



8 July 2016

SUBMISSION TO THE SIGN LANGUAGE FRAMEWORK CONSULTATION DOCUMENT

Please find below, the submission from the Royal College of Speech and Language Therapists (RCSLT) to the above consultation. The RCSLT welcomes this opportunity to comment.

The RCSLT fully supports the aims set out in this framework which seeks to ensure that the natural language of Northern Ireland's deaf community, British Sign Language (BSL) and Irish Sign Language (ISL) is afforded equal recognition and that users of BSL /ISL have the same rights, responsibilities, opportunities and quality of life as those in the hearing community. The RCSLT believe that BSL and ISL, as languages in their own right, should enjoy equal status in law to other languages (e.g. Gaelic, French, Spanish, Urdu etc.) and we support the proposals for the introduction of a BSL/ISL Bill.

The RCSLT also recognise that people with hearing loss who use BSL/ISL may also experience other communication difficulties that may require specialist support. Whilst it is important to legislate for improvements in the equality of recognition for BSL and ISL, it is equally important to ensure that this legislation does not result in greater inequalities for people with hearing loss who may also require other forms of communication support.

We welcome this framework as an important first step in recognising and supporting BSL/ISL and also the needs of individuals in Northern Ireland with differing communication styles.

Yours sincerely

Alison McCullough MBE
Head of the Northern Ireland Office RCSLT

Anne Gamble
RCSLT Country Representative

Patron: Her Royal Highness The Countess of Wessex
Registered Office: 2 White Hart Yard, London SE1 1NX.
Tel: 020-7378-1200 Fax: 020-7403-7254
E-mail: postmaster@rcslt.org

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1. Do you agree with the need for a Sign Language Framework that includes proposals for an Irish Sign Language (ISL) and British Sign Language (BSL) bill?

Equality legislation, in theory, imposes a duty to provide communication accessible services. Evidence from real life experience however demonstrates that access to services are restricted or indeed blocked for many people with speech, language and communication support needs (SLCN), including those who use BSL and ISL. The impacts of such barriers for individuals with SLCN are well reported. A Scottish Government Social Research Unit 2007 report [“Communication Support Needs: a Review of the Literature”](#) or more recently NHS Education Scotland [“Making Communication even Better”](#) initiative and Mystery Shopper Project [“Through a different door”](#) impact report (2014), evidence the difficulties individuals with SLCN have in understanding services and opportunities offered and in expressing themselves to those services.

Some of the issues faced by the ISL and BSL communities can be mirrored by the experiences of people with SLCN. A recent collaborative project between Disability Action, the Northern Ireland Health and Social Care Board (HSCB) and the RCSLT demonstrates the impact and barriers experienced by individuals with a communication disability.

These individuals’ experiences illustrate well the challenges a communication disability has on peoples’ lives. They also demonstrate the positive impact that communication support has for individuals with any SLCN whether they use BSL, ISL or another form of alternative or augmented communication (AAC). <http://www.myjourneymyvoice.org/>

As previously stated above the RCSLT agree that BSL and ISL as languages in their own right should enjoy equal status in law to other languages (e.g. Gaelic, French, Spanish, and Urdu etc.) In some other parts of the UK, BSL is indeed already regarded as a language of equal status to other languages, for example in Dingwall Academy in Scotland BSL is taught as a foreign language.

The RCSLT recognise there may be added value in securing legislative progress for BSL/ISL users as the start of a broader change in Northern Ireland to a society which ultimately embraces inclusive communication for all.

2. Do you agree with the proposed objectives in the Sign Language Framework?

Yes.

3. It is proposed that Irish Sign Language and British Sign Language be recognised and defined as official languages in the north in such a way as to guarantee services through Irish Sign Language and British Sign Language on a par with those available through English. Do you agree?

Yes, the RCSLT are supportive of a change in the official status of ISL/BSL to bring it in line with the British Sign Language (Scotland) Act 2015. We also note that this section undertakes to provide a sustainable supply of regulated sign language teachers, interpreters and translators. The RCSLT believe that this communication assistance should be extended to include specialised speech and language therapists who provide support to deaf individuals with additional SLCN.

It is our members' experience that being profoundly deaf (and a user of BSL or ISL) may be coterminous with other health or social care needs. For these individuals with more complex needs, simple interpretation services will not necessarily be sufficient to enable them to access services and participate in opportunities offered. For example a deaf individual who uses sign language and also has moderate learning difficulties will need information presented in a suitable language format, using an appropriate communication style, as well as through the medium of sign language.

The RCSLT has been made aware of issues regarding BSL competency of HSC professionals for the deaf and also instances where deaf individuals have been unable to participate fully in day services due to a lack of interpretation support.

Our members report that often work placements for young people with sensory impairment and additional communication and learning disabilities often break down due to a lack of communication support. For this reason we support the intention to improve the provision of a sustainable supply of interpreters and regulated sign language teachers and we hope that this can be extended to any other additional support that may be required, for example, specialist speech and language therapists.

3. Do you agree that there should be a Minister assigned with special responsibility for Irish Sign Language and British Sign Language?

Yes. We note that under the new NI government structures, this framework will be considered for progression by the Minister for Communities, who has responsibility for both culture and promoting equality. We believe that the recognition of BSL and ISL as official languages should rightly be regarded as a cultural issue. However, we also believe that the development of an inclusive communication society with communication accessible services is an equality issue for all people with SLCN in Northern Ireland and may also fall within the scope of the department of communities as well as the department of health.

4. Do you agree that the Minister with special responsibility for Irish Sign Language and British Sign Language should be the Minister with responsibility for Culture?

See above.

5. Do you agree with the inclusion of provisions for Executive Ministers to prepare, publish and implement BSL and ISL plans for their departments?

Yes. As mentioned above it is our members' experience that the needs of people within the deaf community can be complex. Therefore services that are commissioned as part of this framework should not sit in isolation from services provided to deaf people that fall under the remit of other ministerial portfolios, notably health and social care and education. To that end we welcome the recognition in the framework that it will be implemented by all executive departments through a 'cradle to grave' approach.

However, we do have some anxieties around possible unintended consequences of the requirement for publication of BSL and ISL plans as part of this framework. Often public authorities typically only recognise people with sensory impairment as having communication support needs and respond accordingly with a relatively narrow and perfunctory provision of large print or audio versions of information.

A new emphasis on the publication of BSL and ISL plans may inadvertently result in the government and public authorities focussing only upon the provision of support to ensure access to services for people with sensory impairment and failing to also ensure the provision of inclusive communication environments which meet the needs of the wider populations of people with communication difficulties including those who use BSL/ISL.

6. Do you agree with the inclusion of provisions for Executive Ministers to promote and protect the use and understanding of Irish Sign Language and British Sign Language Plans for their departments?

Yes – please refer to above answer also.

7. Do you agree with this proposal? (Free classes for parents, siblings and grandparents of deaf children).

Yes, we are aware that Jordanstown School is now offering BSL 1 and 2 classes and agree with the emphasis on early and family focused intervention within the framework.

8. Do you agree with this proposal? (Free classes for deafened individuals and their immediate family members)

Yes

9. Do you agree with this proposal? (Use of ISL and BSL in legal proceedings).

Yes. As mentioned above it is important to recognise that some BSL and ISL users may also have additional language impairment and that this should be addressed to ensure they can access the justice system fairly. For example in a case where a deaf individual also has receptive language difficulties, they may require additional, specialised communication support as well as interpretation services. An excellent example of this type of support is the services provided via the [registered intermediary scheme](#) in Northern Ireland. This type of

support may be needed in addition to BSL or ISL, to enable some individuals to both understand proceedings and participate in them effectively. It is important that the provision of interpreters is not viewed as the sole support that a deaf individual may require.

10. It is proposed that Irish Sign Language and British Sign Language interpreters be provided, where necessary in accessing public services, at no inconvenience or additional expense to the deaf individual. Do you agree with this proposal?

Yes. As outlined above it is also important that where necessary specialised communication support is provided to members of the deaf community who also have additional SLCN.

11. It is proposed that legislation may provide for the regulation of Irish Sign Language and British Sign Language interpreters in the north. Do you agree with this proposal?

Yes.

12. It is proposed that legislation may require registered Irish Sign Language and British Sign Language interpreters and teachers to demonstrate and maintain professional competence. Do you agree with this proposal?

Yes.