least one person or group appearing to the Department to be acting on behalf of the deaf community.

Do you support the approach to consultation required in Clause 5?

Please select only one item

Yes



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x No

Please give details to support your answer.

Text box for entering additional information

'At least one person or group' is acting against trusted protocols for balanced and just involvement without bias. This element of the clause opens the practice to skewed/misleading/self-promoting involvement of the individual/organisation.

### Clause 6

Clause 6 states that the Department for Communities guidance should include best practice advice on the implications of the recognition of BSL and ISL in the Bill for public bodies, including prescribed organisations. This would include:

- what may or must be viewed as amounting to reasonable steps to be taken by prescribed organisations;
- how prescribed organisations should develop plans to be called sign language action plans; and,
- advice on best practice for interacting with people who rely for communication on BSL or ISL.

Do you support the approach taken in this clause?

Please select only one item

Yes



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x No

Please give details to support your answer.

Text box for entering additional information

A working group to lead on this is required.

'May' is ambiguous/open to interpretation and should be removed.

The Bill's tone throughout, and evidenced here, infers that access to information and services is for people who 'rely on communication in BSL/ISL'. This is not recognising that accessible information and services benefits the providers/organisations and promotes inclusion for all (services and service users). Appropriate and inclusive language use in the Bill is required.

The Bill, throughout, as exemplified here, does not recognise Sign Language in capital letters, as is afforded and established for all other languages, i.e English, French etc. This diminishes the importance and equity of the language and needs rectified.

(2) (a) again uses vague language, open to interpretation - 'offer or facilitate communication in BSL/ISL'. Should read - accessible information and access to services through provision of Sign Language/English Interpreter or Translator. Otherwise, organisations are free to appoint unskilled, unqualified, well-meaning individuals to 'support' with this leading to misinformation, misunderstanding and frustration.

Do you feel there is anything else this Clause should include?

Please select only one item

Yes

X No



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Please give details to support your answer.

Text box to enter additional details

### Clause 7

Clause 7 makes provision for the Department for Communities to make regulations (some time in the future) for the purposes of the Bill.

- The Department for Communities will have the power to create new regulations to support the Sign Language Bill. These regulations are a different form of law, with working detail and may cover things like how public services provide sign language access and how organisations support sign language users. These future regulations would also need to come before the Assembly for scrutiny and agreement before they come into effect.
- S:\Comm-Communities\Legislation\Primary\Sign Language Bill\Request for EvidenceThe Department for Communities must consult with the deaf community and relevant organisations before making changes. It can assign responsibilities to public bodies, charities, or groups working with the deaf community.
- If needed, the Department for Communities can limit or adjust requirements for certain organisations based on their resources. Any changes must be approved by the Assembly before they become law.

Do you support the provision for the Department for Communities to make regulations detailed in Clause 7?



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Please select only one item

Yes

No

Please give details to support your answer.

Text box for entering additional information

Whilst I am in support of the Department for Communities making these regulations, these need devised with a robust, representative, Deaf consultation group who are, then, called to consult as and when regulations are to be amended.

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

Please select only one item

Yes

No

Please give details to support your answer.

Text box to enter additional details

As indicated above, this clause does not describe how the consultation is to happen, other than with 'at least one person or group' this cannot protect the system from bias and self-promotion/gain. An established consultation/advisory group, as above, is required.



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**Clause 8**

Clause 8 states that, before laying a draft of such regulations, the Department for Communities must consult everyone on whom the regulations confer functions, and at least one person or group appearing to the Department to be acting on behalf of the deaf community. Such regulations need to be laid before and approved by the Assembly.

Do you feel the level of consultation required in Clause 8 is sufficient?

Please select only one item

Yes

No

Please give details to support your answer.

Text box for entering additional information

One person or group is in no way representative and a means for balanced and fair consultation. The establishment of a working/consultation/advisory group, with membership determined by a fair and representative entry criteria is a common and established method to ensure safeguarding, best practice and conduct.

**Clause 9**

Clause 9 would require the Department for Communities to prepare a report evaluating the impact of the Bill within five years of the Bill's commencement and every five years thereafter.



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Do you think evaluating the impact of the Bill in a report every five years is an appropriate length of time?

Please select only one item

Yes

No

Please give details to support your answer.

Text box for entering additional information

**Clause 10**

Clause 10 provides that the Department for Communities must make a scheme for, or connected to, the accreditation of (either or both) teachers of BSL or ISL, and/or interpreters of BSL or ISL.

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

Please select only one item

Yes

No



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Please give details to support your answer.

Text box for entering additional information

This is unworkable. The Department of Communities does not have the skill, expertise or presence in this field. 'Scheme' is vague.

Accreditation routes for tutors and interpreters is well established and respected avenues for best practice. A poorly equipped, uneducated Department managing, influencing, monitoring this is unwanted, will not be respected and will not be well received.

Interpreter registration with NRCPD is an acknowledged, respected UK-wide route for evidencing fitness to practice.

Tutors accredited to PGCE or above are fit to practice.

This approach when practice is already in place is unnecessarily prescriptive.

A Deaf Centre of Excellence is best placed to 'house' any training opportunities (note: not to act as described in this clause to provide a scheme to establish accreditation and registration on tutors and interpreters).

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

Please select only one item

Yes

No



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Please give details to support your answer.

Text box to enter additional details

As above.

**Clause 11**

Clause 11 defines, for the purposes of the Bill, the deaf community as all people falling within one or more of the following categories:

- (a) individuals who rely for communication on BSL or ISL;
- (b) deaf or deafblind people who normally use BSL or ISL for communication (including people who can obtain some or better levels of hearing when assisted by auditory devices); or
- (c) children of deaf or deafblind people who habitually or occasionally use BSL or ISL for communication (including children who have some or full hearing).

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.

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

Please select only one item

Yes

No



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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 language used here is not inclusive and/or distinct to be satisfactory and is problematic. 'Community' denotes a grouping of people with shared language, culture, humour, life experience etc who come together through shared sense of belonging. It is being used incorrectly here, as highlighted in bold below. This needs reworded if the intention is to list the various groups of people who will benefit from the Bill.

Clause 11 defines, for the purposes of the Bill, the **deaf community** as all people falling within one or more of the following categories:

(a) ~~individuals who rely for communication on BSL or ISL~~; Members of the Deaf Sign Language community

(b) ~~deaf or deafblind people who normally use BSL or ISL for communication (including people who can obtain some or better levels of hearing when assisted by auditory devices); or~~ **'Better levels of hearing' is from a heavily hearing-privilege view of people in terms of how 'well' they hear, making them more normative. This phrase should be removed.**

(b) ~~children of deaf or deafblind people who habitually or occasionally use BSL or ISL for communication (including children who have~~ **some or full hearing). As above, defining a child's language use in terms of ability to have some or full hearing is from a hearing-privileged perspective. A child of Deaf/deafblind who is not Deaf or deafblind does not directly benefit from accessing services so I question their inclusion here. If this refers to a deaf child, regardless of whether parents are Deaf/deafblind, they are beneficiaries of the Bill and should be included here.**

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.



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### Clause 12

Clause 12 defines, for the purposes of the Bill, BSL or ISL as either or both of the visual form of the Language as commonly used and understood by deaf people, and the common tactile or non-visual forms of the Language as used and understood by some deafblind people.

Do you agree with the definition of BSL and ISL provided for in the Bill?

Please select only one item

Yes

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

Language used here, again, separatist/non-inclusive, hearing-centric.

BSL and ISL are not 'visual forms of 'the' language. BSL and ISL are recognised **languages** used in Northern Ireland, with established syntax and grammatical structure.

### Clause 13

Clause 13 defines, for the purposes of the Bill, 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.



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Do you agree with the definition of “everyday reliance” provided in the Bill?

Please select only one item

Yes

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

Any other comments

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

Please select only one item

Yes

No

Please give details to support your answer.



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Text box to enter additional details

The Bill seems to have an emphasis on deaf children having access to Sign Language classes to promote future inclusion in the Deaf Sign Language community which is, in some ways, a small percentage of the signing population. The Bill does not specifically address the access and inclusion needs of Deaf Sign language users as carers. The Bill does not specifically acknowledge or address access and inclusion of private/independent services/organisations which are not on the prescribed list.

The Regulations devised for organisations and administered by Department for Communities need to specifically offer guidance in relation to working with Deaf Intralingual Interpreters. This role has specific stipulations in relation to how and when the service is employed with people with complex language needs e.g. people with a learning disability.

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

Text box to enter additional details

The Bill does not address the social/interactive wellbeing of the Deaf Sign Language community, specifically in relation to leisure and wellbeing. Deaf Sign Language users not being able to avail of these services due to cost of access is impacting on the health and wellbeing of the community and had an impact of public health and welfare services.

The Finish Voucher Scheme, where residents are allocated voucher hours to autonomously access services, such as listed above, addresses this.