

Foreword

Social inclusion and equal access to services provision for British Sign Language (BSL)



Users are enormously important equality and human rights issues. Those who use BSL as their language for everyday participation in our society are often overlooked because their numbers are relatively small. This increases the already compound exclusion faced by the people who are part of this linguistic minority.

Citizens who use BSL still experience unacceptable delays in securing appointments, or are asked to bring a friend to interpret, cope by lip-reading, or use pen and paper to communicate in a second language, in which they may have limited literacy. Each of these scenarios leads

to a poorer quality of service and information, and has the effect of disempowering the service user.

The Assembly Government formally recognised British Sign Language as a language in its own right in January 2004, and since then we have invested significantly to provide more qualified, professional interpreters as a resource for public services.

As we move further into the 21st century BSL Users rightly expect services that are genuinely accessible, flexible and responsive. Greater availability of interpreters, rapidly changing technology, and more widespread opportunities for learning BSL make it easily possible for providers to deliver through the medium of BSL.

My sincere thanks go to the many individuals, organisations and associations that have contributed to the development of this advice. I am especially grateful to those individual BSL Users, who took the time to respond to our public consultation. Your feedback was invaluable in this process.

We take our commitments to equality and to improving public services very seriously. *Delivering in British Sign Language: Advice for Public Services* brings those commitments together. It completes a foundation on which public services can build a future of full inclusion and equal access to public services for BSL Users in Wales.

A handwritten signature in black ink that reads "Jane Hutt".

Jane Hutt AM

Minister for Assembly Business, Equalities, and Children





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Definitions

Throughout this document:


- “*Citizens who use BSL*” and “*BSL User*” are used to mean people who are both deaf as defined under the Disability Discrimination Act and use BSL as their preferred means of communication for participation in everyday life.
- “*Interpreter*” is used to mean registered, qualified bilingual and bicultural professionals who facilitate communication between BSL Users and those who use only spoken languages, such as Welsh or English.





Introduction

- 1.1 British Sign Language is a visual, spatial language that uses movement of the hands, body, face, and head. As different from English and Welsh as they are from each other, BSL has its own grammar, syntax, idioms, and regional variations. It is the first or preferred language of approximately 3,000 people in Wales and is recognised by the Welsh Assembly Government as a language in its own right.ⁱ
- 1.2 Citizens who use BSL are often comfortable and confident only when communicating face-to-face in BSL. It may be their only language, as many BSL Users do not speak, or lip-read Welsh, or English effectively.
- 1.3 A Cabinet Task and Finish Group, chaired by Karen Sinclair AM, published recommendations in 2004 aimed at improving social inclusion and access to services for BSL Users in Wales by increasing from 12 to 64 the number of professional interpreters in Wales. The Assembly Government has responded to those recommendations by:
 - providing £1.6 million to *BSL Futures*, a £2.7million partnership initiative also supported by the European Social Fund. BSL Futures will increase BSL teaching capacity and train more than 30 new interpreters; and
 - developing this advice for publication.
- 1.4 Adjusting mainstream services to make possible effective delivery in BSL is a simple, cost-effective process. This document contains advice for using interpreters and technology to deliver services in BSL.
- 1.5 Implementing the Advice will enable public bodies to move towards prompt and effective service delivery in BSL. This will be in line with the Core Principles published in *Making the Connections: Building Better Customer Service*. Core Principle Four states “Citizens who prefer to access and use services in [...] British Sign Language will be able to do so”. It will also help them to meet, in respect of those citizens who use BSL, the requirements of the Disability Discrimination Act 1995 and Human Rights Act 1998.
- 1.6 The Advice is intended for use by the Welsh Assembly Government, our hospitals, schools, local councils, and other devolved public services. The Advice is relevant to all Assembly Government portfolio areas; it should be applied by them all.
- 1.7 By law the Welsh Assembly Government has to exercise its functions “with due regard to the principle that there should be equality of opportunity for all peopleⁱⁱⁱ” To ensure it delivers on that obligation, it is committed to promoting equality of opportunity in all aspects of Welsh life including race, language, religion, disability, age, gender and sexual orientation. Issues of access for BSL using citizens are important.

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- 1.8 We ask you to note that this Advice does not apply to the “parliamentary” functions of the National Assembly for Wales, which are currently carried out by the Assembly Parliamentary Service, or to functions that have not been devolved to the National Assembly for Wales, for example the Police and Employment Services. We will highlight this Advice as to public services that sit outside the remit of the Assembly Government.

Example of failure to achieve service standard expectations

Diana, a BSL User, attended a routine mammogram at her local hospital. The service providers booked a professional interpreter for the appointment and were able to deliver their service in BSL. Three weeks later Diana received notice to attend a follow up mammogram at the regional specialist centre. She attended as requested, but the service providers had not booked an interpreter.

Diana was at the centre for four hours. She spent much of the time on her own, at no time did she receive an explanation of the purpose of visit, or the procedures. A nurse did write down that Diana was about to be taken for a biopsy, but she didn't recognise or understand the complex medical terminology. Diana was confused, emotionally distressed and in tears when she left the centre. She later described it as “a horrible experience”.


Two days later she attended the centre for follow up. Again, there was no interpreter. Staff tried to explain they needed a further biopsy, but were unable to understand Diana or answer her questions. She was so distressed, she refused.

By not providing an interpreter, the centre was at risk of not fulfilling its legal duties. The quality of service was adversely affected and failed to meet expectations. It resulted in wasted time, creation of additional work and a delay in Diana's care.



Delivering Services in BSL

- 2.1 Quality information sharing is critical to effective service delivery. Poor communication in service settings between those who use only Welsh or English and those who use only BSL leads to poor quality of service. Lipreading, writing, or reading are not adequate replacements to service delivery in BSL, because often these citizens have limited literacy and understanding in Welsh and English.
- 2.2 Services delivered through the medium of BSL should be available to citizens who use BSL to access and use services. This can be achieved by making a few very simple, practical, and cost effective adjustments in provision. Services can be delivered effectively in BSL either:
 - using the services of registered, professional interpreters; or
 - directly in the medium of BSL using staff appropriately competent in the language.
- 2.3 Interpreters provide an interface through which BSL Users and those who use only spoken languages can interact effectively. Interpreters give due regard to cultural and environmental factors that might foster or impede meaning in the message.ⁱⁱⁱ Interpreters with Registered status (MRS LI) meet specific qualification criteria; work to professional and ethical guidelines, including confidentiality, professionalism, impartiality, and a commitment to continuing professional development; carry Professional Indemnity Insurance; and are subject to a formal complaints procedure.
- 2.4 To guarantee service quality, providers should use only registered (MRS LI) interpreters and should note BSL Users' individual interpreter preferences. Sometimes a BSL User will ask or offer to use a family member, friend, or colleague for communication support, instead of using an interpreter. Staff should explain sensitively that this would be inappropriate, and, in addition to using an interpreter, consider, asking or allowing a family member, friend or colleague to act as a buddy, advocate or support, as an appropriate adjustment to the service.
- 2.5 Proven appropriate competence in BSL is as important as professional competence for staff delivering services through the medium of BSL. BSL Levels 1 and 2 are basic level qualifications. Staff with Level 1 are likely to be competent only to meet, greet BSL Users who attend in person; staff with Level 2 are likely to be competent additionally to arrange appointments.
- 2.6 Staff with basic level qualifications are not an adequate or appropriate substitute for qualified, professional interpreters. If the language competence of a staff member is in doubt, a professional interpreter should be engaged. Staff who use BSL as their own first or preferred language can deliver services through the medium of BSL in their field of professional competence.

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- 2.7 There are certain service standards that citizens who use BSL for participation in everyday life have a right to expect from public services in Wales. It is each service's responsibility to deliver on those expectations. The following pages contain outlines of those standards and advice on simple, practical, cost-effective adjustments that will enable services to achieve them. Also included are examples of how services might put those adjustments into practice.
- 2.8 Emergency and time critical services should pay special attention to making sure they have immediate, 24hour access to interpreters. In providing this Advice, we acknowledge that where services and information are not time critical, providers may not be able to make services available in BSL immediately, on demand at all locations; they may need to be prearranged.
- 2.9 There are a number of ways in which public bodies interact with the public in the course of their business, and delivering its services, including: letters, e-mail and telephone calls; face to face at meetings, reception areas, group and one-to-one meetings; and through publications, written material and websites. Providers must be able to deliver effectively in BSL at each of these. The action taken should be proportionate and in line with the "reasonable adjustments" required by the Disability Discrimination Act (1995), in that various factors must be considered including: size of the organisation; function; likely frequency of use; and intended audience.
- 2.10 This Advice aims to not duplicate or replace the standards and guidance on customer service that already exist for public services in Wales. It provides simple steps that should be used to adapt, establish and inform future service provision. The Advice creates no extra burden for services; rather it provides a clear pathway to achieve good practice in delivery of services to citizens who use BSL, thereby meeting the legal obligations that providers already have. Responsibility for monitoring and reviewing service delivery through the medium of BSL lies with individual service providers.



Advice for Public Services

Contacting Services

3.1 Correspondence

BSL Users can expect a good service to receive and respond to letters and email in BSL.

Advances in availability and quality of digital video recording equipment make it possible for letters and email to be created, recorded and exchanged in BSL. These BSL documents are easily transferred for translation. BSL Users are, in general, much more likely to contact a service via email, if they are able to do so in BSL.

Advice

- Make sure your service has access to translation services.
- Make sure ICT systems enable access to BSL email (video attachments).
- Tell staff how to respond to correspondence in BSL.

3.2 Telephone Calls

BSL Users can expect a good service to receive and make telephone calls in BSL.

BSL Users have, in the past, had to have someone make telephone calls on their behalf, or make a special trip to enquire in person. Continuing advances in technology enable telephone calls to be made directly between BSL Users using videophones and high speed webcam links; or short calls can be made from any standard telephone to BSL Users with that technology, and vice versa, by using any one of a number of operator facilitated BSL relay services. Services should also prepare for contact by SMS text message, textphone and fax which BSL Users also commonly use as methods of communicating.

Advice

- Make sure your service has access to services that relay voice telephone calls to videophones in BSL.
- Tell staff how to recognise incoming and make outgoing calls using BSL relay service.
- Install technical systems to make sure competent staff can make videophone calls in BSL.



3.3 At Reception

BSL Users can expect a good service to deal with in BSL in-person enquiries at reception areas in all main offices.

Reception staff with good awareness of BSL and basic skills in the language make citizens who use BSL feel welcome and comfortable. BSL Users are as likely to attend in-person as a form of initial contact, as they are to email, or telephone. This may lead to complicated unscheduled enquiries that require access to: an onsite interpreter; staff member appropriately competent in BSL; or to a remote interpretation service via videophone or high speed webcam.

Advice

- Train all reception staff to be BSL aware.
- Ensure at least one member of reception staff on duty is sufficiently competent to meet and greet in BSL.
- Install technical systems to make sure staff have easy access to remote interpretation services in the reception areas of all main offices.


Practice Example

The National Assembly for Wales has taken major steps to ensure its business and visitor services are available in BSL.

Assembly Parliamentary Service has installed equipment that enables it to superimpose an interpreter on any of the screens in the Senedd. This means proceedings in the main chamber, or in committee rooms are available in BSL on request.

The service has had its leaflet “Welcome to the Assembly” translated into BSL and made available to the public. Members of the Reception and Visitor Service teams have attended basic BSL courses.

Importantly the service has also contracted with an interpreting agency to supply interpreters to the National Assembly on an as-needed basis.



Accessing Services

3.4 Delivering Services

BSL Users can expect a good service to be delivered in BSL.

BSL Users are often only really comfortable and confident communicating face-to-face in BSL. Delivering with dignity and respect, through the medium of BSL improves the quality of information exchange and therefore the quality of service experienced by citizens. Services guaranteeing delivery in BSL are more effective in that they are far more likely to be accessed by BSL Users on a frequent and timely basis.

Advice

- Make sure your service has guaranteed access to interpreters.
- Tell staff how to book and work with interpreters.
- Include BSL issues in basic customer service training for all staff.
- Give staff opportunities to learn and develop BSL language skills.

3.5 Meetings and Events

BSL Users can expect a good service to have BSL as an integral consideration when organising meetings and events.

With appropriate interpretation at public meetings and events BSL Users can participate fully on the basis of equality. BSL Users are far more likely to engage at events where BSL is a publicised consideration.

Advice

- Make sure your service has guaranteed access to interpreters.
- Tell staff how to find out in advance the language preferences of people attending their meetings and events.
- Tell staff how to book and work with interpreters.

Practice Example

Caerphilly County Borough Council has recognised the importance of communicating effectively in BSL in its Corporate Linguistic Skills Strategy and gives support to selected staff to attend BSL courses at the local college, and specialist staff to attend more advanced courses. Its long term training goal for staff using the language is NVQ level 3.



3.6 Emergency/Time Critical Services

BSL Users can expect a good service to be delivered in BSL in time critical and emergency situations.

Effective delivery of services in BSL can have its greatest impact in time critical and emergency situations. Here particularly the lack of effective communication has the potential to create substantial harm. Contracting with interpreters and interpreting agencies to provide 24hr on-call interpretation makes it possible to deliver these services effectively in BSL.

Advice

- Make sure your service has guaranteed access to 24hr on-call, in-person interpretation.
- Tell staff how to call in and work with interpreters.

Practice Example

Cardiff, Merthyr, Rhondda Cynon Taff and the Vale of Glamorgan Local Health Boards run a joint service across their areas that enables them to deliver health appointments in British Sign Language.

The service employs a full-time interpreter who provides:

- a one-stop-shop approach to ensure BSL Users have access to an interpreter when they visit their GP, hospital, pharmacist, dentist or optician; and
- advice to health professionals on delivering services to BSL Users.

Regular feedback consultation meetings are held with BSL Users across the area covered by the service. The feedback received is crucial. It has informed development of the service and provides a key indicator of effectiveness. Informal evaluation suggests there is a greater awareness of available health services amongst BSL Users, knowledge of how to access them, and far greater confidence in those services. There is also greater awareness amongst professionals of the needs of their deaf patients.

Since it was established, the service has led to a dramatic increase in the number of BSL Users requesting and receiving interpreter support in health settings.



Accessing Information

3.7 Websites, Publications and Written Material

BSL Users can expect a good service to make available in BSL information that is aimed at BSL Users, or has BSL as a focus.

BSL Users consult information in BSL on DVD, VHS and the internet with increasing frequency. Advancements in digital video technology have provided the opportunity to translate documents into BSL that are easily portable and accessible. BSL video can be included on websites. In one-off, or low-frequency cases where a citizen requests specific information in BSL, it may be appropriate and proportionate to provide that information face to face through an interpreter, rather than having it translated and produced in BSL.

Advice

- Make sure your service has access to translation services.
- Tell staff how to produce documents in BSL.
- Make sure webservers can support BSL video formats.

Practice Example

The National Waterfront Museum in Swansea has used effective engagement, considered design and state-of-the-art audio visual technology to tell the story of Wales' industrial and maritime heritage and its role in shaping today's economy and society. Opened in summer 2005, it is the first new museum to be built around the Welsh free museum entrance policy.

The architects and design team were advised by an access group that included BSL Users. The designers included BSL as an intrinsic design consideration in developing the exhibits for the new galleries. Extensive use has been made of interactive audio visual technology enable seamless access to information in Welsh, English and BSL.

The Museum and it's exhibitions have proven immensely popular amongst BSL Users; many have returned time and time again.



3.8 Policy and Service Development

BSL Users can expect a good service to ensure all new policies and initiatives take effective account of BSL.

Including BSL, BSL Users and the associated service delivery needs in the policy and service development process is intrinsic to ensuring equity in service provision. BSL provision needs must be considered at the planning and development stages. This enables services to make available the budgets and resources necessary to deliver effectively in BSL. Public bodies have to take action to eliminate inequitable service provision, and have a legal duty under the Disability Discrimination Act to engage with disabled people in the development of policy and services.

Advice

- Check new policies and initiatives to ensure implications for BSL users are assessed.
- Tell staff how to engage BSL users in the local community to inform policy and service development.
- Tell staff how to make sure policies take into full account standards for delivering in BSL.

Practice Example

Leeds City Council has used its website as an effective tool to provide information to BSL Users. It has made available several BSL videos on a special section of its website that is just one click on a special BSL icon from the main page.

The BSL Videos include an introduction to Leeds City Council; information on key services such as Housing, Education and Social Services; and information on Anti Social Behaviour and Council Tax.



References, Bibliography and Websites

- i Minister for Finance, Local Government and Public Services, Sue Essex AM, in a letter to Ann Jones AM on 22 January 2004.
- ii Section 120, Government of Wales Act 1998
- iii "So You Want To Be An Interpreter?", Alcorn and Humphrey, H&H Publishers, Amarillo TX, 1995.

Bibliography

Guidance on providing British Sign Language/English interpreters under the Disability Discrimination Act 1995, for employers, trade organisations and service providers, RNID, 2004

Best Practice Guidance on providing public services to deaf people who use British Sign Language or Irish Sign Language, Hands on Partnership, Northern Ireland Government Department of Culture, Arts and Leisure, 2006 - www.dcalni.gov.uk

BDA Charter for British Sign Language - Guidelines for local authorities on implementing BSL recognition, British Deaf Association, 2003

Good Practice Guide: Providing access to public services for deaf people, UK Council on Deafness, 2001.

So You Want To Be An Interpreter?, Alcorn and Humphrey, H&H Publishers, Amarillo TX, 1995

Wales: A Better Country, Welsh Assembly Government, 2003

Making the Connections: Delivering Better Services for Wales, Welsh Assembly Government, 2004

National Language Standards (revised 2005), CiLT The National Centre for Languages, 2005

Websites

Association of Sign Language Interpreters <http://www.asli.org.uk>

British Deaf Association <http://www.signcommunity.org.uk>

CiLT - The National Centre for Languages <http://www.cilt.org.uk>

Council for the Advancement of Communication with Deaf People
<http://www.cacdp.org.uk>

EyeGaze - <http://www.eyegaze.tv>

NHS Wales Centre for Equality and Human Rights <http://www.wales.nhs.uk/equality>

Just Communication <http://www.justcommunication.co.uk/>



Royal National Institute for Deaf People <http://www.rnid.org.uk>

Sign Solutions <http://www.signsolutions.uk.com/>

Sign Station http://www.signstation.org/signstation_dictionary/showUserHomePage.do

Wales Council for Deaf People <http://www.wcdeaf.org.uk>

Welsh Assembly Government <http://www.wales.gov.uk>

Wales Local Government Association <http://www.wlga.gov.uk>

Welsh Assembly Government - Equality and Diversity
<http://new.wales.gov.uk/topics/equality/?lang=en>



Working with BSL interpreters

There are many considerations for the organiser of a meeting or conference, when preparing a suitable environment for BSL interpreters.

Interpreting requires great concentration and is extremely demanding. Frequent breaks for an interpreter working alone should be incorporated into the programme. For an event lasting for more than 2 hours a minimum of two interpreters should be booked. The speakers should be made aware of the sign language interpreter's presence in advance.

Briefing the interpreter

Papers relevant to an assignment should be sent to the interpreter(s) in advance: minutes and agendas, copies or summaries of speeches and lectures, a programme for the event, background information relating to the conference topic, the people involved or the organisation responsible. You should inform the interpreters if they will be required at registration or lunchtime.

Positioning

Interpreters will be able to advise you on the most suitable place for them to be, and will take into account lighting and visibility. This may require you to make adjustments to your presentation. The ideal background for an interpreter is a solid colour. Strong colours, brightly patterned wallpaper or harsh white walls can be very tiring on the eyes. Portable plain-coloured panels can be used as a background. Behind the interpreter should be no windows, sources of bright light and other visual distractions (frequently used doors, etc). BSL using participants should have a clear view of the interpreter, the platform and visual aids. If flipcharts, OHPs, handouts, film clips or practical demonstrations are going to be used, they must be positioned near to the interpreter(s) so that the BSL user does not have to change the direction of his or her attention.

Workshops

If conference participants are to attend workshops or special sessions, it must not be assumed that all the BSL users will want to attend the same session; an appropriate number of interpreters must be provided for all the workshops. Organisers may want to circulate a list of workshops available to the participants before the event in order to plan the rota and gain some indication of the number of interpreters required.



Speakers / Participants

Participants must understand the interpreter's role and how this will affect their contribution. Participants should:

- Talk at a reasonable, normal speed (not too fast) and not wait for the interpreter to 'catch up.' Reading from a prepared text the rate of speech increases, this may make it unnecessarily difficult for the interpreter.
- Avoid jargon and abbreviations.
- Allow plenty of time when using visual aids. It is not possible to study the visual aids and to watch the interpreter at the same time.
- Do not forget the potential for a delay between the original message and the interpreted message. This is particularly relevant if the audience is asked to provide comments or questions - BSL using participants should be given the opportunity to respond.

Professional Registration

To join the Register of BSL/English Interpreters that covers Wales¹, an interpreter must meet specific criteria issued regularly by the Independent Registration Panel.

Registered status confirms an interpreter has a high level of language fluency and interpreting skills²; works to a set of professional guidelines, which include confidentiality, professionalism, impartiality, and a commitment to continuing professional development; and carries Professional Indemnity Insurance.

Full Members of the Register of Sign Language Interpreters (MRSLI) are fully qualified professionals. The register also offers two levels of registration for those on recognised training courses to become interpreters: Trainee Interpreter (TI); and Junior Trainee Interpreter (JTI)

All Registered interpreters carry an identification card, and will be happy for it to be checked by service providers.

¹ CACDP, The Council for the Advancement of Communication with Deaf People holds the Register of BSL/English Interpreters. http://www.cacdp.org.uk/Directory/Scripts/informationBSL__BSL_reg_update.asp

² So you want to be an interpreter. Information on Routes to Registration, CACDP, Durham 2005. Available at: <http://www.cacdp.org.uk/Information/PDFs/FactsheetWant2bInt06.pdf>

Making it Happen - Implementing this Advice

The advice for actions contained in section 3 fall into three broad categories: Resource Planning; Technical Systems; and Information and Training. Further information and inspiration on how to implement them is available from a number of sources. A selection of links to websites you may find useful is included at section 4.

Resource Planning

The Advice suggests you make sure your service has access to three key services:

- Guaranteed access to interpreters. (24hr on-call for emergency / time critical services). (3.4, 3.5)
- Translation services. (3.1, 3.7)
- Services to relay voice telephone calls to videophones in BSL. (3.2)

These services are offered by a number of agencies, organisations and individuals, run by charities, commercial and community enterprises. Developing contracts with one or more of these will give your service access to the services it requires. Alternatively, some services that have a particularly high demand for BSL delivery have chosen to seek to have people with those skills as staff members. (See Practice Examples at pages 9 & 11)


The Advice also suggests you make sure your service has at least one member of on duty reception staff is sufficiently competent to meet and greet in BSL (3.3). As suggested at 2.6, staff with basic BSL qualifications are likely to be competent only to meet, greet and arrange appointments with BSL Users. Training at these levels is available at Further Education Colleges across Wales. (See Practice Example at page 12)

Technical Systems

The Advice suggests technical systems are:

- Updated to make sure staff can access BSL video email attachments (3.1) and web servers can support BSL video formats (3.7).
- Installed to make sure staff have access to remote interpretation services (3.3) and can make video calls in BSL directly (3.2).

Your organisation's technical support team and equipment suppliers will be able to provide advice on compatible systems.



Information and Training

The Advice suggests BSL awareness be included in basic customer service training for staff(3.4), and staff be given opportunities to learn and develop BSL language skills(3.4).

A number of specific training points to facilitate improved service delivery in BSL are also included. Staff should be aware of how to:

- Respond to correspondence in BSL. (3.1)
- Recognise incoming and make outgoing calls using BSL relay service. (3.2)
- Book and work with interpreters. (3.4)
- Produce documents in BSL. (3.7)
- Ensure policies take into full account standards for delivering in BSL. (3.8)
- Engage BSL users in the local community to inform policy and service development.
- Find out in advance the language preferences of people attending their meetings and events. (3.5)

Your organisation's training department or supplier will be able to offer advice on delivering these learning objectives. Discreet advice is available from a number of charities, organisations and commercial suppliers.