

**Reference number**

██████████

**What is your name?**

██████████████████

**What is your email address?**

██████████████████████████████

**If you are providing a submission on behalf of an organisation, please state its name.**

██████████████

**(Required) Please review the Committee privacy notice at this link. Please tick here to confirm you have read the notice.**

Yes

**(Required) Do you consent to your submission being published on the Committee's website and included in the Committee's report? (For signed responses, these will be transcribed into written English before publication)**

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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.**

I agree with the importance of the recognition outlined in Clause 1. However, it is important to note that the clause does not explicitly affirm the right to use sign languages, nor does it establish a statutory obligation to protect that right. This omission should be addressed to ensure comprehensive legislative protection.

**Clause 2**

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

No

**Please give details to support your answer.**

Upon reviewing Clause 2, it appears that the Department for Communities (DfC) is assuming the authority to determine what is considered appropriate in promoting sign language and Deaf culture. This raises concerns about the process by which

such decisions are made. Will there be meaningful consultation with the Sign Language Partnership Group (SLPG), or will efforts be made to engage directly with the wider Deaf community? It is essential to acknowledge that the SLPG consists primarily of professionals and representatives from Deaf organisations, and does not fully represent the lived experiences of Deaf individuals. Authentic engagement with the community is crucial. Furthermore, the term "promotion" requires clarification - what will this entail? Will it involve actionable, measurable outcomes, or remain theoretical? While some detail may be outlined in secondary legislation, the current wording lacks specificity. Additionally, clarification is needed on DfC's definition of "Deaf culture." I would also like to understand how this bill differs substantively from the Disability Discrimination Act (DDA), which similarly references "day-to-day activities." As the bill focuses exclusively on the public sector, it neglects the private and voluntary sectors, which are also accessed daily by Deaf individuals (e.g., retail, legal services). Without extending coverage, we risk no tangible improvement in real-world access. Finally, the proposal to allow sign language to be taught by "other suitable persons" is concerning. Teaching must be conducted by qualified and accredited professionals to ensure high-quality instruction.

**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/NO**

Yes

**Please give details to support your answer.**

I fully support the promotion of our languages to the general public as a way to foster awareness of the Deaf community and our linguistic heritage. Northern Ireland has four indigenous languages: British Sign Language (BSL), Irish Sign Language (ISL), Irish, and Ulster Scots. These languages deserve equal recognition and support. Promotion must not rest solely on families; it should be driven by public campaigns and robust public relations strategies that reach all sectors of society.

**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/NO**

Yes

**Please give details to support your answer.**

I appreciate the wording in Clause 3, [REDACTED] [REDACTED] I understand the practical considerations such as affordability and predictability. It is my hope that DfC will provide sufficient support to prescribed bodies in developing their five-year action plans. However, my main concern lies with

the lack of an enforcement mechanism - without it, the strength of this clause is significantly weakened.

#### **Clause 4**

**Do you support the approach taken by Clause 4? YES/NO**

Yes

**Please give details to support your answer.**

While I have no objection to the clause in principle, it would have been helpful to see a draft list of prescribed organisations at this stage. Knowing which bodies are included is vital for ensuring accountability. Success will depend on the level of consultation, support, and guidance provided by the Department.

#### **Clause 5**

**Do you support the approach to consultation required in clause 5? YES/NO**

No

**Please give details to support your answer.**

I support the development of guidelines by the Department for prescribed bodies and agree with the need for consultation. However, I strongly oppose the idea of consulting with a single individual or group to represent the entire Deaf community. This approach is not robust or representative. A national advisory group composed of Deaf individuals who use services regularly would provide a more authentic and comprehensive perspective. Terms of reference for this group should be clearly established.

#### **Clause 6**

**Do you support the approach taken in this clause? YES/NO**

Yes

**Please give details to support your answer.**

I welcome the proposed guidance and assume it will address matters such as reasonable steps, communication, engagement with Deaf individuals, technology (e.g., VRS), and booking registered interpreters. However, I stress the importance of extensive consultation with the Deaf community during development. The guidelines must be of a high standard, and while their content may be strong, their lack of enforcement raises concerns about effectiveness.

**Do you feel there is anything else this Clause should include? YES/NO**

No

**Please give details to support your answer.**

No additional comments.

### **Clause 7**

**Do you support the provision for the Department for Communities to make regulations detailed in clause 7? YES/NO**

Yes

**Please give details to support your answer.**

I fully support the development of secondary legislation to support the Bill. It is crucial that DfC consults meaningfully with all prescribed bodies, Deaf organisations, and the wider Deaf community. A key priority should be Deaf education. Currently, many Deaf children lack access to sign language and are not educated in their natural language, resulting in poor academic outcomes. This significantly impacts future employment opportunities and quality of life. Research consistently supports bilingual education as the most effective approach. We need to urgently invest in sign language-based education to protect the language and support the next generation. Establishing a robust consultation process that includes Deaf community voices is essential.

**Do you support the approach to consultation detailed in clause 7? YES/NO**

No

**Please give details to support your answer.**

Regarding Clause 8, I support the requirement for regulation and consultation with relevant departments (e.g., Department of Education). However, I reiterate my concern regarding consultation with a single individual or organisation. The SLPG and other existing groups may not adequately represent the broader community. A national advisory group comprising Deaf community members should be established to ensure authentic representation. While I welcome the Assembly's role in final approval, meaningful consultation must be embedded throughout the process.

### **Clause 8**

**Do you feel the level of consultation required in clause 8 is sufficient? YES/NO**

No

**Please give details to support your answer.**

I must emphasise again that consultation with only one individual or organisation is wholly inappropriate and risks tokenism. Consultation must be broad, inclusive, and genuinely representative of the Deaf community.

### **Clause 9**

**Do you think evaluating the impact of the Bill in a report every five years is an appropriate length of time? YES/NO**

No

**Please give details to support your answer.**

Clause 9 outlines a requirement for reports every five years. While reporting is necessary, a five-year cycle is too infrequent and risks stagnation. A three-year cycle would create greater momentum and encourage faster progress. Many in our community, particularly older members, have waited a long time for change. Timely progress is vital. Additionally, it must be clear who will monitor these reports. A Deaf-led advisory group would be ideal for tracking progress and making further recommendations.

**Clause 10**

**Do you support the creation of a scheme for accrediting BSL and ISL teachers? YES/NO**

Yes

**Please give details to support your answer.**

I fully support the requirement that all teachers and interpreters be qualified, registered, and accredited. This is essential to ensure a professional standard of service delivery.

**Do you support the creation of a scheme for accrediting BSL and ISL interpreters? YES/NO**

Yes

**Please give details to support your answer.**

As stated, I support mandatory accreditation and qualification for interpreters and teachers.

**Clause 11**

**Do you agree with the definition of the deaf community provided for in the Bill? YES/NO**

Yes

**Please give details to support your answer. Please outline what people or groups you think should be included or excluded and why.**

I have no concerns with the categories listed in the definition. If anything, the inclusive language acknowledges the broader Deaf community, including CODAs and family members.

## **Clause 12**

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

**YES/NO**

Yes

**Please give details to support your answer. If you think there are any aspects missing, please outline what you think should be included.**

The definitions of BSL and ISL are appropriate and accurate.

## **Clause 13**

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

**YES/NO**

Yes

**Please give details to support your answer. If you think there are any aspects missing, please outline what you think should be included.**

I support the reference to "everyday reliance" on sign language. While the wording is similar to that in the DDA, it appropriately reflects the reality of our daily communication needs.

## **Any other comments**

**Is there anything which you expected the Bill to make provision for which has not been included in the Bill? YES/NO**

Yes

**Please give details to support your answer.**

The Bill's focus on public bodies, guidance, and regulation is welcome - particularly its commitment to the promotion of sign languages, increasing the pool of qualified interpreters and teachers, and supporting families of Deaf children. However, I am concerned that it fails to address access across the private and voluntary sectors, both of which play a significant role in our daily lives. Deaf individuals routinely access services in these sectors, including shops, hairdressers, sports clubs, and professional services such as solicitors - yet interpreting support in these settings is not covered under this Bill.

One particularly concerning example is the justice system. While the courts themselves provide interpreters during court proceedings, there is a significant gap in access when it comes to interactions with legal representatives outside of court. Deaf individuals are often required to meet with their solicitors to prepare for hearings, understand legal proceedings, or review case documents. However, solicitors frequently state they cannot afford to cover the cost of a sign language interpreter for these meetings. As a result, the financial burden falls on the Deaf

person, placing them at a distinct disadvantage and undermining their right to fair and equal access to justice.

This gap effectively penalises Deaf individuals who wish to seek legal advice or defend themselves adequately within the justice system. Communication breakdowns at this stage can have serious implications for case outcomes and may even infringe on legal rights under equality and human rights law. It is imperative that the legislation accounts for this disparity.

To address this, I propose the introduction of a voucher or interpreting credit system, similar to the model implemented in Finland. Under that system, Deaf individuals receive an annual allowance or “bank” of interpreting hours, which can be used at their discretion across all sectors -including the private and voluntary sectors. This would enable Deaf people to engage fully and equally in everyday life, whether meeting with a solicitor, joining a gym, attending a job interview, or accessing community services.

In Northern Ireland, we currently have no such system, leaving many Deaf people unsupported outside public service settings. The lack of coverage beyond the public sector significantly limits our independence, autonomy, and access to basic services. I urge the inclusion of provisions or supporting mechanisms in the Bill that extend to the private and voluntary sectors, to ensure Deaf individuals are not left behind simply because they step outside a government-funded space.

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

No further comments, thank you.