

Sign Language Bill Written Evidence

9 May 2025

Key messages

- The National Deaf Children's Society (NDCS) **warmly welcomes the introduction, aims and intention of the Sign Language Bill**, particularly the duties to promote greater use and understanding of sign language and the commitment to ensure the provision of sign language classes for deaf children and their families.
- It is vital that the Bill and associated secondary legislation is **inclusive of all deaf children who use or wish to use sign language, and their families**, and recognises that deaf children's relationship with sign language may change, develop and evolve over time.
- The Bill should create meaningful change across all areas of deaf children and young people's lives, and the range of 'prescribed organisations' in the scope of the Bill should reflect the **key sectors and settings in the lives of children, young people and families**.
- Measures to implement and ensure the effectiveness of the Bill should be robust and directly informed by **the views and experiences of deaf children, young people and their families, as well as the wider deaf community**. This includes the development of regulations and statutory guidance, reporting on the operation of the Bill and implementation measures, like sign language plans.

Introduction

The National Deaf Children's Society (NDCS) is a leading charity for deaf children and young people. We are dedicated to creating a world without barriers for deaf children.¹ We give expert support and campaign for deaf children's rights, so they have the same opportunities as everyone else. NDCS provides a helpline service and offers specialist advice and guidance for families, provides training and support for professionals, delivers Family Sign Language classes, and advocates for the highest standards in services for deaf children and young people. We are here for every deaf child who needs us, no matter what their level of deafness or how they communicate.

NDCS is committed to Informed Choice², ensuring deaf children and their families have access to unbiased information and support to make decisions about language and communication. We emphasise that Informed Choice is not a one-time decision but an ongoing process that adapts to the evolving needs and views of the child and family throughout different stages of life. Informed Choice includes promoting access to sign language as a key option, within a fully informed and individualised approach.

We warmly welcome the Minister for Communities' introduction of the Sign Language Bill to the Assembly, with the support of the Executive. The intention of the Bill is to recognise and promote sign language, ensure deaf children and adults have access to sign language in their everyday activities and support the development of Deaf culture. This marks not only a positive change in how deaf children, their families and

¹ We use the term 'deaf' to include all levels and types of deafness and we support, for example, children with unilateral, mild, moderate, mixed, severe and profound deafness and work with deaf children and families whether they use spoken language, sign language or both.

² 2023 (NDCS) Informed Choice: Position Statement. Available at: www.ndcs.org.uk/media/8908/informed-choice-2023.pdf

the wider deaf community are recognised and respected in Northern Ireland but also has real potential to make a meaningful difference in the lives of deaf children.

We would like to acknowledge the Committee's engagement and consultation with organisations working with deaf children and families and the wider deaf community. We welcome the opportunity to provide written evidence on the Sign Language Bill and note that this submission is not comprehensive but seeks to highlight key themes and concerns. Our response draws on previous consultations NDCS undertook with deaf young people in 2016 and 2021 and, following publication of the Bill, a survey in 2025 with parents of deaf children and deaf young adults.

Deaf children in Northern Ireland

There are at least 1,603 deaf children and young people in Northern Ireland³ and most deaf children are born to hearing parents who may have no experience of deafness. More than half (57%) of deaf children have a mild or moderate level of deafness, 27% have unilateral deafness, and 16% have a severe or profound level of deafness.⁴ While identification of deafness can occur in infancy, often following referral via the Newborn Hearing Screening Programme, it may also develop or be identified later in a child's life. For example, over half (58%) of deaf children referred to the Education Authority's specialist Sensory Service have already reached school age.⁵

Around three-quarters of deaf children attend mainstream schools (77%), and 21% attend special schools. Additionally, 36% of deaf children have been identified as having an additional Special Educational Need.⁶ Deaf children in Northern Ireland have a higher prevalence of mental health concerns than their peers, with almost 21% reporting at least one psychological condition compared to about 12% of hearing children.⁷

These figures highlight that deaf children, young people and their families are not a homogenous group – there is a rich diversity and complexity within the population of deaf children and young people across Northern Ireland. The individual circumstances of each deaf child will vary, and their experience of deafness will be unique. This serves as an important backdrop to the Bill.

Comments on the Bill

Aim of the Bill

NDCS welcomes the intention of the Bill to provide official recognition of and to promote British Sign Language (BSL) and Irish Sign Language (ISL) in Northern Ireland as set out in clause 1. We also welcome the inclusion in clause 12(b) of tactile and non-visual forms of language used by those who are deafblind. The understanding of British Sign Language and Irish Sign Language as unique and whole languages and that access to sign language is a linguistic and cultural right, rather than simply an adjustment or mitigation within existing disability frameworks, is a positive legislative development. In our 2021 consultation, deaf

³ CRIDE (2024) Education provision for deaf children in Northern Ireland 2023/24. Available at: <https://www.ndcs.org.uk/media/9561/cride-2024-northern-ireland-report.pdf>

⁴ CRIDE (2023) Education provision for deaf children in Northern Ireland in 2022/23. Available at: <https://www.ndcs.org.uk/media/9158/cride-2023-northern-ireland-report.pdf>

⁵ CRIDE (2024) Education provision for deaf children in Northern Ireland 2023/24. Available at: <https://www.ndcs.org.uk/media/9561/cride-2024-northern-ireland-report.pdf>

⁶ CRIDE (2023) Education provision for deaf children in Northern Ireland in 2022/23. Available at: <https://www.ndcs.org.uk/media/9158/cride-2023-northern-ireland-report.pdf>

⁷ Byrne B. and MacNamee C. (2002) The emotional well-being of deaf children and young people in Northern Ireland. Available at: https://pure.qub.ac.uk/files/616887524/Final_Report_Byrne_and_McNamee.pdf

young people talked about feeling proud that sign language and Deaf culture would be represented in legislation and the sense of confidence for many deaf children that would come from this recognition.

We welcome the duty placed by clause 2 on the Department to promote greater use and understanding of BSL and ISL. This includes ensuring the availability of accredited classes for deaf children under 19 and their families, promoting the entitlement of deaf people to use BSL and ISL in everyday activities and fostering awareness and appreciation of Deaf culture.

Promotion of sign language

In welcoming the Bill's commitment to the promotion of a greater use and understanding of ISL and BSL in clause 2(1)(a)(b), it is important to recognise the much-needed change that this has the potential to support. Indeed, the relationship between increased awareness of, access to and use of sign language was a strong theme from our 2025 survey as well as our 2021 and 2016 consultations with deaf young people. Many survey respondents expressed the view that increased societal awareness of sign language would help deaf children and young people feel more included and reduce feelings of difference and isolation:

- "Her deafness would be more normal to her and others. She would not feel different."
- "It would help normalise deaf children's communication."
- "It's amazing how multi-cultural we are. But somehow we forgot to include everyone in their sign language right."
- She would feel more included. She would not feel different and she would not be disadvantaged."

Meaningful and effective promotion of sign language has a vital role in addressing these concerns and making the aspirations reflected in these quotes a reality. Deaf young people who took part in our 2021 consultation also highlighted the link between promoting sign language and improving inclusion and noted that greater use of sign language, for example, in all schools, would support increased deaf awareness and understanding. Deaf young people in both 2016 and 2021 raised the importance of sign language being part of the school curriculum.

As survey respondents in 2025 also highlighted:

- "Signing shouldn't be a 'secret language' – it should be there for everyone. This would enable children to be part of mainstream school and society. Using it in everyday life will prevent exclusion and create inclusion."
- "When BSL is the norm and accessible and widely available and promoted, society's attitude to deaf children and adults can become more inclusive and respectful."
- "Teaching other kids BSL will help deaf kids to be included, will enable them to miss out less."
- "I'm a teacher and I use a little in my class – I would love to use it more in my teaching to help hearing children communicate more easily with deaf children."

This feedback underscores the importance of ensuring that sign language learning is not limited to deaf individuals and their immediate families but is more widely available. Greater visibility and accessibility of sign language will encourage widespread learning, breaking down barriers between deaf children and their hearing peers, fostering a more inclusive environment for all. Ensuring that deaf children and their families, who use or wish to use sign language, have access to this as well as building BSL and ISL into mainstream settings and everyday life, will facilitate greater inclusion, social cohesion, and respect for Deaf culture. The promotion of BSL and ISL must not be viewed as a niche initiative but as a societal responsibility that benefits all. In considering the Bill, it would be helpful to have further clarification on whether **secondary**

legislation or statutory guidance will provide more detail on duties regarding promotion, such as those suggested above or other measures, for example, awareness raising and training.

Classes for deaf children and their families

In relation to clause 2(2) regarding classes for children and families, NDCS very warmly welcomes this commitment. Access to a language-rich environment is crucial for deaf children's development from the earliest moments of their lives, whether it involves communication and expression, play and learning, building friendships and relationships or fully participating in the world around them. Many families will choose to use sign language to achieve this. Ensuring that these deaf children and families have meaningful opportunities and access to learning sign language and can freely access classes is an important part of this. We applaud this inclusion in the Bill alongside the commitment to ensure that teachers and interpreters are appropriately accredited and registered.

We acknowledge the commitment shown by the Department to support and fund a range of classes for families of deaf children, including Family Sign Language (FSL) and accredited sign language courses. It is important that deaf children and their families are supported in their sign language journey in this way. NDCS continues to deliver Family Sign Language (FSL) classes, which are often the starting point of this journey, for deaf children and their wider family circles. We first developed this approach in Northern Ireland nearly two decades ago.

We note in clause 2(3) that the obligation to ensure access to sign language classes for children and their wider family circle applies to children under 19 years of age. We understand this draws on the age range set out in Special Educational Needs legislation and policy and, while we welcome recognition of the importance of ensuring access to classes until children have reached 18 years of age, we note that there are circumstances where children and young people can access statutory services and support for a longer period.⁸ It may be helpful to consider this in relation to the Bill. NDCS supports deaf young people up to the age of 25 years.

We are also keen to seek confirmation that access to this provision will be available for deaf children and young people of any age within the age criteria and will therefore be inclusive of children, young people and families where deafness is identified or occurs in later years or where children, young people and families may not seek or may not have opportunity to access classes until a later stage. For example, as noted earlier, over half of all deaf children referred to the Education Authority Sensory Service are school aged and families may not have been able to access information about the full range of language and communication options, take part in sign language classes or learn and develop their use of sign language before entering compulsory education. It is important that this group of children can be accommodated within the scope of the Bill.

More broadly, we highlight that for deaf children, young people and families, their use of sign language may change, develop and evolve over time, including as their needs and wishes change or as a wider range of opportunities to learn and use sign language becomes available. This should not detract from their ability to access the provisions and protections of the legislation. It is important that phrasing in the Bill, such as, use of sign language as being 'necessary or convenient in the course of everyday activities' is intended to be **inclusive rather than restrictive, ensuring broad access and application of the Bill's provisions to deaf children and their families**. This should also take account of the need for deaf children

⁸ For example, in certain circumstances where a child or young person is disabled or has experience of the care system.

and families to access sign language classes that reflect the progressive complexity of their use of sign language as this develops.

Accreditation of teachers and interpreters

In relation to clause 2(2)(a) and clause 10, NDCS welcomes the commitment to ensure that classes for deaf children are taught by accredited teachers or other suitable persons. This provides a valuable opportunity to ensure that deaf children and families have access to high-quality, consistent teaching through a recognised and trusted system. During our 2021 consultation, young people also highlighted the opportunities for those with lived experience of deafness to be sign language teachers and tutors. They noted that teaching provides an important opportunity not just to introduce BSL or ISL to others but to share Deaf culture and history.

We also highlight that measures should be in place to ensure that experienced sign language tutors who may not yet hold formal accreditation are supported through the accreditation process. Many highly skilled and experienced tutors may currently lack formal accreditation due to historical barriers, including limited access to qualification routes and financial constraints. It is vital that existing tutors are fully supported through this process, with clear transition arrangements and access to professional development to align with any new standards introduced. Pathways into the profession should be open and accessible to members of the deaf community, who bring essential lived experience.

NDCS acknowledges the work already undertaken by the Department for Communities in this area. The **continued development of pathways** should be undertaken in collaboration with relevant organisations and the wider deaf community to implement an accreditation framework that strengthens, rather than limits, the pool of qualified tutors available to teach BSL and ISL.

While it is not directly a matter for this Bill, we note that work in relation to sign language pathways, accreditation and quality assurance also has the potential to support **wider developments that are of key concern to deaf children and their families**. This includes developing the sign language skills of the workforce that supports deaf children in early years and education settings and the potential introduction of a GCSE in sign language. Every child should be able to study and gain qualifications in their first language and the opportunities that would be offered by a GCSE in sign language were powerfully echoed by a parent responding to our 2025 survey:

“BSL GCSE really should be introduced. The fact that children can opt to study languages such as French, German and Spanish, yet not BSL is crazy! I personally had to study French and German - neither of which I have used. I have a deaf son, and deaf friends, and I am scrambling to learn BSL so I can communicate with my son and teach him BSL. Learning this in school would have been so beneficial.”

Scope of the Bill

Access to services and information

We welcome in clause 3 that listed organisations will be required to ensure that information and services are accessible to deaf individuals and to offer or facilitate the use of BSL or ISL at no extra cost to individuals or families. However, we note concerns that the interpretation of organisations to taking ‘reasonable steps’ and taking into account ‘affordability’ and ‘practicality’ **must set a high threshold for prescribed bodies** to ensure the phrasing does not impede effective implementation of these duties, particularly as more tangible duties or entitlements are not outlined in the Bill. Where such key terms will be given meaning through regulations or statutory guidance, it is important that this includes an

opportunity for deaf children and their families, the wider deaf community and Assembly Members to be consulted.

In our 2025 survey, there was strong support from respondents to being able to access services and information across a wide range of settings particularly: healthcare, childcare and early years, schools and education, but also other areas including: play, leisure and recreation, public transport, social care, and employment support. These findings underscore the importance of making all aspects of public life accessible for deaf children. As one parent highlighted, “My child could attend extracurricular activities without feeling isolated.” This points again to ensuring that deaf children and young people, who use or wish to use sign language, can fully participate in the world around them, touching once more on themes of equality, access and inclusion.

Prescribed organisations

Following on from this, in relation to clause 4, we highlight **concern that further information regarding the list of prescribed organisations is not included** in the Bill. A key test of the capacity of the legislation to make a meaningful difference in the lives of deaf children, young people and their families will be based on the scope and range of bodies and authorities to which it applies. For example, if the Bill applies to the Department of Education but not to the actual settings where deaf children access play, learning and education each day, its impact will be significantly limited. In our 2016 and 2021 consultations, deaf young people shared their excitement at the potential of sign language being used more throughout education and how this could support improved access to the curriculum while also reducing the isolation that deaf children can experience.

Further to this, while we fully support the intention of the Bill to ensure that deaf children and their families can access government and public services through sign language, we note that the lives of deaf children and their families are not easily compartmentalised into definitions of bodies that may and may not be subject to the Bill. It may be useful to consider the Bill in the wider policy context for children and young people, including the Children and Young People's Strategy⁹ and Children's Services Co-operation Act (Northern Ireland) 2015¹⁰ which seek to improve children's wellbeing across a range of outcome areas. This would provide a broader framework in which to consider the range of prescribed organisations for the Bill, including across outcome areas, such as, physical and mental health, living in safety and with stability, and living in a society which respects their rights. This broader consideration also highlights how effective implementation of the Bill can actively support the delivery of improved outcomes for deaf children who use, or wish to use, sign language. In relation to the introduction of the list of prescribed bodies, we note the **importance of considered debate and scrutiny** of this, given the key role of prescribed organisations in implementing the aims of the Bill.

Guidance and best practice

We welcome the clause 5 and 6 duties placed on the Department to issue guidance on the Bill, and for this to set out good practice for prescribed organisations who must have regard to the guidance. We note in the phrasing used that the Department, when devising or reviewing the guidance, must consult each prescribed organisation but only ‘at least one individual or group appearing to the Department to be acting on behalf of the deaf community’. NDCS again highlights that deaf children, young people and their families are not a single or homogenous group and includes children with all levels of deafness and

⁹ <https://www.education-ni.gov.uk/publications/children-and-young-peoples-strategy-2020-2030>

¹⁰ <https://www.legislation.gov.uk/ni/2015/10/contents>

children and families who may make a range of decisions - and make evolving decisions - in relation to language and communication. It is important that any duty to consult **seeks the views of a diversity of deaf children, young people and families** and that implementation of the Bill, including the development of guidance and consultation, reflects this. We also highlight that the Department is the lead duty bearer who must ensure that guidance is produced and reviewed, and that effective and meaningful engagement and consultation are undertaken in relation to this.

We note in clause 6(1)(iii) that reference is made to prescribed bodies producing sign language action plans and highlight that no reference is made to an overarching Northern Ireland plan. It would be helpful to have more **clarification on the intended nature of the sign language plans**, such as, whether guidance issued by the Department will outline a Northern Ireland action plan, if prescribed bodies plans will be linked directly to implementation of the areas outlined in clauses 2 and 3 and if bodies will be required to consult on the development of their plans or the review of their effectiveness.

NDCS notes the potential of sign language action plans to seek to ensure, beyond offering access to communication in BSL and ISL, that services are designed and delivered in a manner which more effectively addresses the needs of deaf children, young people and families who use or wish to use sign language. However, this will require the development of ambitious, high-quality and consistent plans and guidance on 'reasonable steps' and 'best practice' which should reflect this. In the absence of an overarching Northern Ireland sign language plan, we again highlight that plans could be developed with reference to the broader framework of the Children and Young People's Strategy and the Children's Services Co-operation Act (Northern Ireland) 2015 to ensure that implementation of the Bill seeks to directly improve wellbeing outcomes for deaf children and families.

We note that phrasing in this clause references prescribed organisations as well as persons or groups 'exercising functions of a public character' and again highlight that clarification on the range of bodies that will be within the scope of the Bill would be helpful.

Regulations

We note that clauses 7 and 8 of the Bill enable a wide range of regulations to be brought forward and that these may, for example: relate to matters including BSL and ISL or the accessibility of sign language and support for those who rely on BSL or ISL; may confer functions to prescribed organisations and persons or groups appearing to the Department to be acting in the interests of the deaf community; and may limit the Bill when considering issues, such as, a prescribed organisation's resources or functions. These clauses relate to substantive matters which will have a direct impact on how effectively the Bill will be implemented, and **clarity regarding the enabling powers for regulations and the limits to these** would be welcome.

In relation to the preparation and review of regulations we again highlight the importance of ensuring that the views and experiences of deaf children, young people and their families are reflected in this process, including where the Department is required to consult with 'at least one person or group appearing to it to be acting on behalf of the deaf community'. We also note the importance of the Assembly having an appropriate opportunity to properly consider and scrutinise regulations.

We note that both clauses 6 and 7 make reference to those who 'rely' on BSL and ISL and that this differs from the clause 2 phrasing on the use of sign language as 'necessary or convenient' and would welcome

clarification that this does not restrict the applicability of the Bill to deaf children, young people and families who may not have had access or opportunity to learn and develop their use of sign language, as previously highlighted.

Reporting

NDCS notes concern that reporting in clause 9 is required on a five-yearly basis, which may mean a report is not undertaken across each mandate. We also note concern that an earlier or interim report is not required, particularly given the focus in the Bill on implementation which depends on regulations and guidance that have yet to be developed or brought forward. An **earlier initial report may provide an opportunity to consider progress** in bringing forward regulations, issuing guidance and assessing the first steps taken by prescribed organisations in developing and committing to sign language action plans.

In considering the scope of the reporting requirement more broadly, we highlight that this should include a strong focus on: reviewing the effectiveness of the legislation (primary and secondary); implementation of the legislation by the Department and prescribed organisations; and identifying any recommendations that would improve the effectiveness of implementation. As previously noted, to ensure the aims of the Bill are realised and make a positive difference in the lives of deaf children, we highlight the need for all implementation measures, such as, reporting and consultation, to properly assess how well the provisions of the Bill give effect to the rights of deaf children, young people and their families. The views and experiences of deaf children, young people, and their families should be central to this, and the reporting process should also have a direct link to the Assembly to ensure that reporting is accompanied by robust scrutiny.

The deaf community

In addition to deaf individuals including children, we welcome the inclusion of those who are deafblind and children of deaf adults in clause 11, which seeks to identify members of the deaf community, for the purposes of the Bill. We again query the phrasing of 'rely' on sign language in the clause, which differs from the clause 2 phrasing of 'necessary or convenient'. As previously highlighted, it is vital that the Bill recognises the diversity of deaf children, young people and their families, including those who may not currently use or rely on sign language but who wish to do so. We seek **assurance that the definition will not unintentionally create a restrictive understanding of deaf children, young people, and families** as being only those who currently 'rely' on sign language.

Conclusion

The Sign Language Bill represents a long-awaited opportunity to create meaningful change for deaf children, young people, their families, and the wider community in Northern Ireland. For this promise to become a reality, it is crucial that the Bill, along with its regulations and statutory guidance, is strong, well-crafted, and directly shaped by the views and experiences of those it aims to support. Equally important is ensuring that these measures are introduced without delay and backed by sufficient resources and support to make a genuine difference.