

Policy and Sustainability Committee

10.00am, Tuesday, 24 October 2023

Response to Scottish Government Consultation: Draft British Sign Language (BSL) National Plan, 2023-2029

Executive
Wards: all

1. Recommendations

- 1.1 Note the response to the Scottish Government consultation on the draft BSL National Plan, 2023-2029. As set out in the Business Bulletin for this Committee's 22 August 2023 meeting, because the consultation took place over the summer leave period, and a significant number of key stakeholders were on leave, the response was submitted to Scottish Government by the deadline of 3 September under urgency provisions set out in A4.1 of the Committee Terms of Reference and Delegated Functions.

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Report

Responding to Scottish Government Consultation: Draft British Sign Language (BSL) National Plan, 2023-2029

2. Executive Summary

- 2.1 The report sets out the process for developing the response to the above consultation, and the main points made in our response.

3. Background

- 3.1 The Scottish Government launched a public consultation for a [British Sign Language National Plan 2023 - 2029](#) on 7 July, closing on 3 September. This will inform the develop of a final the National Plan and, in turn, the shape of the next iteration of the Council's own British Sign Language Plan due for consideration by Committee in 2024.
- 3.2 Due to summer annual leave among a significant number of key stakeholders, it was not possible to prepare a full draft for consideration by members in time for the 22 August meeting of the Policy and Sustainability Committee.
- 3.3 An item in the Business Bulletin for the August Policy and Sustainability Committee meeting set out the approach to ensuring that Elected Members had the opportunity to consider and contribute to the draft response.
- 3.4 The final draft response was submitted to Scottish Government by 3 September under urgency provisions set out in A4.1 of the Committee Terms of Reference and Delegated Functions.
- 3.5 The submission is presented in the appendix.

4. Main report

- 4.1 The consultation sets out six priority areas supported by 27 proposed actions, and sought views on these.
- 4.2 The six priority areas are:
- 4.2.1 Data for BSL
 - 4.2.2 BSL workforce

- 4.2.3 Supporting deaf children, young people and their families
- 4.2.4 BSL accessibility
- 4.2.5 Promotion of heritage and culture of BSL
- 4.2.6 Social care and wellbeing
- 4.3 Our response was supportive of these high level aims, and sought further detail on the specifics of scope, implementation and resource implications. funding.
- 4.4 Key points in in response to views on the draft actions were that we would seek:
 - 4.4.1 A stronger focus on outcomes in the plan, rather than on exploratory or investigative actions
 - 4.4.2 A clear statement of the challenges of gaps that the plan seeks to address
 - 4.4.3 Clarity around the costs and funding arrangements in the final BSL National Plan for 2023-2029
 - 4.4.4 Further details about the actions and their delivery
- 4.5 Service areas provided detailed responses to actions relevant to them, and these have been incorporated into the overall response, shown in the appendix.

5. Next Steps

- 5.1 The final BSL National Plan for 2023-2029 will provide the framework for relevant public bodies to develop their own plans. The Council's second BSL plan will span the period 2024-2030.

6. Financial impact

- 6.1 There are no direct financial impacts at this stage. As part of our response to this consultation, we have sought information about the financial implications of the recommended actions.

7. Equality and Poverty Impact

- 7.1 We will consider potential impacts on equality and poverty as part of the development of the Council's second BSL plan, which will be developed in 2024.

8. Climate and Nature Emergency Implications

- 8.1 As a public body, the Council has statutory duties relating to climate emissions and biodiversity. The Council

“must, in exercising its functions, act in the way best calculated to contribute to the delivery of emissions reduction targets”

(Climate Change (Emissions Reductions Targets) (Scotland) Act 2019), and

“in exercising any functions, to further the conservation of biodiversity so far as it is consistent with the proper exercise of those functions”

(Nature Conservation (Scotland) Act 2004)

- 8.2 The City of Edinburgh Council declared a Climate Emergency in 2019 and committed to work towards a target of net zero emissions by 2030 for both city and corporate emissions, and embedded this as a core priority of the Council Business Plan 2023-27. The Council also declared a Nature Emergency in 2023.

Environmental Impacts

- 8.3 We will consider potential impacts on equality and poverty as part of the development of the Council's second BSL plan, which will be developed in 2024.

9. Risk, policy, compliance, governance and community impact

- 9.1 Potential impacts will be identified as part of the development of the Council's second BSL plan, which will be developed in 2024.

10. Background reading/external references

- 10.1 [British Sign Language \(BSL\) national plan 2023-2029: consultation](#)

11. Appendix

- 11.1 Scottish Government Draft British Sign Language National Plan: the City of Edinburgh Council consultation response.

Appendix. Scottish Government Draft British Sign Language National Plan: the City of Edinburgh Council consultation response

The consultation sets out six priority areas supported by 27 proposed actions and seeks views on these.

1. Views on the draft priorities

1.a. What do you think about the key priority within the draft BSL National Plan: **Data on BSL?**

The Scottish Government recognises the need to develop a sustainable model of obtaining evidence and data around BSL, which will help inform our work within the current and future BSL National Plans.

- We support the development of a model for data and evidence which informs effective planning and delivery of services to support BSL users. We would welcome further detail on how this will be undertaken.

1.b. What do you think about the key priority within the draft BSL National Plan: **BSL Workforce?**

The Scottish Government recognises the ongoing issues surrounding the shortages in BSL professions such as BSL/English interpreting and BSL tutors in Scotland. By focusing on increasing the number of professionals in these fields, the strategy can help alleviate the shortage and improve access to BSL services for the deaf communities in Scotland.

- We are supportive of efforts to address the shortages in BSL professions such as BSL / English Interpreters and Translators, Deaf Relay Interpreters, Tactile BSL Interpreters, and BSL Tutors in Scotland to improve access to BSL services for BSL

Communities across Scotland. We would welcome further detail on how this will be undertaken.

1.c. What do you think about the key priority within the draft BSL National Plan: **Supporting deaf children, young people and their families?**

Support for deaf children, young people and their families – The Scottish Government recognises that language deprivation in deaf and deafblind children has an impact on their crucial developmental learning in the ages between 0-5 years which can hinder their social, cognitive, and emotional development.

- We agree with this priority, recognising that language deprivation in deaf and deafblind children has an impact on their crucial developmental learning in the ages between 0-5 years which can have a significant adverse impact on all aspects of development - social, cognitive, and emotional.

1.d. What do you think about the key priority within the draft BSL National Plan: **BSL accessibility?**

The Scottish Government recognises that the BSL communities are underrepresented across organisations and services in Scotland. We want to promote and develop sustainable approaches to ensure the most impactful work is being carried out to ensure the level of BSL accessibility in Scotland are visible, high quality and widely available.

- We agree that this is a priority area and that it is closely aligned with priority 2 (BSL workforce).

1.e. What do you think about the key priority within the draft BSL National Plan: **Promotion of heritage and culture of BSL?**

The Scottish Government recognises the rich BSL culture that Scotland possesses and the ongoing projects in heritage, culture, and arts across Scotland to represent and celebrate BSL. We are seeking views on how to grow this sector which will bring a host of empowering benefits to the BSL community.

- We agree with this priority. We would welcome further detail on how this will be undertaken.

1.f. What do you think about the key priority within the draft BSL National Plan: **Social care and wellbeing?**

The Scottish Government recognises the importance of ensuring that individuals are able to thrive in their daily lives, which includes accessing wellbeing services and receiving the right care for their needs. For the BSL communities, this means being able to receive support in BSL with an understanding of their culture as well as being able to receive information in BSL.

- We agree that this is a priority area and that it is closely aligned with priorities c (Supporting deaf children, young people, and their families), d (BSL Accessibility) and e (Promotion of the heritage and culture of BSL). We would welcome further detail on how this will be undertaken.

2. Views on the draft actions – are there any which should be revised in the BSL National Plan?

12. General comments:

The proposed actions need further consideration and development:

- We would welcome a stronger focus on outcomes in the plan, with actions designed to drive improvements in people’s lives and experiences rather than to “explore” or “investigate”.
- An overview of the final report of the current British Sign Language (BSL) National Plan 2017-2023 would have provided useful context around challenges and achievements, and why the number of priorities and actions has been reduced in the new plan.
- Similarly, it would have been helpful if the consultation had set out the specific challenges or gaps that the proposed actions are intended to address – in several cases, the lack of this information makes it hard to comment on how appropriate or effective they would be.
- The actions in the plan should be SMART (specific, measurable, achievable, relevant and time-bound), with clearly stated next steps – for example, once the investigation or exploration is complete, what would the next steps be?
- It would be helpful to ensure that all actions are easy to understand and jargon free, for example, action 15, “to develop a classification framework around British Sign Language, identifying the multiple perspectives including accessibility and as a linguistic minority”.
- Workforce availability is a critical factor in delivering the ambitions of the plan, and it is important that this is recognised.

- Finally, a number of the actions have resource implications for public bodies and we would seek clarity around costs and funding arrangements in the final British Sign Language (BSL) National Plan 2023-2029.

Comments on proposed actions:

Supporting deaf children, young people and their families

Action 1. The Scottish Government will investigate and explore an early intervention model for sign language acquisition for deaf and deafblind new-borns and children to ensure they and their families have access to both BSL and English. This will assess existing models to determine if we can build or improve on them. This action will help to ensure that deaf and deafblind babies and children are able to grow and thrive in an environment using the language of their choice.

- We would support the introduction of an early intervention model. Access to language and communication is important for the development of secure attachment relationships between infant and caregiver. It is also essential for the child's language and cognitive development. This needs to be set in a context of wider access to inclusive communication (ie visual supports for language and language rich communication environments) since the child's eventual communication needs and preferences cannot be known at such a young age.
- The general comment made above applies to this action i.e. the need for the action to be SMART, and in particular with a clear timescale and assessment of resource implications, setting out the workforce requirements for implementation along with a comparison of needs with existing capacity.

Action 2. Investigate the provisions of support for deaf and deafblind children within Scotland, and identify any gaps in support to inform an immediate remedial action plan. This includes BSL tuition for deaf and deafblind children and their families.

- We would note that there is a wide range of D/deaf education paradigms, estate and need across Scotland, and so local authorities should be involved in co-construct the remit, scope and objectives of this review. The wide variety of approaches and practice will make the identification of gaps challenging, and so instead, we would advocate a focus on outcomes instead as a way of shaping future provision.

- BSL tuition for D/deaf children is important for cognitive and language development, and for development of positive self-identity. Again, resource implications and responsibilities for BSL tuition should be set out.

Actions 3. To investigate opportunities for early years workers to learn BSL up to the level of SCQF Level 6 to inform our future work in this area.

- This is the equivalent of a Higher in BSL, and a key challenge would be to establish which EY posts would require this level of qualification.
- In our view, a high level of staff skill in signing is needed in all sectors, not just EY, as children need others around them who have a higher level of BSL skill than them to mediate their learning and opportunities. We know that it is easier and quicker to acquire social conversational proficiency in a second language than academic proficiency so assuming this also applies to sign language then it's all the more important that adults have a high level of sign skill to support children's inclusion, learning and development.
- Clarity is needed on who would provide this training, and on the resource (cost/time and funding) implications associated for staff to be trained to this level, and how the costs would be met.

Action 4. Support the development of opportunities for deaf and deafblind children, young people, and their families, to learn about the heritage and culture of BSL, especially in Scotland.

- As above, there needs to be clarity around who will deliver the training and how this would be funded.
- It could be useful to LAs to have resources like the SG/Ed Scot anti-racism resources, since D/deafness is low incidence and skill and knowledge within and across LAs varies.

Action 5. To establish a BSL Education Advisory Group to inform priorities around access to BSL and teaching of BSL, with initial focus on deaf and deafblind children.

- Further information would be helpful on the role and remit of this group, and the issues that have been identified as needing to be addressed.

Action 6. To work with the General Teaching Council Scotland (GTCS) to explore and facilitate pathways for BSL users to obtain Qualified Teacher Status.

- We would welcome further details about this action and how it would be delivered.
- It is certainly important for D/deaf children to see D/deaf staff to have positive role models "if they can't see it they can't be it". It has been historically difficult for BSL first language users to access the teaching courses either because they do not have the formal qualifications required or due to access issues with regards to access to work and interpretation.

- Consideration should also be given to BSL being included to a greater level as part of Teacher of the Deaf training as currently the minimum requirement of BSL is very low and further opportunities to develop these skills is not planned for at national level or included within GTCS standards.

Action 7. To investigate opportunities for Teachers of the Deaf and teachers working with deaf and deafblind children in obtaining qualifications for BSL up to SCQF Level 10.

- We would welcome this along with recognition of the time it takes to achieve these qualifications as well as the cost implications for local authorities. Further, there are limited training providers that offer this, which brings challenges to workforce/succession planning with an aging workforce.

Social Care and Wellbeing

Action 8. To explore how the National Care Service co-design involves BSL users and includes provisions for BSL users.

- Agreed that this is an important part of the development of the NCS and that the same applies to other groups of people who have specific needs.

BSL Workforce (Actions 10-12)

Action 10: Investigate opportunities for deaf and deafblind young people to learn about transitioning into and navigating the workplace, support available to them, and skills development, including how to work with BSL/English interpreters.

- It would be helpful for the cost implications and funding arrangements for transitioning to be set out.

BSL Data Strategy

Action 13: To explore how a BSL Data Strategy for Scotland would work in practice, including establishing how we will gather data and evidence and distribute this in a way which helps develop sustainable approaches in data gathering around BSL.

- We support the development of a model for data and evidence which informs effective planning and delivery of services to support BSL users. We would welcome further detail on how this will be undertaken.

Accessibility (actions 14-25)

Action 14. To co-ordinate an effort with listed authorities and BSL/deaf communities within the BSL (Scotland) Act 2015 to establish sustainable approaches in the development and implementation of their BSL plans, ensuring that cost-effective work is taking place proportionately within their authorities to help their BSL plans target issues more effectively.

- There is potential benefit in ensuring that the development and delivery of BSL plans across Scotland to provides better outcomes for people, while recognising the importance of responding to local needs and circumstances.

Action 16. The Scottish Government will develop guidance on BSL access for public engagement, including quality assurance of BSL translations.

- We would welcome any guidance so that we can best support all individuals who wish to respond to our consultations/engagement activities. We ask that the Scottish Government considers the resource implications of the guidance for public bodies.

Action 17: Review the BSL accessibility of the Scottish Government website, and work with BSL organisations to ensure a high standard of the accessibility of the website.

- We support this action. Further details on how this would be achieved along with timescales, resource implications and funding arrangements would be helpful.

Action 19: To support the uptake of SignPort, an online portal for BSL/English interpreter bookings which will be launched for public use, within the Scottish Government and public bodies.

- We recognise the need to explore how best to support a way forward for BSL interpreters to work with the council and the community.

- We have some concerns about SignPort, which might pose problems with the billing process for freelance BSL interpreters. This would need further consideration and we would welcome further information on proposed arrangements and responsibilities for the delivery and management of the service, and funding arrangements.

Action 20: The Scottish Government will develop an Implementation Working Group for the BSL National Plan, with the aim of regularly reviewing the National Plan's commitments to ensure it continues to meet the needs of the BSL communities in Scotland throughout the lifetime of this Plan.

- More broadly, BSL provision needs must be considered at the planning and development stages of policies and services by the Scottish Government when co-ordinating with public bodies and local authorities.

Actions 21-22: BSL and the Justice system

- Further consideration is needed on how we support BSL mediators/intermediaries: we work with people who have committed very serious sexual and/or violent offences, but who also have significant trauma histories. Given that the BSL mediators/intermediaries will be privy to all of that information, how do we prepare/support them for that and how do we reduce the likelihood of vicarious trauma?

Action 23: Support public bodies within the justice sector in exploring ways in which BSL support can be accessed more efficiently for frontline work and emergency response services

- Quality information sharing is critical to effective service delivery and poor communication in service settings between those who use only English and those who use only BSL leads to poor quality of service. The Scottish Government should promote effective partnership working and information sharing processes between various public bodies to enhance service delivery to BSL users.
- Effective delivery of services in BSL can have its greatest impact in time critical and emergency situations. The lack of effective communication in this regard has the potential to create substantial harm. Emergency and time critical services should have immediate 24 hours access to interpreters to provide 24hr on-call BSL interpretation which makes it possible to deliver these services effectively in BSL. The Scottish Government could provide a valuable role in supporting the adoption of consistent, effective processes by relevant public bodies.

- More generally, the Scottish Government should work closely with public bodies to develop and implement consistent plans to achieve these important objectives and embed these requirements into mandatory public sector standards. There are a number of ways in which public bodies interact with the public in the course of their business, and delivering its services, including letters, e-mail and telephone calls; face to face at meetings, reception areas, group and one-to-one meetings; and through publications, written material and websites. Service providers must be able to deliver effectively in BSL at each of these.
- Services delivered through the medium of BSL should be available to citizens who use BSL to access and use public services. Services can be delivered effectively in BSL either by using the services of registered/professional BSL interpreters; or directly in the medium of BSL using staff appropriately competent in the language. The Scottish Government should work closely with the relevant industry bodies like the Scottish Register of Language Professionals with the Deaf Community (SRLPDC) and BSL interpreters to improve provision of qualified BSL interpreters.

13. For information, activities already going on in Edinburgh:

Action 24: To work with COSLA and the Scottish Parliament to identify existing barriers in support for BSL users within political settings, such as councillor or MSP, and consider ways in which gaps can be addressed, including learning from the 2022 Access to Elected Office Fund.

- City of Edinburgh Councillors are undertaking a series of facilitated workshops with the Improvement Service and COSLA to look at a range of barriers to participation which may prevent those with disabilities from standing for election. This will include a consideration of a range of disabilities including those who need to use BSL.

Action 25: Support the facilitation of BSL support in electoral campaigns and the election process to ensure BSL users are able to make informed decisions with access to all relevant information.

- The City of Edinburgh Council is working closely with the Electoral Management Board for Scotland (EMB) and the Electoral Commission on a series of project to consider how to improve the accessibility of electoral events. This will include a range of training, equipment and technological measures to ensure that all those with disabilities, including those who use BSL, are able to access information on candidates and then to make vote securely, independently and in secret.

Promotion of the heritage and culture of BSL

Action 26. To work with organisations focusing on BSL within culture and the arts to identify priorities within the BSL communities in Scotland.

- We strongly support prioritising greater integration of cultural activities in the Scottish Government BSL plan.
- From early education programmes for artists and creatives to industry standards regarding work conditions, programming and promotions there should be more effort placed on a more inclusive approach for both industry representatives and audiences/participants.
- Normalising the visibility and access to BSL interpretation would be fundamental in ensuring artists and audiences requiring BSL interpretation and translation services are supported while general audiences recognise the growing need to do so.
- Furthermore, training in supporting BSL provision in mainstream venues should be embedded in standard training programmes, so that technical crews are equipped with skills to manage BSL provision for live and streamed events.
- We propose setting up a working group of artists and creatives who are BSL users to gather information supporting their experiences of working in the sector and support offered by the arts and culture industry for their meaningful engagement and projects.

Action 27. Explore existing support for organisations with a focus on heritage, culture and the arts – with focus on BSL - across Scotland, to identify ways in which the Scottish Government can support growth for BSL in this sector, in line with the aims and ambitions of A Culture Strategy for Scotland.

- Increasing the visibility and inclusion of stories informed by living and lived experiences of the deaf and blind communities as well as on-and off-stage representation of deaf / blind artists and creatives requires same support.
- Supporting arts and culture companies that already provide pathways to careers and development in the sector with equivalent funding as well as increasing awareness, skills and understanding across mainstream arts and culture organisations are instrumental to continuing support for the deaf and blind community representatives and ensuring the plan is not marginalised due to lack of skills or understanding.
- We propose developing a Scotland-wide training programme for mainstream and community arts venues to better support, welcome and include BSL users in cultural provision planning and delivery.

3.1. Are there any additional actions that should be considered for inclusion in the BSL National Plan?

- The plan should encourage greater synthesis with strategic approach to languages learning and teaching in schools. The 1+2 Approach has now come to full implementation stage and work is underway to develop next steps for strategic development. Alignment of this work to include broadening access to BSL learning would improve inclusion for BSL users, raise the profile of BSL and BSL culture and support the workforce planning needed to carry out the actions in the plan.
- The direction of the British Sign Language (BSL) National Plan needs to be stated more clearly i.e., for all deaf (including deaf, deafblind, deafened, hard of hearing and hearing loss), not just deaf and deafblind alone uses BSL – this was highlighted after the launch of the current British Sign Language (BSL) National Plan 2017-2023.

4.1. What is the one key change you would like to see happening for BSL users in Scotland by 2029?

There are two key changes that we would seek:

- Increased availability of high quality interpretation to support communication between BSL users and non-users
- Normalising the use of and access to BSL through inclusion in school curricula leading to greater inclusion of BSL users in our communities and to improved equality.

5. Are you aware of the Contact Scotland BSL service?

- Yes. We continually promote Contact Scotland BSL service through several emails, marketing, websites, and promotional materials. We support the valuable and critical Scottish Government's funded Contact Scotland BSL service to continue – this is a lifeline for many BSL users to contact us and vice-versa. This is a priority area, and it is closely aligned with priority d (BSL Accessibility).