

EQUALITY COMMISSION FOR NORTHERN IRELAND

Response to the Committee for Communities [Sign Language Bill - Call for Evidence](#)

May 2025

Executive Summary

- i. The Equality Commission for Northern Ireland (the Commission) welcomes the introduction of Sign Language legislation in Northern Ireland which represents a significant step toward recognizing and supporting British Sign Language (BSL) and Irish Sign Language (ISL) users in Northern Ireland.
- ii. The Commission recommends that the Department for Communities consider take action to strengthen the Bill's provisions in relation to the following:
 - a. **Monitoring & Compliance:** provide clarity in relation to implementation timelines, monitoring arrangements and enforcement mechanisms.
 - b. **Adequate and Dedicated Funding:** provide clarity in relation to establishing an adequate and dedicated budget to support interpreter training and service provision.
 - c. **Early Education Support:** address the need to support families faced with financial burdens arising from the need to learn sign language.
 - d. **Scope / Existing Accessibility Duties:** consider adopting a phased approach to extending duties to essential non-public sector service providers and promote / clarify their existing accessibility duties.

- e. **Digital Accessibility:** address the need for BSL/ISL interpretation in online government services, such as websites and virtual consultations.
- f. **Support for Wider Cultural Promotion:** The Bill's focus could be expanded to promote the cultural richness of BSL and ISL more broadly.
- g. **Ongoing Engagement with Stakeholders:** Continue and develop the collaborative working approach with stakeholders to ensure that the outworkings of this legislation reflects their lived experiences and priorities.

1 Overview

1.1 The Equality Commission for Northern Ireland (the Commission)¹ welcomes the introduction of Sign Language legislation in Northern Ireland as a significant step toward recognizing and supporting British Sign Language (BSL) and Irish Sign Language (ISL) users in Northern Ireland.

1.2 We note that it will provide 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.²

1.3 The Bill's provision for the official and equal recognition of BSL and ISL as languages of Northern Ireland is a landmark achievement. This recognition affirms the cultural and linguistic identity of the Deaf community, aligning with their view of themselves as a linguistic minority rather than a disability group and sets a foundation for greater inclusion.

¹ See Appendix 1 for a summary of the Commission's powers and responsibilities.

² [Bill - As Introduced](#)

2 UNCRPD Context

2.1 The Commission, together with the Northern Ireland Human Rights Commission, is part of the Independent Mechanism for Northern Ireland (IMNI) which has been designated under [Article 33.2](#) of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) to promote, protect and monitor the implementation of the Convention in Northern Ireland.³

2.2 The [World Federation of the Deaf](#) was among one of the eight largest organisations of persons with disabilities invited to participate in the process of drafting the [UN Convention on the Rights of Persons with Disabilities](#), leading to the development of five articles of the CRPD directly concerning sign language, namely:

- [Article 2](#) – Definition
- [Article 9](#) – Accessibility
- [Article 21](#) – Freedom of expression, opinion, and access to information
- [Article 24](#) – Education
- [Article 30](#) – Participation in cultural life, recreation leisure and sport

Draft Sign Language Framework

2.3 In our 2016 response to the consultation on a draft Sign Language Framework, which included a proposal to introduce sign language legislation, we recommended that the Northern Ireland Executive give consideration to including the implementation of the Framework as an action under an appropriate indicator in the Draft Programme for Government and allocate adequate resources to enable the effective implementation.⁴

³ Together with the Scottish Human Rights Commission and the Equality and Human Rights Commission, we comprise the UK Independent Mechanism (UKIM).

⁴ [ECNI \(2016\): Response to the Consultation by DCAL on a Sign Language Framework](#)

UNCRPD Committee Recommendations

2.4 In their 2017 concluding observations on the initial report of the UK on compliance with the Convention, the UN Committee on the Rights of Persons with Disabilities raised the following concerns regarding the limited provision of accessible information from public services and public authorities and the insufficient obligatory standards for making websites accessible and for monitoring ICT accessibility:

- insufficient resources for the education and training of sign language interpreters and the insufficient availability of high-quality educated sign language interpreters, especially in relation to education, employment, health, and leisure;
- the lack of training and education for families, classmates, and co-workers in high quality sign language communication to better provide for inclusion within the community of d/Deaf and hard of hearing persons.

2.5 The Committee recommended that the NI Executive act to:

- identify outstanding gaps in the implementation of obligatory accessibility standards on information channels based on ICT;
- ensure that legislation provides for the right to high quality sign language interpretation and other forms of alternative communication in all spheres of life for d/Deaf and disabled people and hard of hearing persons in line with the Convention;
- allocate resources for the education of children with hearing impairments, their families, and others, such as classmates and - workers in sign language and tactile language⁵.
- Accessible communication continues to be a barrier to d/Deaf and disabled people in NI accessing their right to freedom of expression and opinion. There are no accessible communication standards in NI.

⁵ CRPD (2017): [Concluding Observations on the initial report of the United Kingdom of Great Britain and Northern Ireland](#), CRPD/C/GBR/CO/1, paragraphs 44 and 55 (accessed 20 December 2021).

Disability Expert Advisory Panel Recommendations

2.1 In 2020, the Department for Communities' Disability Strategy Expert Advisory Panel made the following recommendations:

- promote digital inclusion and access to communication and information technologies for d/Deaf and disabled people and ensure that these are accessible at minimum cost;
- ensure that departmental information and communications are available in alternative accessible methods for d/Deaf and disabled people who require it.⁶

Progress Towards UNCRPD Implementation

2.2 In 2022, independent research commissioned by the Equality Commission to assess compliance with the Convention in Northern Ireland included a section on sign language.⁷ This highlighted the need to take action to protect UNCRPD Article 21 Rights in relation to:

- the provision of information intended for the general public to persons with disabilities in accessible formats in a timely manner and without additional cost;
- facilitating the use of sign languages, and all other accessible formats of communication in official interactions;
- urging private entities to provide information and services in accessible and usable formats for persons with disabilities;
- encouraging the mass media to make their services accessible to persons with disabilities;
- recognising and promoting the use of sign languages.'

2.3 Research findings particularly recommended that the Executive ensure that there is adequate provision of BSL and ISL interpreters in NI.⁸

⁶ Disability Strategy Expert Advisory Panel (2021): [Report & Recommendations](#), p. 19 (Department for Communities).

⁷ Toman, N. et al (2022): [Progress towards the implementation of the UNCRPD in NI](#), pp. 378-385.

⁸ Ibid, pp. 385.

3 Public Policy Analysis and Recommendations

- 3.1 The Commission welcomes the introduction of Sign Language legislation in Northern Ireland which provides official legal recognition for British Sign Language (BSL) and Irish Sign Language (ISL) in Northern Ireland and of the deaf community as a cultural and linguistic minority group.
- 3.2 We note the lack of formal consultation by the Department for Communities on the Bill itself, whilst acknowledging that the Sign Language Framework Document was consulted on in 2016 by the Department for Culture, Arts and Leisure (neither it or the Department for Communities subsequently issued a consultation report).
- 3.3 The Bill aligns with the social model of disability promoted through the UNCRPD and represents a significant milestone reached in the fulfilment of state party obligations under [Article 21](#) (Freedom of expression, opinion, and access to information): *‘to take all appropriate measures to ensure that persons with disabilities can experience the right to freedom of expression and opinion...including by...accepting and facilitating the use of sign language...and recognising and promoting the use of sign languages’.*
- 3.4 The Commission acknowledges that while the disability discrimination legislation is not an apposite vehicle for cultural and linguistic recognition, it nonetheless provides for legal redress where discrimination has occurred against deaf people.⁹ It should be noted, however, that the Commission continues to call for reform of the current disability discrimination legislation in Northern Ireland, which provides less protection for disabled people than the Equality Act 2010 extant in Great Britain.¹⁰
- 3.5 The Commission considers that the Bill will complement the existing disability discrimination legislation in setting forth and underpinning the rights of Deaf people, incorporating aspects of

⁹ See, for example: [ECNI - DAERA settles Disability Discrimination Case for £50,000](#); [ECNI - Deaf woman settles disability discrimination case against bank](#); [ECNI - Legal case settled: Curlette v Parkway Surgery](#); [ECNI - Two claimants with hearing loss settle cases against public bodies](#)

¹⁰ See: Equality Commission for Northern Ireland (2014): [Strengthening Protection for Disabled People](#)

a number of the relevant UNCRPD rights referenced at paragraph 2.2 above into domestic law..

- 3.6 We note that the Bill will place a statutory duty (under clause 3, subsection 2a) on prescribed public organisations to take reasonable steps to make sure their services and the information they provide as accessible to individuals in the deaf community as are to individuals who are not in the deaf community.
- 3.7 Clause 5 of the Bill requires prescribed organisations to ‘have regard’ to guidance to be issued by the Department, when providing information and services. It will be essential that the guidance provides clarity on what is considered to demonstrate having ‘regard’ and what is meant by ‘taking reasonable steps’..
- 3.8 The Commission notes that the guidance will indicate how prescribed organisations should develop sign language action plans. However, the Bill is silent on what safeguarding measures will be put in place to ensure consistent implementation of the guidance or arrangements to ensure a joined-up/co-ordinated approach by prescribed bodies in the implementation of the requirements of the Act.
- 3.9 The Commission notes that listed authorities in Scotland are required to develop local BSL plans aligned to Scotland’s National BSL Plan
- 3.10 We note that the Bill requires the Department of Communities to consult with the prescribed organisations on the guidance as well as with at least one person or group ‘appearing to the Department to be acting on behalf of the Deaf community’. This latter requirement seems to set the requirement for consultation at a low level.
- 3.11 A more inclusive approach would be to invite participation in consultation from all groups acting on behalf of or representing the Deaf community, in order to reflect the diversity of views and needs within the community (and recognise multiple identities within the community).

- 3.12 The Commission notes that clause 2 of the Bill provides for the promotion of the greater use and understanding of BSL and ISL and of the deaf community's culture and will be promoted through making or entering into arrangements for ensuring the availability of classes, taught by accredited or other suitable persons, for deaf children and their close families, guardians and carers, to learn (or improve proficiency in) the language.
- 3.13 We observe, however, that there appears to be no budget or costing associated with the Bill, an issue which may prove, in practice, to be an impediment to adequate or effective implementation of this provision.
- 3.14 The Commission recognises that the Bill provides for the establishment of a framework for accrediting sign language interpreters and teachers, ensuring professional standards and capacity building within the sector and for regulations to this effect to be progressed. The Commission considers that it is important that ongoing steps are taken to address the undersupply of sign language teachers. However, the Commission notes the absence of a timescale or deadline for the implementation of regulations
- 3.15 The Commission also notes the lack of detail on governance considerations in the Bill, particularly regarding the role deaf stakeholders will have in the development, implementation, monitoring and review of the Bill and the action plans of prescribed bodies.¹¹
- 3.16 The Commission observes that the Bill does not provide for a complaints process accessible to deaf stakeholders in the event of non-compliance or for independent oversight of the outworking of the Bill.
- 3.17 [Article 4\(3\)](#) of the UNCRPD requires that: *In the development and implementation of legislation and policies to implement the present Convention and in other decision-making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons*

¹¹ The Commission acknowledges, however, the involvement and engagement of the British Deaf Association by the Department in the development of both the Sign Language Framework and the current Bill.

with disabilities, including children with disabilities, through their representative organisations’.

3.18 The Commission observes that the Scottish Government adopted a BSL National Plan (the current iteration dates from 2023-2029) and has committed to embed BSL in policies and strategies within the Scottish Government taking a whole systems approach. It has also established an implementation advisory group to provide accountability on the actions in its plan and to utilise the experience of the group to strengthen delivery.

3.19 The Commission notes that although the Sign Language Bill provides for a five-year reporting cycle there are no specific goals, timescales for actions or performance indicators associated with the Bill.

3.20 It would be helpful to outline the scope of the Review e.g.:

- Evaluation of the impact of the Bill on deaf people in Northern Ireland;
- Assessment of the efficacy of strategies for promoting sign language;
- Identification of the remaining barriers experienced by sign language users;
- Recommendations for improvement.

3.21 The Commission recommends that action is taken to strengthen the Bill’s provisions in relation a number of key areas highlighted below.

Monitoring & Compliance

3.22 The Commission recommends that the Bill and / or associated statutory guidance provide clarity in relation to implementation timelines and monitoring mechanisms. This should include a requirement that public authorities report regularly on progress towards full implementation and compliance with duties established by the Bill.

- 3.23 The Commission recommends that the Bill and / or associated statutory guidance provide clarity in relation to adequate enforcement mechanisms, such as an independent oversight body inclusive of deaf people and their representative organisations or a complaints process for Deaf individuals if public organizations fail to meet their duties.
- 3.24 These steps will help to strengthen the legislation’s impact by ensuring consistent application and service delivery across public authorities and recourse for service users in the event of non-compliance.

Adequate and Dedicated Funding

- 3.25 The Commission recommends that the Bill and / or associated statutory guidance provide clarity in relation to establishing an adequate and dedicated budget to support interpreter training and service provision.

Early Education Support

- 3.26 The British Deaf Association Northern Ireland have highlighted a lack of consistent support for families, who often face financial burdens to learn sign language.¹²
- 3.27 The Commission recommends that the final Bill fully addresses this issue. For example, a targeted provision—such as subsidized or free BSL/ISL classes for parents of Deaf children under five—could prevent early isolation and align with best practices in child development.

Scope / Existing Accessibility Duties

- 3.28 The Bill could be improved by adopting a phased approach to extending duties to non-public sector service providers that provide essential services.
- 3.29 Associated guidance could also assist to promote and clarify existing accessibility duties to, including examples of

¹² See para 9: [Sign language: Bill proposed along with plans for more interpreters - BBC News](#)

reasonable adjustment anticipated minimum standards (e.g., mandatory interpreter availability for key appointments).

Digital Accessibility

- 3.30 The Bill and / or associated statutory guidance should explicitly address the need for BSL/ISL interpretation in online government services, such as websites and virtual consultations.

Support for Wider Cultural Promotion

- 3.31 The Bill's focus could be expanded to promote access to BSL and ISL more broadly within a wider cultural context.¹³ This would reflect a commitment to implement Article 30 of the UNCRPD and recognition of the right of D/deaf and disabled people to take part on an equal basis with others in cultural life.¹⁴

Ongoing Engagement with Stakeholders

- 3.32 The Commission notes that the British Deaf Association (BDA) have welcomed and acknowledged that: *“Deaf community members played a significant role in this effort, collaborating with the BDA, Deaf organisations, and government departments to prepare this Bill.”*¹⁵
- 3.33 The Commission commends the Department for adopting a collaborative working approach with stakeholders in the development of the Bill and would encourage the continuation and development of this approach to ensure that the outworkings of this legislation reflects the lived experiences and priorities of those it aims to serve.

Public Policy & Strategic Engagement May 2025.

¹³ For example, funding or incentives for arts projects, media content, or community events in sign language could celebrate Deaf culture and raise public awareness, fostering greater societal acceptance.

¹⁴ [Article 30](#) – Participation in cultural life, recreation leisure and sport

¹⁵ See: [BDA – Sign Language Bill Update](#)

Appendix 1

The Equality Commission Northern Ireland

The Equality Commission for Northern Ireland (the Commission) is an independent non-departmental public body established under the Northern Ireland Act 1998. We have a statutory remit to:

- promote equality of opportunity and affirmative action;
- work towards the elimination of unlawful discrimination and harassment;
- keep relevant legislation under review;
- promote good relations between persons of different racial groups and good disability practice;
- oversee the effectiveness of statutory equality and good relations duties on public authorities.

The Commission and the NI Human Rights Commission form the 'Independent Mechanism for Northern Ireland' (IMNI) which is tasked, under Article 33.2 of the [UN Convention on the Rights of Persons with Disabilities](#), with promoting, protecting and monitoring implementation of the Convention in Northern Ireland. Together with the Equality and Human Rights Commission (GB) and Scottish Human Rights Commission we form the United Kingdom's Independent Mechanism (UKIM).¹⁶

This response draws on our work across a range of policy areas including that derived from our role as part of the 'Independent Mechanism' in Northern Ireland as well as our work to promote equality and ensure the effectiveness of the Section 75 duties.¹⁷

¹⁶ For further information on the Convention see: <https://www.equalityni.org/uncrpd/>

¹⁷ Our powers and duties derive from a number of statutes which have been enacted over the last decades, providing protection against discrimination on the grounds of age, disability, race, religion and political opinion, sex and sexual orientation. We also have responsibilities arising from the Northern Ireland Act 1998 in respect of the statutory equality and good relations duties.