



**The Health and
Social Care
Alliance
Scotland
(the ALLIANCE)**



**ALLIANCE response to the call for
views on the Scottish Parliament's new
BSL Plan (2024-2030)**

23 August 2024

Introduction

The Health and Social Care Alliance Scotland (the ALLIANCE) welcomes the opportunity to respond to the call for views on the Scottish Parliament's new BSL Plan (2024-2030). The Scottish Parliament plays an important role in demonstrating best practice and expected standards for embedding and supporting BSL throughout government and civic society – including seeking out and responding to the views of BSL users in Scotland.

Question 1: What do you think of proposed actions 1-8?

The proposed action to retain BSL interpretation of First Minister's Questions and parliamentary business directly relating to Deaf and Deafblind people is welcome, as is the commitment to retaining open dialogue with people who are Deaf or Deafblind. However, we suggest that inclusive communication practices should be followed across all items of parliamentary business to ensure Deaf and Deafblind people are fully included within civic life – not only those areas deemed to be “directly related” to Deafness or Deafblindness. Deaf and Deafblind people should be able to engage with parliamentary business on all issues pertaining to their lives – whether that be education, health and social care, justice, travel, employment, or the economy (to name but a few).

BSL users in Scotland represent a spectrum of receptive and productive language skills. This means BSL users will have different levels of experience and confidence in both receiving information in BSL, and in giving information in BSL. Some people benefit from captioning alongside BSL and this should also be mentioned explicitly within the Plan, to better support inclusive communication practices.

The commitment to providing a range of digital, online and print information and resources including resources in BSL is also welcome. We suggest that this area of the Plan would benefit from a commitment to simultaneous publication of resources in captioned BSL and print formats, to ensure that everyone can access information they want, in the format they require, when they need it.



Inclusive communication practices should be embedded throughout Parliamentary practice. All impact assessments should include plans for ensuring inclusive communication, as part of the commitment to considering BSL user needs.

Question 2: What do you think of proposed actions 9-10?

As with the response to the previous question, we would highlight the importance of captioned BSL to ensure that people with varying levels of fluency are supported in Parliamentary processes, working environments, and recruitment.

We would also encourage Parliament to consider the need for proactive recruitment strategies to recruit Deaf BSL users. Ensuring the simultaneous publication and sharing of job adverts and associated information in BSL is a welcome action, but further proactive engagement is required to see a meaningful increase in the number of Parliament staff who are BSL users and support those currently employed. Further actions could include a commitment to targeted advertising to increase recruitment diversity, and support for staff at all levels to learn BSL to advanced levels as part of their continued professional development and to support wider communication practices between colleagues.

Question 3: What do you think of proposed actions 11-16?

The commitment to improve and develop monitoring and evaluation systems is particularly welcome. We suggest that the Scottish Parliament has an opportunity to set a benchmark for other listed public bodies under the BSL (Scotland) Act 2015 in this area, in publishing aggregate data from this evaluation work, and demonstrating public accountability and transparency on its inclusive communication practices. We suggest that this data collection, analysis, and publication should include a wider scope, spanning inclusive communication practices as a whole – in line with (and in preparation for) the pending Public Sector Equality Duty on inclusive communication.



The ALLIANCE welcomes the expansion and promotion of a BSL dictionary resource on parliamentary phrases. We suggest that this should be co-designed by BSL users from across Scotland, to ensure it responds to the needs of people who are Deaf and Deafblind. We are strongly supportive of the continued use and promotion of Contact Scotland BSL.

Question 4: What do you think of proposed actions 17-21?

As detailed above, the ALLIANCE welcomes efforts to improve BSL and Deaf awareness among parliamentary staff. However, we believe that actions 17-21 could go further in order to demonstrate best practice. Occasional and one-off training is useful, but unlikely to ensure systematic improvements in practice and support. Regular and repeated training for all staff, embedded within mandatory continued professional development and training, would be more useful in promoting and ensuring inclusive communication practices and sensory awareness.

The recommendation to ensure that all SPCB office teams should receive presentations on the BSL Plan and have basic BSL training within the life of the Plan (2024-2030) is too small scale an action to have meaningful impact. As with any language, people must use BSL regularly if they are to be confident and able to converse competently. There is also a high probability of staff turnover within a two-to-five-year period, which would leave many people without training or support. BSL and inclusive communication practices should be part of regular training and support offers – potentially via weekly or monthly BSL conversation practice opportunities for staff, accompanied by formal training on basic BSL and sensory awareness on a six-monthly or annual basis.

Question 5: If there is anything you feel is missing from the proposed actions, please tell us what we should consider.

The ALLIANCE recognises the progress the Scottish Parliament has made to date in increasing accessibility for BSL users and welcomes the proposed actions 1-21.



To further build on accessibility, participation and active contribution, the ALLIANCE refers to the principle of universality on which the BSL (Scotland) 2015 Act was founded, and the historical context of barriers to accessing BSL.

Access to BSL

BSL users in Scotland represent a spectrum of receptive and productive language skills. This means BSL users will have different levels of experience and confidence in both receiving information in BSL, and in giving information in BSL.

BSL users include people born deaf to deaf parents/caregivers and whose first language is BSL, and those born deaf to hearing parents. Acquiring fluency in BSL remains more challenging in the latter due to factors the BSL (Scotland) Act 2015 and the Scottish Government's National BSL Plan seeks to address.

For example, Deaf/Deafblind children may have spoken language prioritised as a first language and transition to learning BSL/tactile BSL later in childhood or adulthood. This later transition may be due a lack of resources (financial and/or availability of BSL tutors/classes), poor information for parents/caregivers on BSL and bilingualism for Deaf/Deafblind children, and/or parents/caregivers opting for a purely oral approach to language acquisition in the early years.

Conversely, Deaf/Deafblind children whose first or preferred language is BSL may learn spoken/written language later in childhood or adulthood, as well as later transition to using assistive technology such as hearing aids or cochlear implants to provide access to sound. They may then make use of other communication tools such as loop/FM systems or Bluetooth connectivity, in addition to captioning and BSL.



The population of BSL users in Scotland also includes people with Learning Disabilities who may require additional communication support such as Easy Read resources.

Communication strategies to improve access to information and participation for people who use BSL are therefore optimal when they also include the option to access other forms of communication and technologies. A combination approach enables a BSL user with Deafness/Deafblindness to fill in as many gaps as possible arising from a single form of communication (e.g. speech or BSL) by also being able to capitalise on their other receptive abilities.

In summary, taken as a spectrum, literacy levels in BSL and spoken/written English vary across everyone who uses BSL in Scotland. To meet the needs and communication rights of this population in ensuring equity of access to information and participation in the Scottish Parliament, the ALLIANCE advocates for not just translation/interpretation of information into BSL, but a combination approach to communication to reflect the diversity of BSL users and their individual levels of language skills in BSL and spoken/written English, as well as differences in visual acuity.

Improving Participation

Scottish Parliament's Cross-party Groups (CPGs) are an important way for MSPs, organisations and individual members to highlight and progress actions on a range of subjects. These meetings can take place in-person, online or follow a hybrid format. Currently, CPGs do not receive financial support from the Scottish Parliament, including for translation services. CPG rules do allow for members to be charged a subscription to cover costs.

At present, BSL users can access and participate in the CPG on Deafness because this group receives external funding applied for by the Secretariat (the ALLIANCE), for BSL/English interpreters and Electronic Notetakers. If this external funding is withdrawn or becomes unavailable, BSL users will



no longer be able to attend. This practice does not support equity and inclusion in political and civic life.

There are currently 122 Scottish Parliament CPGs. When communication support is not provided for BSL users, they are excluded. The Scottish Parliament's BSL User Guide states the Parliament can arrange for a BSL interpreter for Deaf/Deafblind visitors and this includes tours as well as Scottish Parliament business such as Chamber debates or committee meetings. CPGs are not defined as Scottish Parliament business, suggesting BSL interpreters are not available to book for this purpose.

A consideration for the Scottish Parliament's BSL Plan would therefore be addressing this barrier to participation across all 122 CPGs. Provision of BSL interpreters and Electronic Notetakers where required would be in keeping with the principles of the BSL (Scotland) Act 2015 and the Scottish Government's BSL National Plan. Highlighting to CPG Secretariats how to make meetings accessible for BSL users, and also promoting the range of CPGs to BSL users, would increase awareness of the range of subjects and participation opportunities.

Question 6: Do you have any further comments on our BSL Plan?

We note that this consultation was launched after the legislative deadline for the publication of completed plans (May 2024), as per the British Sign Language (Scotland) Act 2015. We would strongly encourage the Scottish Parliament – and all listed public bodies in the BSL (Scotland) Act 2015 – to embed the timescales required for meaningful consultation with BSL users within systems design, to ensure that they are compliant with the Act and illustrate best practice for Scotland.



About the ALLIANCE

The Health and Social Care Alliance Scotland (the ALLIANCE) is the national third sector intermediary for health and social care, bringing together a diverse range of people and organisations who share our vision, which is a Scotland where everyone has a strong voice and enjoys their right to live well with dignity and respect.

We are a strategic partner of the Scottish Government and have close working relationships with many NHS Boards, academic institutions and key organisations spanning health, social care, housing and digital technology.

Our purpose is to improve the wellbeing of people and communities across Scotland. We bring together the expertise of people with lived experience, the third sector, and organisations across health and social care to inform policy, practice and service delivery. Together our voice is stronger and we use it to make meaningful change at the local and national level.

The ALLIANCE has a strong and diverse membership of over 3,600 organisations and individuals. Our broad range of programmes and activities deliver support, research and policy development, digital innovation and knowledge sharing. We manage funding and spotlight innovative projects; working with our members and partners to ensure lived experience and third sector expertise is listened to and acted upon by informing national policy and campaigns, and putting people at the centre of designing support and services.

We aim to:

- Ensure disabled people, people with long term conditions and unpaid carers voices, expertise and rights drive policy and sit at the heart of design, delivery and improvement of support and services.



- Support transformational change that works with individual and community assets, helping people to live well, supporting human rights, self management, co-production and independent living.
- Champion and support the third sector as a vital strategic and delivery partner, and foster cross-sector understanding and partnership.

About the ALLIANCE Scottish Sensory Hub

The ALLIANCE Scottish Sensory Hub provides a platform for the voice of anyone in Scotland with lived experience of Deafness, Deafblindness or Visual Impairment. It was launched in 2021 with substantial support from Scotland's sensory sector and draws experience from deafscotland (formerly the Scottish Council on Deafness) and SCovi (Scottish Council on Visual Impairment).

Lived experience is at the heart of everything the ALLIANCE Scottish Sensory Hub does. It acts as a bridge between the Scottish Government, public bodies, the third sector, and individuals, and enshrines a human rights based approach for all. The Scottish Sensory Hub was founded to provide a strategic forum for cross-sensory input into policy and practice. It focuses on three key areas to promote living a good life – communication, information, and mobility – and is supported by an advisory group, with members from across the sensory sector.

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