

BRITISH SIGN LANGUAGE (SCOTLAND) BILL WRITTEN EVIDENCE: JANUARY 2015

Professor Graham H. Turner
 Director, Centre for Translation & Interpreting Studies in Scotland
 Department of Languages & Intercultural Studies (BSL Section)
 Heriot-Watt University, Edinburgh EH14 4AS

Heriot-Watt University (HWU) is the academic home to Scotland's largest concentration of scholars (15 individuals at the time of writing) specialising in the field of Sign Language Studies. In the REF2014 UK-wide audit of research, HWU's case study on 'Ensuring greater equality for sign language users', describing the impact of our work in the field over the last decade, was recognised as outstanding in terms of its reach and significance for society. This written evidence is a personal submission which draws upon intensive dialogue within this academic team and with students and partners in the community and professions, and on the author's global experience of 30 years' academic engagement with Sign Language Studies.

General comments

The British Sign Language (Scotland) Bill is strongly supported as a groundbreaking initiative which proposes a concrete manifestation of the commitment the country and its Parliament have long professed to securing the linguistic human rights of its signing community.

These rights are not a new demand from BSL users. Essentially the same position has been taken ever since a Milan Congress of 1880, in which educators of deaf children rejected sign languages, and set back the status of signing communities globally. For 135 years, then, successive generations of BSL users have been desperately explaining to the non-signing world that its approach to them is damaging, disempowering, arguably even genocidal (www.un.org/esa/socdev/enable/rights/ahc5docs/ahc5wfdside.ppt) – and self-defeating.

The reason this is done with a sense of 'desperation' is simple. Over and over again, anyone who cares to notice can see Deaf adults wanting to be assured that deaf children will never again experience the battle for self-expression and self-realisation, and the oppression of the human spirit, which they themselves have faced (Lane 1992, Baynton 1996). It is important to note that this ardent sense of urgency does *not* arise from self-interest: Deaf people know that over 90% of deaf children are born into hearing families. They are asking not so much for protection of their own children, as of *yours and mine*.

In what sense has the denial of sign language rights proved self-defeating? The community has not been 'saved' or 'set free from a terrible infliction' as a result of society's historic insistence that signing should not be prioritised (Ladd 2003). On the contrary, the evidence is that British deaf children consistently fare poorly in education (<http://onlinelibrary.wiley.com/doi/10.1002/dei.38/abstract>), while adults are disproportionately unemployed or under-employed (http://www.ros.hw.ac.uk/bitstream/10399/2387/1/DickinsonJC_0810_sml.pdf)

and at greater risk than most of experiencing mental health concerns (file:///C:/Users/ght2/Downloads/Unheard_unseen_the_state_of_mental_health_services_in_Scotland_for_peolpe_who_are_deaf_or_deafblind.pdf).

The key to addressing these longstanding concerns is an appreciation of signed languages as the natural form of communication for Deaf people. Not until the 1950s did standard principles of linguistic analysis begin to be applied to signing (Stokoe 1960). British research began following the naming of BSL in Scotland in 1975 by the late Dr Mary Brennan (Brennan et al 1984, Deuchar 1984, Kyle & Woll 1985), and led to the publication of the British Deaf Association/Durham University BSL dictionary (Brien 1992). This research demonstrated conclusively that BSL is indisputably a full, rich and dynamic language which (though it has no orthography) can be systematically written for transcription purposes. BSL should not be misconstrued as a manual form of English: like other signed languages, it is an entirely independent language with a structure radically different from English or, indeed, any spoken language (Sutton Spence & Woll 1998; Schembri & Johnston 2007).

Quantity and quality, access and promotion

This re-appraisal of the status of signed languages has been transformational for Deaf people around the world. The current Bill offers the prospect of rooting such a transformation into Scottish soil. It will not be a 'quick fix', but creates a sustainable platform for life-enhancing practices to be embedded in our social fabric, and for continuous improvement in BSL users' well-being, advancement and citizenship. The Bill's proposals are designed to focus the relevant authorities' considered attention upon ensuring that members of the signing community are afforded a genuinely effective, pro-active right to use BSL throughout the public sphere, meaningfully securing equal access to facilities and services. Critical to the success of these measures will be both the *availability* and also the *quality* of communication service provision: the right to an inadequate service is no right at all.

But the Bill as proposed goes further, and it is this additional element that holds out the prospect of enabling BSL users (of all ages) to benefit alongside others from the kind of social values and principles perfectly encapsulated in Scotland's 'Curriculum for Excellence' – to be 'successful learners', 'confident individuals', 'responsible citizens' and 'effective contributors'. The right of linguistic access is vital, but it is largely interpreted (as the submissions to this Call for Evidence will attest) as conferring 'access to the hearing world'. Beyond this stands the right to human *flourishing*, fulfilment and self-actualisation. Here, it is the focus of the Bill on active 'promotion' of the use of BSL that is significant. As the nature of signed languages has been analysed without prejudice over the last half-century, Deaf people have been characterised not as *deficient* – 'impaired' versions of hearing people, as the earlier medical model would have claimed – but simply *different*. In this light, it is no more than rational to recognise sign languages as evidence of human creativity and endeavour, to be cherished like any other language (Turner 2006: see <http://onlinelibrary.wiley.com/doi/10.1111/j.1473-4192.2006.00128.x/abstract>).

Contemporary scholarship is, in fact, revealing a phenomenon known as 'Deaf Gain'. Back in 1989, the initial identification of Deaf Gain was reported by the popular scientist Oliver Sacks: "It is as if the left hemisphere in signers 'takes

over' a realm of visual-spatial perception, modifies it, sharpens it, in an unprecedented way, giving it a new, highly analytical and abstract character, making a visual language and visual conception possible... The signer becomes a sort of visual 'expert' in many ways, in certain nonlinguistic as well as linguistic tasks (producing) not just a visual language but a special visual sensibility and intelligence as well." In an environment where BSL is truly promoted, we generate the exciting prospect of allowing Scotland to find out what hearing and Deaf people alike can learn, to the benefit of our entire society, from nurturing the signing expression of the human spirit.

As the Distinguished University Professor of Psychology at Northeastern University in Boston, Massachusetts, Harlan Lane, has noted (<http://jdsde.oxfordjournals.org/content/10/3/291.full>): "How we ultimately resolve these ethical issues goes well beyond Deaf people; it will say a great deal about what kind of society we are and the kind of society in which we wish to live. Difference and diversity not only have evolutionary significance but, I would argue, are a major part of what gives life its richness and meaning."

Education and Culture Committee Questions

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?

A change in the law is needed because the existing legislation has comprehensively demonstrated its inability to resolve the relevant issues.

Whilst the post-War consensus of the late 1940s had a profound effect on attitudes to disability and social cohesion, repeated legislative initiatives since that time have lacked either the understanding or the courage to treat sign language issues as a matter of linguistic human rights. Instead, provision ostensibly designed for Deaf people has been impossibly entangled with broader matters of communication and assistance for deaf, deafened, hard-of-hearing and Deaf-Blind people. It is scarcely surprising that public service employees are, with the best will in the world, often unaware of the nature of BSL and therefore uncertain of the appropriate way to proceed in encountering BSL users.

Deaf people do not imagine that the non-signing world means them harm. They are just collectively exhausted and dispirited by the experience of trying to make the existing legislative environment *deliver* the rights it claims to afford them (<http://deafcitizenship.com/>). And they hope against hope – after countless false dawns – that future generations will not still be fighting the same battles.

What Scotland needs for its BSL users now is:

- Access to education, skills, information and participation in the broadest sense

- The opportunity to nurture and express a distinctive contribution to society
- Reliable resources to enable the above access provision and contribution to function as intended, including:
 - Skills of relevant individuals (community members, frontline and intermediary personnel) – primarily BSL skills
 - Awareness of their responsibilities on the part of service providers
 - Suitable infrastructure (eg training and qualification pathways) where required
 - Clear and sufficient budgetary channels to facilitate the above.

It is imperative that the relevant actions are taken on a *sustainable* and, ultimately, wherever possible, a self-activating footing. A plethora of initiatives has been taken in the past, at UK (eg the 2004 £1.5m funding of 10 short-term projects <http://www.batod.org.uk/index.php?id=/resources/publications/on-linemagazine/sign/bsl-initiatives.htm>) and Scottish levels (over £1m for 10 apprentice interpreters www.ssc.education.ed.ac.uk/forum/docs/infopack.doc in 2008). Few have led to significant long-term advances for BSL users, or to self-replication (cf the Scottish Funding Council's investment of £0.75m in HWU to secure university places for three intakes of 12 BSL/English interpreting students: this level of support is now open-endedly embedded in HWU's core planning).

The changes that are therefore required necessitate incremental, long-term, aggregated national planning of a kind which only Government has the authority to deliver through dedicated legislation. Wherever children are born, for example, a proportion of deaf children are born to hearing parents: these parents will always need input from fluent signers with first-hand experience and knowledge of how to live well as a Deaf person. No short-term burst of attention or injection of funding will meet this need for the foreseeable future. It will require sustained, expert, nationwide intervention. Numerous other vital undertakings are of a similarly constant, long-term character, since this is a Bill about shifting deeply-ingrained social attitudes and assumptions, and creating an entirely new climate of familiarity and understanding around the use of BSL.

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?

This is an entirely reasonable and achievable objective. In line with the spirit of the Bill as a whole, it seeks to "increase" use of BSL, rather than trying to

impose unrealistic, unattainable or unaffordable targets. The intention is evidently that the planning process should guide the considered and efficient exploitation of resources in agreed priority areas.

In order to "increase the use they make of BSL", public authorities may wish to:

- i. Identify opportunities to add Deaf BSL users to their workforce
- ii. Train existing staff in BSL
- iii. Hire interpreters and/or translators
- iv. Use video technology in order to be more penetrable to BSL users
- v. Create discussion fora in which BSL is the main language
- vi. Commission BSL output of their products and materials.

The initial skills to deliver and to nurture all of the above already exist in Scotland. Over time, capacity can expand through a co-ordinated process of duly integrated planning and development.

In terms of positioning authorities to respond to demand, all of the above will help to meet this requirement. However, the *sine qua non* here is the sincere, direct engagement with the BSL community which will lead to an appreciation of the nature of members' priorities.

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?

No. Existing legislation and the Scottish Government's *See Hear* Sensory Impairment strategy protect other languages (principally English and Gaelic) and forms of communication adequately. Where the British Sign Language (Scotland) Bill initiates innovations whose replication across other social group contexts may be considered desirable, such emulation should be promptly and attentively reviewed, and further action initiated on behalf of these groups.

It should be noted that other signed languages are rare but not entirely absent in Scotland. Users of these languages are typically migrants, refugees and asylum seekers, tourists or business visitors. The nature of sign language is such that they will rapidly begin to adapt towards BSL from their first encounters with Scottish signers, becoming 'new signers' of BSL. Until they acquire greater fluency, however, their encounters with the Scottish authorities require specific expertise in their preferred national sign language or in 'International Signing' (McKee & Napier 2002, Turner & Napier 2014). Further research is necessary to explore the extent of Scotland's requirements for this kind of support, and to develop an understanding of good practice in order to meet these needs.

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?

BSL issues would fit very comfortably within the portfolio of the Cabinet Secretary for Education and Lifelong Learning and with the Minister for Learning, Science & Scotland's Languages.

As to what the Minister should *do*: she/he should immediately and unambiguously state that, just as the Gaelic Language (Scotland) Act 2005 aims to secure Gaelic as an official language of Scotland, "commanding equal respect" with English, so this initiative commits the country to an equivalent position with respect to BSL. In order to be credible as a national 'champion' of the language, successive Ministers for Learning, Science & Scotland's Languages (or equivalent as and when Ministerial remits are redefined) should be expected to develop BSL skills – with the support of a qualified, Deaf BSL teacher – during their period of office.

At Ministerial level, authority can also be exercised over those aspects of the National Plan for BSL (proposed in Mark Griffin MSP's Bill) which will require co-ordination across a wide span of the public sector, either because the scale of change is beyond the reach of individual or clustered listed authorities, or because a series of consecutive steps need to be managed over several planning cycles in order to build towards the desired outcomes.

It is clear that Scotland needs to expand provision of BSL/English interpreting and translation services. What remains unclear is the character of expansion that will best serve the country's requirements in future. All of HWU's expertise therefore leads to the view that a thorough, prompt and wide-ranging scoping review should be undertaken as a vital prelude to a schedule of coordinated national and local initiatives, programmed over a realistic timeframe. Actions should be neither precipitate nor improperly deferred. The landscape under consideration should cover:

- i. Planning and organising the workforce – including how the profession should be constructed and regulated so that service users' interests are protected, individual workers can build careers, agencies adopt ethical and enterprising business practices, and commissioning/procurement bodies spend public money wisely (Harrington & Turner 2001, Brien, Brown & Collins 2002, Turner 2005, Napier, McKee & Goswell 2006, Bontempo & Napier 2007, Turner 2007, Wilson, Turner & Perez 2012).
- ii. The use of digital technology to secure remote access to interpreting/translation – addressing questions such as when is it appropriate or particularly beneficial; how should services be established and managed for mutual benefit; what characterises good practice in service delivery; can translation of written documents into recorded BSL be made more readily available (with appropriate recordings archived on an 'open access' basis to reduce wastefully expensive repeat translation); how can all stakeholders be trained appropriately (Napier 2011, 2012, Napier & Leneham 2012, Napier, Skinner & Turner 2014)?
- iii. Education and training of BSL/English interpreters and translators – addressing questions such as in what formats and contexts does Scotland need education and training to proceed; what post-qualifying training is appropriate; what is the optimal role for Deaf practitioners

- within the workforce, and how can training provide appropriate pathways to professionalism; how many people need to follow which educational pathways, and how quickly, to meet national demand (Napier 2006, Turner 2006, Bontempo & Napier 2009, Napier 2009, Major et al 2011, Major & Napier 2012, Napier, Song & Ye 2013)?
- iv. Consolidating shared understandings of best practice – how can we build a workforce with relevant context-specific expertise (Tate & Turner 1995, Turner 1997, Turner & Pollitt 2002, Napier & Cornes 2004, Napier 2007, Turner 2007; Dickinson & Turner 2008, Major, Napier & Stubbe 2012, Napier et al 2014)?

Alongside improving BSL users' access to public life via the planning of interpreting and translation, the British Sign Language (Scotland) Bill aims to empower BSL users through the *promotion* of their language. Here, too, National Plans will need to consider long-term, incremental advances, as climate-changing, transformative progress will need to be built over time.

The primary means of promoting BSL will be to enhance the public visibility of the language by teaching it. Caution should be exercised here, however: BSL takes as much time as any other language to learn well. And it matters greatly that new signers are encouraged and enabled to learn *well*. Only through *close* engagement with the language, and developing genuine depth of linguistic, communicative and cultural competence, will students approach a profound appreciation of the culture and heritage it expresses and makes possible (Turner 1994, 1999, 2004, 2006). Once they achieve such an appreciation, however, they unlock for themselves insights into the cognitive landscape of Deaf Gain mentioned above, and enhance their own and, indirectly, others' understanding of human diversity and capability.

To achieve a Scottish programme of BSL skills development, in the context of the day (Turner 2003, 2009), will again require a managed, deliberative process at the national level, since neither supply nor demand can be satisfied without high-level developmental resources.

- i. Four major learning environments are identifiable – the homes of deaf children, wherein it is vital that family members are afforded Government-sponsored, sustained access to BSL teaching until at least the deaf child's 16th birthday; schools, where, at primary and secondary levels, BSL could be actively promoted within the Government's 1+2 languages policy; adult education (especially in colleges, which saw huge growth of BSL learning in the 1980s and 1990s, but seem latterly to have ceased to facilitate the delivery of BSL classes); and the workplaces of Deaf employees.
- ii. For each of these contexts, teachers need to be trained. This presents challenges (which must be faced), since whilst native signers with first-hand experience as Deaf people bring personal insight to the task of sharing cultural knowledge with students, hearing signers are more likely to have the educational background to secure teaching qualifications.
- iii. Scotland needs a ladder of BSL qualifications so that learners at all levels are rewarded and encouraged to progress (cf the frustrations of Dingwall Academy pupils whose BSL studies are going unrewarded at present <https://www.tes.co.uk/article.aspx?storycode=6439804>).

- iv. Work is required with the responsible parties to secure the platform for teaching; clearly, this cannot blithely be imposed upon families and institutions.
- v. The BSL teaching profession has lacked support in Scotland and needs a networking infrastructure to share good practice. There will be a need for workforce development, although the presence of up to 20 graduates of the Scottish Government-funded 'BSL Training of Trainers' course at HWU offers a platform upon which to build (<http://www.scotland.gov.uk/Publications/2009/07/01102537/10>).
- vi. Good practice in BSL teaching has been poorly examined to date: the findings from systematic, well-designed research in this field would clearly underpin teacher-training to good effect.
- vii. Across all teaching contexts, appropriate learning resources would be required. Although the advent of digital video has facilitated production processes, there is nevertheless considerable scope for informed development and careful 'road-testing' of age-appropriate and purpose-sensitive materials.
- viii. The above requires ongoing enhancement of linguistic analysis of Scottish BSL. Whilst the ESRC-sponsored BSL Corpus Project (<http://www.bslcorpusproject.org/>), in which HWU was the Scottish partner, generated significant insights into regional variation in BSL, and a legacy of open access video material of real benefit to teachers and students, the project gathered Scottish data from no more than 40 people in just one city (Glasgow). The ideal international model to emulate would be the longitudinal German Sign Language Corpus project at Hamburg University (<http://www.sign-lang.uni-hamburg.de/dgs-korpus/>), which has a state-sponsored 15-year workplan designed to allow detailed exploration of variation over time and regional locations.

Finally, whilst promotion of BSL will surely entail increasing the number of sign language users within Scottish society, if the country decides to express a sense of pride in its national signed language through this piece of legislation, it will also wish to celebrate the richness of expression embodied in BSL through performance.

Signed television programmes made by and for Deaf people have been available here since the 1970s, but again it is only the arrival of digital video that has created the opportunity for entire signed channels (such as, since 2008, BSLBT's <http://www.bslzone.co.uk/>). BBC Alba receives part of its funding from the Scottish Government, reflecting the country's commitment to promoting Gaelic. A comparable approach to BSL promotion would appear logical.

Elsewhere, whilst live interpreting into BSL is commonplace in many theatres in Scotland, Deaf attendances are not known to be high. Numerous initiatives have shown an enthusiasm for BSL-originated artistic performances – the installation of a Deaf BSL Storyteller-in-residence at the Scottish Storytelling Centre in Edinburgh (<http://www.bbc.co.uk/programmes/p00m6sz5>) showcased one such art form, for instance, while the Scottish Poetry Library (a near neighbour to our Parliament) used support from Creative Scotland's pilot *Promoting Equalities Programme* to award its first artist residency to a BSL interpreter, poetry researcher and artist who produced a video of a BSL poet

saluting Deaf Scotsman, Gerry Hughes, who sailed solo round the world, via the five great capes (<http://www.scottishpoetrylibrary.org.uk/connect/blog/signed>) – called 'The stars are the map I unfurl' – which was well received at the Edinburgh Book Festival, Dundee Literary Festival and Shetland's annual *Wordplay* festival, among other events.

Such artistic output is the unwritten literary heritage of the BSL community, and may be rightfully highlighted and significantly expanded in the delivery of BSL promotion as proposed in Mark Griffin MSP's Bill and endorsed in the Government's responding Memorandum.

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?

The spirit of the Bill before Parliament is to create a climate to foster continuous improvement in the authorities' interactions with BSL users. Insofar as a Performance Review process implies expectations of delivery against imposed targets, it would appear to be of questionable value. What the community seeks – and the Bill fundamentally seems to intend – is a sustained, unwavering, national commitment proactively to identify and deliver incremental advances that benefit BSL users in terms of their daily experiences and life-chances.

Performance Review also entails forms of benchmarking for which baseline data are required: and the relevant baselines have not been established. No matter what form the monitoring of implementation may take, it is clear that Scotland needs to collect, aggregate and interpret data pertaining to the use of BSL to much better effect. Quite properly, the economics of this Bill have been a prominent issue at all phases of consultation. Yet there is no measure of the potential value of the Bill's enactment to the Scottish economy, or any attempt to attach a value to the benefits to individuals, organisations and society that could accrue as a result of using BSL. Salient benefits to society are conceivable – but as yet unquantified – as a result of the proposed legislation.

As regards national and local spending to support the roll-out of the Bill, it can be noted that BSL users have no more unrealistic expectations about budgetary limitations than any other social group. The cornerstone of a positive outcome to review processes will surely be evidence of a sincere spirit of progressive, co-productive endeavour.

If a 'holding to account' is genuinely required, the community will no doubt trust the Minister and relevant parliamentary authorities to take appropriate action.

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?

It appears from the Scottish Government's Memorandum responding to the published Bill that Authority Plans may, in practice, be expected to take the more limited form of a 'statement'. The nature of this 'statement' may be construed as an adaptation of the National Plan to the particular role and responsibilities of the specific authority. This process of 'focusing' must be undertaken in co-operation with the appropriate constituency of BSL users and representatives. There is no substitute, in this context, for the first-hand life experiences of Deaf community members and it will be incumbent upon authorities to be publicly accountable for the manner in which they handle this process of engagement.

The most direct mode of interaction will always occur where authorities embed appropriately trained and supported Deaf BSL users in their own workforce to lead on such dialogue. Such appointments could, in themselves, be part of an effective, no-nonsense actualisation of promoting the use of BSL within the authority's activities. Where intermediary action (eg the commissioning of English-to-BSL translations) is required because an authority is unable to present itself directly in BSL, it will always be imperative that such action is a. timely, b. culturally sensitive, c. linguistically competent, and d. carefully considered as regards the exploitation of diverse and appropriate channels of communication. Feedback from the community will enable the effectiveness of approaches to dialogue to be evaluated and continuously improved across successive review cycles.

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 Scottish Government's Memorandum proposes a timetable which is designed to reflect lessons learned in the implementation of the Gaelic Language (Scotland) Act 2005. The logic of the proposed revision to the timetable originally documented by Mark Griffin MSP appears to be reasonable.

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?

It is to be expected that HWU will consult with its BSL section (including staff, students and external stakeholders where appropriate) in satisfying its responsibilities as regards this matter. Nothing less than enthusiastic participation can be anticipated.

Students on HWU's BSL/English interpreting and translation degree programmes constitute a group with a specific, high-level engagement with the issues addressed in the Bill. On the one hand, they exemplify the experience of hearing (typically non-native) signers learning BSL with the aim of working in the community after graduation. Insofar as the country will need many more new signers to meet long-term requirements, their experiences should inform recruitment and practice. On the other hand, they are expected to play a pivotal role in the workforce as successive National Plans are rolled out. Their participation as respondents to consultation initiatives will therefore be pertinent, since they will be expected to deliver the interpreting and translation services devised through planning processes.

Over time, improved access to education for Deaf people, along with the promotion of BSL to families and the wider society, can be expected to lead to increased demand for Higher Education opportunities for Deaf students. Whilst Scotland's universities do offer services for disabled students, and some BSL users avail themselves of these services, there is no Scottish university that has yet established itself as a consistent 'magnet' attractor of Deaf students. Given its concentration of academic staff and student knowledge of BSL, along with its programmes of study, it is foreseeable that HWU may become such a centre in future (as, for example, the University of Bristol has been in the past, for the same reasons). Our research on the use of sign language in higher education (eg Napier 2001, 2002; Trowler & Turner 2002, Napier & Barker 2004; Quinn & Turner 2014) may help to inform the development of good practice.

Consultation on all issues with the BSL community should also take cognisance of the "history of solutions" (Padden & Humphries 1988) already identified through research and dialogue. To support this information process, there may be a role for a BSL-focused knowledge hub which can reliably produce and signpost robust background documentation, surveys, fieldwork and other resources. HWU's position as a recognised centre of excellence in this field (eg http://scotlandfutureforum.org/assets/library/files/application/BSL_Report.pdf) may generate a role as an insight beacon to support research-informed planning.

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?

In light of the evidence submitted to Parliament, further consideration to inclusion of the following would appear appropriate:

To secure fair and appropriate social care for BSL users in Scotland
Care Inspectorate
Scottish Children's Reporter Administration

To secure fair and appropriate treatment under the law for BSL users in Scotland
Police Investigations and Review Commissioner

Scottish Criminal Cases Review Commission
Scottish Legal Complaints Commission
HM Inspector of Constabulary in Scotland

To facilitate equitable opportunities for BSL users in the enterprise and business activities of Scotland

Highlands and Islands Enterprise
Scottish Enterprise

To enable BSL users to engage equally in educational opportunities in Scotland
Skills Development Scotland

To promote access to citizenship for BSL users in Scotland

Commissioner for Ethical Standards in Public Life
Scottish Human Rights Commission
Scottish Information Commissioner
Standards Commission for Scotland

To value BSL users in Scotland's heritage and cultural life

Architecture and Design Scotland
Cairngorms National Park Authority
Creative Scotland
Loch Lomond and The Trossachs National Park Authority
National Galleries of Scotland
National Library of Scotland
National Museums of Scotland
Royal Botanic Garden Edinburgh
Royal Commission on the Ancient and Historical Monuments of Scotland
Scottish Futures Trust
Scottish Environment Protection Agency
Scottish Natural Heritage
sportscotland
VisitScotland
SEPA
Scottish Canals
Scottish Water
Historic Scotland
Transport Scotland

For academic sources, please see:

[https://pureapps2.hw.ac.uk/portal/en/persons/graham-h-turner\(689b53b0-7385-4e0f-af2b-872fa55ebeb0\)/publications.html](https://pureapps2.hw.ac.uk/portal/en/persons/graham-h-turner(689b53b0-7385-4e0f-af2b-872fa55ebeb0)/publications.html)

and:

[https://pureapps2.hw.ac.uk/portal/en/persons/jemina-napier\(3aadebae-a415-4063-98f8-f18d8cfdca99\)/publications.html](https://pureapps2.hw.ac.uk/portal/en/persons/jemina-napier(3aadebae-a415-4063-98f8-f18d8cfdca99)/publications.html)

Other source details available on request.