About you

1. Are you responding as an individual or on behalf of an organisation?

X Organisation

2. If you are responding on behalf of an organisation, please provide the organisation's name. (Please DO NOT include personal names / personal data)

Organisation's name

Royal College of Speech and Language Therapists Northern Ireland (RCSLT NI)

3. Consent to publication of consultation comments. (We will remove any personal names / personal data from any published comments).

X I agree that all or parts of my consultation comments may be published.

Section 1: Draft Policy Vision

Our draft vision for a new public libraries policy is: *"A single library authority that is trusted, valued and community-centred."*

4. To what extent do you agree or disagree with the draft vision?

Agree

5. Please provide us with any comments you may have on the draft vision.

The RCSLT NI welcomes the draft vision and supports its ambition for a trusted, valued and community-centred public library service.

However, we recommend strengthening the vision by explicitly recognising accessibility and inclusion. For people with speech, language and communication needs (SLCN), including developmental language disorder (DLD) and acquired communication difficulties e.g. a person following a stroke, barriers to accessing information, understanding services and participating in activities can limit their ability to benefit fully from public libraries.

A genuinely community-centred service must be accessible to everyone, including those with communication difficulties, across the lifespan.

We therefore suggest the following revised vision:

"A single library authority that is trusted, valued, accessible, inclusive and community-centred."

This would reinforce the commitment to equitable access and ensure that communication accessibility is recognised as a fundamental part of inclusive public library provision.

Section 2: People and Communities

The draft aims at **Section 2** are focused on **People and Communities.** We believe the broad range of customer-orientated resources and services provided by public libraries make important contributions to many areas, including but not limited to education, child development, literacy, information literacy, tackling isolation and loneliness, supporting digital inclusion, contributing to better health and wellbeing, and connecting people to new skills and interests.

To what extent do you agree or disagree with the following proposed aims?

6. Aim 1: Promoting the benefits of reading and contributing to improved literacy.

Public Libraries will do this by providing free-to-access reading material, in libraries and online, and through help and advice from staff, as well as programmed activities and events which promote the importance of reading and contribute to improved literacy. Public Libraries will look to form partnerships with other institutions and organisations where their specialist skills and resources can be applied for mutual benefit and impact.

Strongly agree

Please provide us with any comments you have on Aim 1.

The RCSLT NI strongly supports this aim. However, it is important to recognise that speech, language and communication skills underpin literacy development, reading comprehension and learning. Children and adults with SLCN, including DLD, may experience significant barriers to developing literacy skills and accessing reading materials.

We recommend that library literacy initiatives recognise the relationship between language and literacy and provide accessible reading materials, appropriately adapted activities and support for individuals with differing communication and literacy needs.

Partnership working with speech and language therapists / RCSLT NI, education providers and relevant voluntary organisations could further strengthen inclusive literacy provision.

7. Aim 2: Supporting positive health and wellbeing through engagement and participation.

Public Libraries will do this by providing reading material, resources, and programmed activities and events to support people to live healthier and more fulfilling lives. This could include activities and events that might, for example, support social inclusion, address loneliness, and bring people together in a safe, welcoming environment.

Strongly agree

Please provide us with any comments you have on Aim 2.

The RCSLT NI welcomes the recognition of public libraries as important community spaces that support health, wellbeing and social inclusion.

Communication is fundamental to developing relationships, participating in activities and maintaining social connections. People with SLCN, including those with lifelong or acquired communication difficulties, may experience increased barriers to social participation and community engagement.

We recommend that libraries adopt communication-inclusive approaches to ensure that activities, events and information are accessible to people with differing communication needs. This could include accessible information, visual supports, awareness of augmentative and alternative communication (AAC) and staff training in supportive communication strategies. We would recommend that all staff undertake Communication Access UK training (free of charge), which focuses on these areas. Further information can be found here:

Home - Communication Access UK

This would help ensure that people with communication difficulties can participate meaningfully and benefit from the health and wellbeing opportunities libraries provide.

8. Aim 3: Inspiring creativity and supporting opportunities for life-long learning.

Public Libraries will do this through the provision of reading material, resources, and programmed activities and events which support development of new skills and foster creativity and interests for people of all ages.

Strongly agree

Please provide us with any comments you have on Aim 3.

The RCSLT NI supports this aim and welcomes the commitment to lifelong learning and creativity for people of all ages.

Opportunities to learn, develop new skills and participate in creative activities should be accessible to individuals with differing SLCN. These needs may affect how individuals understand instructions, process information, express ideas or participate in group activities.

We recommend that libraries consider communication accessibility when designing and delivering learning opportunities, including the use of plain language, visual supports, flexible methods of participation and appropriate communication support.

This would help ensure that people with communication difficulties are not excluded from opportunities for creativity, personal development and lifelong learning.

9. Aim 4: Contributing to the development of children and young people whilst retaining the trust of parents.

Public Libraries will do this by actively increasing engagement with children and young people and encouraging their membership of their local library and the wide range of appropriate reading material and by continuing to encourage children and young people to use their facilities as study space. Public Libraries will ensure that their operational policies and practices provide appropriate controls and safeguards on access to material which is not age-appropriate, and that they recognise parental views as they review and implement these.

Strongly agree

Please provide us with any comments you have on Aim 4.

The RCSLT NI strongly supports this aim and welcomes the recognition of the important role public libraries play in supporting children and young people's development.

Speech, language and communication skills underpin learning, literacy, social relationships and participation. Children and young people with SLCN, including DLD and those who are non-speaking, may experience barriers to accessing library resources, understanding information and participating in activities.

We recommend that libraries provide inclusive, communication-accessible environments, resources and activities that reflect differing language, communication and literacy abilities. This should include children and young people whose communication needs have not been formally identified or diagnosed.

While recognising the importance of parental trust and age-appropriate materials, the policy should also emphasise the rights, views and participation of children and young people themselves. This includes ensuring that those with communication difficulties are meaningfully involved in decisions about services intended for them.

Partnership working with speech and language therapists / RCSLT NI, education providers, families and relevant organisations could further strengthen inclusive provision.

We suggest broadening the wording of Aim 4 to:

"Supporting the development, participation and wellbeing of children and young people, whilst retaining the trust of parents and carers."

To what extent do you agree or disagree with the following proposed aims?

10. Aim 5: Growing library membership and encouraging engagement and participation.

Public Libraries will aim to substantially increase membership and will encourage life-long and active membership with current members through a range of means including service development, marketing, promotion, partnerships, and outreach, targeting those who might benefit most from the services available.

Strongly agree

Please provide us with any comments you have on Aim 5.

The RCSLT NI welcomes the commitment to increasing library membership and encouraging participation, particularly among individuals and communities who may face barriers to accessing services.

People with SLCN may be less likely to engage with services where information, registration processes or activities are not communication accessible. These barriers are not always visible or recognised.

We recommend that outreach and engagement strategies specifically consider people with communication difficulties, including those who do not currently use library services. Accessible promotional materials, simplified membership processes and opportunities for supported participation could help remove barriers.

Success should be measured not only through increased membership but also through equitable access, meaningful participation and sustained engagement.

11. Aim 6: Supporting access to trusted information and resources.

Public Libraries will help people and communities find accurate and reliable information in connection with public services, support, interests, and any other topics. Libraries will promote online safety, including avoiding scams and thinking carefully about the information they access.

Strongly agree

Please provide us with any comments you have on Aim 6.

The RCSLT NI strongly supports this aim and recommends that greater emphasis is placed on ensuring information is not only accurate and reliable but also accessible and understandable.

People with SLCN, including DLD, aphasia and other communication difficulties, may experience challenges understanding complex information, evaluating its reliability and making informed decisions.

Accessible communication should therefore be central to information provision, including the use of plain language, Easy Read formats, visual supports and appropriate assistance from library staff.

We particularly welcome the focus on online safety and recommend that information about scams, misinformation and digital risks is provided in

accessible formats to ensure that people with communication difficulties can understand and act upon this advice.

12. Aim 7: Supporting digital inclusion.

Public Libraries will provide access to IT resources, including WIFI and computers, and provide digital choices for those who wish to access reading material, resources, and programmed activities and events online.

Strongly agree

Please provide us with any comments you have on Aim 7.

The RCSLT NI supports this aim but emphasises that digital inclusion must go beyond access to computers, Wi-Fi and online resources.

For people with SLCN, digital barriers may arise from complex language, unclear instructions, inaccessible website design or difficulties navigating online services. Access to technology alone does not guarantee meaningful digital participation.

We recommend that Libraries NI incorporates communication accessibility into its digital inclusion strategy, including accessible content, plain language, visual guidance and compatibility with assistive technology and augmentative and alternative communication (AAC).

Digital skills support should also be adapted to individual communication needs, with staff equipped to provide appropriate assistance. Non-digital options should remain available for those who need or prefer them.

13. Aim 8: Responding innovatively to meet the aspirations and transformational needs of a modern and evolving public library service.

Public Libraries will respond dynamically and innovatively to meet future need for change, ensuring strategic decision making is underpinned by evidence and research, that statutory obligations continue to be met, and that library resources and services remain aligned to customer needs and habits.

Strongly agree

Please provide us with any comments you have on Aim 8.

The RCSLT NI welcomes the commitment to evidence-informed innovation and ensuring library services continue to respond to changing community needs.

We recommend that inclusive design and communication accessibility are embedded in future service development, recognising that traditional approaches to consultation and engagement may not capture the experiences of people with SLCN.

People with communication difficulties should be actively involved in identifying priorities, developing services and evaluating outcomes, with appropriate support to enable meaningful participation.

Partnerships with speech and language therapists / RCSLT NI and relevant community organisations could provide valuable expertise in developing communication-inclusive approaches.

We also recommend that the impact of service changes on accessibility and participation is routinely evaluated to ensure innovation benefits all members of the community, including those whose communication needs may otherwise remain unidentified.

Partnership working with speech and language therapists / RCSLT NI and relevant organisations could support the development of innovative, inclusive and evidence-informed approaches.

Section 3: Places

The draft aims set out at **Section 3** are focused on our public libraries as important **Places,** being visible and welcoming centres where anyone can access resources and information. Our libraries contribute to a sense of place, and for smaller towns that have seen an exodus of banks, post offices and other service centres in recent years, the local library can play an important role as a civic and community space.

To what extent do you agree or disagree with the following proposed aims?

14. Aim 9: Preserving, growing and promoting local heritage collections.

Public Libraries will collect, preserve, promote and make accessible literary and other local heritage collections for people to access, study and enjoy.

Strongly agree

Please provide us with any comments you have on Aim 9.

The RCSLT NI supports this aim and recognises the importance of ensuring local heritage collections are accessible to everyone.

We recommend that consideration is given to how people with SLCN can access and engage with heritage materials, particularly where collections rely on complex written language or traditional methods of presenting information.

Accessible formats, plain language summaries, visual resources and alternative ways of exploring collections could support wider participation and enable more people to connect with their local heritage.

Opportunities should also be provided for people with communication difficulties to contribute their own experiences and stories to local heritage collections, with appropriate communication support where required.

15. Aim: 10: Providing safe, accessible, neutral and genuinely inclusive spaces which are welcoming for all.

Public Libraries will remain trusted, fit-for-purpose spaces where everyone, regardless of age, disability, faith, race or socio-economic status, feels welcome and can access a range of services in which they see themselves represented and their interests catered for and where approaches and practices recognise, respect and evolve with the needs and views of users.

Strongly agree

Please provide us with any comments you have on Aim 10.

The RCSLT NI strongly supports this aim and welcomes the explicit commitment to accessibility and inclusion. However, we recommend that communication accessibility is recognised as an essential component of creating genuinely inclusive public spaces.

For people with SLCN, including DLD, aphasia and communication difficulties associated with other conditions, barriers may arise not only from the physical environment but also from how information is presented, how staff communicate and how services and activities are organised.

Communication difficulties are often hidden and may not be immediately apparent to staff. We therefore recommend that Libraries NI adopts a communication-inclusive approach across its facilities and services, including

clear signage, accessible information, visual supports, awareness of AAC and appropriate staff training.

Consideration should also be given to sensory environments, recognising that noise, busy spaces and other environmental factors may affect communication and participation.

Importantly, people with communication difficulties should be meaningfully involved in shaping and evaluating library environments and services.

Embedding communication accessibility within the design and delivery of library services would help ensure that inclusion extends beyond physical access to meaningful participation for everyone.

Accessibility should be considered across the whole experience of using library services, from obtaining information and planning a visit through to engaging with staff, accessing resources and participating in activities. This includes providing clear information about what to expect, predictable and flexible arrangements, appropriate processing time and access to quieter spaces where needed. Staff should also recognise that communication differences or difficulties expressing needs may be misunderstood as behavioural issues. A communication-inclusive approach should be embedded in everyday library provision rather than relying solely on individual adjustments or specialist activities.

16. Aim 11: Responding to environmental challenges through sustainable operations and local actions.

Public Libraries will contribute to Northern Ireland's response to environmental challenges through the consideration of carbon efficiency and sustainable practices in the construction and maintenance of library facilities, vehicles and in day-to-day operations. They will support public awareness, understanding and local community engagement through the provision of relevant resources and programming.

Agree

Please provide us with any comments you have on Aim 11.

The RCSLT NI supports the commitment to environmental sustainability and recognises the important role public libraries can play in raising awareness and encouraging community participation.

We recommend that information, resources and activities relating to environmental issues are provided in accessible formats, recognising that complex terminology and unfamiliar concepts may present barriers for people with SLCN.

The use of plain language, visual information and inclusive activities would help ensure that people with communication difficulties can understand environmental information and participate in local initiatives.

Accessibility should also be considered when introducing changes to library facilities or services as part of sustainability measures, ensuring that these do not inadvertently create additional barriers to participation.

17. Aim 12: Developing a financial and operating model which enables resilience and sustainability.

Public Libraries will explore and develop opportunities to increase revenue, assist with financial sustainability and augment public funding to support its activities. This will include exploring suitable and appropriate commercial partnerships as well as playing their full role in a wider public sector asset management approach, so that the right facilities are in the right places, of the right size and connected to other public services.

Agree

Please provide us with any comments you have on aim 12.

The RCSLT NI recognises the importance of securing a financially sustainable public library service. However, financial and operational decisions must be balanced against the need to maintain equitable access, particularly for individuals who may already experience barriers to using public services.

People with SLCN may rely on accessible local services, face-to-face support and familiar environments to access information and participate in community activities. Changes to library locations, opening hours, staffing or service delivery could disproportionately affect those with additional communication needs.

We recommend that accessibility and equality considerations are embedded within financial planning, service redesign and decisions about facilities and partnerships.

Any proposed changes should be informed by meaningful engagement with people who experience communication difficulties, using accessible consultation methods.

Financial sustainability should not come at the expense of inclusive provision, and the impact of operational changes on accessibility and participation should be monitored.

Section 4: Partnerships

The draft aims set out at **Section 4** are focused on the importance of partnership working to make best use of library resources in supporting and benefitting people and communities across Northern Ireland. Our public library service has a long and positive history of working innovatively with others to drive beneficial outcomes for people and communities. We want to encourage and facilitate more partnership working to support delivery across the range of library service interests. That could include harnessing the experience and professional skills of our library staff and resources, and bringing the benefits of reading, literacy and participation onto new ground for Libraries NI through collaborations in education, prisons and other areas.

To what extent do you agree or disagree with the following proposed aims?

18. Aim 13: Demonstrating the value of the public library sector in meeting government outcomes.

Public Libraries will work closely with the Department for Communities, other public authorities and interested bodies to ensure the value and impact of public library services is demonstrated and understood. That role should include library development plans taking greater account of the needs and opportunities of other public sector organisations in the area and considering the role they may play in regeneration and placemaking.

Strongly agree

Please provide us with any comments you have on Aim 13.

The RCSLT NI strongly supports this aim and recognises the important contribution public libraries make to government priorities, including education, health and wellbeing, social inclusion and reducing inequalities.

As previously mentioned, speech, language and communication skills underpin learning, literacy, employment, social participation and access to public services. Libraries therefore have an important role in supporting people with SLCN across the lifespan.

We recommend that the contribution of libraries to communication development, accessible information and inclusive participation is recognised when demonstrating their impact on government outcomes.

Partnership working across government departments, Health and Social Care, education and the voluntary and community sectors could strengthen this contribution.

We also recommend that measures of success extend beyond membership and usage figures to consider accessibility, equitable participation and outcomes for people who may otherwise experience barriers to accessing services.

19. Aim 14: Investing to deliver a comprehensive and efficient public library service.

Public Libraries will work closely with the Department for Communities to ensure public funding provides optimum value for money and meets the needs of wider society and delivers against statutory responsibilities.

Strongly agree

Please provide us with any comments you have on Aim 14.

The RCSLT NI supports continued investment in a comprehensive and efficient public library service that meets the diverse needs of communities across Northern Ireland.

Value for money should be considered alongside accessibility, inclusion and equitable outcomes. People with SLCN may require additional communication support, accessible resources or assistance from appropriately trained staff to benefit fully from library services.

We recommend that investment decisions recognise the importance of communication-accessible environments, staff development and inclusive resources as essential components of effective service delivery.

Consideration should also be given to the needs of people who may be disproportionately affected by reduced local provision, particularly those who rely on face-to-face support.

Ensuring services are accessible from the outset can help maximise the value and reach of public investment while supporting the statutory commitment to a comprehensive public library service.

20. Aim 15: Working with others to support and celebrate local heritage, arts and culture.

Public Libraries will act as gateways for a wide range of cultural experiences, working with individuals and organisations to celebrate and showcase our heritage, arts and culture.

Strongly agree

Please provide us with any comments you have on Aim 15.

The RCSLT NI welcomes this aim and recognises the important role that arts, culture and heritage can play in supporting communication, self-expression, social connection and wellbeing.

People with SLCN, including those with lifelong or acquired communication difficulties, should have equitable opportunities to access, enjoy and contribute to cultural activities.

We recommend that partnerships with arts, heritage and community organisations consider communication accessibility when designing and delivering events, exhibitions and activities. This could include visual supports, accessible information and alternative ways for individuals to express themselves and participate.

Importantly, people with communication difficulties should be recognised not only as audiences but also as active contributors to cultural life, with opportunities to share their experiences, creativity and perspectives.

21. Aim 16: Working innovatively with others to support positive outcomes for people and communities.

Public Libraries will use their resources and the knowledge and expertise of library staff, to explore partnerships with others that enable more people to access and benefit from public library services. Public libraries will actively seek to grow existing

partnerships and explore and develop new relationships and collaborations to extend the reach of their services across the public and other sectors.

Strongly agree

Please provide us with any comments you have on Aim 16.

The RCSLT NI strongly supports this aim and welcomes the commitment to strengthening partnerships across public services and the voluntary and community sectors.

We recommend that speech and language therapy services are explicitly recognised as potential partners in supporting literacy, communication development, accessible information and inclusive community participation.

Collaboration between Libraries NI, Health and Social Care services, education providers and relevant voluntary organisations could support the development of communication-inclusive library programmes and resources. This could include early language and literacy initiatives, accessible reading activities, support for people with acquired communication difficulties and opportunities for inclusive social participation.

There is also potential for partnership working within the justice sector, recognising the high prevalence of speech, language and communication needs among people in contact with the justice system and the importance of accessible literacy and learning opportunities.

Partnerships should draw on the specialist knowledge of speech and language therapists alongside the expertise of library staff and the lived experiences of people with communication difficulties.

We recommend that the policy encourages practical, sustainable partnerships with clear outcomes, ensuring that collaboration leads to measurable improvements in accessibility, participation and inclusion across Northern Ireland.

Section 5: About the Public Library Service

At **Section 5** we are seeking your views about what you think is important for the public library service in meeting the needs of people and communities now and in the future.

How important are the following statements to you?

22. Public libraries are welcoming and accessible spaces open to everyone and where my interests are catered for.

Very important

23. Public libraries offer free-at-the-point-of-access physical books, audiobooks, newspapers and magazines and in-person services and programmed activities.

Very important

24. Public libraries offer free-at-the-point-of-access digital e-books, e-audiobooks, e-newspapers and e-magazines and online services and programmed activities.

Very important

25. Public library facilities are fit-for-purpose and designed to meet customer needs.

Very important

26. Public libraries are appropriately stocked with books and other lending resources.

Very important

27. Public libraries offer reading material, resources, services and programmed activities that reflect and meet the general needs and interests of our diverse society.

Very important

28. The network of library service points (library buildings and mobile libraries) serves people in both urban and rural areas.

Very important

29. Universal library resources and core programmed activities are provided across the public library network.

Very important

Section 6

Not applicable

Section 7

Not applicable

Section 8: Final views

37. Is there anything else you would like the policy for public libraries to take into consideration?

Is there anything else you would like the policy for public libraries to take into consideration?

The RCSLT NI welcomes the development of a new public libraries policy and its commitment to providing inclusive, accessible and community-centred services across Northern Ireland.

While we have highlighted specific recommendations throughout our response, we would particularly encourage the Department for Communities to recognise communication accessibility as a fundamental aspect of equitable access and participation. The policy should also recognise people with communication difficulties as active contributors to community and cultural life, rather than solely as users of library services. Opportunities to participate in storytelling, creative activities, volunteering, employment and service development should be accessible to people with differing communication abilities. Their experiences and perspectives should help shape the services and cultural activities provided.

SLCN can affect people of all ages and may be lifelong, acquired or associated with other conditions. These needs are often hidden or unrecognised yet can significantly affect an individual's ability to access information, engage with services, develop relationships and participate in community life.

We recommend that the final policy and its implementation plans:

- **Embed communication accessibility** across library services, environments, information and activities, recognising that accessibility extends beyond physical and digital access.
- **Recognise the importance of speech, language and communication** in supporting literacy, learning, health and wellbeing, independence and social participation across the lifespan.
- **Invest in staff awareness and training** to ensure library staff are equipped to recognise and respond appropriately to differing

communication needs. We recommend that all staff undertake Communication Access UK training. This is free of charge and libraries NI can become accredited at no additional cost:

Home - Communication Access UK

- **Strengthen partnership working** with Health and Social Care speech and language therapists / RCSLT NI, education providers and relevant voluntary and community organisations.
- **Ensure meaningful involvement** of people with communication difficulties, including children and young people, in the design, delivery and evaluation of library services, using accessible engagement and consultation methods.
- **Establish measurable outcomes** for accessibility and inclusion, ensuring that progress is evaluated beyond membership and usage figures to consider whether people can meaningfully access and benefit from services.

The RCSLT also recommends that the policy adopts an explicit rights-based approach to inclusion, recognising the right of disabled people to participate in cultural life on an equal basis with others, as reflected in Article 30 of the United Nations Convention on the Rights of Persons with Disabilities. This includes people with speech, language and communication needs, whose difficulties may not always be visible or formally identified. Accessibility should therefore be embedded within mainstream library provision, with additional support and reasonable adjustments available where required.

We would also encourage the Department to consider the accessibility of its own consultation and engagement processes, including making language accessible at source and alternative communication formats.

Public libraries have an important role in reducing inequalities and supporting participation across communities. Ensuring that people can understand, communicate and engage with the services available to them is essential to achieving the policy's ambition of a genuinely inclusive public library service.

Communication accessibility should not be viewed as an additional consideration, but as an integral part of how public library services are designed, delivered and evaluated.

For further information, please contact:

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