

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.

N/A

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Yes

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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?

No

Please give details to support your answer.

Clause one is concerning for two key reasons. Firstly, the wording lacks clarity - after enactment, will we have a recognised language, or will sign languages be established as official languages? While I understand that English is not currently an official language, I believe it is essential that this clause is robust and unambiguous. Additionally, the DDA will remain the primary disability framework, which may still carry more legal weight even after this bill is passed. This raises the concern that the bill, from the outset, may be more symbolic than substantive. I recognise the complexity and nuance of the language, but greater clarity and understanding around Clause One is essential.

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.

My second concern relates to the promotion of our culture, language, and the Deaf community. The term "culture" is not defined, and without this definition, we lack the context needed to understand what is being promoted. This lack of detail makes it difficult to comment constructively. While sign language classes for deaf children and their families are mentioned, the wording remains vague. It is also concerning that this is the only concrete proposal within this clause, which heightens the overall sense of ambiguity.

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.

You've asked whether there are other ways this clause could be achieved. There are countless. Firstly, it is vital that sign language classes be led by Deaf, native sign language users. These teachers must be properly remunerated and treated on par with other educators. Classes should not be delivered in isolation but integrated into a holistic developmental programme tailored to deaf children, inclusive of peer interaction, parental support, and diverse activities. Language is not just taught; it is acquired through rich, immersive exposure to a variety of Deaf individuals in multiple settings.

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

No

Please give details to support your answer.

I disagree with Clause Three due to the lack of clarity on what constitutes a "prescribed organisation." This ambiguity opens the door for organisations to justify why they cannot provide access, offering them a convenient loophole. Both public and private sectors should be included - citizens interact with both, and the current provision appears to absolve the private sector of responsibility. The list of bodies we engage with is far more extensive than those considered public services.

Clause 4

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

No

Please give details to support your answer.

This is a difficult question to answer, but I would cautiously say that the Department for Communities appears to have excessive power and authority in shaping decisions that deeply affect our lives. Ideally, the department should work with us and for us. I'll leave it at that.

Clause 5

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

No

Please give details to support your answer.

With regard to Clause Five, I must again express concern. The Deaf community is highly diverse - across age, language background, geography, and more. Consulting only one person or group is entirely inappropriate. Given past experiences where the Department failed to adequately listen to the Deaf community, I would strongly advocate for substantial revisions to this clause.

Clause 6

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

No

Please give details to support your answer.

I must also disagree with this clause due to the repeated use of the term "reasonable." Legislation should mandate that, when a Deaf person requires communication support - such as BSL or ISL translation, a VRS system for phone calls, or an in-person interpreter - this support is provided as a matter of necessity, not reasonableness. Furthermore, this legislation should create pathways for Deaf individuals to fill roles that directly serve our community. Interactions in which Deaf people can communicate directly are far more effective and preferable, yet this is not addressed in the current draft.

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

Yes

Please give details to support your answer.

The proposed guidance feels overly generic. I question whether specific, tailored guidance will also be created for the private sector. Each organisation - whether serving children, the elderly, or others - requires bespoke guidance. I would welcome initiatives encouraging the recruitment and leadership of Deaf individuals, but the scope here seems limited. There must be clear efforts to foster Deaf leadership and Deaf-led services.

Clause 7

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

No

Please give details to support your answer.

Clause Seven appears to serve as a convenient opt-out for organisations to avoid providing access. I would prefer a clause with the opposite intention - one that obligates organisations to provide interpreters, translations, or any necessary accommodations for Deaf individuals to access their services.

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

No

Please give details to support your answer.

I do not believe the Department for Communities will genuinely take on board the views of Deaf people before making key decisions.

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 disagree with the notion that a single person or group should speak on behalf 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.

Monitoring and reporting cycles must be shortened. Consider the past five years - with the COVID pandemic and significant societal changes - delayed reporting fails to capture the rapidly evolving needs of our community.

Clause 10

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

No

Please give details to support your answer.

Regarding sign language teachers, we must be cautious in insisting that all be formally qualified. Some of our most experienced and skilled teachers are older and have not had the opportunity to gain formal qualifications. Excluding them would be detrimental. The focus should be on ensuring teachers are Deaf and that the Deaf community leads this field, rather than becoming overly fixated on qualifications. If qualifications become mandatory, it could disproportionately benefit hearing individuals, who find it easier to meet such requirements. Sign language teaching must remain in the hands of the Deaf community. The current NRCPD registration system works well across the UK; I see no reason to move away from it.

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

No

Please give details to support your answer.

I do not support the creation of a new accreditation or registration system for interpreters in Northern Ireland. The NRCPD system is well-established, rigorous, and effective. Reinventing this would be unnecessary and counterproductive.

Clause 11

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

No

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

Many Deaf individuals grow up without early access to sign language, which severely affects their development. Even those who do not use sign language should still be entitled to interpreting support in education and healthcare to help develop language and self-advocacy skills. These children must also be included in the bill.

Clause 12

Do you agree with the definition of BSL and ISL provided for 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.

I cannot comment on the issue of deafblindness as I am not deafblind. However, I believe there should be a separate category for Deaf individuals who relocate to

Northern Ireland from other countries and must learn BSL or ISL. This should also include mobility considerations.

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.

I do not understand the framing of sign language as something we "rely on" - as if it were a form of medication. We use language, just like any other person. I doubt similar terminology would be used for those who speak English. This framing is misguided and needs to be reconsidered.

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.

I would love to see legislation that encourages Deaf individuals to serve their own community. For example, in media, having Deaf presenters or Deaf-led programmes would remove the need for interpreters and make content more accessible. The BBC's lunchtime signed news bulletin was cancelled despite being funded by taxpayers - including us. We should not need to activate special features to access our language; it should be visible and available by default, especially for our older community members. A voucher system like that in the Republic of Ireland would be invaluable, offering interpreting hours for events like weddings or training courses. A single point of contact VRS/VRI system would simplify access to services. Funding should also be ring-fenced for Deaf staff in sports and arts, which are essential cultural hubs. Outreach programmes in schools, Deaf-led theatre, and community events must all be prioritised.

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

Access to Work must be urgently addressed. In England, Deaf people can receive up to £69,000 in interpreting support annually, enabling full workplace integration and progression. In Northern Ireland, support is typically limited to just 6–8 hours per week. This disparity stifles opportunity, forcing many to leave for England or beyond. The system here is overly restrictive in terms of hours, travel costs, and budget caps, severely limiting workplace advancement.