



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



**Equalities, Human Rights and Civil
Justice Committee Inquiry into British
Sign Language (Scotland) Act 2015**

ALLIANCE response

2 May 2025

Introduction

The Health and Social Care Alliance Scotland (the ALLIANCE) welcomes the opportunity to respond to the Equality, Human Rights and Civil Justice Committee’s inquiry into the British Sign Language (Scotland) Act 2015.¹

The British Sign Language (Scotland) Act 2015 (“the Act”) received Royal Assent on 22 October 2015 and is the legislation recognising both visual and tactile forms of the language.² The Act requires the Scottish Government to publish a national plan every six years. The Act also provides a Schedule of Listed Authorities (listed authorities) who have a statutory obligation to produce their own local BSL Plan within a designated timescale. The Act stipulates that all local BSL plans must be publicly available, including in a BSL format.

Scotland’s first BSL National Plan was launched on 24 October 2017 and covered the period 2017-2023.³ This plan included 70 actions across ten long-term goals. The Act states that listed authorities had up to twelve months following the launch of the first National Plan to publish their own BSL Plan (spanning 2018 – 2024). The second BSL National Plan, which covers the period 2023 – 2029, was launched by the Scottish Government on 6 November 2023 and includes 45 goals spanning ten priority areas.⁴

The Act also states that preparation for each local plan must include publishing a draft version first for consultation, where the consultation process is “accessible to persons who use British Sign Language and who are deaf, or deafblind”. Following the consultation period, the final plan must “take into account any representation received by it by virtue of such consultation” and be publicly available in BSL.⁵

Over the last three years, the ALLIANCE have carried out a range of lived experience research with Deaf and Deafblind people who are BSL users, including work commissioned on behalf of Scottish Government and the Scottish Commission on Social Security.⁶ We have also carried out an independent analysis of the local BSL plans produced by the authorities



and public bodies listed in the BSL (Scotland) Act 2015.⁷ Evidence from this range of research has informed our response, alongside additional input from our members.



Questions

Question 1: What difference has the BSL (Scotland) Act made to BSL users in the past ten years in terms of progress or setbacks?

The British Sign Language (Scotland) Act 2015 was flagship legislation – the first of its kind in the UK. The ALLIANCE believes that the Act, and the associated BSL national and local plans, have been key to promoting and facilitating the use and understanding of BSL across Scotland. However, there remain significant gaps with its implementation. There is more to be done to deliver on the Scottish Government’s commitment to “make Scotland the best place in the world for BSL signers to live, work, visit and learn”.⁸

In terms of progress over the last ten years, there are a range of examples available – beginning with the pilot of ContactScotland BSL, and then the full roll-out of the ongoing service. Contact Scotland BSL is the Scottish Government’s national flagship service for Deaf and Deafblind people who use BSL as their first language.⁹ It enables thousands of people every year to access public services, providing independence and empowerment via online interpreting Video Relay Services, Braille displays, and speech synthesizers. It operates 24 hours a day, 365 days a year and is universally accessible and free at point of use. It handles on average between 3,000 – 4,000 calls every month, with high satisfaction rates among users. It is one of the key successes of the BSL (Scotland) Act 2015 and is held up internationally as an example of good practice.

The ALLIANCE believes that this service has been deeply beneficial to the day-to-day lives of Deaf and Deafblind people and their families, enabling independent access to civic society. Within our lived experience work, Deaf BSL users spoke positively about the impact of ContactScotland BSL and the positive impact of being able to arrange remote BSL interpretation with relative ease via that platform.¹⁰ One person shared that:



“The best thing the Scottish Government have provided is Contact Scotland [BSL] 24-7, and this was a massive lifesaver as people had connections quickly, possibly saving lives [...] now the best thing to do is use Contact Scotland [BSL].”¹¹

Another person reflected that:

“Contact Scotland [BSL] has been a real help, Scottish Government have had a lot of money saved by them, and that’s a fact!”¹²

In terms of other examples, every listed authority in the Act must by law consider BSL users within their operations – consideration most easily assessed by two rounds of local plans. As ALLIANCE research on this topic demonstrates, this expectation has set an example that is now being followed by some organisations and groups not mentioned in the Act, who have no legal duty to develop and deliver BSL plans – but have chosen to do so anyway. For example, Historic Environment Scotland published a plan in BSL and English by the March 2024 deadline – and were not listed in the Act.¹³

As a direct result of the local plan for the Scottish Parliament, BSL is now embedded into the fabric of the Scottish Parliament, including welcome information in BSL in the entrance of Holyrood, the employment of a BSL Communities Officer, and the provision of interpretation and captions during First Minister’s Questions.

Early findings from ALLIANCE research on inclusive communication provision by public bodies (pending publication 19 May 2025) indicates that there is a higher provision and uptake of BSL/Deaf awareness training and data collection around supporting BSL users than other forms of inclusive communication. It is possible that the Act, and the recent work on the second round of BSL local plans in 2024, has informed this improved tracking and consideration of the needs of BSL users.



These welcome examples indicate some of the ways that the BSL (Scotland) Act has made a difference to BSL users in Scotland over the last ten years.

However, there are also areas of concern. For example, despite being a flagship service, ContactScotland BSL has faced closure on two separate occasions. Firstly, at the end of the pilot period – a decision overturned following concerted campaign work by Deaf organisations and people. More recently, in December 2024, after ten years of successful provision of services and strong key performance indicators, the suppliers of ContactScotland BSL were issued a contract termination notice by the Scottish Government.

The termination notice stated that there was no intention to retender service provision, “following Ministerial agreement”. After rapid campaigning by Deaf people and organisations, including concerns raised with the Equalities, Human Rights and Civil Justice Committee, a welcome commitment was made by the First Minister that the service would be retendered with no break in service provision. While this outcome is positive, it demonstrates the fragility of progress – and how limited consideration was regarding the needs of people who are Deaf and Deafblind in making the initial decision (with no consultation or impact assessments).

In April 2025, the Scottish Parliament considered amendments to the Education (Scotland) Bill, with specific amendments concerning the inclusion of BSL within education in Scotland.¹⁴ These amendments have been warmly received by the sensory sector, and both Parliamentarians and civil servants have been supportive of the inclusion of BSL within the Bill at Stage 2. However, it is concerning that – once again – BSL, and particularly the needs of Deaf and Deafblind children and young people, were not considered at the outset, and included within the initial draft of the Bill.



As a further example, while all listed authorities in the Act published their first set of local plans by the deadline, in both English and BSL, the second round of plans indicated much poorer uptake. In 2024, the ALLIANCE analysed the second round of local BSL plans from all listed authorities and public bodies. Plans were due by 6 May 2024. By 22 August 2024 (more than three months after the legal deadline), 72% of listed authorities had published plans in English – and only 62% had published in BSL (as required by the Act). That only 62% were compliant with the Act is concerning – and does not indicate that listed authorities are prioritising work to improve outcomes for BSL users.¹⁵

Overall, while the Act has demonstrably had a positive impact on the lives of BSL users in Scotland, more work remains to be done to ensure that Deaf and Deafblind people are treated equitably and can fully participate in civic life.

Question 2: What are your views on the second National BSL Plan from 2023? Were you consulted on this plan, and does it address issues faced by BSL users?

The ALLIANCE responded to the Scottish Government’s public consultation on the second National BSL Plan.¹⁶ Our views on key aspects of the second National BSL Plans are summarised below:

Data gathering is transformative when it is applied to progress human rights and social justice. If a BSL language plan does not have an efficient data collection process, individuals will continue to face huge barriers of isolation and loneliness, poorer health and wellbeing, and constrained, disconnected, and restricted lifestyles. It is crucial BSL data includes disaggregated data to reveal inequalities which may be concealed within aggregated data. It is equally important that BSL and other relevant data feed into other Scottish Government strategies to enable improved understanding of the significant numbers of people who are Deaf, Deafblind, or who have Visual Impairments, and the barriers they face.



All workplaces need to be more sensory aware and consider the benefits of as well as a need to keep people with age-related experiences of sensory impairment in employment longer. Currently too many workplaces are not readily inclusive of a range of communication methods and languages, including BSL. This needs to improve to remove socially constructed communication barriers.

Education pathways to improving language knowledge and implementation should include mapping key professions that have already achieved assessable levels of BSL use, then investing in assistance to upgrade, retrain and develop more specialist posts to address translator, interpreter, and tutor workforce gaps. Trained and skilled workforces should have BSL in addition to other communication and language skills; bilingualism, including audio-visual communication (not just reliance on spoken or written language) benefits all. This should include teaching – and it is critical to work with the General Teaching Council for Scotland (GTCS) and other professional groups to ensure lived experience BSL users obtain qualified teacher and other relevant professional status.

Currently, it is difficult for people in many parts of Scotland to practice BSL skills. A more systematic spread of inclusive BSL ‘cafés’ or similar would provide the necessary space to practice and maintain language skills so that any prior learning is not lost. This would also promote integration from BSL users at various stages of their BSL journey and a shared appreciation of the language and culture.

Arts and culture are vital to consider in enabling equitable access to civic life for BSL users who are Deaf or Deafblind. Equal opportunities for people whose first or preferred language is BSL is necessary to secure employment in the field of arts and media, improving representation. Plans need to support both the growth and support of BSL in a context of integration with others. To harness the culture and creativity of all BSL users, there should be concerted efforts to expose inequalities and identify power hierarchies wherever these exist, to ensure no one is discriminated against or prevented from participating.



Question 3: How effective have the BSL plans from listed authorities been in improving outcomes for BSL users?

The local BSL plans from listed authorities have been mixed in their effectiveness, in terms of improving outcomes for BSL users. The ALLIANCE analysed the second round of local BSL plans from all listed authorities and public bodies. More than three months after the legal deadline, 72% of listed authorities had published plans in English – and only 62% had published in BSL. That only 62% were compliant with the Act is concerning – and raises concerns about the effectiveness of BSL plans from listed authorities, and the corresponding work to improve outcomes for BSL users.¹⁷

All plans were required to consider the needs of Deafblind BSL users. However, some only make singular mention of Deafblind people as part of including Deafblindness within the term “BSL user”. Mention of support for Deafblind children and young people is welcome but does not encompass a whole life course approach to inclusion and public planning. We suggest that best practice would be to cascade that awareness throughout plans, to best support Deafblind people of all ages to live well throughout their lives.

Most local authorities and Health Boards chose to include at least some of the 10 priority areas found in the BSL National Plan 2023 – 2029:

Priority 1: Delivering the BSL National Plan

Across local authorities and Health Boards who published plans by 22^d August, 49% included material on delivering the BSL national plan. This was the joint-lowest inclusion rate of any priority area in local BSL plans, along with “Access to justice”. Positive areas of work found in several plans include:

- Commitments to ensure ongoing engagement with Deaf and Deafblind people, as part of BSL advisory/working groups Some



listed authorities include specific targets for how often groups would meet to ensure regular input on decision-making.

- Monitoring and evaluation processes to track progress and success, including proposals for annual reporting.
- Publication of interim reports on progress, mid-way through plan period (2026-2027).
- Plans for partnership working across geographic areas and listed authorities.

Examples of good practice around engagement work are welcome, particularly commitments to ongoing co-production and development work with BSL users and listed authorities (e.g. BSL advisory groups). Feedback loops for participants and involvement in decision-making are key to ensuring that BSL plans respond to the priorities of BSL users.

Priority 2: BSL accessibility

All listed authorities surveyed included material on BSL accessibility. This high rate of inclusion and consideration of accessibility in local plans is particularly welcome. Positive work found across most plans include:

- Signposting the use of ContactScotland BSL, and training staff in how to use the system and book interpreters.
- Work to improve the accessibility of council and HSCP websites for BSL users, including the production and ease of access of more content in BSL.
- Staff training to improve accessibility and support for BSL users.

The ALLIANCE welcomes the acknowledgement of ContactScotland BSL in the local plans as a vital resource and improving awareness of its availability and purpose. Improvement in website accessibility and the provision of sensory awareness and BSL training is also welcome. However, commitments on these topics in some local plans is vague and risks meaningful progress over the life of the plans. It is important BSL



users who are not able or comfortable using technology still have equal access to public life, services, and support.

One Deaf BSL user summarised their perspective on the importance of BSL accessibility as follows:

“[It is vital] to provide equal access and information for BSL users as others, so that they enjoy the quality of a good life and manage themselves.”¹⁸

Priority 3: Children, young people and their families

97% of surveyed listed authorities include specific material on supporting children, young people and their families. Most include the following:

- Support for children and young people to learn BSL.
- Support for the families of Deaf/Deafblind children and young people to learn BSL.
- Promotion of education and NHS staff understanding of BSL provision and referral pathways for children and young people to learn BSL.
- Education and NHS staff training to learn BSL and attend Deaf awareness training.

It is positive many local BSL plans recognise the importance of including actions within the children, young people and families priority area, and that there are several examples of good practice. The main concern from our analysis is that local BSL plan actions mostly lack clarity on specific outcomes and on measures to track success and impact. For this reason, most plans risk being tokenistic, and proactive, evidence-based work is required to bring about improvements.



Priority 4: Access to Employment

97% of surveyed listed authorities include specific material on access to employment. However, the level of detail is limited. Most of these plans include the following:

- Signposting BSL users to Access to Work and raising staff awareness of Access to Work.
- Increasing BSL content on relevant websites around employability.
- Signposting to local organisations that support people with employability.
- Commitments to wider work on the ambitions of No One Left Behind approaches to employability.

Access to Work and No One Left Behind are important policies to enable people to work. Local BSL plans should be shaped around the specific requirements of BSL users. Signposting BSL users to local employability organisations is only likely to be helpful if those organisations can support BSL users, with good Deaf awareness and arrangements for interpretation and/or the use of ContactScotland BSL.

Some plans mentioned volunteering under this theme. Volunteering brings many benefits but should not be viewed as a primary route to employment. Planning should be in place for BSL interpretation support for any volunteering schemes as Access to Work will not cover volunteering.

One Deaf BSL user shared the following:

“When I was working in the hospital in care I was using a BSL interpreter, and that was a real help to me doing my job as a carer in the hospital setting. But it was really challenging for me to do my job in the hospital without BSL support in place as a care worker.”¹⁹

Another stated:



“My friend was going for a job and no interpreter turned up. And when you’re looking for a job, you need to book an interpreter, and it’s a waste of time if they don’t show up, as without an interpreter there’s nothing. So my friend became quite frustrated unfortunately.”²⁰

Priority 5: Health and Wellbeing

Across published plans from local authorities and Health Boards, 95% include specific material on health and wellbeing. Most plans include the following:

- Promoting existing healthcare information and support in BSL (e.g. via NHS Inform, remote video interpreting services).
- Increasing Deaf awareness and BSL training for front-line health and social care staff (including on the use of Contact Scotland BSL and how to book interpreters).
- Promoting the use of the Scottish Mental Health Service for Deaf People. Some plans include specific actions around collecting data to track and respond to trends/needs.
- Provide leisure facility inductions and information in BSL.

Prioritising health and wellbeing is important because BSL users typically wait longer than hearing people to access health and social care appointments. There is also limited and varied support for BSL users in leisure facilities across Scotland – some locations and staff offer excellent tailored support, but this is not nationwide.

Many plans rely on the continuation of existing services and activity – continuing the status quo is unlikely to reduce health inequalities experienced by Deaf and Deafblind people. It is disappointing that relatively few plans include specific commitments and targets on how to improve access to health and social care services. Including monitoring and evaluation would encourage targeted and evidence-based activity for improvements.



One Deaf BSL user reflected on the difficulties Deaf people face accessing mental health services:

“Talking about mental health, we know that one or two of us work in mental health, thinking about barriers. Deaf people don’t know how to get support for their mental health. Waiting until 2025 to get support – that’s just no help, is it? Deaf people are being let down. Thinking about mental health support for BSL users is important.”²¹

Others shared difficulties accessing BSL interpretation in healthcare settings:

“But again, it’s letting them know about BSL thing. If I had access to [BSL at the GP] it would make things ten times easier. And when I bring that up with my GP they say, ‘but you can talk’. But BSL would be much easier, and they don’t understand that.”

“In Audiology that attitude is there [that BSL impairs other forms of communication]. I think Audiology, Speech Therapy and BSL should all be one thing. [Audiologists] don’t even sign. They’re in Audiology! Even in Audiology I take my hearing aids out they start talking and I can’t hear! And they don’t sign. [...] It goes back to linking up newborn screening – where are people supposed to get information?”²²

Priority 6: Celebrating BSL culture

92% of surveyed listed authorities include specific material on BSL and culture. Most plans focus on BSL users’ access to arts, culture and heritage events and venues. Others centre on promoting BSL culture and heritage, such as Deaf Awareness Week, the Edinburgh Deaf Festival, local Deaf clubs, and performances and creative work produced by BSL users.

Proposed actions are as follows:

- Increasing the provision of BSL interpretation at arts, culture and heritage events and performances.



- Increasing information online about which venues and events include BSL interpretation.
- Providing BSL tours of places of public and cultural interest.
- Using technology to increase provision of BSL in arts, culture and heritage venues.
- Increasing Deaf awareness among staff working in arts, culture and heritage venues.

The best practice examples involve specific commitments – either to increase and measure the provision of BSL interpretation/translation at arts, culture and heritage events, or to support creative work celebrating Deaf and BSL history and culture. Many plans are less specific, with repeat use of the words “explore”, “where possible”, and “consider”. This level of commitment lacks ambition and makes accountability and transparency difficult.

One Deaf BSL user shared the following reflection:

“It’s about protecting language isn’t it, that’s one of the key parts of that work. Where’s the protection of our language? We’re seeing Deaf schools closed, our culture, our heritage is disappearing. What we need to do is challenge this and ensure that our language, our values, our culture remains.”²³

Another person reflected on good practice examples:

“[Name of cinema] are actually incredible, they’re having more and more captions on films. I know there are language barriers for people who don’t know English, but compared to other cinemas they’re a massive improvement. If you ask to see a film with captions they’re happy to do that for you. [...] The good thing is, thinking about access in the arts there’s lots of events and museums, theatres etc. that are accessible and that’s good. It’s good to see BSL and captioning as well.”²⁴



However, a different Deaf BSL user shared ongoing challenges in this area:

“On a negative point we need to think about our choices are restricted to the places that choose to provide it. A theatre may say at 7.30pm or 2.30pm on a Wednesday there’s a BSL performance. That’s hardly Friday night is it, if we have to get kids up Thursday morning for school?”²⁵

Priority 7: BSL data

78% of surveyed listed authority plans include specific material on BSL data. More work needs to be done to support listed authorities to engage with BSL data. Plans that discuss data under other priorities (e.g. around BSL accessibility, health and wellbeing, or transport) do not include much information within their named sections on data. Health Boards generally include more robust proposals for how they intend to collect, use and improve BSL data than local authorities. Three local plans include specifics on using data to track how often BSL users can access healthcare appointments with appropriate communication support. Most plans reference data sets such as the Scottish Census 2022, without any clear outline of how that data would be used to inform policy and practice. This is concerning – without good data, it is difficult to assess the impact of plans and effectively plan for continued improvement.

Priority 8: Transport

Across published Health Board and local authority plans, 73% include specific material on transport. Content on this priority is notably less detailed compared to others. Most plans consist of the following items:

- Compliance with Transport Scotland’s Accessible Travel guidance.
- Promoting awareness of Transport to Healthcare Information Centres.



- Deaf awareness training for bus and taxi drivers – particularly those involved in transporting Deaf children and young people to and from school.

While some local BSL plans are aspirational and have innovative content, the material on transport is generally limited. Compliance with existing legislation, regulation and guidance is not likely to bring significant improvement. Deaf awareness training for bus, taxi and train drivers and transport company staff is welcome – but there is a significant difference between “mandatory” training for all bus staff, and “considering” or “exploring” awareness training.

Deaf BSL users stressed the importance of staff training in discussion with us. One respondent shared the following good practice example:

“My point’s connected to the ones from [other focus group participants] about seeing people out there making an effort. When I’m out there [in the community] I will use BSL. [...] It’s amazing seeing people say simple things like ‘thank you’ and ‘I need help’, it’s fantastic. I was flying recently, and one of the air staff came up, and I said I was Deaf and one of the staff signed ‘wait there, it’ll just be two minutes’ to me and let the other staff know I was Deaf, so I did not have to explain again. I felt so relaxed, I felt seen.”²⁶

Another stated:

“I was thinking about Edinburgh trams – we’re seeing BSL regularly on the trams. I see it on the trams, at the airports. We’re seeing some places have the screens with BSL (although some not switched on) and in train stations in London. In Birmingham, in Euston, presenting live information. It’s good to have access to that information. There are positives, there are good things happening! We just need to see the same replicated up here in Scotland, and how registered charities can get going on this.”²⁷



Priority 9: Access to justice

Of the 37 local authority and Health Board plans available for analysis, 49% include specific material on access to justice. The content on this priority is less detailed compared to others. Most consist of the following items:

- Deaf//BSL awareness raising sessions and training for people employed in the justice system. In some cases, this includes specific outreach programmes and named partners.
- Provision of BSL interpretation and translation for people accessing the justice system.

It is concerning that “access to justice” has the joint-lowest inclusion rate of any priority area in local BSL plans, along with “Delivering the BSL National Plan”. BSL users have the right to expect equitable access to the justice system – as members of civic society who are called for jury duty, as victims or witnesses of crime, as people accused of crimes, or as family members. To do otherwise is to deny people their human rights.

Some Deaf BSL users commented on access to justice and justice advice. They indicated that they struggled to access justice services and particularly highlighted the disproportionate costs on Deaf BSL users of having to pay for interpreter fees (in addition to any other legal fees) within legal and justice spheres. Key comments are as follows:

“There can be no good life without access to the courts. The Equalities Act 2010 is an excellent piece of legislation but it is being ignored by large companies because they know that the Scottish government is refusing to allow disabled people to get legal aid for small claims.”

“Legal Aid is currently discriminatory towards BSL users. Legal Aid will not pay for anything in retrospect, so there is no BSL provision for Deaf people at their first solicitor's appointment when legal aid eligibility is established.”



“Legal aid should be available to bring actions for disability discrimination cases under the Equalities Act 2010. Those who have suffered from disability discrimination and who are also on means-tested benefits should have an automatic right to legal aid.”

“Justice can be quite challenging. They expect me to pay for a lawyer, and they expect for me to pay for an interpreter as well. I can’t pay for both those things! I’m paying for the service, you should be providing [interpretation for] me. They show me these 72 guidelines, but it’s really difficult, because when I do use lawyers I try and get two to three hours and have to pay interpreters too, and the money just goes.”²⁸

Priority 10: Democratic participation

Of the 37 local authority and Health Board plans available for analysis, 81% include specific material on democratic participation. Key actions across most plans include:

- Promoting the Access to Elected Office fund, as a source of support for BSL interpretation for potential candidates.
- Informing elected members about how to access Contact Scotland BSL and book interpreters to meet with Deaf constituents.
- Deaf awareness training for electoral staff.
- Provide election information in BSL. Plans vary between providing information in BSL about how to register to vote and use polling stations, through to BSL translation of information on candidates, and BSL interpretation of debates, campaign material.

Plans which signposted the Access to Elected Office fund, to support BSL users to stand for election in local and national government, encourage democratic participation. As does awareness raising among elected members and electoral staff to improve BSL users’ access to surgeries, election material, and voting. However, there is wide variance in the level of commitment detailed by different listed authorities across the plans.



Some plans discuss support for wider or community-level forms of democratic participation although these were few. There is work to be done to share these commitments among listed authorities, as examples of good practice and wider understanding of democratic participation.

BSL users have a right to support for more than just voting every parliamentary term – they have a right to full and equal participation in every area of democratic and civil society. BSL plans at national and local level should demonstrate a firm commitment to ensuring equitable enjoyment of human rights.

Question 4: What reforms do you think are needed to improve outcomes for BSL users?

Accountability on the publication of local BSL plans

The timely publication of BSL versions of local plans is a key part of ensuring transparency, accountability, and compliance with the Act. The relatively low compliance rate around publishing BSL version of plans (62%) shows that more communication on both legal requirements and inclusive communication practice is needed to support listed authorities in this work. In response to the ALLIANCE's enquiry, several listed authorities acknowledged late publication. Some noted that producing their second local BSL plan within a six-month timetable was more difficult than the 12-month timetable of the first local BSL plans. One listed authority only started work on their plan when we emailed to enquire if it was available. It would be useful to seek feedback from listed authorities on why they did not publish plans in BSL by 6 May 2024 (or at all). That information could then be used to inform future action to ensure that local plans are provided in BSL as quickly as possible for 2024 – 2030 plans, and in a timely manner in the future.

Acceptance and use of the definition of Deafblindness

With regard to the inclusion and consideration of Deafblind BSL users, we suggest that it would be useful for all listed authorities to recognise and use



the proposed definition of Deafblindness developed by a working group of the Cross-party Group on Deafness (led by Deafblind Scotland and chaired by Annabelle Ewing MSP).²⁹

Regular monitoring and evaluation

The ALLIANCE welcomes that some plans include explicit commitments to transparency and regularity of reporting on progress. We suggest this should be standard practice for all listed authorities. Few plans included specific, measurable and time-bound outputs and outcomes. It is important that definitions of success are clearly laid out, to enable meaningful assessment of progress and evaluation of impact. Some plans did include specific goals, but we would encourage greater use of evaluation and monitoring tools.

We recommend all listed authorities should assess their progress on BSL accessibility annually, using specific, measurable, achievable, relevant and time-bound goals. We encourage the public sharing of this data to promote public accountability.

Network for sharing good practice

A network to share good practice across listed authorities would be helpful in ensuring listed authorities have clear pathways for engagement, responses to queries, and support with monitoring and evaluation tools. We recommend that Scottish Government support the development of such a network within the life of their National plan.

It would be useful for the monitoring and evaluation reporting of the more innovative aspects of plan content to be shared more widely, to share learning and good practice. There is a potential role here for the national network to share good practice. This could include sharing BSL data collection to be shared in aggregate form. The Scottish Government's BSL Implementation Advisory Group could begin this work – it is important that learning is shared across all listed authorities to support the development of better outcomes for BSL users.



Supporting children and young people

In terms of planning support for Deaf children, young people and their families, objectives should be underpinned by a firm understanding of child development and language acquisition to ensure that babies, children and young people have the support they need at all stages, in line with the UN Convention on the Rights of the Child. There are several major educational transitions for children, beginning in the early years and continuing through to young adulthood, all of which need to be prioritised to ensure appropriate access to support and information for children and their families, as well as any staff and professionals involved in the transitions. It is vital Scotland builds capacity and public accountability into systems design and planning to bridge the educational attainment gap for Deaf and Deafblind children and young people.

Staff training

Training for front-line health and social care staff when accompanied by commitments to ensuring staff will complete training is best, rather than “explore” or “consider” the possibility of Deaf awareness or BSL training.

Communication requirements and record keeping

More listed authorities should commit to providing preferred or same sex interpreters where requested, and act to ensure that inclusive communication requirements are flagged across all patient records in health and social care settings. Without these actions, there is a risk that people will not be able to access the health and social care support they require.

Deaf artists and access to culture

Few plans mentioned activity to support Deaf artists across genres. We would welcome work to ensure that more funding opportunities are open to BSL users, and creative work in BSL, and more public reporting on the number of BSL users who obtain support via cultural and heritage funding schemes at local and national levels.



Travel and transportation

Commitments in some plans to translating timetables and travel information into BSL are welcome, as are proposals for alternative text alert systems for cancellations. It is important progress is made across the country, not only in areas of good practice. Under current proposals, only some parts of Scotland might see improvements in the accessibility of travel for BSL users – resulting in inequality of access. There is a need for the Scottish Government to support the roll out of good practice across the country.

Justice

With regard to access to justice, local BSL plans centre around partnership work to improve Deaf/BSL awareness among relevant groups, and the provision of BSL interpretation for people accessing the justice system. In both cases, stronger commitments and clearer targets to define success and improvement are needed across most plans.

Prioritising and supporting the sensory sector

Finally, in light of wider cuts to sensory services and policies (including the cancellation of the See Hear Strategy refresh, and the near-cancellation of ContactScotland BSL), we call for the following:

- The Scottish Government and listed authorities to carry out Equalities and Human Rights impact assessments on all decisions that will affect Deaf and Deafblind people, with prompt publication and transparent sharing of the information which has informed the decision.
- The Scottish Government and listed authorities to commit to engagement and consultation activity with Deaf and Deafblind BSL users and their families on all decisions that will affect Deaf and Deafblind people, with a commitment to responding to the information shared.



- An investigation by the Equality, Human Rights, and Civic Justice Committee into the impact of the recent and widespread cuts to sensory support across Scotland, and how this has adversely impacted the human rights of Deaf, Deafblind, and visually impaired people.

Question 5: Do you have any other comments?

Throughout listed authorities' local BSL plans, there are frequent references to partnership working, and particularly to links with local Deaf and third sector organisations. Given that nearly every plan references local Deaf and third sector organisations in some capacity, it seems appropriate to include this within final reflections.

Meaningful participation is key in delivering on people's human rights, and to ensure policy and practice responds to the priorities of affected communities and population groups. Many of the good practice examples carried out detailed consultation and engagement activities; activity that would not have been possible without support from the third sector. Deaf clubs and sensory organisations are frequently named in individual listed authority plans as key partners to the work. These organisations deliver vital services, often with short-term and limited funding support. If these organisations and groups are to continue providing support for BSL users, then they must be sustainably resourced and supported. Planning at local and national government levels must include and supports the third sector, to ensure sustained progress and participation for BSL users.



About the ALLIANCE

The Health and Social Care Alliance Scotland (the ALLIANCE) is the national third sector membership organisation for the health and social care sector. We bring together over 3,500 people and organisations dedicated to achieving our vision of a Scotland where everyone has a strong voice and enjoys the right to live well, with dignity and respect. Our members are essential in creating a society in which we all can thrive, and we believe that by working together, our voice is stronger.

We work to improve the wellbeing of people and communities across Scotland by supporting change in health, social care and other public services so they better meet the needs of everyone in Scotland. We do this by bringing together the expertise of people with lived experience, the third sector, and organisations across health and social care to shape better services and support positive change.

The ALLIANCE has three core aims.

We seek to:

- **Empower people with lived experience:** we ensure disabled people, people with long term conditions, and unpaid carers are heard and that their needs remain at the heart of the services and communities.
- **Support positive change:** we work within communities to promote co-production, self management, human rights, and independent living.
- **Champion the third sector:** we work with, support and encourage co-operation between the third sector and health and social care organisations.



The ALLIANCE is committed to upholding human rights. We embed lived experience in our work and aim to ensure people are meaningfully involved at every level of decision-making.

Working together creates positive, long-lasting impact. We work in partnership with the Scottish Government, NHS Boards, universities, and other key organisations within health, social care, housing, and digital technology to manage funding and develop successful projects. Together, our voice is stronger, and we can create meaningful change.

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