

RESPONSE ON BEHALF OF GLASGOW CLYDE COLLEGE

British Sign Language (Scotland) Bill

CALL FOR EVIDENCE

The Education and Culture Committee invites your views on the British Sign Language (Scotland) Bill.

1. *In the Policy Memorandum, Mark Griffin MSP says he considered a number of alternative approaches to achieve his intention of promoting BSL, for example, by establishing a voluntary code or adapting existing legislation, such as the Equality Act 2010. He concluded that introducing the BSL Bill was the best approach. Do you think we need to change the law to promote the use of BSL and, if so, why?*

This approach will focus attention and ensure improvements in the promotion of the use BSL in a specific and accountable way. Simply adapting existing legislation would have less impact.

2. *Mark Griffin MSP hopes that the obligations under the Bill will, in practice, “lead public authorities to increase the use they make of BSL and the extent to which they are in a position to respond to demand for services in BSL” (Financial Memorandum, paragraph 4). How realistic do you think this aim is and to what extent do you believe the Bill can achieve this objective? The aim is ultimately achievable but will take a significant amount of time and require additional resources.*

3. *The Bill is solely about the use of BSL. Could there be unintended consequences for other languages or forms of communication used by the deaf community? This certainly could be the case particularly if already limited resources are largely dedicated to the promotion of BSL and its use.*

Duties on the Scottish Ministers

4. *The Bill will require the Scottish Government to prepare and publish a BSL National Plan (Section 1) and a BSL Performance Review (Section 5) in each parliamentary session (that is, normally every four years). The Scottish Government will also be required to designate a Minister with lead responsibility for BSL (Section 2). What should this Minister do? Not qualified to comment however would suggest strongly that this individual involves and collaborates with representatives from the Deaf community and BSL users in all planning and decision making processes.*

5. *The BSL Performance Review provides the basis for the Parliament to hold the Scottish Ministers to account, and for Ministers to hold listed authorities to account. If listed authorities say they will do something relating to the promotion of BSL, will the Performance Review process ensure they are held to account?* **There is still some possibility that this will not be fully effective unless Performance Reviews are published and feedback is given by a relevant external body.**

BSL Authority Plans

6. *The Bill requires listed authorities to prepare and publish BSL Authority Plans in each parliamentary session. The Bill sets out what a BSL Authority Plan should include (Sections 3(3) and 3(4)). Do you have any comments on the proposed content of the Plans?* **The proposed content of the Plans is straightforward and clear. It is similar to plans required by the Equality Act for Mainstreaming.**

7. *The Policy Memorandum (see diagram on page 6) explains the timescales for publication of Authority Plans. Do you have any comments on these proposed timescales?* **The timescales themselves are realistic and acceptable but it would be particularly helpful to discuss specific due dates in relation to other reporting requirements in each sector.**

8. *In preparing its Authority Plan, a public authority must consult with those who are “likely to be directly affected by the Authority Plan or otherwise to have an interest in that Plan” (Section 3(6)) and must take into account any comments made to it during the consultation (Section 3(5)). What effect do you think these requirements will have on you or your organisation?* **These requirements will ensure that we engage regularly with relevant stakeholders and appropriate external agencies at all stages of the planning process and beyond. Their involvement will be recorded in both this and wider Equality work. We would have increased confidence that incorporated actions would be targeted and meaningful and that evaluation and reviews would be more effective.**

9. *The Bill (Schedule 2) lists 117 public authorities that will be required to publish Authority Plans. Would you suggest any changes to the list of public authorities?* **The list is fairly comprehensive. Others could be added if the need was identified.**