

<b>Report to:</b>	QSMTM
<b>Report by:</b>	Claire Stephen, Acting Head of Policy and Information (HOPI)
<b>Meeting Date:</b>	11 May 2022
<b>Subject/ Title:</b> (and VC no)	British Sign Language (BSL) Plan 2018-2023 – report and review for 2021-22 (VC169332)
<b>Attached Papers</b> (title and VC no)	British Sign Language (BSL) Plan 2018-2023 (VC 142122)

## Purpose of report

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- The purpose of this report is to provide the annual report and review of the [Scottish Information Commissioner's \(Commissioner\) British Sign Language Action Plan](#) (BSL Plan) (as per the C1 Governance Reporting Arrangements – VC 110086).

## Recommendation and actions

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- I recommend that:
  - The Senior Management Team (SMT) notes the contents of this report
  - No revisions are made to the BSL Plan at this time, but reviews continue to take place annually
  - This Committee Report (CR) is published in full as set out in paragraph 18.

## Executive summary

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### Summary

- In October 2018, the Commissioner's BSL Plan 2018-2023 (VC 107919) was published, in compliance with sections 2 and 3 of the British Sign Language (Scotland) Act 2015, and following consultation with British Sign Language (BSL) users. The Plan sets out the actions which the Commissioner will take over the period 2018-2023 to improve access to information and services for BSL users.
- As of end 2021-22, of the total 14 commitments in the Commissioner's BSL Plan, delivery of one commitment is fully complete; activity is underway with further action required on ten commitments; and action is yet to be taken and still required for a further three commitments.
- As a result of the continued impact of the Covid-19 pandemic and team capacity changes, progress against each action point has not been as significant as hoped across 2021-22. Planned actions will be reviewed early in 2022-23 to take account of available resource and to ensure delivery against each commitment in the most efficient method possible.
- As set out in the BSL Plan the Commissioner is due to contribute to the national progress review (interim report) on the National BSL Plan when it takes place. This was originally scheduled for 2020 but has been delayed by at least a year as a result of the impact of the Covid-19 pandemic.

**Commitment progress to date:**

7. The status, progress and actions taken regarding each commitment in the BSL Plan to date are set out in the table below.

Commitment	Status	Action taken to date
i. Develop links with BSL user groups and adopt best practice guidelines. This will include advice on how to involve BSL users in the design and delivery of our services	Underway – further action required	<ul style="list-style-type: none"> <li>BSL community /user group landscape in Scotland and appropriate routes for engagement explored across 2019</li> <li>Action to develop partnership and communication/involvement channels required</li> </ul>
ii. Make information about our functions, and how to access and use our service, accessible to BSL users, including producing new BSL materials.	Underway – further action required	<ul style="list-style-type: none"> <li>“Your Right to Know” translation videos developed, published and promoted across website and Twitter in January/February 2020</li> <li>Action to identify needs and develop further information for BSL users required. Renewed data from website views to inform production of new BSL materials.</li> </ul>
iii. Begin a programme of work to increase the accessibility of our website and social media channels.	Underway – further action required	<ul style="list-style-type: none"> <li>Initial accessibility audit of website completed March 2020</li> <li>New website project has delivered a number of accessibility improvements – new website launched on 7 April 2022, assessment of accessibility improvements underway.</li> <li>Continued programme of general accessibility improvements across website to ensure compliance with Public Sector Accessibility Regulations conducted (non-BSL specific)</li> <li>Action to develop and deliver increased accessibility required.</li> </ul>
iv. Promote the use of the Scottish Government’s nationally funded BSL online interpreting video relay services ‘contactSCOTLAND-BSL’, which allows BSL users to contact public and third sector services, and for these services to contact them	Underway – further action required	<ul style="list-style-type: none"> <li>Secured access to Scottish Government contactSCOTLAND-BSL relay service for BSL interpreting and made staff aware that they may receive enquiries through this service, in 2018</li> <li>contactSCOTLAND-BSL logo, links and information added to Contact Us and other key relevant pages across website.</li> <li>Reference to contactSCOTLAND-BSL to printed guidance and resources for the public across 2022_23</li> <li>Action to further promote use of the service required</li> </ul>
v. Train our staff to use online interpreting video relay services (such as contactScotland-BSL), and explore the potential for greater use	Underway – further action required	<ul style="list-style-type: none"> <li>Mandatory deaf awareness training held for all staff, including awareness of BSL use, in October 2018 and in subsequent induction training for new members of staff</li> <li>Action to further train staff, as appropriate, on use of interpreting video relay services required.</li> </ul>
vi. Raise awareness amongst all staff of the needs of BSL users through training and induction programmes	Underway – further action required	<ul style="list-style-type: none"> <li>Mandatory deaf awareness training held for all staff, including awareness of BSL use, in October 2018 and in subsequent induction training for new members of staff</li> <li>Action to further embed appropriate training required</li> </ul>

<p><b>vii.</b> Put in place systems for the obtaining of BSL / English interpretation and translation services, including interpretation for deaf-blind BSL users</p>	<p>Underway – further action required</p>	<ul style="list-style-type: none"> <li>Secured access in 2018-19 to Scottish Parliamentary Corporate Body / Officeholder contracts for the provision of BSL / English interpreting and video services, meaning Commissioner can respond to enquiries and appeals from BSL users</li> <li>Secured access in 2018-19 to the Scottish Government contact SCOTLAND-BSL telephone relay service for BSL interpreting and made staff aware that they may receive enquiries through this service</li> <li>Translation service identified and used for “Your Right to Know” videos across 2019-20</li> <li>Action to further develop suitable and appropriate systems required</li> </ul>
<p><b>viii.</b> Respond promptly to requests from BSL users to arrange BSL / English interpreting when required for access to our services.</p>	<p>Underway – further action required</p>	<ul style="list-style-type: none"> <li>No requests to date</li> <li>Actions for (vii) above will support when required in future</li> </ul>
<p><b>ix.</b> Ensure our policies of promoting diversity in the workplace are widely disseminated among BSL user communities</p>	<p>Action required</p>	<ul style="list-style-type: none"> <li>Action to promote effectively required – dependent on commitment (i) above</li> </ul>
<p><b>x.</b> Make training available to staff who would like to learn BSL</p>	<p>Action required</p>	<ul style="list-style-type: none"> <li>Action to make appropriate training available as required</li> </ul>
<p><b>xi.</b> Develop and make available online BSL versions of key guidance including “Your Right to Know”.</p>	<p>Underway – further action required</p>	<ul style="list-style-type: none"> <li>BSL versions of “Your Right to Know” available and published on website January/February 2020</li> <li>Action to identify needs and develop further information for BSL users required</li> </ul>
<p><b>xii.</b> Increase awareness of and invite applications from BSL users for our External Engagement events.</p>	<p>Underway – further action required</p>	<ul style="list-style-type: none"> <li>FOI awareness training session held for Dunfermline Hard of Hearing group 2018/2019</li> <li>Action to identify further opportunities required</li> </ul>
<p><b>xiii.</b> Consider the needs and requirements of BSL users in our planning for public engagement meetings and outreach events</p>	<p>Complete</p>	<ul style="list-style-type: none"> <li>Developed and added detail on considering BSL requirements to organisational event planning checklist template in January 2019, ensuring all future events run by Commissioner comply</li> <li>No large events run directly by Commissioner since implementation of plan – but requested organisers of the two major FOI conferences that the Commissioner participates in each year do consider needs and requirements of BSL users.</li> </ul>
<p><b>xiv.</b> Work with public authorities subject to the Freedom of Information legislation to consider the needs of BSL users in their Freedom of Information processes</p>	<p>Action required</p>	<ul style="list-style-type: none"> <li>Action yet to be taken</li> <li>Promotion of the BSL materials available on our website to network groups.</li> </ul>

### **BSL Plan review**

8. I recommended that no changes are made to the BSL plan at this time, and that reviews continue to take place annually.

### **Risk impact**

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9. The risks associated with non-delivery of appropriate communication and equalities activity are recognised within our existing risk management frameworks. The Commissioner's BSL Plan helps to mitigate these risks. There is also a risk that the Commissioner will not have sufficient and appropriate resources available to meet relevant commitments in the BSL Plan. Actions to mitigate these risks will be considered by the SMT when developing the Operational Plan 2022-23 to include appropriate actions and planning scoping to determine the resource required.

### **Equalities impact**

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10. The British Sign Language (Scotland) Act 2015 is to promote the use and understanding of BSL. In addition, our BSL action will help reduce inequality and barriers experienced by speakers of BSL in relation to public sector functions and services. The focus of the Commissioner's BSL plan is therefore on ensuring equitable access to the Commissioner's functions and services, through the use of BSL.

### **Privacy impact**

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11. No new direct privacy impacts are identified within this report. However, the SMT will consider whether a Data Protection Impact Assessment is required for any individual implementation activities as planning for them is undertaken.
12. As noted in previous reports on the Commissioner's BSL Plan, there are privacy implications in providing interpreting support to individuals to access the Commissioner's services and functions. These must be taken into account in the confidentiality provisions in the Scottish Parliamentary Corporate Body (SPCB) (169332) and Scottish Government contracts for interpreting services.

### **Resources impact**

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13. Meeting commitments set out in the Commissioner's BSL Plan may require additional resources, depending on the final actions, as set out in the agreed implementation plan. Where this may be the case, these will be scoped and determined in advance by the SMT so any required projected future costs may be included in future budget submissions to the SPCB as necessary.

### **Operational/ strategic plan impact**

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14. Delivery of the commitments in the Commissioner's BSL Plan formed part of Operational Plan 2021-22 and will be reflected in the Operational Plan 2022-23.

### **Records management impact (including any key documents actions)**

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15. None identified.

### Consultation and Communication

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16. The BSL Plan was developed with input from the SPCB, other parliamentary Officeholders and from feedback gathered from BSL users. As many commitments in the plan depend on greater engagement with BSL users, we expect that consultation will be a regular feature of delivery of the BSL plan objectives.
17. The Head of Enforcement and Head of Corporate Services were consulted on the draft of this CR. Joint work across the SMT, as a whole, is required in order to progress actions across coming year, specifically via the agreed implementation plan for the remainder of plan timeline.

### Publication

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18. I recommend that this CR is published in full.