

**Reference number**

██████████

**What is your name?**

██████████████████

**What is your email address?**

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

N/A

**(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.**

It is straightforward that BSL and ISL are official languages of Northern Ireland and must be granted legal recognition and 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.**

Teaching sign language to deaf children, their families, carers, and guardians is essential. However, this issue extends beyond that. We must also consider CODA (Children of Deaf Adults). Hearing children raised in deaf households require support upon entering the education system. For instance, if a newly arrived child from Ukraine starts school, accommodations are made due to their lack of English

proficiency. Similarly, CODA children are often perceived as academically weaker than their peers from hearing families. Sign language must be recognised as a legitimate language. CODA children often speak English as a second language. Support should be available for both deaf parents and their children. We must acknowledge the importance of sign language, the culture it represents, and the wider deaf community. It may be more inclusive to refer to it as "sign language culture" to encompass CODAs and others who use sign language.

**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.**

While ongoing education in sign language for families and hearing individuals is crucial, priority must be given to access for deaf community members. Accessible means of communication should include services such as VRS (video relay service) and VRI (video remote interpreting). These should be available for daily interactions - phoning a doctor, contacting the police, or answering the door. The current lack of interpreter funding for job interviews is a major barrier. A comprehensive VRS and VRI system would allow deaf individuals to participate fully in professional opportunities.

**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 support the inclusion of public services, but I have concerns about those excluded despite government funding. I disagree with the term "prescribed bodies." For instance, the BBC, although publicly funded, cut the live BSL news broadcast in Northern Ireland. Some legal services are private and thus fall outside the legislation. Private organisations are similarly excluded. Since disability legislation applies to the private sector, this bill should cross-reference or integrate relevant obligations, including sign language provisions.

**Clause 4**

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

No

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

I strongly oppose a selective approach to public services. Deaf individuals pay taxes like everyone else and deserve equal access. One government department should not unilaterally decide what services are covered. A uniform policy across all departments is necessary. Access should not be restricted arbitrarily. Deaf individuals must have the same access rights as anyone else, without limitations imposed by departmental discretion.

### **Clause 5**

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

No

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

While I support the general consultation format, I reject the minimal level of consultation conducted. DfC lacks internal BSL/ISL expertise and therefore cannot ensure effective representation. Without cultural and linguistic understanding, meaningful consultation is impossible. The disability movement's principle, "Nothing about us without us," must be upheld. DfC must seek qualified external experts to carry out proper consultations.

### **Clause 6**

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

Yes

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

Guidance is essential for prescribed organisations, many of which are unfamiliar with accessibility requirements. However, DfC currently lacks the internal capability to provide this guidance. To be effective, DfC must employ individuals who are deaf, native signers, and deeply embedded in deaf culture. These individuals offer invaluable insight into the lived experiences, behaviors, and needs of the deaf community, which is crucial for effective policy-making and guidance.

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

Yes

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

Language is intrinsically linked to culture, whether it's English, French, or sign language. Deaf culture is distinct and should be recognised. Many deaf individuals have experienced language oppression and discrimination, affecting how they navigate public systems. A team member at DfC with lived experience and cultural competence is vital to ensure the department understands and reflects the deaf community's perspectives.

### **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.**

It is important that DfC regulations are approved by the Northern Ireland Assembly. However, consultation processes must be robust and inclusive. Language alone does not encompass the full scope of cultural needs. Without internal expertise, whether a deaf person or a CODA, DfC cannot effectively gather or interpret community input. True consultation requires understanding the depth and nuance of deaf culture.

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

No

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

I reiterate the necessity for DfC to include deaf individuals in its staff. It is deeply concerning that only one person may be consulted to represent the entire deaf community. No individual can reflect all experiences, especially considering the disparities between BSL and ISL users. ISL speakers, though fewer in number, often face greater barriers and require specific attention. Balanced, multi-perspective representation is essential.

**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.**

Consulting a single person or group is insufficient. The deaf community is diverse in language, culture, and experience. A one-size-fits-all approach will lead to tokenism and ineffective policy. Authentic voices from both BSL and ISL communities must be heard. Only through thoughtful, inclusive consultation can this legislation succeed.

**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.**

A five-year reporting period is too long. Problems may escalate if left unaddressed. England mandates annual reports for the first five years, followed by triennial reports. Scotland required reports every three years for six years, then every five. Annual

reporting in the early stages ensures continued engagement and allows for timely adjustments.

#### **Clause 10**

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

No/Yes

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

Initially, I disagreed, but I now support the need for accredited BSL and ISL teachers. However, the responsibility should lie with the Teaching Council of Northern Ireland, not DfC. Aligning sign language teacher accreditation with other language teachers under the Department of Education would elevate the profession's status and ensure consistency.

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

No/Yes

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

While existing registration bodies in England and Wales offer a model, Northern Ireland has unique dialectal and cultural needs, influenced by ASL and the presence of ISL. Interpreter training should reflect local BSL and ISL variations. A Northern Ireland-based program would strengthen community pride and preserve linguistic identity.

#### **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.**

Interpreters should be recognised as a distinct category. They bridge deaf and hearing worlds and must remain engaged with the deaf community to maintain language proficiency. Immersion ensures interpreters stay current with evolving sign language usage.

#### **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.**

I support the definition of sign language, including tactile methods used by the deafblind community. I defer to their expertise for further input.

### **Clause 13**

**Do you agree with the definition of “everyday reliance” provided in the Bill?  
YES/NO**

No

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

The phrase "everyday reliance" is patronising. Do Irish or Ulster Scots speakers face this same categorisation? Framing sign language as a crutch rather than a language reinforces negative stereotypes. This terminology should be reconsidered or removed.

### **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 absence of cultural recognition in the bill is disappointing. Language and culture are inseparable. Deaf cultural expressions - poetry, theatre, and visual arts - must be acknowledged and celebrated. While rights are crucial, so too is the celebration of language and its richness. Cultural considerations are also vital in addressing broader issues like mental health.

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

Although I have identified areas for improvement, I appreciate the efforts that have gone into this bill. Legal recognition of BSL and ISL is a critical milestone. I am optimistic that this legislation will lead to meaningful inclusion and resourcing. The deaf community possesses immense talent and insight. I urge ongoing, inclusive consultation to ensure the best outcomes for all.