Department for Work & Pensions

Market review of British Sign Language and communications provision for people who are deaf or have hearing loss

Part One: British Sign Language and communications provision

Part Two: Communication Support Workers

Summary of responses

July 2017

Contents

Part One: British Sign Language and communications provision

Introduction 5

Executive Summary 6

Chapter 1 - Demand 9

Chapter 2 - Supply 30

Chapter 3 - Technology 58

Chapter 4 - Forward Look 74

Part Two: Communication Support Workers

Introduction 82

Executive Summary 83

How do you define Communication Support Work as done by Communication Support Workers? 84

What do Communication Support Workers do? 92

Where and how can Communication Support Workers add value? 95

Does the use of CSWs mask the demand for sign language interpreters and other communication and language professionals? 98

Glossary 101

Annexes:

Annex A - Statistics on the deaf population 109

Annex B - Methods of communication and language support 111

Annex C - More information about deafblind people 116

Annex D - Relevant qualifications 121

Annex E - Disabled Students Allowance (DSAs) 126

Annex F - Technological aids and support 128

Annex G - Access to Work 131

Annex H – Summary: The Organisation and Provision of British Sign Language/English Interpreters in England, Scotland and Wales, 2002 136

Annex I -Conclusions 140

Part One: British Sign Language and communications provision

Introduction

In March 2015 the Minister for Disabled People announced that the Department for Work and Pensions (DWP) would lead on a review of the present state of the market for support that facilitates communication for people who are deaf, deaf-blind or have hearing loss and those that need to engage with them. The most recent comprehensive study of the market was the Durham Report, published in 2002[1], which focused on British Sign Language (BSL) provision.

Throughout 2015, DWP worked with a wide range of stakeholders to develop the review's parameters and criteria. These partners included other government departments; organisations that work for and with people who are deaf, Deafblind or have a hearing loss; and individuals from the communication and language professions.

A Call for Evidence for the review was launched on 4 January 2016 and ran until 10 March 2016. Over 200 submissions were received, varying from brief e-mails detailing personal experiences to detailed documents comprising hundreds of pages, many of which also included links to, or embedded copies of, further academic papers, reports, articles and other reference material.

The main areas of focus of the review were:

- Demand
- Supply
- Technology
- Forward Look

The Scope of the review

The review aimed to look at provision in the UK as a whole, covering all forms of language and communication support.

[1] In 1999, the former Department for Education and Employment (DfEE) commissioned a research project to study current BSL/English interpreter provision for the Inter-Departmental Group on Disability.

The final report - *The Organisation and Provision of British Sign Language/English Interpreters in England, Scotland and Wales* – was published in 2002.

The report found that it was difficult to measure demand for interpreting services, but concluded that that there was a shortage of BSL/English interpreters in England, Scotland and Wales and that the limited number of professional interpreters, the geographical variation in provision and the varying standards of interpreting skills held, as well as organisational problems in the provision of interpreting services, provided Deaf people with limited access to services and organisations, and influenced their use of the existing interpreting services.. See Annex H for more information

DWP did not undertake field research during the course of this work and the accuracy of information submitted during the review has therefore not been further assured by the department.

Interested organisations and individuals were invited to make a submission to the review. However, it was not possible to ensure that evidence applicable to the review was submitted from all relevant stakeholders. There was a limited number of submissions from other government bodies, who are likely to commission and use language and communication support.

This report reflects a summary of the responses received. The report highlights current available evidence relating to the areas under review, including relevant published statistical data. The report also summarises common themes that were evident in the wide-range of submissions received to the review.

It was not within the scope of the review to make policy recommendations based on the evidence received.

Executive Summary

There is not enough robust information about supply and demand in the market. This can affect the ability of commissioners, users and suppliers to plan effectively.

The data that are available show BSL is the first language of 24,000 people, but there are only 908 registered sign language interpreters.

People who are Deaf or have a hearing loss report not being able to access public services because their communication needs are not met.

The lack of agreement on the role of communication support workers can lead to problems in service provision.

Demand

There was a general feeling from respondents that demand for different methods of communication is high and is growing, and that instances of unmet demand are common. However, there is no single universal metric for either the volume of demand or the scale of unmet demand and government has no provision to measure these.

A number of reasons for the growth in demand for communications and language professionals were suggested including the work that the public, private and not-for-profit sectors are doing to secure equal access for disabled people. A significant number of submissions outline situations where inappropriate support has been provided for deaf people by employers, service organisations and agencies; with negative consequences in a range of fields, including employment, Higher Education, and primary education. Some evidence submitted to the review suggests that lack of awareness of available support among deaf people is also a challenge.

A number of responses provided, or gave links to varied information about the size of the Deaf population. For example: Action on Hearing Loss (AOHL) estimates that there are over 11 million Deaf and Hard of Hearing people aged 17 and above in the United Kingdom; and the Consortium for Research into Deaf Education (CRIDE) found in 2016 that there were at least 48,075 deaf children and young people aged 0 to 19.

Supply

A number of submissions expressed the view that there is an insufficient pool of professionals working in the communication support sector, with some suggesting that this could be due to the expense of training and accreditation. Many highlighted situations from the perspectives of both service users and service providers in which inappropriate support was commissioned or supplied.

NRCPD was cited as the main registration body across most of the communication professions, some contributors also listed a number of smaller bodies, including SASLI in Scotland, but many contributors felt that coverage of the interpretation and communication market was not comprehensive. It was recognised that for various reasons not every person working in the field is registered and several responses called for a national body, possibly even statutory, to oversee professional registration. It is possible that this call was due in part to respondents' lack of understanding of the roles that NRCPD and SASLI already play in monitoring registration.

A number of respondents felt the route to qualifications, training and registration was not as clear as it should be and that, consequently, the supply of professionals supporting deaf people is far too low – potentially leading to an inappropriate use of lower qualified Communication Support Workers in some settings

Many interpreters felt that agencies are constantly trying to try to drive down fees and costs, ask qualified interpreters to cover more of their travel costs and do not build personal relationships with interpreter or local deaf communities. Many express concerns that the current structure of the interpreting market is dissuading younger people from entering the sign language profession. There a degree of tension in the market, with avoidance of some agencies (i.e. interpreters and deaf people refusing to accept or commission work via certain agencies because of concerns about the quality of provision).

Some respondents noted that the lack of communication professionals in their area meant that the cost of sourcing appropriate, qualified interpreters was significantly increased by their travel costs to the users' location"

Technology

New technology is broadly welcomed and well used by the Deaf community, especially among younger Deaf people. However, contributors were very clear that, in particular situations, technology could not replace the need for one-to-one interpreting support, for example in medical settings or in longer business meetings. Respondents also express concerns about the impact on the skills and careers of sign language professionals of increasing use of remote technologies like video relay services (VRS).

A number of respondents highlighted shortfalls in Wi-Fi availability and mobile internet speeds degrading the quality and efficacy of online services like VRS, Skype, etc. Generic speech-to-text software, which is free to use but depends on reliable internet connections, is also impacted by these factors.

Forward Look

Many contributors referred to statistics suggesting that the number of people with hearing loss will rise over the next few decades. Age-related hearing loss was highlighted as a particularly significant factor – particularly in the context of extended working lives, as well as increasing numbers of Deaf professionals. Linked to the anticipated increase in demand for a range of services was concern that current resources would not be able to keep pace.

Although emerging technology is generally welcomed, contributors outline both positive and negative potential effects of new technology. A particular concern is that technology should not be expected to replace face-to-face support in every situation.

There is also significant concern that increasing reliance on technological solutions, which although cheaper than one-to-one support for shorter bookings, are not always appropriate, will have a depressive effect on the interpreter market.

Demand

Chapter Summary

There was a general feeling from respondents that demand for different methods of communication is high and is growing, and that instances of unmet demand are common. However, there is no single universal metric for either the volume of demand or the scale of unmet demand and government has no provision to measure these.

A number of reasons for the growth in demand for communications and language professionals were suggested including the work that the public, private and not-for-profit sectors are doing to secure equal access for deaf and disabled people. A significant number of submissions outline situations where inappropriate support has been provided by employers or service organisations. Some evidence submitted to the review suggests that lack of awareness of available support among deaf people is also a challenge.

A number of responses provided, or gave links to, varied information about the size of the deaf population. For example, Action on Hearing Loss (AOHL) estimate that there are over 11 million Deaf and Hard of Hearing people aged 17 and above in the United Kingdom, and the Consortium for Research into Deaf Education (CRIDE) found that in 2016 that there were at least 48,075 deaf children and young people aged 0 to 19.

1.1. How many people are Deaf in the United Kingdom?

1.1.1. Action on Hearing Loss (AOHL estimates that there are 11 million adults living with hearing loss in the UK today (one in six of the population) [2], broken down as follows:

[2] Action on Hearing Loss (2015), Hearing Matters, Action on Hearing Loss, London - https://www.actiononhearingloss.org.uk/supporting-you/policy-research-and-influencing/research/hearing-matters.aspx
The quoted figures are based on a comprehensive study of the prevalence of hearing loss among the adult population (Davis AC, 1995. *Hearing in adults*. London: Whurr), with prevalence rates applied to current population estimates (Office for National Statistics (ONS), 2015. Population estimates for UK, England and Wales, Scotland and Northern Ireland, mid-2014. Available from: http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-368259).
`

Population in UK with hearing Loss

Age Range (Years)	Number of those with hearing loss
17-29	188,000
30-39	234,000
40-49	743,000
50-59	1,569,000
60-69	2,524,000
70-79	2,879,000
80+	2,887,000

Source: Hearing Matters, AOHL, 2015

1.1.2. National Deaf Children's Society (NDCS) is a charity that works to improve access for deaf children and young people. NDCS is a member of the Consortium for Research into Deaf Education (CRIDE) which carries out an annual survey of local authority education services for deaf children[3]. NDCS's submission draws on CRIDE data showing that[4] there are at least 48,075[5] deaf children and young people aged 0 to 19 across the UK.

1.1.3. The Department for Education School Census[6] is the statutory data collection vehicle for a broad range of schools and colleges in England, and it includes data on deaf children who have been formally identified by the school or local authority as having a special educational need. The number of pupils recorded in the School Census as having hearing loss as their primary SEN

[3] CRIDE survey of educational provision for deaf children, http://www.ndcs.org.uk/professional_support/national_data/cride.html

[4] http://www.ndcs.org.uk/professional_support/national_data/cride.html

[5] This figure is an apparent decrease from 48,846 reported in the 2015 CRIDE survey. However, six services that previously data did not give figures for numbers of deaf children this year. CRIDE's analysis of figures from previous years suggest that there may be around 2,000 deaf children in these six areas, so CRIDE estimates that the actual number of deaf children in the UK is around 50,000

[6] https://www.gov.uk/guidance/school-census

need in 2015 was 19,350, around half of the number identified by CRIDE[7]. This is likely to be because many schools and local authorities do not always formally identify deaf children as having a special educational need. The Department for Education School Census does not ask local authorities or schools to record whether a child has a disability.

1.2. **How is the deaf population comprised and what kind of support do different groups need?** A number of terms are used to differentiate between groups of people affected by hearing loss or deafness in different ways:**Deaf or d/Deaf.** These are blanket terms for all people with deafness or significant hearing loss. They cover people who are deaf, deafblind, deafened and hard of hearing.

1.2.1.1. **The Deaf Community**. Deaf can also be a cultural label that refers to the group of people who are profoundly deaf, whose first or only language is BSL and who may see themselves as part of a cultural and linguistic minority known as 'The Deaf Community'.

- AOHL's submission to this review cites publicly available 2011 Census data[8] to estimate that there are 24,326 people who use BSL as their main language, although AOHL do make the point that they believe that this is likely to be an underestimate..

- Wales Deaf Council estimates that there are more than 150,000 people in the UK with severe to profound hearing loss whose first language is BSL, 3,000 of whom live in Wales.

- The Scottish Association of Sign Language Interpreters (SASLI) survey respondents (interpreters) expects an increase in demand due to the BSL (Scotland) Act (2015) with the impact of this projected to be evident in a

[7] The School Census only records children's primary and secondary needs on the basis of what schools are aware of, so it will not capture children who are beginning to have hearing loss (some conditions are progressive), nor some of those with complex and multiple needs where their hearing loss has not been picked up. It does not capture the child's main or preferred means of communication.

[8] https://www.ons.gov.uk/census/2011census

couple of years' time following the implementation of the first National Plan.

1.2.1.2. **People who are Hard of Hearing (HOH).** This term describes people with mild to severe hearing loss, and is often used to describe people who have lost their hearing gradually.

1.2.1.3. **People who are deafened**. People who were born hearing and became severely or profoundly deaf after learning to speak are often described as deafened. This can happen either suddenly or gradually.

1.2.1.4. **People who are Deafblind**. Deafblind is the term used for people with severe impairments of both hearing and vision. Many people who are Deafblind may have some hearing and vision. Others will be totally deaf and totally blind. (See **Annex C**)

1.2.1.5. **People with age-related hearing loss.** National Community Hearing Association (NCHA)[9] estimates that, in 2014, there were 10.5 million people in the UK with some degree of age- related hearing loss and 1.1m people with severe, age-related hearing loss live in England. Most people with hearing loss benefit from hearing aids or other assistive technologies and/or other support (e.g. hearing therapy, lip-reading etc.), but approximately 9 percent (i.e. about 1.3 million people) needed communications support.

1.2.1.5.1. As our population ages, hearing loss will affect a growing number of people. AOHL estimates that by 2035, there will be 15.6 million people living with hearing loss in the UK (equivalent to one-fifth of the population). This will impact on demand for hearing services.

[9] http://the-ncha.com/

1.2.1.6. **Deaf children.** Consortium for Research into Deaf Education's (CRIDE) 2016 UK-wide survey[10] found that there are at least 48,075[11] deaf children aged 0 to 19 across the UK.

1.3. How does demand for services break down?

1.3.1. AoHL[12] is a large UK charity helping people confronting deafness, tinnitus and hearing loss. It offers a range of services and processes approximately 20,000 requests for communication support each year throughout the UK. Over half of AOHL's communication support business comes from public sector organisations.

1.3.2. Around 95 percent of requests received by AOHL are for BSL and the remaining 5 percent is split into note-taking (manual and electronic), speech-to-text reporting and remote speech-to-text-reporting, Deafblind interpreting and lipreading.

1.3.3. The British Deaf Association (BDA) reports that there has been an increased demand from Deaf people for highly skilled, qualified registered Sign Language Interpreters and that BDA members and supporters report a noticeable shortage of availability. BDA suggests the following reasons for the growth in demand:

- The introduction of the "Disabled Students Allowance" (DSA)[13] in 1992, which enabled a greater number of Deaf people to study at a university (see Appendix 01 for more information about DSA);

[10] http://www.ndcs.org.uk/professional_support/national_data/cride.html

[11] Taking into account where services did not respond, CRIDE believes the actual figure is around 50,000.

[12] https://www.actiononhearingloss.org.uk/

[13] https://www.gov.uk/disabled-students-allowances-dsas/overview

- The introduction Access to Work scheme in June 1994, which increased demand for qualified SLIs to support deaf people in work (see Annex G for more information about ATW);

- Increased awareness following the introduction of the Disability Discrimination Act 1995 (now replaced by the Equality Act 2010), which increased the statutory requirements for reasonable adjustments.

1.3.4. Signature[14] acknowledges that the government wants to increase access to education, employment and services for disabled people, highlighting the Government's disability strategy 'Fulfilling Potential: Making it Happen'[15], published in 2014, which states equality *"is fundamental to building a strong economy and fair society where everyone has opportunities to realise their aspirations and fulfil their potential.*

1.3.5. Like many contributors to this review, Signature states that the demand for communication and language professionals is growing and will continue to do so. Signature proposes that there are several reasons for this, including the work that the public, private and not-for-profit sectors are doing to secure equal access for disabled people.

1.3.6. As awareness of the communication and support that is available grows, so does demand. Signature has recently developed new qualifications for interpreters for Deafblind people, Lipspeakers, Notetakers, and speech to text reporters. This follows demands from the professional associations for qualifications that lead to registration with NRCPD. Signature reports that its members are unable to keep up with demand.

[14] Signature is a charity that campaigns to improve the quality of communication between deaf, Deafblind and hearing people in the UK and is also an awarding body for nationally recognised qualifications in BSL and other deaf communications. http://www.signature.org.uk/

[15] https://www.gov.uk/government/collections/fulfilling-potential-working-together-to-improve-the-lives-of-disabled-people

1.3.7. CRIDE's 2015 summary report[16] provides details of demand among deaf children, reporting that:

- the majority of these children have a mild (28 percent) or moderate (31 percent) hearing loss compared to severe (10 percent) or profound (12 percent). 19 percent have a unilateral (one-sided hearing loss). 21 percent of deaf children are recorded as having some form of additional need.

- 78 percent of school-aged deaf children attend mainstream schools (where there is no specialist provision). 7 percent attend mainstream schools with resource provisions, 3 percent attend special schools for deaf children whilst 12 percent attend special schools not specifically for deaf children.

- 2 percent of deaf children use BSL in education, 8 percent use Spoken English together with signed support, 87 percent use spoken English or Welsh. The CRIDE data do not reveal whether children use these languages in their home setting on a similar scale, nor whether these are their preferred languages. It is difficult to be certain whether the relatively low number of sign language users in education settings reflects parental wishes or a lack of choice for specific communication approaches in different education settings.

1.3.8. Most deaf children use a spoken language. However, the National Deaf Children's Society believes that, as no hearing technology has the potential to replace lost hearing (at best, hearing technology complements and enhances existing hearing), many of these deaf children will require some form of 'visual' support in order to access the spoken language. This visual communication support can be provided in a range of ways:

- British Sign Language;

[16] ibid

- Signed supported English – using signs to supplement the spoken language, but whilst following the structure of the English language;

- Lip reading or speech reading;

- Written support – i.e. provided through a notetaker, palantypist, speech to text support, etc;

- Cued Speech – which provides visual representation of the sounds in each word.

1.3.9. Children and young people may move flexibly on this spectrum as they get older, depending on the situation and the way in which their preferences may change. In other words, there will rarely be a single approach that deaf children and young people will use all the time.

1.3.10. A submission from the parent of a deaf child studying in a mainstream school sets out some of the issues around using CSWs with only BSL Level 2 or 3 qualifications. A 3-year-old deaf child can sign at this level and could soon be communicating at a level that a CSW would not be able to in order to meet that child's needs. The parent felt that a deaf child who has had access to sign language from birth and has support from a level 6 BSL interpreter in school stands a better chance of acquiring good literacy skills.

1.3.11. The parent also felt that having a Level 6 qualified and registered BSL interpreter in the classroom ensures that the teacher's chosen pedagogy is conveyed for optimum learning. No-one would choose for their hearing child to learn their first and natural language from someone who cannot really speak it. In addition, Deaf children of Deaf parents are more likely to receive better support than Deaf children of hearing parents, as the Deaf parents will usually have knowledge of what to expect and how to improve on their own school experiences.

1.3.12. The parent goes onto describe how one mainstream school supports deaf students:

- This school organises weekly visits from a Teacher of the Deaf[17](TOD) to ensure that the lessons are accessible for the deaf and answer any questions that the teachers may have regarding teaching a deaf child.

- A deaf instructor who is a qualified and registered deaf interpreter as well as a qualified BSL teacher works at the school one day a week.

- The deaf instructor's role is to teach children, teachers and the whole school community sign language as well as acting as a role model for the deaf child and to the other children.

- There are lunchtime BSL clubs and after school BSL clubs as well as in-class BSL stories. The deaf instructor also provides specialist deaf awareness training to the school where the staff can ask him anything they'd like to know – and perhaps feel that they cannot ask the parent.

1.3.13. Department for Education's submission to this review states that, of the total number of students entering Higher Education in 2013/14 and declaring that they had a disability, the percentage declaring that were deaf or had a serious hearing impairment was around 2 percent (for comparison blind or visually impaired stood at around 1 percent, and specific learning difficulties at around 49 percent). Some young people may choose not to declare they have disability.

1.3.14. Although Higher Education Providers offer support for deaf students, the type of support will vary. For example, some Higher Education Providers have integrated lecture capture and allow the student to choose between a variety of formats to access their learning (e.g. audio file, annotated lecture

[17] http://www.batod.org.uk/

notes, sub-titles, etc.). Other Higher Education Providers may not have this facility and so would provide lecture notes, or provide individual note takers.

1.3.15. Disabled Students Allowances **(**DSAs)[18] are available to cover some essential additional expenditure that a disabled student is obliged to incur due to disability whilst undertaking a course of higher education. They are non-repayable and not means-tested. They are available to full-time and part-time undergraduates and postgraduates, and some distance learning students.

1.3.16. DSAs are administered by Student Finance England (SFE), a service provided by the Student Loans Company (SLC). **See Annex E for more information**.

1.4. Geographical variations

1.4.1. A number of individual respondents highlight particular issues in their local areas. For example, in rural areas, where there may be fewer registered SLIs per head and travel can be an issue, commissioners may book unqualified and unregistered interpreters instead of registered SLIs. Individuals give examples of unqualified and unregistered interpreters being booked to 'interpret' in a variety of inappropriate situations, including medical consultations, resulting in Deaf people not receiving adequate communication support.

1.4.2. Another issue is that a relative dearth of specialists in one local area may mean that the costs of sourcing appropriate, qualified interpreters is significantly increased by their travel costs to the users' location. If an Access to Work award does not take this into account, then the amount of support available to affected users may be reduced[19].

[18] https://www.gov.uk/disabled-students-allowances-dsas

[19] It is important to note here that Access to Work grants are calculated with input from the Access to Work user and quotes from prospective interpreters are an important element of the evidence used to

1.4.3. The Scottish Association of Sign Language Interpreters (SASLI)[20] carried out an online survey of its membership to inform its evidence for this review. SASLI's submission says that the highest demand for communication assignments in Scotland is for medical settings, followed by employment assignments for the individual registrants and local authority appointments for the registered agencies. 80 percent of the Interpreters in the SASLI survey stated that they carried out face-to-face interpreting only, with the remaining 20 percent having done remote interpreting to varying degrees.

1.4.4. AOHL's Commercial Services team processes bookings for around half of the NRCPD registered communication professionals in the UK and estimates that about 5 percent of the requests it receives cannot be met. The organisation feels that geographical supply variations cause disparities in unmet demand between regions, submitting the following table breaking down its bookings by region to illustrate the problem:

Area	Regional Volume of Bookings
Merseyside	*20 percent*
South West	*15 percent*
South East	*11 percent*
N. Ireland	*11 percent*
Manchester	*10.5 percent*
Wales	*3 percent*
Midlands	*1.5 percent*
North East	*1.25 percent*
S. Yorkshire	*0.75 percent*

determine an appropriate award amount. Access to Work requires quotes for an all-inclusive fee for the interpreter, including travel costs."

[20] http://www.sasli.org.uk/

Scotland	*0.5 percent*
Central	*0.5 percent*
National	*14 percent*
Internal	*11 percent*

1.4.5. National Deaf Child and Adolescent Mental Health Service South West (NDCAMHS SW) submitted a detailed response to explain the situation in the South West, and illustrate how an uneven geographic spread of qualified interpreters affects the market, making the following points:

- Access to Work currently contributes to funds for the majority of communication support for deaf clinical staff. Clinical work that involves deaf young people with clinical staff who are hearing is funded by the NHS;

- NRCPD figures for February 2016 state that there are 66 registered interpreters in the South West. Of those, it is not possible to know how many have training and experience in working in mental health services, as there is no UK requirement for interpreters to undertake accredited or specified training post-qualification;

- The SW of England's geographical area means it is not feasible (time or cost) for interpreters living in at the extremities of the region, to regularly undertake work in the majority of the counties within this service. Even interpreters who live more centrally are unlikely to work on a frequent basis for the service, due to the demands of the work combined with long distances and travelling time often required;

- There are currently approximately 24 interpreters who regularly offer communication support to the service. Only one of these is based in Cornwall, and none are based further north than South Gloucestershire;

- The current model includes sourcing self-employed interpreters who are local to appointments, but this still regularly sees interpreters travelling in excess of 50 miles each way to attend;

- Sometimes the service is required to respond to urgent mental health needs of young people, and the need for interpreters to be booked at very short notice then becomes vital. This is very difficult to achieve consistently. In these circumstances, locally-based BSL specialist agencies are engaged to help source suitable interpreters, in addition to the usual pool;

- Use of local agencies ensures good practice is maintained, as the agencies understand the complex needs of the service and interpreters without suitable experience or skills are not engaged. This means significantly increased costs.

1.5. Estimated unmet and potential demand

1.5.1. AOHL suggests that it is difficult to estimate the level of unmet need given there is limited information on the entire market place. A survey of people with hearing loss in 2012[21] found that nearly seven out of ten (68 percent) of BSL users had asked for an interpreter for GP appointments but not been given one. Additionally, deaf people may be ignorant of their entitlement to support, and may not even ask for the support they should have.

1.5.2. A number of respondents highlight particular scenarios where communication professionals who are booked should be expected to have high level interpretation skills as well as specific knowledge in order to provide effective support:

[21] Ringham, L (2013), Access All Areas: A report into the experiences of people with hearing loss accessing healthcare, Action on Hearing Loss, London https://www.gov.uk/disabled-students-allowances-dsas/overview

- Higher education degree courses (such as art, law, accountancy);
- Business meetings;
- Law domains (specific legal knowledge and experience or court interpreting;
- Police/crime;
- Personal medical situations (consultations, appointments, etc.);
- Religious & Cultural settings;
- Conference /platform interpreting;
- Media interpreting;
- Specialist knowledge like foreign languages;
- Technical business meetings.

1.5.3. A number of contributors to the review feel that it can be difficult for Deaf people to ensure that an appropriate interpreter with relevant expertise is provided, e.g. in health settings, because hospitals and GP surgeries often do not understand what is required when booking a BSL interpreter.

1.5.4. Contributors point out that where Deaf people are not properly supported in medical situations there may be negative personal impacts for individuals as well as serious legal implications for healthcare providers[22]. The failure to use appropriately trained, qualified and registered BSL interpreters in medical/health settings may contravene the Care Quality Commission's Essential Standards of Quality and Safety outcomes 1, 2, 4 and 12 and the NHS Accessible Information Standard[23], which all organisations that provide NHS care or adult social care are now legally required to follow.

1.5.5. A number of respondents highlight particular groups of people whose needs may not be adequately met. For example, the submission by Association of Teachers of Lipreading to Adults (ATLA) proposes that the needs of deaf and

[22] http://www.cqc.org.uk/sites/default/files/documents/guidance_about_compliance_summary.pdf

[23] https://www.england.nhs.uk/ourwork/accessibleinfo/

hard of hearing people who prefer to use spoken language (the largest group within the estimated 11 million deaf and hard of hearing population[24]), are too often overlooked.

1.5.6. ATLA states that people who are deafened may wish to continue to use spoken English as their primary means of communication. Although a few may have an understanding of BSL or be in the process of learning it, in many cases it is unlikely to become their main form of communication.

1.5.7. Further, many deaf or hard of hearing people are completely unaware of the existence of Lipspeakers, Notetakers (manual and electronic) and speech to text reporters and how to obtain their services. Many service providers are also unaware of them, and think only in terms of BSL interpreters when attempting to address the communication needs of deaf or Hard of Hearing people.

1.5.8. ATLA also states that often service providers don't provide a way for Deaf people to request an interpreter, e.g. only providing a phone number to make an appointment. The NHS Accessible Information Standard, which also covers Adult Social Care Service providers, specifically requires that providers make available a wider range of ways of being contacted.

1.5.9. Further, for Deaf people who have BSL as their first language, who may have limited English literacy, letters may not be accessible, and so may not be understood. Again this is specifically required to be addressed in NHS and adult social care by the NHS Accessible Information Standard.

1.5.10. National Deaf Children's Society (NDCS) states that children with mild/moderate hearing loss often fall below the eligibility criteria for support from education services, which may mean there is some unmet demand for

[24] Action on Hearing Loss (2015), Hearing Matters, Action on Hearing Loss, London - https://www.actiononhearingloss.org.uk/supporting-you/policy-research-and-influencing/research/hearing-matters.aspx

further support in this area. This demand could be satisfied by better, more consistent use of hearing technologies but NDCS suggest that there may also be a need for more support from speech to text reporters or palantypists or other spoken language support systems such as Cued Speech.

1.5.11. NDCS cites research[25] by the Ear Foundation and Phonak which found that 52 percent of deaf young people aged 18 to 25 surveyed did not believe that they had sufficient information about communication support options available to them. Many stated that it was hard to access this information. 84 percent said there was no-one they could think to turn to for information about communication support in work. Organisations like the Ear Foundation and NDCS will be working to address these gaps in coming years.

1.5.12. Royal Association of Deaf People (RAD) proposes that for Deaf people to achieve full workplace participation, within reasonable cost constraints, they need to be empowered to choose from a more dynamic mix of support, including:

- Fully-qualified English/BSL interpreters to support communication at multi-person meetings, training events, formal/high level/external meetings;

- Pooled support. Where more than one Deaf person is employed, or attending the same training or conference, interpreters can be pooled for efficiency[26];

[25] http://www.earfoundation.org.uk/research/current-research/technology-and-communication-support-for-young-adults

[26] During the course of this Review, DWP became aware that some Deaf people think that, as awards are individual, pooling resources is specifically prohibited by Access to Work (AtW).

Pooled applications are not prohibited within AtW. However, there may be practical difficulties to pooling support if AtW advisers is not aware of overlapping applications where customers apply separately, or already have existing AtW awards in place.

To help overcome these difficulties, and to make an application for pooled support easier to manage, if an employer comes to Access to Work with a clear plan of what support is needed for each employee, and has 3rd party consent for each person, then the AtW can look at each customer's record and pooled support can be agreed.

- Communication support workers (CSWs) who have BSL to Level 3 or Level 6 BSL (but not necessarily an interpreter qualification). Suitably qualified and experienced CSWs can help with day-to-day interactions including translation and proofreading of written materials. A CSW (or interpreter) who works regularly with the same Deaf client or company is also able to develop industry or profession-specific vocabulary and knowledge, increasing the value of their support;

- Video interpreting for telephone calls on demand[27];

- Deaf Awareness training for employers and co-workers. Some basic training and tips can make workplaces much more Deaf-friendly and increase the likelihood of the Deaf person sustaining employment.

1.5.13. Individual respondents highlight a number of examples of unmet demand in public life:

- The lack of onscreen BSL translations for important politics-related television[28] programmes, such as Parliament, Question Time, etc.

- Shortfalls in the Arts. For example, accessible cinema screenings tend to take place in the middle of the working day[29], and only large theatre organisations can afford to caption their shows;

[27] See paragraph **3.3 Video Remote Interpreting (VRI) and Video Relay Services (VRS)** for more information

[28] Under the Communications Act 2003, certain television broadcasters licensed by Ofcom are required to provide a proportion of their programming with access services (subtitling, signing and audio description). Ofcom publishes an annual statement of broadcasters' performance in this field: https://www.ofcom.org.uk/research-and-data/accessibility-research/tv-access-2016

[29] *Accessible Screenings UK* is owned by and managed on behalf of the UK Cinema Association (UKCA), the trade body that represents well over 90 percent of UK cinema operators: http://accessiblescreeningsuk.co.uk/

- Dental and hospital appointments potentially postponed due to a lack of sign-language interpreters (whether this was due to local supply issues or failure to commission appropriate support) leaving communication support workers feeling they had to stand in, even though they were not qualified to interpret.

1.5.14. Respondents also contrast instances of public services that are good at ensuring that deaf peoples' needs are met with those that are less effective. For example:

- **Health.** A local hospital which consistently checks whether deaf patients will need BSL support for appointments compares well with a local GP who consistently does not;

- **Transport.** The information provided on screens in train carriages can be very useful, but is often not updated live when there are issues or problems, which may leave deaf people feeling vulnerable and uninformed when there are problems with services;

- **Education.** Where a child is a fluent BSL user, a skilled CSW working in a classroom may be able to facilitate basic levels of communication between pupil and teacher, but they are far less likely than a trained BSL Interpreter to be able to pick up and convey important nuances, thus reducing that child's ability to reach his/her full potential.

1.5.15. Some Deaf respondents highlight difficulties they've experienced in trying to get organisations to understand the forms of communication they can use:

- Commissioners who are unfamiliar with deaf people's needs may assume that deaf people primarily use BSL for their communications. In fact, people who become deaf later on in life, for example, may not have learned BSL;

- Deaf people who use BSL can find correspondence, including Government correspondence, difficult to understand - particularly if BSL is their first language. Similarly, service users who are hard of hearing may not be able to hear sufficiently on a standard telephone.

1.5.16. The Association of Notetakers reports that verbatim recording used by STTRs may be inappropriate or not at all helpful for the client in some circumstances, for example:

- Where the client's reading speed cannot keep pace with the speed speech is delivered;

- Where the client only requires notes or summary;

- Where the client does not have the understanding or cognitive ability to access the technical language or level of language used.

1.5.17. The CRIDE survey for England in 2014[30] asked what provision was available in each area to support the development of BSL in deaf children and found indications of sizeable gaps in each area – for example, over half of local authorities did not provide designated sign language lessons for families or deaf children.

1.5.18. In 2011, National Deaf Children's Society (NDCS) carried out a telephone survey of local authorities to investigate the level of provision of sign language support for families with deaf children. 80 councils – picked at random - were contacted. Of the 70 LAs that responded:

- 39 councils (56 percent) did not provide any services or support for parents of deaf children wanting to learn sign language;

[30] CRIDE survey of educational provision for deaf children, http://www.ndcs.org.uk/professional_support/national_data/cride.html

- 31 (44 percent) stated that they made some form of provision of support or services for families wanting to learn sign language. However, the level of support varied considerably between councils and it is clear that not all families can rely on ready access to family-friendly sign language classes.

1.5.19. The variations reported in the NDCS survey include (with some councils offering more than one option):

- 24 councils (34 percent) provided support within the home. This support varied between being taught very basic signs to having 6 week sessions. Many councils confirmed that families have to request this service;

- 14 councils (20 percent) provide classes for parents. These vary from baby signing, toddlers and under 10s, and are held weekly, fortnightly or monthly;

- 5 councils (7 percent) provide support through specialist resource bases for deaf children within mainstream schools;

- 4 councils (6 percent) fund the cost of British Sign Language level 1 free of charge to parents. However, in one council, parents would need to pay for the assessment.

1.5.20. In some instances where respondents to this review detail specific examples of unmet demand, there are services available. This suggests that awareness or understanding of some services may be an issue. For example, Deafinite[31] explains that many members of the Deaf community are still unaware of Access to Work support. Even among those who do know about ATW, some elements of the scheme are not understood. For example; some advisors and Deaf people are simply unaware of how to arrange Access to Work support for job interviews, or find the ATW systems too complex and time consuming. However, Access to Work can support job interviews and

[31] Deafinite is an interpreting agency based in the southwest: http://www.deafiniteinterpreters.co.uk/

encourages people who need such support to contact them direct[32] as early as possible, as award agreements can be fast tracked in urgent situations.

1.5.21. Respondents generally felt that demand for different methods of communication was high and that instances of unmet demand were common. The 2002 Durham Review reached similar conclusions, which may indicate that this imbalance is not a new phenomenon in the market. However, there is no single universal metric for either the volume of demand or the scale of unmet demand and government has no provision to measure these. Accurate historical comparisons are not readily available and the facility to develop these is outside the remit of this review.

[32] Contact information for Access to Work can be found here: https://www.gov.uk/access-to-work/apply.
Access to work has recently introduced both online and Video Relay Service application channels in addition to the traditional paper/telephony route.

Supply

Chapter summary

A number of submissions expressed the view that there is an insufficient pool of professionals working in the communication support sector, with some suggesting that this could be due to the expense of training and accreditation. Many highlighted situations from the perspectives of both service users and service providers in which inappropriate support was commissioned or supplied.

Contributors listed a number of registration bodies, but many felt that coverage of the interpretation and communication market was not comprehensive. It was recognised that for various reasons not every person working in the field is registered.

A number of respondents felt the route to qualifications, training and registration was not as clear as it should be and that, consequently, the supply of professionals supporting deaf people is far too low.

Many interpreters felt that agencies are constantly trying to try to drive down fees and costs, ask qualified interpreters to cover more of their travel costs and do not build personal relationships with interpreter or local deaf communities. Many express concerns that the current structure of the interpreting market is dissuading younger people from entering the sign language profession. There a degree of tension in the market, with some boycotts of some agencies (i.e. interpreters and deaf people refusing to accept work via certain agencies).

2.1. What type and number of communication and language professionals are there nationally?

2.1.1. According to the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD), in 2015 in the UK there were:

- 908 registered SLIs;
- 234 trainee SLIs and
- 11 registered sign language translators.

2.1.2. According to the Scottish Association of Sign Language Interpreters (SASLI), in Scotland there are[33]:

- 66 registered SLIs;
- 9 trainee SLIs and

2.1.3. 2 Deafblind Manual Interpreters.

2.1.4. The National Union of British Sign Language Interpreters (NUBSLI) explains that interpreting and translating are incorrectly used as interchangeable terms. However, they relate to different activities, skills and competencies:

- **Interpreting** means working between languages as they are spoken or signed, e.g. a Deaf Occupational Therapist meeting with a hearing patient.
- **Translating** means working to and from languages that are recorded, e.g. from an English autocue to recorded BSL for the news.

2.1.5. Interpreters as part of their work, particularly in employment will often do 'sight translation' and/or short pieces of translation between BSL and written English. An example of sight translation would be translating an email with a Deaf BSL user, i.e. working from written English to live BSL. Sight translation and translation require Level 6 fluency and skills (e.g. Level 6 NVQ Diploma in Sign Language Interpreting, unit INT6E1, Support sign language interpreting through sight translations of routine written documents).

2.2. What registration bodies are there?

NRCPD (National Register of Communication Professionals for the Deaf)

[33] Interpreters in Scotland may be registered with SASLI and / or NRCPD.

2.2.1. The NRCPD was established on 1 January 2009 as a single voluntary[34] registration body with common policies and professional standards for a range of disciplines. For example, in order to register with the NRCPD:

- Registered Sign Language Interpreters must have a minimum of level 6 (equivalent to honours degree) in both language and interpreting;

- Registered Sign Language Translators must have a minimum of level 6 in their second language and translating;

- Registered Interpreters for Deafblind People must have a minimum of level 3 in Deafblind manual interpreting;

- Registered Lipspeakers must have a minimum of level 3 in lipspeaking;

- Registered Notetakers must have a minimum of level 2 in notetaking (although Signature and NRCPD are working to raise this to Level 3).

SASLI (Scottish Association of Sign Language Interpreters)

2.2.2. SASLI is the only voluntary Registering and Membership body based in Scotland[35] for BSL/English Interpreters, Deafblind Manual Interpreters and Guide Communicators[36]. SASLI Registered and Trainee Members are subject to SASLI's Complaints Policy and Procedure, and are required to abide by:

- SASLI's Code of Conduct and Professional Practice Policy, and

- SASLI's Continuing Professional Development Policy.

[34] Although NRCPD is currently a voluntary regulator, it supports statutory regulation of communication and language professionals.
[35] Although NRCPD registration still covers interpreters who work across the UK, including Scotland

[36] Ibid

2.2.3. Lipspeakers, Speech-To-Text-Reporters and Notetakers who register can only register with the NRCPD regardless of where they practice.

ANP (Association of Notetaking Professionals)

2.2.4. The ANP is a voluntary register for Notetakers. Professionals who sign up for membership hold a Level 2 or Level 3 qualification The ANP register currently holds 46 notetaking professionals, some of whom are also on the NRCPD register. These Notetakers will work with a variety of clients, including D/deaf/hearing loss. The highest qualification available at present is Level 3.

2.3. Other professional bodies

ASLI (Association of Sign language Interpreters)[37]

2.3.1. ASLI is a membership organisation that works to:

- promote the raising and maintenance of standards in interpreting,
- encourage training and other initiatives,
- provide information for interpreters and consumers,
- promote research into areas of relevance to interpreters or interpreting services
- advise and cooperate with others interested in sign language interpreting
- ASLI also offers members opportunities for continuous professional development (CPD) and mentoring.

Visual Language Professionals (VLP)

2.3.2. VLP is a professional association which represents communication professionals whose working languages are English and British Sign

[37] https://www.asli.org.uk/about/

Language (BSL). VLP was established in 2010 for British Sign Language interpreters to support each other on a local and national basis and encourage good practice. It has since expanded its membership to include other fully qualified communication professionals who work with deaf people: Deafblind communicators, BSL/English Translators and Lipspeakers.

CSAUK (Cued Speech Association UK)

2.3.3. The CSAUK is a specialist body that focuses on Cued Speech practitioners. CSAUK recommends that practitioners have Level Two proficiency in Cued Speech, based on the CSAUK written Code of Practice for Cued Speech Transliterators (CSTs). CSAUK lacks the resources to take forward formal registration, but estimates that there are between 6 and 10 CSTs working intermittently as CSTs in the UK.

ADEPT (**Association of Deaf Educational Professionals and Trainees)**

2.3.4. There is no national registration body for CSWs. ADEPT[38] provides a Code of Practice[39], which details the qualifications that ADEPT feels should be expected of a CSW and is available free of charge from ADEPT's website. ADEPT believes there should be a national registration system for CSWs. ADEPT's submission offers a simplified summary of the differences between a CSW and an SLI.

- In order to become a qualified CSW, an individual should achieve BSL Levels 1, 2 & 3, Level 2 in English and have attended a recognised Level 3 professional course at a minimum. The shortest length of time to do this is 4 years.

[38] ADEPT is a collaboration between NATED (The National Association for Tertiary Education for the Deaf) and ACSW (The Association of Communication Support Workers). More information can be found here: http://adeptuk.co.uk/

[39] http://adeptuk.co.uk/DDT_ShowEntry_documents?GalleryName=Adept_Documents&EntryID=983&ImageSeqNo=1

- To be a qualified sign language interpreter, an individual needs to have Level 3 in English, BSL Level 6 and have attended a recognised professional interpreting course, one option being a degree course. The minimum length of time to do this is 6 years.

2.3.5. National Association of Deafened People (NADP) noted that since 2011 there has been no significant growth in NRCPD registration of interpreters who offer support in English i.e. Lip speakers, Speech to Text Reporters (STTR), Manual and Electronic note takers, Interpreters for the Deafblind.

2.3.6. AOHL supports registration for many reasons, including assurance for users that registered communication professionals have reached the national agreed level of qualification. AOHL also points out that the lists held by NRCPD are not comprehensive; there is an unknown number of professionals who are not registered for a variety of reasons, including:

- They have the qualifications which are suitable but choose not to register;
- They don't have the correct qualifications but still work in the field, or;
- They are working in a role where there is no registration category, such as Communication Support Workers and Deaf Relay Interpreters[40.]

2.3.7. Individual contributors list a number of registration bodies, but some feel that coverage of the whole interpretation and communication market was less than comprehensive, as not every person working in the field is registered. Several responses call for a national body to monitor registration.

[40] Deaf Relays are experienced Deaf people who work alongside BSL interpreters to support people who are Deaf and have a specific language need due to a disability or not being a native BSL user.

2.3.8. A number of respondents suggested that the market is becoming more focused on profit than on the best interests of deaf people or people with hearing loss and feel that stricter regulation would help to tackle this issue.

2.3.9. There are clear definitions for the roles of sign language interpreters, notetakers and lipspeakers, set by the National Register for Communication Professionals for Deaf people (NRCPD). There is no legal requirement for people to register with this registration body.

2.3.10. Some interpreters dual register with both NRCPD and SASLI for different work in England and Scotland.

2.3.11. City Lit, a London-based adult education learning provider, states that language and communication professionals' employment status may vary from self-employed/freelance to employed. They may be employed by an agency or within an organisation. Interpreters undertaking work in religious settings (church services, funeral, pastoral appointments, religious conferences) may provide their services voluntarily and be contacted through charitable organisations or e-groups.

2.4. How do agencies affect the market?

2.4.1. A number of individual respondents state that the growth of interpretation agencies has changed the market. One retired BSLI contrasts their experience of the market in the '90s with the present day:

- In 1994, most third party bookings came via one of the two national deaf organisations (BDA & RNID) or local/regional deaf organisations.

- Now, there are hundreds of entities booking BSL interpreters for 3rd parties and large multi-language agencies dominate public service contracts for health, policing, local public services, central government, legal meetings, etc.

2.4.2. This individual also makes a point echoed by a range of other submissions: that multi-language agencies may not understand the specialist nature of BSL interpretation and in particular may not understand the different needs of people in the Deaf Community and the differences between the services provided by, say, interpreters and communication support workers.

2.4.3. The smaller agencies generally will know the interpreters who work with them, their experience, specialist skills, etc. and match them on that basis with the needs of the specific customer and assignment. They will often approach particular interpreters if they think they are the most appropriate for that booking, and will wait to book the most appropriate interpreter who that is available. Having a direct relationship with the interpreter, they will then ensure that they have full and accurate information about the assignment. Where a request seems inappropriate, e.g. with insufficient information provided, or just one interpreter requested where two are needed, the agency will discuss this with the booker.

2.4.4. The larger agencies instead increasingly use software to match interpreters with assignments, based on broad criteria agreed with the customer, not unlike automatic dating software. An interpreter who replies to an agency email with a booking, who meets those broad criteria, will then be automatically assigned, based on fastest and/or cheapest response. Where there is human involvement in the process, it is often to admin check the process, rather than ensure that the most appropriate interpreter available is allocated. As the booking is essentially unseen, the agency usually won't offer advice to the booker, whether or not what they've requested is appropriate.

2.4.5. Nottinghamshire Deaf Society's submission discusses the pros and cons of booking support services through agencies, advising there are many ways in which specialist agencies can deliver a good service for Deaf employees, such as:

- offering a range of communication professionals to meet individual needs;

- providing cover if the assigned interpreter is off sick/on annual leave;

- assuming some of the burden of the administration processes required by Access to Work; and

- improving the efficacy of the Deaf employee, as less of their time is spent sourcing interpreters.

2.4.6. However, some of the negative aspects of using an agency include:

- the addition of the agencies' fees into the supply chain increases the expense of booking an interpreter while potentially depressing interpreters' earning capability;

- non-specialist agencies often supply unqualified and unregistered CSWs/signers; and

- the Deaf client's choice of interpreter is restricted to the agency team.

2.4.7. A number of common themes emerged in responses submitted by individuals, including freelance BSL interpreters, and advocacy groups:

- Many deaf professionals book interpreters directly so that they can maximise their budgets, but also to ensure they get to work with an appropriate interpreter with sufficient knowledge of their work, and suitable skills and experience, to be effective in interpreting for them.

- Deaf professionals may build up an informal 'team' of individual freelance interpreters, with the appropriate knowledge and skills, who they call on as appropriate on a regular basis. In some circumstances, inflexibilities in funding arrangements may make such 'teams' harder to maintain, particularly in instances where costs like traveling time vary between interpreters.

- Booking through an agency can be more expensive and may not guarantee that the user will work with an interpreter with whom they are comfortable or who is adequately skilled.

- There are instances of certain agencies winning contracts to supply BSL support, but offering unrealistically low rates of pay that professional interpreters cannot afford to accept. Interpreters' codes of conduct inhibit them from revealing details of agency costs, but anecdotal evidence suggests that an agency's mark-up on an interpreter's fee typically varies between 50 percent to 200 percent and that, as part of the drive to maximise profit, some agencies source and provide cheaper unqualified signers instead of appropriately qualified interpreters.

- One respondent gave the example of an agency, contracted to provide BSL interpreters to a city healthcare trust, which charges the trust £500 per appointment but pays the BSL interpreter around £90-£125.

- Many respondents feel that high agency fees have led to a misconception that BSL interpreters are overly expensive.

2.4.8. Some interpreters may be reluctant to accept work through larger agencies, because:

- larger agencies usually only have one payment run per month, or every six weeks, whereas industry standard invoice terms for interpreters tend to be between 28-31 days after submission; and

- larger agencies often don't understand the BSL/English interpreter training route and sometimes book people who only know introductory level sign language. Professional interpreters will avoid such bookings because of the professional and reputational risks of participating in the provision of sub-standard service.

2.4.9. Interpreters may favour smaller, more specialised agencies, because:

- users can establish a more personal working relationship with smaller ‘niche’ agencies that have an understanding of the client’s needs, as well as the interpreter’s skills and abilities. This relationship puts such agencies in a better position to place the most appropriate interpreter in to an assignment; and,

- smaller agencies have a wider knowledge of industry standard fees and will usually bid for jobs accordingly, meaning that both businesses remain sustainable.

2.4.10. However, a number of interpreters’ submissions outline how larger agencies are increasingly dominating the market. In recent years, many contracts have been picked up by large agencies which then sub-contract the work to smaller agencies or individual interpreters. The prime contractor will often charging commissioning organisations high fees to book interpreters, while at the same time pressurising its supply chain to accept reduced fees. This can mean that interpreters are expected to take a cut in their rates.

2.4.11. One consequence of the market’s shift towards larger agencies is that interpreters have to undertake more work to maintain their income level, because they cannot invoice for the full value of their work and expenses. However, there is a limit to the amount of ‘extra work’ a sign language interpreter can take on and sustain. For example, while a health appointment may be booked for one hour at 10am, such bookings often start late and overrun. Interpreters who try to schedule a number of bookings in one day risk having to choose between leaving Deaf individuals without support when a meeting runs late, or arrive late at the next booking. In addition, Interpreters can be prone to injury from repetitive strain. An interpreter who is physically and mentally tired or injured cannot give a good service and they cannot continue to earn.

2.4.12. Respondents express concern that national Framework agreements will result in a further channelling of public funds to large organisations, since smaller SMEs may not be able to meet Framework requirements.

2.4.13. Respondents accept that it may be easier for a Deaf service user to go through an agency to secure the services of an interpreter. However, many express concern that freelance BSL fees have not changed for nearly 10 years, but agencies continually challenge these fees. One respondent describes the situation as a dichotomy where the interpreter has the cost of keeping skills up to date (as well as registration and insurance costs), while the market requires greater numbers of highly skilled interpreters, but is increasingly structured to pay less to interpreters. This in turn risks creating a market where the most appropriate support, by a skilled, qualified and experienced interpreter, is priced out in favour of a less appropriate, but cheaper, option.

2.4.14. Contributions from a number of freelance registered interpreters suggest that even the best of the private agencies add little value to interpreters in return for their booking fee. They do not offer training, supervision, sickness cover, etc.

2.4.15. There are groups which provide support, supervision and development opportunities (such as ASLI, VLP and ADEPT) but by necessity on a piecemeal and extemporised basis and only for those who can afford it.

2.4.16. Signature requires Continuous Professional Development (CPD) checked through a sampling exercise, but does not support qualified interpreters' development beyond this.

2.4.17. Most good quality, fully-qualified, experienced, full-time interpreters will accept a fee of around £250 to work a full-day in London and the South, [date] which equates to around £35 per hour for a 7-hour day (9-5 excluding an hour for lunch and excluding travel expenses), whereas an agency will often charge £300 to £500 for one interpreter for one full day. On the other hand,

there is a handful of reputable BSL specialist agencies who have built up specific knowledge and expertise about working with service users and BSL interpreters.

2.4.18. One freelance interpreter explains that their gross annual earnings are generally around £27,000[41]. Out of this, they cover all their self-employment costs – pension contributions, professional fees (accountant, ASLI membership, registration fees to the NRCPD), cost of running and replacing a car, tax, NI, training and Continual Professional Development costs, etc. Consequently, their net annual income is considerably lower than the gross figure.

2.4.19. Many interpreters feel that an 'average' salary does not compensate for the academic and training requirements of a sign language interpreter. For example, all qualified sign language interpreters hold post-graduate level qualifications as the industry standard basic. Many also hold additional graduate and post-graduate level qualifications. The time taken to train as a sign language interpreter is significant – approximately 7-8 years. The total costs associated with training are averaged at least £10,000. These costs could increase by an additional £10,000 depending on whether the interpreter also has a relevant undergraduate degree.

2.4.20. A survey conducted by Visual Language Professionals (VLP)[42] suggests that the majority of professionals accept bookings either directly from clients or through specialist BSL agencies with only 4 percent accepting the majority of their work through non specialist spoken language agencies. VLP's submission suggests this is because non-specialist agencies do not have an understanding of how English/BSL Interpreters work or the needs of the deaf community.

[41] Just below the national average earning level: https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours

[42] http://www.vlp.org.uk/

2.4.21. It also questioned the quality of the service monitoring that is carried out. VLP suggest that in recent years there has been an increase in the number of government contracts for the provision of communication services for service users being awarded to the ‘one stop shop’ non-specialist agencies which has had a negative impact on the remuneration of the profession, with the biggest challenge being an erosion of working terms and conditions. VLP states that the profession has seen fees either remain the same or reduced in recent years. VLP's survey shows that 67 percent of respondents confirm this and 50 percent of respondents already have or are considering a second income.

2.4.22. Users say that, when booking through an agency they trust, they are confident that the interpreters are appropriately trained; monitored to abide by professional standards; and supported in their role. One user stated that the agency they use guarantees quality and also continuity of personnel. One of the advantages of using a trusted agency is that cover can be provided for contingencies like unexpected unavailability of an interpreter due to sickness, etc.

2.4.23. A number of Deaf people submitted evidence highlighting key risks with regard to larger agencies:

- If the agency pays significantly below market rates, or has lower terms and conditions, many of the experienced qualified interpreters will not accept those rates and will no longer be available to deaf professionals.

- Interpreters who will accept lower rates are likely to be less experienced, e.g. trainees, who would not be suitable for the work of the deaf professional.

- Booking through an agency may not allow a Deaf professional to book the appropriate interpreters for a specific assignment, whereas booking freelance interpreters direct may allow the service user to check the skills and experience of the interpreter first.

- The quality of BSL Interpreters provided by agencies varies a great deal.

2.4.24. One interpreter submitted an example of good practice by a large commissioning organisation:

- The Patient Advice and Liaison Service (PALS) department at an NHS Foundation Trust books local registered and qualified interpreters directly with a minimum 2 hour fee.

- Travel is paid at 45 pence per mile and car parking tickets are validated.

- The hospital has worked hard on raising awareness of the service, creating and distributing new posters, posting bulletins on the hospital intranet and providing training on how to book a BSL interpreter through the PALS department to staff in all departments.

2.4.25. The Scottish Association of Sign Language Interpreters (SASLI)[43] carried out an online survey of its membership to inform its response to this review. Findings from the survey include the following points:

- There are over 200 agencies that book BSL/English interpreters.

- Some agencies are specialist and knowledgeable about BSL and the deaf community, and are thereby able to match appropriately skilled interpreters to different work domains.

- Other agencies are less informed and may send insufficiently or inappropriately trained personnel to assignments where miscommunication have the potential to create detrimental impacts on service users´ lives.

[43] Scottish Association of Sign Language Interpreters (SASLI) is a professional body for BSL/ English interpreters, trainee sign language interpreters, deafblind manual interpreters, guide communicators and agencies providing communication support services, and voluntary regulatory body.

- Good agencies understand and respect their clients and the profession, providing a consistently high standard of service to service users and interpreters. Such agencies ensure they ask appropriate and necessary questions to ascertain what the booking entails, enabling them to fulfil the booking with an interpreter who can meet the service user's needs.

- Conversely, less knowledgeable agencies try to fill booking requests with minimal information, and with no commitment to ensure sufficient preparation is provided to interpreters.

- Agencies will always have a role to play in the wider market; they are invaluable for purchasers who are not sure of their interpreting requirements and/or need to book someone at short notice. There will always be a premium to these bookings because of the administration fee charged by the agency and service users managing their own bookings will have to handle to associated administration involved either eating into their working day or their own time.

- A further observation made was that in recent years, there has been a significant increase in spoken language agencies adding BSL to the list of the languages they are able to provide interpreters for. Seeing the same job re-advertised a few days later via a smaller 'niche' agency could imply that interpreters are mostly not accepting working through larger agencies. In their experience, most deaf professionals book interpreters directly to maximise their AtW budget, but also to secure a preferred interpreter.

2.4.26. Respondents such as NUBSLI (National Union of BSL Interpreters) and DeafATW[44] question the standard of a number of brief online training resources offered by some language agencies that purport to 'qualify' interpreters in specific domains such as child protection and legal interpreting.

[44] DeafATW is a website which supports Deaf and disabled people with Access to Work related problems.

Some of these online 'courses' take no more than 15 minutes to complete, and respondents express the view that they are not adequate to 'qualify' interpreters in specialist domains, existing merely to meet the letter, if not the spirit, of contracting frameworks requirements.

2.4.27. The Crown Commercial Service Framework Agreement for the provision of Language Services[45] requires that all suppliers' staff and Linguists possess the qualifications and competence appropriate to the tasks for which they are employed and comply with all aspects of the NRCPD Code of Conduct or the SASLI Code of Conduct or equivalents as specified by the organisations contracting for interpretation services. The Framework also stipulates that suppliers' staff and Linguists possess the qualifications and competence appropriate to the tasks for which they are employed and that the Supplier must within five working days provide details of the qualifications and competence of any person employed, contracted or proposed to be employed or contracted when requested by a contracting organisation.

2.5. Rates charged including agency fees

2.5.1. NUBSLI provides indicative guidance on fees that interpreters are likely to charge[46]. Agency rates vary according to the agency.

2.5.2. City Lit state that BSL interpreters and other LSPs working freelance usually set their own fees. Typically there is a minimum fee to cover bookings up to 3 hours in length. Some interpreters have a fixed fee based on half-day and full-day. Some charge VAT, some don't. Some add travel expenses, others include this in their total fee. City Lit say that, in London, most fully-qualified interpreters charge a minimum of around £135 per booking (for half a day) at the time of this Call for Evidence.

[45] This Framework is available to public sector organisations to provide Language Services throughout the United Kingdom http://ccs-agreements.cabinetoffice.gov.uk/contracts/rm1092

[46] http://www.nubsli.com/guidance/interpreter-fees/

2.5.3. A number of individual respondents, described situations where a national contract is held with an interpreting agency for the supply of qualified interpreters, but the provider sub-contracts the work to local interpreters at a greater cost to the commissioning organisation than might have been incurred if the booking had been made direct with the interpreter. For example:

- Agency fees for 2 interpreters for a one hour meeting can be as much as £300, plus travelling costs, often with an admin fee of £25 upwards.

- On the other hand, a local organisation can realise savings by only booking local registered and qualified interpreters direct and offering a minimum 2 hour fee, with travel paid at an agreed rate per mile.

2.5.4. A number of interpreters and users submitted evidence that there is a recent trend in real terms reductions to the fees that qualified, experienced and registered Sign Language Interpreters could command. For example:

- One Interpreter described how, up until 2009, they charged an hourly rate of £25 with a 3 hour minimum booking period. Following a career break, this individual returned to work and raised their hourly charge to £30. However, they could no longer find agencies who operate a 3 hour minimum booking period, instead most agencies offer a 2 hour minimum. In practical terms, taking account of travel to assignments, this means that the individual's daily earning potential can be as low as £60 plus travel expenses.

- Another Interpreter explained that, although their fees have not changed since they qualified ten years ago, recently they are increasingly being pressed by interpretation booking agencies to reduce them. Along with the caps on travel costs which some agencies have introduced, the cumulative effect has been a reduction of 15 percent in this individual's net earnings.

- A number of contributors attributed some of the downward pressure on Interpreters' fees to the criteria used by Access to Work to assess

applications for awards. One contributor explained that the public sector standard ‘Three Quotes’ system used by ATW to achieve value for money in its distribution of public finds means that Deaf people have to spend too much of their time trying to contact interpreters that fit within their ATW budget, and sometimes resort to booking cheaper but less qualified (or even unqualified) support. In evidence submitted to this review, officials from the Access to Work policy team have confirmed that the Government wishes to support a healthy market for interpreters and intends to explore whether other commercial solutions may achieve better value for money for the scheme.

2.6. The Crown Commercial Service (CCS) Language Services framework

2.6.1. The CCS has established a Framework Agreement for the provision of Language Services including BSL, Written Translation, Transcription and Ancillary Services; and Telephone Interpreting and Video Language Services. The current Framework Agreement runs from April 2016 to April 2017 and is available to public sector organisations to provide Language Services throughout the United Kingdom.

2.6.2. Public Sector organisations are not mandated to use the Framework, but any large contracts procured outside the Framework require sign off by the Minster for the Cabinet Office.

2.6.3. The Framework is structured to set minimum standards for suppliers’ staff and interpreters while still offering a contracting organisation flexibility and choice. It spans a wide and diverse range of public sector organisations, with a customer base covering a variety of specialisms, including: criminal justice procedures, legal, medical and medical trauma, pharmaceutical, financial, IT, media, children, mental health, transportation, engineering, procurement, marketing, housing, benefits, immigration, defence, security, technical and government (central and local). If a public body conducts a further competition within the framework then it can amend the specification for its particular needs.

2.6.4. The Framework is weighted towards quality of service over price, with a quality/price ration of 70/30 for suppliers.

2.6.5. CCS acknowledges that there are concerns among interpreters about the effect that the Framework may have on their fee levels and told this review that any interpreters who believe they are being paid less than the market rate by a CCS supplier should contact the CCS Customer Service Desk on info@crowncommercial.gov.uk.

2.6.6. On the CCS's previous framework, RM738 - Face-to-Face Interpreting Services, reported annual spend on BSL was as follows:

2012/13 - £234,060
2013/14 - £612,149
2014/15 - £670,899
2015/16 - £505,186
2016/17 - £371,178
2017/18 – (as of May 2017) £37,176

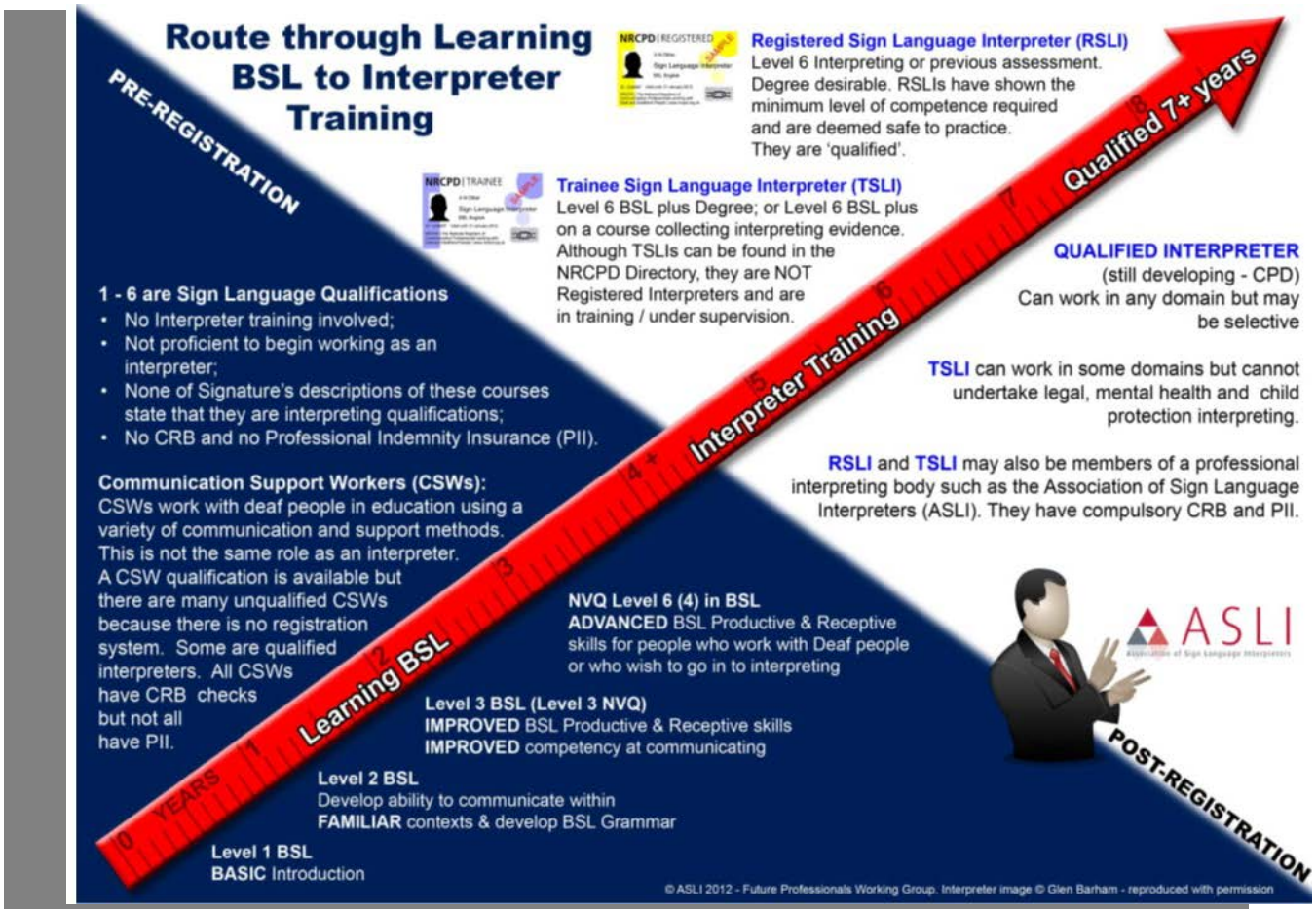
2.6.7. BSL spend so far on the current Framework is recorded as follows:

2016/17 - £38, 317
2017/18 (as at May 2017) - £23,334

2.6.8. The impact of the framework on the market is difficult to assess. CCS's view is that increasing use of VRS reduces Framework BSL volumes and spend. However, CCS does not hold data for annual volumes of bookings in each year. The number of invoices issued by a supplier is reported to CCS. Individual invoices may be for a specific period of time, or a specific number of interpreters, but not necessarily for individual bookings.

2.7. Educational routes and the numbers currently in training

ASLI supplied this graphic representation of the route form learning BSL to becoming a Registered SLI.



2.7.1. At Entry Level to Level 2 there are a range of qualifications that are eligible for funding through the Adult Education Budget as part of local flexibilities. These qualifications cover BSL, Irish Sign Language and Deafblind communication.

2.7.2. At Level 3, Level 4 and Level 6 there are a range of qualifications that a learner aged 19 and above can undertake by taking out Advanced Learner Loans. These qualifications cover advanced BSL skills, advanced Irish Sign Language skills, communication support for deaf learners, sign language interpreting and sign language translation.

2.7.3. City Lit's submission states that there is currently no clear route to becoming a registered manual or electronic notetaker. There is a register of Notetakers held by NRCPD but there are very few on the register as NRCPD don't recognise any current qualification as a proxy for the Signature qualification (which has been discontinued). Up until now Notetakers were qualified either through the OCNL (Open College Network London) qualifications or through AQA (Assessment and Qualifications Alliance, an awarding body in England, Wales and Northern Ireland). These concerns are echoed by individual respondents as well.

2.7.4. City Lit also explain that NRCPD have a register of Level 3 Lipspeakers. Many CSWs have had basic training in lipspeaking through completion of the Signature Level 3 Communication Support Worker course. The 'clear speech and notetaking skills' unit provides basic information on this form of communication access provision, but does not entitle someone to register as a lipspeaker or work in this professional capacity.

2.7.5. A service provider working as an STTR expresses concern about the limited availability of NRCPD-registered STTRs which they feel was due to there not being any scheduled courses for stenographers or Palantypists and training on a shorthand machine being only accessible via distance learning. They suggest that prospective learners have to 'discover the profession' and have to invest in software and equipment without knowing they have the skills to be a stenographer.

2.7.6. Signature's evidence states that City Lit went through a major restructure due to cuts in government funding. The entire communication professional training programme was cut. In addition, funding for adult education is being cut at the local level. For example, in 2015 Adult Community Learning Essex withdrew funding for BSL level 1 and 2 courses due to a significant reduction in Adult Skills Budget funding from the Skills Funding Agency.

2.7.7. Signature cites data from the National Aims Report 2005/06 to 2013/1447, published by the Skills Funding Agency, showing that in 2005/6, 19,160 learners who received government funding for further education achieved a qualification in sign language (from entry level to level 3). That dropped to:

16,300 in 2006/7;

12,580 in 2007/8;

11,170 in 2008/9;

10,840 in 2009/10;

6,850 in 2010/11;

6,230 in 2011/12; and

6,070 in 2012/13 - an average fall of almost 17 percent a year. Between 2012/13 and 2013/14 there was a 25 percent fall to 4,610.

2.7.8. Signature also reports that there has been a consistent and significant drop in candidates for entry level Signature qualifications in recent years. For example, in 2011 they had had 9,672 candidates for BSL level 1. That figure dropped to 8,752 in 2012, 7,658 in 2013 and 6,366 in 2014. The fall in the number of people taking up and completing entry level qualifications in BSL

[47] The National Aims Report 2005/06 to 2013/14, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/515248/feandskills-national-aims-report-1415.xls

will translate into fewer people progressing to a sign language interpreting qualification. Currently only around 26 qualify each year.

2.7.9. Signature supplied the table below to illustrate recent trends in NRCPD registrations. Although not all communication professionals register with NRCPD, Signature feels that these figures are indicative of the proportions of individuals within the profession.

NRCPD Registrations 2009-15

	Dec-09	**Dec-10**	**Dec-11**	**Dec-12**	**Dec-13**	**Dec-14**	**Dec-15**
Interpreters for Deafblind people	20	20	19	17	15	18	15
Lipspeakers	43	40	36	42	37	30	30
Notetakers	28	29	26	23	23	21	19
Sign language interpreters	536	639	714	773	869	881	940
Sign language translator	0	0	0	4	9	13	13
Speech to text reporters	21	22	26	25	25	23	25
Trainee sign language interpreters	223	233	266	248	238	224	224
Trainee sign language translator	0	0	0	0	0	3	3
Total	**871**	**983**	**1087**	**1132**	**1216**	**1213**	**1269**

2.8. The crossover between support workers employed in education and the 'adult' world

2.8.1. Submissions suggested that there were different views on the role of a Communication Support Worker.

2.8.2. National Deaf Children's Society's submission explains that, in an education context, a Communication Support Worker is an education professional

tasked with providing flexible support to a child or young person who needs support to access the curriculum. This support could be provided in a range of ways including signing, lipspeaking or notetaking, depending on the individual needs of the child.

2.8.3. The level of BSL support provided must match the needs of individual deaf children. Respondents felt that, where a deaf child is a fluent BSL user, Trainee SLIs and RSLIs ideally should not be used in Primary and Secondary Education. CSWs who are not SLI are likely to have little or no skill in processing information from spoken English into BSL, putting a fluent BSL Deaf student at a disadvantage.

2.8.4. Many submissions state that CSWs are increasingly being used in the workplace. The role is similar: they support deaf workers to communicate with their colleagues. The support CSWs provide may include some interpreting, help with emails and reports, and notetaking at meetings. ASLI proposes that Access to Work funding should only be agreed for registered interpreters, and that CSWs should not be recommended as a cheaper option. However, evidence submitted to this review outlines some circumstances in which a CSW's support may be an appropriate option for customer – for example, proofing emails or ad hoc informal communication. There are simply not enough interpreters available 'for instant on demand' use by deaf employees. In addition, some customers are comfortable working with particular individuals who, although less qualified (or even unqualified) provide a low-level service that might not be funded but for ATW. However, it is important to note that there is no minimum English qualification or skills required to be a CSW.

2.8.5. On the other hand, NUBSLI's submission expressed the view that this kind of use of CSWs demonstrates a misunderstanding of the degree of skills required to do such work adequately, which in turn results in qualified interpreters becoming devalued within the market. Translation to the standard required for the public domain takes considerable time and expertise and NUBSLI states that it has received feedback from Deaf users that AtW

advisers do not always appear to take this into account when awarding support. However, the ATW policy team has submitted evidence to his review stating that it recently made changes to ATW guidance, written with the help of interpreters, to aide advisers' understanding of what support may typically be appropriate for certain settings and what would be likely to be unsuitable.

2.8.6. A number of respondents explained that it is not unusual for a qualified sign language interpreter to work in the Further or Higher Education sector in a role that commissioners may describe as a Communication Support Worker.

2.8.7. The CRIDE (Consortium for Research into Deaf Education) survey asks about numbers of specialist staff, other than Teachers of the Deaf. Numbers are usually expressed as 'full-time equivalent' (i.e. someone working part-time would be recorded as 0.5 FTE). In 2015, CRIDE found that there were around 424 communication support workers across the UK. The majority were from England. Education authority regions in Northern Ireland did not report having any CSWs and Wales only reported having 7.2 CSWs[48].

2.8.8. National Deaf Children's Society (NDCS) regard a communication support worker as a type of specialist teaching assistant, stating that, in education, communication support workers are not sign language interpreters, as they do more than just interpret what the teacher is saying – they provide additional support to access the curriculum.

2.8.9. NDCS states in its evidence that there is a need for a further qualification to provide assurance that communication support workers are also able to take notes to a high standard, provide general language support and able to support the pupil appropriately (i.e. by ensuring they don't act as a barrier themselves to the pupil's inclusion in the wider classroom).

[48] CRIDE survey of educational provision for deaf children, http://www.ndcs.org.uk/professional_support/national_data/cride.html

2.8.10. NDCS feels that where children need sign language support to access the curriculum, it should be provided by someone with at least a level 3 qualification in BSL, depending on the individual needs of the child. In some circumstances, higher qualifications may also be needed. Level 2 is roughly equivalent to a GCSE – asking a communication support worker with a level 2 qualification to support a deaf children would be akin to expect a student with a GCSE in French to support a French speaker.

2.8.11. For the past three years, NDCS has been provided with funding by the Department for Education to issue grants to communication support workers wishing to improve their sign language skills. In 2015/16, 37 grants were issued. In each year, the grant has been oversubscribed. It is not possible to reliably estimate what unmet demand there was, as publicity ceased after the grant became depleted – however, NDCS believe it is considerable.

2.8.12. CRIDE reports that one area where some services have less information is around deaf young people over the age of 16. Figures from the Office of National Statistics suggest that 15 percent of all children and young people aged 0 to 19 are aged 16 or above. However, only 8 percent of children identified by CRIDE in England fall into this age group. NDCS states that this underreporting maybe because, in many areas, education services no longer provide support to deaf children once they leave school. This means it is likely that neither Government nor other bodies have a good understanding of the numbers of deaf young people in further or higher education or undergoing apprenticeships or training.

2.8.13. A number of contributors, including BSL Interpreters, discuss the competence levels of trainee interpreters. NRCPD's code of Code of Conduct says that Trainees should only take work they are competent to do. Trainees may be 'unconsciously incompetent' i.e. not yet skilled enough to translate comprehensively and still unaware of the layers of complexity required for a comprehensive translation.

2.8.14. Previously, specialist interpreter agencies would employ trainees and develop them under close supervision. Currently, larger, non-specialist agencies don't employ or supervise trainees directly and may not recognise the difference between trainees and qualified interpreters. As a result, when trainee interpreters are provided it is likely that service users will not receive the quality of support and access to which they are entitled.

2.9. Regulation and career structure of communication and language professional

2.9.1. NUBSLI (National Union of British Sign Language Interpreters) surveyed its members to inform its response to the call for evidence. Survey respondents state that inappropriate use of unqualified interpreters (including CSWs) reduces the opportunities for qualified and registered professionals, which may in turn reduce the perceived value market of RSLIs.

Introduction

In March 2015, the then Minister for Disabled People announced that the Department for Work and Pensions (DWP) would lead on a review of the present state of the market that facilitates communication for people who are deaf, deafblind or have hearing loss and those that need to engage with them. He also commissioned a further call for evidence specific to Communications Support Workers.

Throughout 2015, DWP worked with a wide range of stakeholders to develop the review's parameters and criteria. These partners included other government departments; organisations that work for and with people who are deaf, deafblind or have a hearing loss; and individuals from the communication and language professions.

A Call for Evidence for the review was launched on 12 February 2016 and ran until 10 March 2016. Submissions received, varied from brief e-mails detailing personal experiences to detailed documents, many of which also included links to, or embedded copies of, further academic papers, reports, articles and other reference material.

The main areas of focus for this review were to ask respondents:

- How do you define communication support work as done by CSWs?
- In your experience, what do CSWs actually do?
- In your experience, where and how can CSWs add value?
- In your experience, to what extent does the use of CSWs mask the demand for sign language interpreters and other communication and language professionals?

This document is a summary of the responses received.

Technology

Chapter Summary

New technology is broadly welcomed and well used by the Deaf community, especially among younger Deaf people. However, contributors were very clear that, in particular situations, technology could not replace the need for one-to-one interpreting support, for example in medical settings or in longer business meetings. Respondents also express concerns about the impact on the skills and careers of sign language professionals of increasing use of remote technologies like video relay services (VRS).

A number of respondents highlighted shortfalls in Wi-Fi availability and mobile internet speeds degrading the quality and efficacy of online services like VRS, Skype, etc. It was highlighted that service availability also impacts on the use of recent generic speech-to-text software which is free to use but depends on reliable internet connections.

3.1. Non-specialist technology

3.1.1 Many contributors commented that, as 'non-specialist' equipment and videoconferencing progresses, communication may be increasingly supported via Skype, Skype for Business, Facetime, Citrix etc. and through desktops, laptops, tablets or smartphones, with the key caveat that these methods of communication depend on sufficient internet bandwidth being available to ensure the necessary quality.

3.1.2 Contributors also highlighted recent improvements in generic speech-to-text software, such as Apple Siri, Google Now, etc., which are free to use but depend on an internet connection. These services are fully implemented in mobile telecommunications devices such as iPhones/iPads and android smartphones/tablets, respectively, and are increasingly being incorporated into laptops. In some circumstances, use of a mobile phone or tablet may reduce the need for personal interpretation by providing a text display of the hearing person's speech, although this is currently only one way communication, not two way.

3.1.3 Ofcom has been producing research into the communication and media needs of disabled people, including those with any kind of hearing impairment. Its most recent report 'Disabled consumers' access to and use of communication devices and services 2016'[49] found that hard of hearing people were more likely to use a landline phone than non-disabled consumers, but just over 10% felt that their disability limited its use. Conversely, hard of hearing consumers were less likely to use a smartphone than non-disabled consumers, although only 6% felt that their disability had an impact on their use. Overall, online access is generally increasing for Deaf and hard of hearing people, albeit at a lower level than for non-disabled consumers.

3.1.4 The National Deaf Children's Society describes a rising trend in the use of 'remote' speech to text support or sign language support through portable tablet computers and widely available Wi-Fi, making it significantly easier to book and arrange remote communication support in different locations. The Society suggests that Cued Speech and speech and language therapy may increasingly be available remotely.

3.1.5 A number of contributors make the point that BSL users are generally comfortable using Skype, FaceTime or other video calling platforms. These services can allow Deaf people to communicate directly and independently, but they are only really effective over networks with good broadband speeds – a poor quality picture means that Deaf users are unable to make effective use of a given service.

3.2. Specialist technology

3.2.1. There is also a growing number of technological aids and solutions to support or facilitate communication for deaf people, including Text Relay Service/Next Generation Text (NGT, Speech to Text Software, Audio induction loop

[49] https://www.ofcom.org.uk/__data/assets/pdf_file/0029/98480/hearing-impaired-consumers-access.pdf

systems, Radio based communication support, Speech amplifiers, Inductive couplers.

3.2.2. The National Deaf Children's Society's (NDCS) submission discusses the introduction of Next Generation Text Service (NGTS) and the option to use this on tablets and smartphones, which it feels has the potential to be very useful for deaf people. This technology enables deaf young people to make phone calls where a third party operator listens in and types up verbatim what the other is saying.

3.2.3. However, NDCS feels that NGTR is currently too slow and unlikely to be popular with deaf young people who may find the interruptions of a third party speaker to be impersonal, unprofessional and cumbersome. Unless significant improvements are made to this service, including to the speed in which text is transcribed and the user experience, it is unlikely to be more widely used.

3.2.4. For more detail on these systems, see Annex F.

3.3. Video Remote Interpreting (VRI) and Video Relay Services (VRS)

3.3.1. InterpreterNow wrote in regarding VRS usage in the UK giving international comparisons. The UK's first National VR service is contactSCOTLAND. After a highly successful pilot, this service was commissioned for a 3 year contract and expanded to include all voluntary as well as public organisations. Call volumes continue to grow and are currently the highest of any existing service in the UK averaging over 100 calls per week.

3.3.2. For public sector/authorities there are no additional call charges to call contactSCOTLAND-BSL, apart from the usual phone call cost. For Deaf BSL Users there is no cost to using the service – all they need to do is register with

contactSCOTLAND-BSL, have an appropriate device and an internet connection[50].

3.3.3. A number of individual respondents, including VRS interpreters, comment that VRS has been around for several years but is yet to really take off in the UK to the same degree as it is in the US and Sweden.

3.3.4. In 2012 Ofcom commissioned telecoms and digital media consultancy CSMG to review international deployments of video relay (VR) services[51]. The purpose of the study was to assist Ofcom in understanding how VR services operate in various countries, how adoption has evolved, and how the services are set up with respect to regulation, funding, operations and technology.

3.3.5. In most countries reviewed by CSMG, VRS services are partly or wholly government funded.

3.3.6. Germany features a mixed funding model, but in addition to being financed by telecoms providers and government funding, it is also financed by user fees, although personal VR service fees account for less than 5% of the total costs. Germany charges organisations both a monthly fee and a per-minute fee, which is unpopular and has led to some organisations boycotting the VR service.

3.3.7. In the US, VR service providers are funded by telecom providers, which contribute a percentage of their interstate telecom revenue to cover the calculated costs of the service; telecom providers raise these funds by applying a small surcharge on the phone bill of all telecom consumers.

[50] http://contactscotland-bsl.org/faqs/

[51] CSMG report on international deployments of video relay services, December 2012 https://www.ofcom.org.uk/__data/assets/pdf_file/0031/52969/video-relay-services-2012.pdf

3.3.8. Sweden has had a National VR service since 1997, whereas Scotland has only had a 'proper' National VR service since 2015. In Sweden Deaf people have the option of using both Remote Interpreting (VRI) and Telephony (VRS) services for emergency and non-emergency purposes 24/7. Although Scotland has near identical deaf population size, geography and demographics as Sweden, it is a highly immature market but with enormous potential for growth and expansion.

3.3.9. In Sweden 15 percent of the deaf population use VR services monthly. VR services have not impacted upon the requirement for face-to-face interpreting support, demand for which has remained the same.

3.3.10. Countries such as Sweden and the US which are mature markets define the price per minute or let the companies that offer services offer that. As they are mature markets, the service providers know that the volume of calls will cover costs.

3.3.11. Some countries, like France, offer VRS but limit it to control costs – which ultimately limits availability and usage. Other countries, such as New Zealand and Australia, put a Cap on costs. Other countries have had a Pilot phase during which they financed the set-up of the infrastructure then follow up with procurements where quality and price are important issues. In some countries the balance is weighted more heavily on price meaning quality parameters are omitted**.**

3.3.12. In the Netherlands the government offers a fixed price that covers costs of technology, set up, call centres, outreach etc. Bidders get a per-minute price to cover operational/running costs and upgrades etc. They permit both VRS and VRI to be used on the platform; however under current rules VRS calls have to be sorted out from VRI calls. Only VRS calls are funded by the Telecom Regulator, and a log with calls has to be available for auditing purposes. Other countries, such as Germany and the US, do not allow remote interpretation (VRI) to be used on the same platform as VRS.

3.3.13. VRS supply in Britain is still developing, when compared to many of the countries mentioned above. There are various factors that currently limit VRS supply, including:

- Broadband internet access is required for VRS to work effectively and this is not currently a universal service in the UK.

- VRS is currently expensive in comparison to text relay services as it requires interpreters with formal qualifications, and there are comparatively few people who use sign language.

3.3.14. However, a growing number of bodies in the private, public and voluntary sector are providing VRS access to their services for deaf BSL users. Some VRS services in the UK are publically funded, while many others are not. Access to Work can fund VRS/VRI where appropriate.

3.3.15. UKCOD has published a directory[52] of organisations offering VRS, which include Government departments, high street banks, County Councils, police forces, housing associations and retailers.

3.3.16. A number of individual respondents, including interpreters, comment that VRS has been around for several years but is yet to really take off in this country to the same degree as it is in the US and Sweden. The UKCoD (UK Council on Deafness) submission refers to a study[53] it commissioned from Cassiopeia Consultancy which estimated there will be 28,200 Deaf people using Video Relay Services (VRS) by 2024.

3.3.17. There is a feeling among a lot of respondents that that people who aren't Deaf or don't use BSL don't understand how VRS interpretation is different from face-to-face interpretation. Sign language is a three dimensional medium, and as such is limited when presented in only two dimensions.

[52] http://deafcouncil.org.uk/deaf-access-to-communications/video-relay-directory/

[53] http://www.cassiopeia-consultancy.co.uk/cs27.htm

Interpreting is about much more than just language - it also relies on trust and preparation, as well as sociolinguistic and psycholinguistic factors that use of VRS may not allow. VRS can be a very useful tool for some relatively simple conversations or transactions, for example, when ordering a pizza, phoning a bank or Government departments, or for last minute bookings, and certain other situations. However, it is not appropriate for complex interactions, such as medical appointments, legal meetings, and many business meetings.

3.3.18. Deaf people who are confident BSL/English users may find VRS to be the solution to many of their access needs. However, respondents highlight areas of concern:

- VRS removes the relationship between user and interpreter that can be vital to good quality interpreting;
- VRS is two dimensional whereas face-to-face is three dimensional Sign language is a three dimensional medium;
- issues of confidentiality and security;
- the potential lack of an audit trail;
- the possibility that an overuse of online interpreting could restrict the development of signing skills in the future; and
- remote Interpreting doesn't work for those who are Deaf/Blind, there could also be problems with Deaf people who have an additional disability, including those who have Mental Health conditions.

3.3.19. On-line interpreting is considerably more difficult to perform (even for experienced interpreters) compared with traditional face-to-face methods. High quality interpreters - experienced in face-to-face situations; offices, courts, police stations, hospitals, GPs, working alongside social workers,

advocates, CSWs, etc. - are best suited to VRS interpretation because they will understand the limitations.

3.3.20. National Association of Deafened People (NADP) explains that technology will not be able to remove the need for real communication support provided by professionals. Even with remote captioning, a lot of pressure is placed on a deaf person and the client to ensure that the technology is correctly set up. This pressure is removed if the professional is present at the actual meeting because s/he will be able to ensure accuracy of what has been said. Behaviours change positively when the communication support is present and enables full inclusion in the proceedings. This is not always possible with remote support.

3.3.21. A newly qualified interpreter is unlikely to have the coping strategies to deal with difficult language, people with different expectations and the complexities of language interpretation and cultural mediation to routinely ensure a successful outcome.

3.3.22. However, there is a consensus between the majority of submissions on this topic that VRS does offer service users more choice and convenience when it comes to accessing interpreting services. VRS is well suited for some users in some situations but not for every user nor every interpreter nor every situation. A number of respondents state that guidance or a code of practice for VRS would be useful. ASLI published a best practice document in 2015[54].

3.3.23. The Regulatory Body for Sign Language Interpreters and Translators (RBSLI)[55] explains that, while research continues into the avatar transmission of signed languages by media like VRS, it is not yet at a stage where it could

---

[54] https://www.asli.org.uk/all_documents/best_practise_advice/asli_video_interpreting_best_practice_vibp_2015

[55] RBSLI is a newly established not-for-profit body administering the RBSLI Register of qualified sign language interpreters and translators, which focuses solely on interpreters and translators. http://www.rbsli.org/

have any impact on meeting the demand for sign language interpreting or translation services. Current technology is not sufficiently advanced to adequately replace services to meet the demand and highlighted the need to increase the number of qualified interpreters and translators available.

3.3.24. AOHL is concerned that following the introduction of the NHS Accessible Information Standard in July 2016, hospitals and other NHS facilities will rely on technology for communication support, because it is cheaper than face-to-face support Respondents raised concerns about whether:

- service providers would have the right equipment to use remote communication support;

- the staff working in those services would have the training to use the technology; and

- technology would be used in ways that are appropriate, and not where face to face services are required.

3.3.25. Responses to SASLI's online survey of its membership recommended that before working online interpreters should have two years plus experience, have receptive skills and confidence in those skills, and experience of working in a wide range of settings.

3.3.26. Royal Association of Deaf People (RAD) reported that Video Interpreting (VI) and Video Remote Interpreting (VRI) have the potential to be game-changers in the provision of communication support for Deaf people, as they offer a more flexible solution than the standard face-to-face appointment, which is usually charged at a minimum of 2 or 3 hours plus travel costs.

3.3.27. However, RAD suggests that developing a sustainable business model for VRS is more problematical. Current UK solutions are based on the US

model: an interpreter available on demand, and charging by the minute (currently £3.20). However, the main US provider of this service, Sorenson, filed for Chapter 11 bankruptcy in March 2014. (It has since restructured and re-emerged.) Given the relative size of the UK market, it may be some time before use of VI/VRI is sufficiently widespread to allow for the kind of demand/supply management that will reduce costs to a sustainable level.

3.3.28. Signature in its contribution mentions that both the public and private sectors are exploring the greater use of video relay services (VRS) in delivering public services. Private companies – including Virgin, Sky and BT - are increasingly providing access to customer services via VRS.

3.3.29. The Cued Speech Association UK (CSAUK) proposes that use of Remote Cued Speech Transliteration with video relay services could significantly increase the availability of, and demand for, CST.

3.3.30. City Lit is of the opinion that VRS and VRI would increase access to employment for Deaf people. For example, for short telephone calls, short meetings up to 15 minutes and last minute meetings they believe this to be cost effective. VRS / VRI offers complimentary support, but it cannot replace SLIs.

3.3.31. An individual service user identified public service areas where video interpreting services should be provided. These included Jobcentre plus offices, transport, emergency contacts for police, ambulance, coastguard and fire, NHS hospitals and dentists and social workers for remote interpreting in 1 to 1 settings. Another service user highlighted a concern that VRS can be limited by regional sign language.

3.3.32. A social worker suggested an equivalent to recorded messages for hearing people when ‘put on hold’ in VRS for a deaf person waiting for an operator. They also highlighted that while there is a real need to take advantage of the technological advances many people are not confident with

written English, and others may need palantypists or Lipspeakers in preference to sign language interpreters.

3.4. Next Generation Text Relay (NGTR).

3.4.1. Text relay enables people with hearing and/or speech impairments to communicate with others through telephone or textphone equipment.

3.4.2. Since October 2014, all UK landline and mobile suppliers have provided customers an improved text relay service called Next Generation Text Relay (NGTR). This service allows users to communicate using a variety of devices such as smartphones, tablets and PCs, using an app. Currently, the only approved service is supplied by BT. Performance and user satisfaction with text relay continues to improve across a range of measures[56]. However, many deaf people have expressed concerns about the speed of the service and the National Deaf Children's Society contends that many deaf young people choose not to use it.

3.4.3. Ofcom commissioned research with text relay users before and after the launch of Next Generation Text Relay[57]. One of the key findings is that Text relay is more frequently used in a functional capacity to contact services or colleagues as opposed to socialising with family and friends, where channels like SMS, web-chat and Skype are preferred.

3.5. Cochlear implants

3.5.1. A cochlear implant (CI) is a surgically implanted device enabling those who are unlikely to meaningfully benefit from conventional hearing aids to access sound. The implant does not turn a deaf person into a hearing person. The

[56] http://ngts.org.uk/content/news/NGT%20User%20Experience%20and%20Satisfaction%20Survey%20Sept%202016.pdf

[57] https://www.ofcom.org.uk/research-and-data/accessibility-research/text-relay-services-research

technology is good but far from perfect, particularly in group situations, noisy offices and anywhere there is background noise.

3.5.2. The Cochlear Implanted children's support group (CICS) states that the advent of cochlear implants has reduced the need for BSL interpreters in schools. More children are attending mainstream schools with Teaching Assistant support. However, more Deaf children in mainstream schools means there is a greater need for deaf awareness training, as well as improved availability of note takers (pen and paper and electronic) and speech to text reporters (STTRs). Without this support deaf people with cochlear implants can still find themselves unable to participate fully. While cochlear implants are appropriate for some people, in group settings it may be appropriate to use another form of communication support in addition to the implant.

3.5.3. CRIDE's 2015 UK-wide summary report found that 7 percent of deaf children have a cochlear implant. The reported absolute number has increased from 2,689 in 2011 to 3,515 in 2015 (a 30 percent increase).

3.5.4. CCIS suggest that massive investment is needed in raising public awareness for hearing loss and the benefit those with hearing loss can get from hearing aids and cochlear implants. Many older people with age- related hearing loss are not aware of the help available to them.

3.5.5. The Cued Speech Association UK (CSAUK) anticipates that cochlear implants and other implantable devices will increase the numbers of deaf children who can understand and use English, thereby increasing the number who use Cued Speech (CS). It may also increase the number of adults who use Cued Speech.

3.5.6. City Lit suggests that the current trend of increased uptake of cochlear implants (CI) is likely to increase participation of CI users in further/higher/adult education and the workplace. They are still likely to need communication support to supplement their residual hearing and lip-reading,

i.e. interpreters for those who use BSL and ENTs/STTRs for those who don't. This view is backed up by a number of individuals who responded to this review.

3.5.7. CICS say that the majority of profoundly deaf children who are suitable for cochlear implants are having them at a very young age. This group of deaf children are very different to the previous generations of deaf young people. Most young people using cochlear implants use listening skills and spoken language to communicate and do not learn BSL. The National Cochlear implant users association suggests that very few people with a cochlear implant are familiar with BSL, and may instead be more reliant on STTRs.

3.5.8. A freelance interpreter respondent reports that they are meeting more children with cochlear implants, highlighting that it is not yet known what the long term impact will be for such children's communication needs. They suggest it would be useful to see a study into how many of those children who are raised without BSL, or with BSL as a second language, opt to use it as a preferred language when they are older.

3.6. Emerging technologies

3.6.1. The Association of Sign Language Interpreters (ASLI) looks forward to emerging technologies which enable the video remote interpreting services offering effective and cost efficient solutions to many short and simple exchanges. ASLI feels that these are particularly important for deaf people living in rural and remote settings where face-to-face support may be relatively difficult to source.

3.6.2. According to The Association of Teachers of Lipreading to Adults (ATLA) there are many exciting speech to text apps for smartphones on the horizon, and this is a key development. However, there is still room for development and software solution are not always suitable for everyone. Dragon software needs to be trained to the speaker's voice, so it is not suitable for HOH people

other than in familiar domestic contexts. Spuble[58] shows some promise, but currently there are the same issues with clarity and coping with background noise that hearing aids have.

3.6.3. AOHL points out that motion recognition technology, which would function in a similar way to voice recognition for people who use BSL is not currently feasible as the sophisticated technology required has not yet been developed.

3.6.4. Respondents generally feel that current technological support should not be expected to fully replace face-to-face communication support, and that not all technological solutions are suitable for every person and every situation. If the interpreter is not physically in room, they will miss nuances and in turn not communicate. It's not just that the technology isn't yet good enough.

3.6.5. Contributors highlighted a number of situations where remote support would not be appropriate, such as meetings that may have a significant effect on a person's life; particularly:

- medical appointments where the impact could be serious;
- disciplinary meetings at work, or legal appointments;
- sensitive bookings such as counselling or mental health meetings/assessments;
- long meetings over 20-30 minutes; and
- meetings with more than a couple of attendees (it may be difficult for a deaf individual to know who is speaking without having an interpreter present).

[58] An app that uses voice recognition facilities on tablets and phones to create 'speech bubbles' http://spuble.com/

3.6.6. Respondents stated that some people are not confident with written English, and others may need Palantypists or Lipspeakers in preference to sign language interpreters.

3.7. Does increasing use of technology alter the market?

3.7.1. Some views from interpreters include:

- A trainee interpreter suggested that a big fear for many interpreters is that professional standards will drop in order to save money and VRS will be used in place of proper interpreting, again, in order to save money rather than provide the deaf community with the proper access they deserve.

- A BSL interpreter shared that many interpreters have set up regional networks and established websites to give clients a single point resource to find interpreters. For example BSL Beam is an online portal that, for a minimal initial cost, allows deaf people to be in control and advertise for interpreters. This has proved to be effective.

- The interpreter added that there is an app called 'Cover my Job' set up by an interpreter. They described this as a large forum of registered interpreters, enabling them to reach out to colleagues for cover, due to illness etc. Also used to assist deaf clients to find cover for (generally last minute) jobs. They reported that it works remarkably well and enables the interpreting community to support both each other, and the deaf community, with no need for agencies.

3.7.2. Signature discussed employment patterns in the context of provision of Video Relay Services. Assuming a sign language interpreter worked on four calls an hour for 7 hours a day, 250 days a year, Signature calculates that 500 sign language interpreters would be needed to meet the demand for VRS alone. However, most of the sign language interpreter workforce is part time and unlikely to work on a VRS service all day, every day. Sign language

interpreters take on a variety of work to make sure their skills continually develop.

3.7.3. Signature proposes that VRS and VRI will increase access to employment for deaf people, as they are cost effective alternatives for short and last minute meetings and permit greater flexibility for deaf employees. VRS and VRI could also be used to increase access for deaf and Deafblind people to culture, leisure and online education activity.

3.7.4. Some respondents feel that increased use of remote support services like VRS may have a negative effect on the market:

- On-line interpreting is considerably more difficult to perform (even for an experienced interpreter) compared with traditional face-to-face methods because BSL is a 3D language. Interpreting in a 2D environment can degrade the quality of the translation, losing important nuances of personality and tone.

- If the balance of interpreting work shifts so that the proportion of remote commissions becomes much higher than the proportion of face-to-face interpretation, trained interpreters may begin to lose skills and become disenchanted with their profession.

- The flexibility that is one of the key advantages for interpreters when it comes to comes to providing remote interpretation services – interpreters can work from home, or can work around caring and family commitments, etc. – is offset by the lower fees that are typically offered for this work.

Forward look

Chapter Summary

Many contributors referred to statistics suggesting that the number of people with hearing loss will rise over the next few decades. Age-related hearing loss was highlighted as a particularly significant factor. Linked to the anticipated increase in demand for a range of services was concern that resources would not be able to keep pace.

Emerging technology is generally welcomed and contributors outline both positive and negative potential effects of new technology. A particular concern is that technology should not be expected to replace face-to-face support in every situation. Many respondents make the point that VRS, for example, is very useful for simple conversations but should not be used for complex situations, such as medical discussions or long meetings, or important business and legal meetings.

There is also significant concern that increasing reliance on technological solutions, which although cheaper than one-to-one support for shorter bookings, are not always appropriate, will have a depressive effect on the interpreter market.

4.1 How will changes in population demographics affect the market?

4.1.1 AOHL estimates that by 2035 there will be 15.6 million people living with hearing loss in the UK, up to a fifth of the population.

4.1.2 Signature's submission references 2013 research commissioned by the UK Council on Deafness from Cassiopeia Consultancy Limited (CCL), which estimated that:

- By 2024 there will be 28,200 people in the UK who are Deaf, 371,000 people who are Deafblind; and 11.2 million people with hearing loss.

- By 2024, 75 percent of Deaf people (around 18,000) would use a funded VRS to make over 3.2 million calls a year.

4.1.3 The demand for Notetakers, particularly Electronic Notetakers, is likely to increase, as people coming through the education system are more accustomed to accessing communication via English.

4.2 What is the impact on the market of new legislation?

4.2.1 Royal Association of Deaf People (RAD) proposes that there are opportunities to be obtained from recognition of BSL as a minority language. For example:

4.2.2 By making BSL more widely used and more visible, it will help overcome the fear and embarrassment that many people feel around Deaf BSL users;

4.2.3 Pupils in schools can be influenced to see BSL as “cool” and with a little encouragement, groups are willing to learn basic signs and fingerspelling. This in turn leads to a more inclusive attitude to Deaf people from classmates and co-workers;

4.2.4 There is potential for organisations of all sizes to capitalise on the communication skills of Deaf employees, e.g. by producing BSL clips of key information uploaded to YouTube and linked from their website, or “BSL here” signs in windows to encourage customers and clients.

4.2.5 AOHL’s submission to this review proposes that the introduction of new legislation is likely to have an impact on future demand for communication and language services. For example, NHS England’s Accessible Information Standard[59], which is a legal requirement under the Health and Social Care Act 2012, may increase the demand of communication support services. For the

[59] Mandatory for all health and social care providers from 31 July 2016 - NHS England (2015) Accessible Information Standard, SCCI 1605, available at: http://www.england.nhs.uk/ourwork/patients/accessibleinfo-2/

first time, the Standard establishes a clear framework to make sure people with sensory loss and learning disabilities, including people with hearing loss, understand the information they are given and are able to participate fully in discussions about their care. Services must also seek assurances that communication professionals are appropriately qualified; for example, they must ensure that BSL interpreters have achieved BSL Level 6 or an honours degree in their second language, in line with NRCPD registration requirements.

4.2.6 AOHL is also concerned that changes in legislation that make increased support mandatory might increase employers' expectation that technology could be used more widely for communication support. However, service providers may not have the right equipment to use remote communication support, or staff working in those services may not have the training to use the technology.

4.2.7 AOHL believes that remote STTR and video relay/remote services should not be a replacement for face-to-face communication support, as they are complementary services that can be used for instances where a last minute appointment occurs or where support is needed for a short time for a small meeting. It is not appropriate to use these services in large or long meetings, as remote interpreting support will only be supported by one interpreter. For longer periods of support, breaks must also be included for both the deaf service user and the interpreter. In addition, not everyone will be able to use remote services, including people who have sight loss or those who may not be able to read the sign language via a video link (BSL is three dimensional and a video screen is two dimensional).

4.2.8 AOHL does not recommend remote support for meetings that may have a significant effect on a person's life, such as medical appointments where the impact could be serious, disciplinary meetings at work, or legal appointments.

4.3 What trends are evident in the market?

4.3.1 A number of respondents, among them registered BSL interpreters, discuss trends in registration numbers[60] for new practitioners entering the profession.

4.3.2 Respondents state that they are aware of a perception that the interpreting profession is a high risk career in which entrants may not be able to recoup their training and qualification costs, even when qualified and registered. One consequence of this may be an ongoing decline in registrations.

4.3.3 SASLI's submission discusses the passing of the British Sign Language Scotland Act 2015, stating that The Scottish Parliament has acknowledged that one of the challenges to the success of the Act is sourcing enough registered interpreters to meet the needs of the deaf community.

4.3.4 SASLI's view is that there has been an increase of initiatives raising awareness of deaf issues and BSL in Scotland, which in turn will increase recruitment of interpreters across the country. However, SASLI also states that if terms and conditions for communication professionals are eroded further (for example, one hour minimum contracts / agreements) then the end result could be detrimental to BSL users as interpreting will be less financially viable occupation.

4.3.5 An increasing number of interpreters in Scotland are approaching retirement. However, recruitment is difficult due to costs, time and travel required to attend training in Scotland where provision is limited, particularly in rural areas.

4.3.6 Individual respondents, including qualified and trainee Sign Language Interpreters, share the view that that there is significant concern in the interpreting community that fees (which have remained static for the last five years) are going to be squeezed further. A number of respondents cited a 2015 NUBSLI survey which found that 48 percent of Sign Language

[60] NRCPD Registrations 2009-15, http://www.nrcpd.org.uk/

professionals are thinking about or are actively looking to leave the profession[61].

4.3.7 In that survey, of the respondents to that survey[62] who expressed a desire to leave or were thinking about it:

93 percent were qualified.

49 percent had over 10 years' experience.

15 percent had over 20 years' experience

4.3.8 From these data, NUBSLI conclude that a significant proportion of the qualified BSL interpreter workforce is thinking of moving on. Other contributors, including RBSLI, draw similar conclusions, warning of a skills drain caused by pressure on fees and the undermining of interpreters' terms and conditions

4.3.9 RBSLI points out that interpreting consumers expect a competent and effective interpreting service where the flow of communication is linguistically accurate and culturally appropriate, which can only be delivered by a fully qualified interpreter.

4.4 How might new technology affect the market?

4.4.1 Some respondents speculated that improved technological communication support would benefit deaf people, making day-to-day interaction easier and more accessible.

4.4.2 The internet has a continuing part to play in improving access for Deaf people. A number of contributors say they would not know where to start finding information about agencies and freelance MRSLIs. Many areas currently have

[61]Survey of BSL Interpreters' Working Conditions (NUBSLI, 2015) http://www.uniteforoursociety.org/page/-/NUBSLI%20Working%20Conditions%20Survey%20Report%20January%202015%20FINAL%20(3).pdf

[62] ibid

no central ‘portal’ for accessing services, meaning that an individual or commissioning organisation has to use a mixture of freelancers and agencies when booking communication support. Ideas put forward included the establishment of a national web portal to book all ad hoc BSL interpreting assignments, drawing on the experience of existing platforms which include transparent star ratings, costs and monitoring of both users and suppliers with appropriate safeguards.

4.4.3 However, there are still many concerns about the potential negative effect on the professions and the potential for technological support to be offered inappropriately where one-to-one support would be more appropriate. A number of respondents also express concerns about the effect on the interpreting profession if the work for becomes increasingly focused on technology-based distance support, such as VRS.

Department for Work & Pensions

Call for evidence: Market review of BSL and communications provision for people who are deaf or have hearing loss

Part Two: Communication Support Workers

July 2017

Contents

Introduction 82

Executive Summary 83

How do you define Communication Support Work as done by Communication Support Workers? 84

What do CSWs do? 92

Where and how can CSWs add value? 95

Does the use of CSWs mask the demand for sign language interpreters and other communication and language professionals? 99

Executive Summary

Many responses from organisations, service users and service providers called for there to be a nationally recognised communication support worker (CSW) qualification, with minimum BSL qualifications. At the moment, the title ‘CSW’ seems to mean different things to different people. There is also a call for increased awareness of the needs of people who are deaf or who have a hearing loss, and appropriate communication services to meet their needs.

This linked to concerns from people who are deaf or have hearing loss who have not received the type and level of support they need. This included people in further education, employment and undertaking simple everyday activities that everyone faces such as booking appointments etc.

Submissions to this review suggest that deaf peoples’ individual requirements are often not being taken into account. This may be partly attributed to lack of awareness by those who book or allocate resources, about both the diversity of needs among deaf people and what forms of support are available and suitable to meet them. One size does not-fit-all.

Evidence was also submitted indicating that a dearth of both communication professionals and sufficiently qualified CSWs may be another factor.

This concern also came from CSWs who wrote about finding themselves in circumstances where they felt unqualified to provide adequate or appropriate support. While there will always be circumstances where exact requirements cannot be met because of a lack of availability or urgency, what has come through clearly is that where this happens the deaf person should be asked what is the minimum support that will be acceptable. Additionally, awareness needs to be raised with education establishments, employers and public service providers to promote a better understanding of the range of support that exists and could be appropriate.

Funding was also highlighted as an issue which is reflected in the response to the wider call for evidence for the ‘Market review of British Sign Language and communications provision for people who are deaf or have hearing loss’.

1.1 How do you define Communication Support Work as done by Communication Support Workers?

1.1.1 Aligned to the call for evidence for the 'Market Review of BSL and Communications Provision for People who are Deaf or have Hearing Loss' was a separate call for evidence specifically about the communication support work (CSW) provided by communication support workers (CSWs). This separate review had a specific focus on roles that are collectively referred to as CSW but where there is not a generally shared agreement or understanding of the work carried out by CSWs, or the training and experience they need.

1.1.2 Extracts and summaries from the contributions follow and where appropriate have been attributed to a named organisation or group (for example: 'a number of replies from people working as BSL interpreters'). Individual respondents – people either using or delivering services as students, teachers and interpreters – are not named but their interest and personal experience as a service user or deliverer is identified where appropriate.

1.1.3 The call for evidence started with the premise of there being widespread use of CSWs carrying out sign language interpretation in education and employment potentially without adequate training or skills. There is concern that such practice, as well as meaning that deaf people are not provided with equal access as those with hearing, would likely be masking the true demand for BSL NVQ Level 6 sign language interpreters.

1.1.4 Responses were received - overall broadly reflecting this premise - from a wide range of organisations and individuals involved in delivering or receiving support from CSWs. Lack of: training, understanding of the needs of people who are deaf or have hearing loss, funding and appropriate accreditation all featured significantly as root causes.

1.2. Limitations

1.2.1 In reading this review it is important to recognise the limitations of the information provided. Focus groups of CSWs have not been used which would likely have attracted more input from practicing CSWs. Some responses have quoted published research but broadly this contains individual and group perspectives which may be subjective with limited - if any - quantitative data.

1.2.2 However, responses from a mix of areas and people who are deaf and hearing make clear that communication support is vital to all deaf and severely hard

of hearing individuals. There was a consensus that all of the forms of support mentioned in the call for evidence are used and that it is important to credit and acknowledge the range of essential work provided by CSWs for whom there is a clear future requirement and to help define the role and minimum standards required.

1.3 What to expect in this report

1.3.1 Responses have been set out under the four original headings and for the first three the content falls neatly under 'schools', 'further education' and 'employment and training'. Responses under the fourth heading, which asked whether the use of CSWs masked the need for other services, are presented as a summary narrative.

1.3.2 For this review it is not possible to measure demand or supply though some contributions to the wider review[63] suggest that despite this the evidence would appear to be that there is a gap between the two. A very small number of responses made comparisons about the type of support internationally and this may be an area for future review.

1.4 Communication support work: A problem with terminology

1.4.1 A number of responses from organisations and individuals expressed concern about this catch-all descriptor.

1.4.2 For example, a survey[64] carried out by the National Union of British Sign Language Interpreters (NUBSLI) identified concern that the umbrella term 'communication support work' was misleading. It is commonly used in education to describe both qualified interpreters and people with a wide variety of support functions that are not required to demonstrate minimum skills or qualifications.

1.4.3 Concern was also raised that use of the term is potentially a barrier to the effectiveness of the market in communication services for deaf people or people with hearing loss. For example, service users can independently engage or be allocated service providers with unsuitable skills for the support required based on this generic terminology. Some service users report that service providers do not understand the difference between registered qualified interpreters and CSWs, where interpreting is required, and so opt to provide CSWs as the cheaper option. Provision of CSWs may give a service provider the impression that communication needs have been met, as they

[63] 'The Market review of British Sign Language and communications provision for people who are deaf or have hearing loss'.

[64] 83 people responded to the questions about Communication Support Work in NUBSLI's survey 2016.

often aren't in a position to judge the adequacy of the CSW's work. Respondents highlighted this as a particular issue in higher education.

1.5 Communication Support Workers (CSWs) – where they work and what they do

1.5.1 A survey[65] carried out by the British Deaf Association (BDA) in February 2016 indicated that CSWs interpret either in schools/colleges or in the workplace, but mostly in education settings.

1.5.2 Half of deaf respondents and a third of hearing respondents said that CSWs should not work as interpreters outside of schools/colleges (unless they are also a qualified interpreter).

1.5.3 Survey respondents also highlighted that CSWs use a variety of methods to convey the content or meaning of English to deaf people who may or may not be sign language users, and who may or may not have age appropriate literacy skills. In order to do so, CSWs are described as using note taking, Sign Supported English, Signed Exact English, Total Communication, lip-speaking or re-speaking, and explaining words or concepts in ways that the deaf person can understand.

1.5.4 Internal consultation within the National Deaf Child and Adolescent Mental Health Services (Northern) indicated that in their view CSWs provide 'support' for a deaf person with everyday tasks such as booking appointments, arranging meetings and liaising with others and have a meaningful role to play in working with deaf children and young people but they should not be employed as the only or major source of support.

1.5.5 The National Deaf Children's Society wrote that, in an education context, CSW has the specific meaning of an education professional tasked with providing flexible support to a child or young person who needs support to access the curriculum. They explained that this support could be provided in a range of ways including signing, lipspeaking, notetaking, etc. depending on the individual needs of the deaf child. In effect, NDCS regard a communication support worker as a type of specialist teaching assistant.

1.5.6 The consultation also indicated the importance of using suitably qualified interpreters and that deaf people and people with hearing loss to have choice and flexibility with whichever form of communication support they use.

[65] The British Deaf Association's response is based on a survey (in English & BSL) in February 2016.
There were 119 eligible responses, of which 75 per cent of respondents were D/deaf and 25 per cent hearing.

1.6 Qualifications and standards

1.6.1 A theme of many responses, from organisations and individuals, included the role of CSWs, and the concern that sometimes CSWs were used as 'cheap interpreters'. Similarly there is a view that the demand for communication support in terms of qualified sign-language interpreters outstrips the supply of professionally trained people.

1.6.2 The response from the Association of Deaf Education Professionals and Trainees (ADEPT) highlighted that as more deaf people engage in further education and enter employment, the more likely the shortage of communication professionals.

1.6.3 When reading this review, it is useful to have a basic understanding of what NVQ levels mean[66]. For example:

- NVQ Level 1 is equivalent to GCSE, grade D, E, F or G
- NVQ Level 2 is equivalent to GCSE, grade A, A, B or C
- NVQ Level 3 is equivalent to A level, grade A, B, C, D or E
- NVQ Level 6 is equivalent to a degree - with or without honours – e.g. bachelor of the arts (BA), bachelor of science (BSc)

1.6.4 Many responses referenced the different NVQ levels held by interpreters and CSWs. The response on behalf of Deafinite Interpreters Ltd set out that interpreters work to BSL NVQ Level 6 in their second language and up to Level 7 in their first language and have further in-depth training to Level 6 on interpreting. They cover topics such as linguistics, sociolinguistics, language and culture, processes of interpreting and further assessments in consecutive and simultaneous work; conference and dialogic interpreting; co-working and translation work. Many interpreters qualify via NVQ Level 6 or via higher education (post Graduate).

1.6.5 Deafinite explain that, 'many CSWs are not trained to this level and may have NVQ Level 2 or Level 3 in their second language (BSL) and may have limited qualifications in their first language (English) and to this extent deaf people do not always receive the best support for access to education or information and are therefore potentially being denied opportunities to achieve'.

[66] A more detailed explanation can be found here: https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels

1.6.6 The National Deaf Children's Society commented that where children need sign language support to access the curriculum, they believe it should be provided by someone with at least a level 3 BSL qualification. Depending on the individual needs of the child, a higher qualification will also be needed.

1.6.7 A CSW working in further education reported that CSWs are hardworking and committed to the students they support but often are not able to access higher levels such as Level 6 or interpreting due to the high cost of courses for which no Government grants or loans are available. From their own experience of the BSL Level 6 course, they were disappointed there was no formal element of teaching. Instead it was personal development with evidence being checked and critiqued.

1.6.8 An interpreter working in further education suggested that deaf learners should have the right to learn BSL at school and/or college to a minimum of Level 3. They continued that you would not expect to be taught an English lesson by somebody who spoke very little English and that this was no different for a deaf student. They were concerned that students were receiving information from CSWs who do not have the appropriate level of fluency. In their opinion there should be a minimum standard of level 3 or above (or proven skills at interview).

1.6.9 The Deaf Ex-Mainstreamers Group (DEXperience) is a deaf-led organisation that campaigns for improved access to education for deaf children, and for bilingualism in English and British Sign Language. The organisation's contribution is based on direct personal and professional experience of deaf mainstream education as well as anecdotal experiences and findings from research. They report that recruitment of CSWs started when there were few hearing people in the employment market who could sign to a competent level. Many CSWs do not have the requisite skills to "voice over" what the deaf person is signing into English which, in their opinion, is the most difficult aspect of BSL/English interpretation.

1.6.10 DEXperience continued that the requirement is still that CSWs are often only required to be qualified in BSL at NVQ Levels 1 and 2. Few Deaf or hearing loss services request Level 3[67] as a minimum standard. It is thought that very few CSWs voluntarily undertake to become Registered BSL Interpreters unless they intend to leave education since the full time pay for CSWs is still £18,000 at starting salary, rising to £22,000 p.a. Some CSWs use this route

[67] Level 3 Certificate in British Sign Language (BSL) caters for the learning needs of those who already have competence in BSL at Level 2. Successful learners must be able to demonstrate competence at Level 3 of the UK Occupational Language Standards (CILT, 2010). This means that the learner will be able to understand and use varied BSL in a range of work and social situations.

to receive payment whilst upgrading their skills to Level 6 and then leave education to become freelance interpreters.

1.6.11 ADEPT is a registered charity and professional body that supports communication professionals. ADEPT's submission stated that there is no national registration body for CSWs, and no National Occupational Standards (although National Occupational Standards for learning support are applied to CSWs by some institutions). ADEPT has its own Code of Practice[68] for CSWs and for deaf learners and employers but as there is no register for CSWs, adherence to the code is voluntary, and no sanctions can be taken if it is breached.

1.6.12 They asked some questions about how CSWs and interpreters develop their experience. For example, where are trainee CSWs and interpreters meant to get their experience? Is it fair to subject deaf learners to trainee CSWs or interpreters? Where are the mentors to supervise them and who funds this?

1.6.13 Inclusion London held a focus group[69] to gather views which included that some CSWs have a much higher level of skills than their qualification level suggests. This is due to the cost of training to be registered as a BSL Interpreter which is a significant barrier to career progression for interpreters. They continued that there should be a national minimum standard of BSL Level 6 for CSWs, and if CSWs are used this must only be with agreement from the service user. Another comment from the focus group suggested that since many people learn BSL informally – e.g. because a family member signs – it would be helpful to have a quick and cheap way of certifying that skill level without having to go through additional training.

1.7 In schools

1.7.1 Respondents to the British Deaf Association (BDA) survey[70] indicated that CSWs interpret for deaf people mostly in education settings and advised that some CSWs are reported as giving other kinds of support such as pastoral care, managing students' behaviour, liaising with home and/or other professionals, 1:1 help with learning, assisting with homework, and checking the student's written English.

[68] ADEPT's Code of Practice for communications support workers and for Deaf Learners and Employers guide.
[69] Inclusion London held a focus group on 2 March 2016 to gather evidence. The Group comprised: 13 representatives from 12 Deaf and Disabled People's organisations. Of the 12 organisations 10 were specifically for Deaf people.

[70] The British Deaf Association's response is based on a survey (in English & BSL) in February 2016. There were 119 eligible responses, of which 75per cent of respondents were D/deaf and 25per cent hearing.

1.7.2 DEXperience[71] reported that the CSWs' role in education is only different from that of a BSL/English Interpreter in that it also involves the written word, i.e. preparation of teaching materials, and, in education, an elementary teaching role. With respect to supporting deaf people in their interaction with other hearing children or colleagues, there is no significant difference to that of the role of a BSL/English Interpreter. When working between BSL and the spoken form of English, the main role divergence is that CSWs do not "voice over" as much as do BSL/English Interpreters. This is largely because CSWs' skill levels are not generally high enough to receive BSL from deaf children. Also they suggest that if the deaf child is not learning BSL adequately enough to be able to express their views or they are missing out so much information that they do not possess the confidence to respond in the classroom.

1.8 In further education

1.8.1 An informal response from a member of the British Association of Audiological Physicians (BAAP) identified CSWs can be notetakers for lessons and lectures – for example, where a deaf person may be lip-reading the tutor. The duration of the work can be the whole day or just a couple of hours depending on the needs of the student.

1.8.2 Their response continued that CSWs provide a holistic communication support package for each individual client, by lip-speaking; note-taking; interpreting between spoken English and BSL, SSE or deaf-blind manual language or other language; adapting to the needs of that student, to help them grasp what is required in class, produce written work, support learners in tutorials; talking about their learning needs, building relationships with learners whilst getting to know their style of learning, coaching professional staff and students in deaf-awareness, supporting the school and college in improving the environment for hearing aids and lip-reading.

1.8.3 The National Deaf Child and Adolescent Mental Health Services (Northern) internal consultation cautioned that while CSWs have a meaningful role to play in working with deaf children and young people, they should not be employed as the only or major source of support for deaf young people. They suggested that using CSWs as the main source of support is equivalent to asking Health Care Assistants to perform the tasks of Registered Nurses.

1.8.4 ADEPT responded that the role of the CSW is not that of a 'lower level interpreter', although it does involve signing what the lecturer and other learners say and voicing over the information provided in sign language by the deaf learner, which are the basics of what an interpreter does. CSWs also

[71] The organisation's contribution is based on anecdotal experiences and findings from research

have to be able to switch to taking notes, drawing pictures, providing deaf awareness to staff and other learners, facilitating group work, simplifying hand outs and modifying written work into English. Each subject area has its own terminology and much of this has no specific matching sign, so this has to be agreed individually with the deaf learner, who may have to learn the sign as well as the English word. Continuity of CSW is therefore vital to enable success, and deaf learners need to work closely with their CSWs in order to flourish.

1.9 In employment and training

1.9.1 The Royal Association for Deaf people (RAD) response is based on their direct experience mainly relating to the use of CSWs with their staff in RAD, and some familiarity with the role of CSWs in an educational setting based on the experience of their clients and deaf staff.

1.9.2 They reported that in the context of employment, depending on the employee's role, they would expect a CSW to have Level 6 in BSL, or be Level 3 and working towards Level 6, and eligible to register as a trainee interpreter as part of an approved interpreter training program. In these circumstances CSWs perform some of the functions of a qualified interpreter.

1.9.3 For example, they may interpret one-to-one interactions (face-to-face or by telephone) but perhaps with less speed/simultaneity, and would not be expected to support a multi-party exchange or if high-level or specialist vocabulary was required. RAD advised that deaf people for whom English is their second language can have a lower level of literacy, and CSWs do provide assistance to deal with written English including translating English documents into BSL, transcribing and/or proofreading the deaf person's written work to enable them to achieve an acceptable standard of English in a workplace setting. Many interpreters would also consider these tasks a normal part of their interpreting work.

1.9.4 DEXperience highlighted that the demand for communication support, in its broadest sense, constantly outstrips the supply of professionally trained people. They reported that deaf professionals often have to juggle their working week to fit around the availability of interpreters and due to costs some deaf people have been advised to book CSWs. They expressed concern that deaf people are not able to have the level of professional support they need and it blurs the lines between the two roles.

2.1 What do Communication Support Workers do?

2.1.1 Deafconnect summed up the CSW's role as to: 'Allow a deaf and severely hard of hearing individual equal access to the situation whether it is a meeting, a service or support. Interpret the whole situation so a deaf or severely hard of hearing person understands everything'. It advised that some people find lip-reading very accessible but need a clear lip pattern and one-face-to watch; others need a BSL interpreter or notes of the meeting etc. to keep up and fully understand what is being said to them. They expressed serious concern regarding the use of CSWs for appointments with GPs, hospitals, consultants and other health professionals due to the quality of translation and potentially serious impact on a deaf person's health.

2.1.2 Communication support, as done by Communication Support Workers, was described by Vista (a deafblind charity) as a means of aiding a person's communications in a way that is acceptable for them to be able to communicate and express their wishes and make informed choices.

2.1.3 Respondents to the BDA survey[72] identified a wide range tasks carried out by CSWs. In schools and further education these include interpreting - BSL, Sign Supported English and Signed Exact English; translating written English and checking the student's written English; note taking; lip-speaking; teaching; disciplining deaf students/managing behaviour; liaising with family/other professionals; facilitating integration with hearing peers; giving the student advice/pastoral support/advocacy; advising teachers/lecturers about accessibility & deaf awareness training; 1:1 work with the deaf student; interpreting for deaf parents at parents' evenings or for deaf staff at school meetings; and interpreting with the student outside of the classroom, such as for meeting with a college nurse and reception. They also said that sometimes CSWs gave the deaf student answers (unfairly) in tests and assessments.

2.1.4 The survey from NUBSLI also reported that sometimes CSWs are acting for deaf people as social workers used to, for example, assisting deaf people by reading correspondence, obtaining prescriptions and providing support with establishing daily living routines.

2.2 In schools

[72] The British Deaf Association's response is based on a survey (in English & BSL) in February 2016. 119 eligible responses, of which 75 per cent of respondents were D/deaf and 25per cent hearing.

2.2.1 Inclusion London's focus group[73] expressed serious concerns about the quality of CSWs used throughout the education system. They highlighted that deaf pupils/students may receive support from the same CSW during their primary and secondary education, so it is crucial that the professional can provide a high level of support and has good English language skills as if they are inadequate this can seriously impede the deaf person's learning through into higher education.

2.2.2 The National Deaf Children's Society wrote that in education, CSWs are not sign language interpreters. This is because CSWs undertake a range of tasks in order to provide access to the curriculum. They continued that as CSWs act as a type of specialist teaching assistant, they also believe there is a need for a further qualification to provide assurance that CSWs are also able to take notes to a high standard, provide general language support and able to support the pupil appropriately (by ensuring they don't act as a barrier themselves to the pupil's inclusion in the wider classroom).

2.2.3 NUBSLI[74] identified that other tasks performed by CSWs included note taking, translating between written English and BSL, advocating for deaf students, teaching, mentoring, liaising with others, correcting written English, working 1:1 on projects with deaf students, advising teachers on deaf awareness, and acting as Learning Support/Teaching Assistant.

2.2.4 DEXperience identified that recent research[75] findings do not differ much from their 'Best Value Review of deaf education in 2001 to 2004' where they found that CSWs in classrooms who were not able to keep up with the mainstream teacher did not generally attempt to slow down or ask for repeated information. There appeared to be very few concessions made by the mainstream teachers to include deaf pupils in classroom discussions or their topic questions, so often deaf children were silent and unable to contribute much through their lessons.

2.3 In further education

2.3.1 Deafinite Interpreters Ltd wrote that depending on the educational establishment, the skills of the CSW and the individual's needs, CSWs can act as notetakers, helping to adapt and create learning materials to make them more accessible. They can also provide support for students outside of the

[73] Inclusion London held a focus group on 2 March 2016 to gather evidence. The Group comprised: 13 representatives from 12 Deaf and Disabled People's organisations. Of the 12 organisations 10 were specifically for Deaf people.

[74] See other evidence from NUBSLI.

[75] The organisation's contribution is based on anecdotal experiences and findings from research.

classroom and take a more active role in supporting the social and emotional needs of students.

2.3.2 Deafinite Interpreters Ltd continued that language skills are a major issue for deaf learners who need high standards from CSWs or Interpreters to access information. They said that in their experience CSWs predominantly work one-way, i.e. English to BSL, and with very little voicing for a deaf sign language user, this can disadvantage the student in class in discussions or in presenting their work. At a higher educational level, mature independent students are being asked to work with CSWs who again often do not meet the fluency of language required.

2.3.3 One individual working in further education set out that CSWs are hardworking and committed to the students they support. They often do not receive advance notice about the content of a lesson and always have limited time for preparation. There is an expectation of them being subject experts despite sometimes very detailed, subject specific language being required. CSWs often commit personal time to researching and preparing for unfamiliar or new subjects.

2.3.4 Another individual respondent advised that it would be helpful if deaf students were made aware of the difference between CSWs and Interpreters as it leads to confusion if CSWs are expected to have the same knowledge or skills level as an Interpreter. They also confirmed that supporting deaf students in college is not just about interpreting voice to sign and vice versa; it requires a number of other skills such as understanding the way deaf students learn, giving support with written assignments, helping them manage their workload and deadlines and support with pastoral issues.

2.4 In employment and training

2.4.1 The BDA survey[76] indicated that CSWs provide support by making telephone calls, checking written English, including emails and 'low impact' interpreting such as for general chit chat and small scale meetings.

2.4.2 Some respondents went on to say that in the workplace, Deaf people can be disadvantaged as a result of being assigned under-qualified CSW support, for example, by being misrepresented in meetings, in their everyday work and particularly on the telephone.

3.1 Where and how can Communication Support Workers add value?

[76] The British Deaf Association's response is based on a survey (in English & BSL) in February 2016. There were 119 eligible responses, of which 75 per cent of respondents were D/deaf and 25 per cent hearing.

3.1.1 Responses, including the BAAP[77], suggest that CSWs add value in particular when they are employed part-time or full-time, or are booked regularly, to support the same deaf person(s). Working regularly with the same person, they are able to learn and adapt to that person's communication style.

3.1.2 Responses indicated that many CSWs work as unpaid volunteers, e.g. at church services, certain agencies help with employment / advice, voluntary, deaf community theatre events, cultural and religious festivals, workshops. Unpaid volunteering, it is suggested, allows CSWs to gain language skills and experience.

3.1.3 Whilst potentially having bilingual fluency respondents said that children of deaf adults, proficient in BSL in the family home, have to take all the BSL Level exams and interpreter training and assessment to gain the appropriate skills.

3.1.4 Vista responded that CSWs also add value by enabling a person to make informed choices and promote independence. Accessing an individual's own community can be far more relaxing for them if they are being supported by CSWs they know rather than an official interpreter.

3.1.5 The BDA is very clear that deaf people are not protected or safeguarded if they are provided with CSWs instead of registered and insured interpreters. In their survey 10 per cent of deaf respondents said they prefer a CSW over an interpreter, and a further 15 per cent said that they sometimes prefer a CSW. The most common reasons given for this preference were that the deaf person wanted a broader range of communication support, such as note taking and SSE support, and because CSWs were cheaper than interpreters. A small number of deaf respondents said that they prefer to use a CSW for office based support.

3.1.6 Two responses from deaf professionals who took part in the February 2016 BDA survey give a flavour of the views:

> *"CSWs who supported me all my life supported me by encouraging me to learn and allowing me to understand everything and I benefitted a lot from them."*
>
> *"I would like a CSW to have good training and have at least a Level 3 certificate in BSL."*

3.2 In schools

[77] An informal response from a member of the British Association of Audiological Physicians (BAAP)

3.2.1 The 2016 CRIDE survey[78]' responses suggest that there were 1,512 specialist support staff, other than Teachers of the Deaf, supporting deaf children in England, 415 (27.5%) of whom are listed as *'Communication support workers/Interpreters/Communicators, etc'*.

3.2.2 More than one respondent cited that the value in particular lay with the duration of relationship and continuity specifically with CSWs and often wider communication support work. In schools the work is often about more than the translation of language and there can be advantages from continuity of support. It was felt to be more beneficial when the CSW employed by schools and colleges develops a positive 1-3 year relationship with the student for the duration of the course. CSWs may be able to offer a supportive role outside of the classroom.

3.2.3 The views of a parent of a deaf child studying in a mainstream school are that a school with a resource centre or Deaf school will not meet the child's needs. That is because resource centres and deaf schools mainly employ CSW's, who hold either BSL Level 2 or 3 qualifications, which is wholly inadequate. A 3-year-old deaf child can sign at this level and may need support from someone who with more advanced BSL qualifications.

3.3 In further education

3.3.1 The view from DEXperience[79] was that at present, CSWs do not represent best value for money or quality of support, particularly not in further education. They consider Wakefield College demonstrates good practice where they employ Education Interpreters, with salaries commensurate to attract the requisite skills (minimum NVQ Level 3) and to match the job description.

3.3.2 They suggested the role of an Education Interpreter is essential in mainstream schools, to ensure that deaf children have as much access to the school environment and national curriculum as is humanly possible.

3.3.3 The NUBSLI[80] survey suggested that where CSWs are inappropriately used as unqualified interpreters they do not add value. However, where CSWs with approximate training can or do add value is in an education setting, with deaf students who are not sign language users, for example, by assisting deaf students with learning by re-explaining what is being taught and assisting with written English, providing note-taking and lip-speaking.

---

[78] http://www.ndcs.org.uk/professional_support/national_data/cride.html#contentblock1

[79] The organisation's contribution is based on anecdotal experiences and findings from research.

[80] See other evidence from NUBSLI.

3.3.4 One student respondent spoke of their experience in college and highlighted that the relationship with interpreters or CSWs is really key and the level of qualification is not a guarantee of a successful partnership. The point was also made however, that a higher level of qualification in an interpreter is essential to help with understanding technical or specialist terms. The student wrote that if CSWs have to write down information because they cannot sign details, the delay is simply too much and can be overwhelming. Equally important, the student highlighted, is that people who engage or allocate interpreters must have real deaf awareness and work with the deaf person to ensure they understand the individual's specific needs.

3.3.5 Aligned to the last point, a response from an individual with hearing loss who has worked in the provision of support for deaf students, was the importance of enabling continuity of support for students and involving deaf people or those with hearing loss in the allocation of support. They also endorsed the importance of an interpreter understanding the subject sufficiently to avoid repeated fingerspelling of words, which makes things very difficult for deaf students.

3.3.6 An individual's experience, while working in the provision of support for students in further education, was that the quality of the service was poor, and that this affected the students' progress. The individual has witnessed complaints from lots of students who were referred to hearing staff who did not sign to the advanced level of the students and essentially could not understand them. They felt that the focus is on money rather than quality as, despite each learner having an individual budget, there's insufficient money to provide support for them to continue in their education. They suggested that the Government needs to work with deaf organisations, like the BDA.

3.4 In employment and training

3.4.1 RAD[81] set out that in an employment setting, depending on the employee's role, they would expect CSWs [82] to have Level 6 in BSL, or be Level 3 and working towards Level 6, and be eligible to register as a trainee interpreter and be part of an approved interpreter training program - although requirements do vary between courses. RAD lists other essential attributes as: a good standard of English and a good standard of education in general, IT skills, knowledge and understanding of the NRCPD Code of Conduct, good general communication and interpersonal skills, and a high standard of Deaf Awareness. For this reason, RAD advises that well-chosen CSWs can provide

[81] The response is based on their direct experience mainly relating to the use of CSWs with their staff, and some familiarity with the role of CSWs in an educational setting based on the experience of their clients and deaf staff.

[82] See other evidence from NUBSLI.

support equivalent to that of an interpreter, for a particular client/employer or job role. CSWs can also be employed to provide pooled support for more than one person, or a team.

3.4.2 RAD reported that a CSW working regularly with the same person in an employment role is able to learn about the organisation and job role. This expands the CSWs job-specific or professional vocabulary and ability to provide tailored communication support – both verbal and written. They suggest a qualified interpreter would seldom accept a role working full time with one deaf person because as they need to work in a variety of domains and with a variety of people for professional development.

4.1 To what extent does the use of Communication Support Workers mask the demand for sign-language interpreters and other communication and language professionals?

4.1.1 Not all respondents answered directly as to whether in their view the use of CSWs masked the demand for sign-language interpreters. Of those that did, the view was fairly equally split. NUBSLI provided that untrained CSWs often interpret, as a core activity in an educational setting, which can be hidden by the use of terms such as “facilitating communication”, or aiding “communication between pupil and teacher by using Signing where appropriate”.

4.1.2 BAAP[83] were clear they did not feel the use of CSWs masks the demand for communication and language professionals, and cautioned that there is an undocumented and real need for large numbers of CSWs, who fulfil their roles in the educational setting. Adding that it is not feasible (cost and current low numbers of interpreters) to replace the majority of CSWs with registered interpreters. They said they are aware that in rare situations certain medical, optical, dental, social service providers, legal agencies, public meetings, job and college interviews with less stringent requirements for communication support may employ CSWs for cost reasons and due to insufficient numbers of interpreters outside London**.**

4.1.3 However, the unit at University College London Hospital has a policy of only using NRCPD registered and fully qualified interpreters and not trainee interpreters or level 6 BSL CSWs. They described three components of the ‘qualification’ they require:

- BSL fluency: which takes 6-7 years on average to get BSL level 6 (language skills).
-

[83] An informal respose from a member of the British Association of Audiological Physicians (BAAP)

- They must also be fluent in English (preferably A-level standard).

- Interpreting skills – Usually an interpreting skills course for post BSL level 6 students is two years duration.

4.1.4 RAD highlighted that CSWs and BSL interpretation were overlapping skillsets and complementary roles, believing that one person may perform both roles at different times, provided the job requirements for CSWs are set appropriately.

4.1.5 The National Deaf Children's Society believes that families and young people need to be as well informed as possible about the support available in schools and colleges. They continued that everyone's needs will be different. Some children will require someone qualified to interpret into BSL/English at a high level and that local authorities have to do their best to ensure those needs are met. As reported by other though they highlighted that there is no one-size-fits-all approach. Instead it is about ensuring staff have the skills that meet the needs of an individual child.

4.1.6 DeafConnect suggested that 'unqualified CSWs should not be used other than in primary schools as they do not have the vocabulary or linguistic ability to adapt to every situation, nor are they qualified to deal with high level needs of advanced BSL users'.

4.1.7 A submission from the parent of a deaf child studying in a mainstream school sets out some of the issues around using CSWs with only BSL Level 2 or 3 qualifications. A 3-year-old deaf child can sign at this level and could soon surpass such CSWs. They also say that a deaf child who has had access to sign language from birth and has support from a level 6 BSL interpreter in school stands a better chance of acquiring good literacy skills.

4.1.8 They explain that having a Level 6 qualified and registered BSL interpreter in the classroom ensures that the teacher's chosen pedagogy is conveyed for optimum learning. No-one would choose for their hearing child to learn their first and natural language from someone who cannot really speak it. In addition, Deaf children of Deaf parents are more likely to receive better support than Deaf children of hearing parents, as the Deaf parents will usually have knowledge of what to expect and how to improve on their own school experiences.

4.1.9 The parent goes onto describe how one mainstream school supports deaf students.

4.1.10 This school organises weekly visits from a Teacher of the Deaf[84](TOD) to ensure that the lessons are accessible for the deaf child and answer any questions that the teachers may have regarding teaching a deaf child.

- A deaf instructor who is a qualified and registered deaf interpreter as well as a qualified BSL teacher works at the school one day a week.

- The deaf instructor's role is to teach children, teachers and the whole school community sign language as well as acting as a role model for the deaf child and to the other children.

- There are lunchtime BSL clubs and after school BSL clubs as well as in-class BSL stories. The deaf instructor also provides specialist deaf awareness training to the school where the staff can ask him anything they'd like to know – and perhaps feel that they cannot ask the parent.

4.1.11 An individual, who did not define their role, who thought it depended both on the qualifications held by CSWs and who they are working with. For example: if a young child's primary mode of communication is sign, then a BSL qualification of Level 3 is necessary. CSWs also have experience where a child is using speech and sign for which a level 2 may be appropriate, but what is more important are the CSWs' other skills of working with young children. Sometimes it is not just about the qualifications. This is different for older students and adults for whom there should be access to sign language interpreters.

4.1.12 Some others advised that risks should be highlighted in using a CSW in certain settings such as medical, legal, social service providers, public meetings and interviews where the interpreted detail may be insufficient.

4.1.13 RAD and others suggested that the experience gained by working as CSWs can assist in achieving a full interpreter qualification. Others, including the BDA and Inclusion London, emphasised the importance of giving people the choice about the level of support they receive. The funding to support such choice was also raised as an issue.

4.1.14 There was a view that CSWs should all have a BSL Level 6 (or degree /equivalent) qualification.

4.1.15 DEXperience suggested the role be renamed Education Interpreters, to continue to incorporate the discrete tasks required in education (preparation

[84] http://www.batod.org.uk/

of materials, lesson planning with mainstream teachers to ensure deaf pupils' involvement, one-to-one support where required, assisting in Education, Health and Care Plans, assessments and reviews, etc.). The thinking being that change of CSWs' job title alongside requiring the highest level of BSL qualifications would reflect the core interpreting function, whilst giving BSL an equivalent status and value to English in education.

4.1.16 Since this report was first commissioned, the Department for Education has asked the National Sensory Impairment Partnership (NatSIP_ to develop a framework around how Communication Support Workers should be used in education. NatSIP will be undertaking this work in collaboration with other stakeholders including the National Deaf Children's Society and ADEPT.

Glossary

Access to Communication in English (ACE)

Lipspeaking, note-taking, speech to text reporting are often collectively referred to as ACE.

Age-related hearing loss

A long-term and progressive condition in which the severity of hearing impairment increases with age.

British Sign Language (BSL)

BSL is the first or preferred language of an estimated 70,000 Deaf people in the UK. In March 2003, BSL was recognised by the British Government as an official minority language.

British Sign Language Interpreter (BSLI):

A BSL Interpreter is usually a professional interpreter, with postgraduate qualifications in both signed language like BSL and another language, who may (or may not) be registered with NRCPD, SASLI or RBSLI as a sign language interpreter.

Communication Support Worker (CSW):

Generally an individual with at least a level 2 qualification in British Sign Language (BSL). CSWs mainly work in education, in schools, colleges and universities.

Communicator guide

Someone who will both guide and support communication for a Deafblind person.

Cued Speech (CS)

A system which uses eight hand-shapes in four positions near the mouth to clarify the ambiguous or invisible lip-patterns of normal speech.

Cued Speech Transliterator (CST)

A person who facilitates communication between spoken and cued English via Cued Speech. They have a similar role to that of a BSL interpreter, but, because they do not interpret from one language to another, but between two modes spoken (oral) and cued (visual) of the same language, they are called Transliterators

Deaf

The term 'deaf' includes people who are deaf, Deaf, Deafblind, deafened and hard of hearing. ‘The capital **D** ‘**Deaf**’ is also used as a cultural label that refers to people who are profoundly deaf, whose first or only language is BSL and may see themselves as part of a cultural and linguistic minority known as the Deaf community.

The lower case **d** for ‘**deaf’** which indicates those who may not know any sign language, are more likely to identify as English users and are also more likely to consider themselves as having “hearing loss”.

- **d/Deaf** - When talking in English about both groups at once, the term ‘**d/Deaf’** is often used.

Designated interpreter

A Designated Interpreter is an interpreter who works with the same Deaf Person over a long period.

Disabled Students Allowance

DSAs are grants awarded by Student Finance England[85] to cover some essential additional expenditure that a disabled student is obliged to incur because of their disability whilst undertaking a course of higher education. Higher education students living in England can apply for DSAs if they have a disability or long term health condition which meets the definition of disability[86] under the Equality Act 2010.

Deafblind

Deafblind is the term used for people with severe impairments of both hearing and vision. The majority of these are people over the age of 70 who have acquired gradual visual and hearing loss related to the ageing process.

Deafblind manual interpreter

A Deafblind manual interpreter will fingerspell words in English on the Deafblind person's hands. This can only be done one-to-one.

Deaf Relay Interpreter

Deaf Relays are experienced Deaf people who work alongside BSL interpreters with users who are Deaf and have a specific language need due to a disability or not being a native BSL user. An individual who requires a Deaf Relay Interpreter may have learning disabilities, mental health problems or use rare signs. The Relay adapts what the hearing interpreter is signing into a variation of sign for the client, together with the client's response for the interpreter, to assist understanding.

[85] https://www.gov.uk/student-finance/overview

[86] https://www.gov.uk/definition-of-disability-under-equality-act-2010

Intervenor

An intervenor provides one-to-one support to a child or adult who has been born with sight and hearing impairments.

Live captioning

This provides real-time, speech-to-text delivered remotely to any connected device, for example by making spoken words appear on a screen seconds after they are articulated.

- Live captioning services are delivered by trained captioners who listen to the live audio stream and re-speak what they hear, including punctuation and grammar, into the system. The converted text is then displayed on the user's live device. Transcripts from the captioning session are available online in Word or PDF format.

MRSLI

Member of the NRCPD Register of Sign Language Interpreters (see NRCPD)

Notetaker

- **Manual Notetakers** take notes for D/deaf people and people with disabilities in a wide range of situations. Their clients include, but are not limited to, D/deaf, deafened, hard of hearing, and Deafblind people and also people with visual impairments, dyslexia or mobility problems. Manual Notetakers are trained to take a clear set of notes handwritten in English for the client to read later.
- **Electronic Notetakers** may provide communication support for D/deaf people who are comfortable reading English. The Electronic Notetaker produces a real-time summary of what is said using an ordinary laptop computer – usually linked to a second laptop for the client to read from. The laptops are connected by cable, wireless or Bluetooth networking or linked to a Braille machine for Deafblind clients. At the end of a

meeting or event, the Electronic Notetaker provides a copy of the transcript by email or on a memory stick/flash drive.

- A qualified operator is specially trained in condensing language and uses dedicated Notetaking software with abbreviation/shorthand capabilities to speed up the typing process. This software also enables the client to type messages to the operator and add their own notes to the transcript. There is some remote working, using text streaming services via the internet

NRCPD (The National Registers of Communication Professionals working with Deaf and Deafblind People).

NRCPD is a body that provides voluntary regulation of communication and language professionals who work with deaf and Deafblind people. NRCPD holds Registers of interpreters for Deafblind people, Lipspeakers, Notetakers, sign language interpreters, sign language translators and speech to text reporters.

Palantypists (or **Speech to Text Reporters (STTR))**

A palantypist or Speech to Text Reporter is a specially trained person who is types live speech verbatim.

Prelingually deaf

People who have been deaf since birth or before acquiring language. The majority of this group identify as “Deaf” which encompasses a language and culture as well as a disability, and their first or preferred language is British Sign Language (BSL). The ability to read English, their second language, is affected. Unlike hearing people learning a second language, Deaf people’s ability to acquire complete fluency in English is limited by their inability to hear the language in everyday and professional use.

RBSLI (The Regulatory Body for Sign Language Interpreters and Translators)

RBSLI is a new, independent, voluntary regulator established in 2015.

SASLI (Scottish Association of Sign Language Interpreters)

SASLI is the Scottish body for training and qualifying BSL interpreters.

School Census

The School Census is a statutory data collection for all maintained nursery, primary, secondary, middle-deemed primary, middle-deemed secondary, local authority maintained special and non-maintained special schools, academies including free schools, studio schools and university technical colleges and city technology colleges in England.

School Census data are not published in their raw form as they include information defined by the Data Protection Act 1998 as sensitive personal data. However, a wide range of aggregate outputs, including official statistics, are published on a regular basis.

The School Census captures data on children who have been formally identified as having a special educational need. It does not capture data on children who are disabled. The National Deaf Children's Society argues that the School Census does not reliably capture data on all deaf children for this reason.

Social Haptic Communication

Social Haptic Communication is a method of conveying additional information about the environment though touch

Video remote interpreting (VRI)

VRI provides an off-site sign language interpreter via a webcam or videophone to help two people in *the same* location, such as a GP surgery, communicate.

Video Relay Service (VRS)

VRS provides an off-site sign language interpreter via a webcam or videophone to help two people in *different* locations, such as a customer and a customer service representative.

Visual frame

Signing in a way that the Deafblind can see, using the sight they have. This may mean sitting a particular distance away, signing within a smaller space, signing at a particular pace, adapting signs, wearing particular colours, lighting the environment in particular ways. Each Deafblind person will have different requirements, and it will often mean that they need one-to-one interpreting support, since it may not suit or be appropriate to other Deaf and/or Deafblind people.

Annex A – Statistics on the deaf population

The most recent NHS Digital[87] statistics for England are from 2010[88] and show that at 31 March 2010:

- 56,400 people were recorded on the deaf register. The number on the register increased by 1,900 (3 percent) since March 2007, which is also an increase of 10,900 (24 percent) since 1995.

- Over half (53 percent) of people on the deaf register were aged 18-64 which is a 4 percentage point decrease from 57 percent in March 1995.

- 156,500 people registered as hard of hearing. This is a decrease of 8,000 (5 percent) since March 2007.

- 69 percent of people on the hard of hearing register were aged 75 or over which is an increase from 61 percent in March 1995.

Wales Deaf Council estimates that there are more than 150,000 people in the UK with severe to profound hearing loss whose first language is BSL, 3,000 of whom live in Wales.

Deaf children

The Department for Education School Census[89] is the statutory data collection vehicle for a broad range of schools and colleges in England, and it includes data on deaf children who have been formally identified as having a special educational need. It does not identify all deaf children.

The number of pupils recorded in the School Census as having hearing loss as their primary SEN need in 2015 was 19,350, around half of the number identified by CRIDE.

---

[87] Previously known as Health and Social Care Information Centre (HSCIC)
[88] People Registered as Deaf or Hard of Hearing - England, Year ending 31 March 2010 [NS], Health and Social Care Information Centre, 2010 - http://www.hscic.gov.uk/pubs/regdeaf10

[89] www.gov.uk/guidance/school-census

The School Census only records children's primary and secondary needs on the basis of what schools are aware of, so it will not capture children who are beginning to have hearing loss (some conditions are progressive), nor some of those with complex and multiple needs where their hearing loss has not been picked up. It does not capture the child's main or preferred means of communication. The number of pupils recorded in the School Census as having hearing loss as their primary SEN need in 2015 was 19,350, around half of the number identified by CRIDE. The number of pupils recorded in the School Census as having hearing loss as their primary SEN need in 2015 was 19,350[90]. From 2015 SEN support replaces School Action and School Action Plus[91] but some pupils remain with these provision types in first year of transition. Those who were formerly School Action did not provide type of need in previous years. Those who remain on school action provision are not included here but have been included within the SEN support category in other tables.

[90] https://www.gov.uk/government/statistics/special-educational-needs-in-england-january-2015.

This records children's primary and secondary needs on the basis of what schools are aware of, so it will not capture children who are beginning to have hearing loss (some conditions are progressive), nor some of those with complex and multiple needs where their hearing loss has not been picked up. It does not capture the child's main or preferred means of communication.

[91] The Department for Education and Skills (DfES) Special Education Needs: Code of Practice (September 2001) became effective from 1 January 2002. LEAs, schools, early education settings and those who help them – including health and social services – were obliged to have regard to it.

The code was designed to help these bodies to make effective decisions regarding children with SEN. It did not (and could not) tell them what to do in each individual case.

School Action (SA) was a provision used when there was evidence that a child was not making progress at school and there was a need for action to be taken to meet learning difficulties. SA could include the involvement of extra teachers and may also have required the use of different learning materials, special equipment or a different teaching strategy.
School Action Plus (SA+) was used where SA had not been able to help the child make adequate progress.

http://webarchive.nationalarchives.gov.uk/20130401151715/https://www.education.gov.uk/publications/standard/publicationdetail/page1/dfes%200581%202001

Annex B - Methods of communication and language support

British Sign Language

British Sign Language (BSL) is a visual-gestural language, which uses hands, facial expression and body language. BSL has its own grammar and syntax, which are completely different from the structure of English. A direct transliteration of English to BSL (or BSL to English) that preserves the syntax will often produce passages that are incoherent in the target language. A translation between the two languages will convey the meaning without preserving the grammar and syntax.

Communication support worker (CSW)

There is no definitive occupational definition of a CSW, however A CSW is generally an individual with at least a level 2 qualification in BSL. CSWs mainly work in education, in schools, colleges and universities. CSWs may also have some knowledge about or and experience with lipspeaking, notetaking, interpreting and modifying written texts.

Some qualified sign language interpreters call themselves CSWs and some higher and further educational institutions require that CSWs are qualified interpreters.

A separate Call for Evidence was issued in respect of CSWs and the summary of findings can be found at Annex G.

Cued Speech

Cued Speech (CS) is a system which uses eight hand-shapes in four positions near the mouth to totally clarify the ambiguous or invisible lip-patterns of normal speech. It is primarily used with deaf children to develop language and literacy. CS is more widely used in other countries than in the UK, and can be used with any traditionally spoken language.

Cued Speech Association UK provides training from basic to advanced. Level 1 confirms accurate use of CS and Level 2 confirms more fluency and speed.

Interpreter for Deafblind people

Interpreters for Deafblind people use manual communication to enable Deafblind people to understand, participate and interact. The interpreter also relays visual and other non-verbal information, for example reactions to what has been said.

To register with NRCPD as an interpreter for Deafblind people, an individual must achieve the CACDP Level 3 Certificate for LSPs (Language Service Specialists) working with Deaf and Deafblind People (Deafblind Manual).

Intervenor

An intervenor provides one-to-one support to a child or adult who has been born with sight and hearing impairments – known as congenital Deafblindness. Intervenors use very individual ways of communicating, which may combine speech, signs, gestures, facial expressions and objects. This individuality usually means that the Deafblind person and intervenor must be familiar with working together.

Lipspeaker

Lipspeakers repeat spoken messages for people who can lipread. They ensure clear communication in critical situations or when there is more than one voice to follow. Lipspeakers use facial expression, natural gesture and fingerspelling to support communication.

To register with NRCPD as a Lipspeaker, an individual must achieve the CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Lipspeaking).

Member of Registered Sign Language Interpreters (MRSLI)

An MRSLI is a Member of the National Registers of Communication Professionals working with Deaf and Deafblind People or NRCPD.

Signature[92] regulates communication and language professionals via the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD).

[92] Signature (legally **CACDP** and formerly **The Council for the Advancement of Communication with Deaf People**) is a charity whose aim is to improve communication

Notetaker

Notetakers produce an accurate summary record of speech which a deaf person can use for reference after the fact.

To register with NRCPD as a notetaker, an individual must achieve the CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Notetaking).

Manual and Electronic Notetakers

A manual notetaker is trained to produce a hand written clear and accurate summary record of speech which a deaf person can use for reference after the fact. Notetakers are often used in educational settings. They do not provide a verbatim record of what was said.

Electronic Notetakers take notes onto a laptop. Most use two laptop computers – one for the user and one for the operator – and special software. The operator types a summary of what is being said into the computer and the text appears on the user's screen. This allows the user to interact with the operator and add their own notes. It is up to the user, not the notetaker, to decide what they want to keep. Alternatively, they can just take notes directly onto their own laptop and pass them over to the user afterwards.

To register with NRCPD as a notetaker, an individual must achieve the CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Notetaking).

Sign Language Interpreter

Sign language interpreters (SLIs) transfer meaning from one spoken or signed language into another signed or spoken language[93]. They use their skill and

between deaf and hearing people in the United Kingdom. Signature offers a portfolio of qualifications in British Sign Language and other forms of communication with deaf and deafblind people.

[93] Interpreting and translating are often used as interchangeable terms. However they relate to different activities, skills and competencies:

- **Interpreting** means working between languages as they are spoken or signed, e.g. a Deaf Occupational Therapist meeting with a hearing patient.
- **Translating** means working to and from languages that are recorded, e.g. from an English autocue to recorded BSL for the news.

Interpreters will often do 'sight translation' and/or short pieces of translation between BSL and written English. An example of sight translation would be translating an email for a Deaf BSL user, i.e. working from written English to live BSL. Sight translation and translation require Level 6 fluency and

knowledge of the two languages, and their understanding of cultural differences, to transfer a message in one language into the other.

To register with National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD) as a sign language interpreter, an individual must be highly skilled in a signed language like BSL and another language, which may be another signed language or a spoken language. They must have postgraduate qualifications in both interpreting and the second language and be able to facilitate clear communication in both directions in a conversation between a hearing person and a deaf person.

Trainee Sign Language Interpreter

A Trainee Sign Language Interpreter (TSLI) registered with NRCPD is someone who is undertaking an approved sign language interpreter training course or an approved development plan leading to registered status; meets all the requirements set out in the National Occupational Standards for Trainee Interpreters (NOS TINT); and are supervised throughout their training.

Sign language translator

Sign language translators translate text (which might be written English or recorded signed language) from one language into another. Most often this will be written English into a signed language for the purposes of broadcasting or online distribution.

To register with NRCPD as a sign language translator, an individual must achieve the Durham University MA in Translation Studies or the Signature Level 6 Diploma in Sign Language Translation.

Speech to text reporter

Speech to text reporters (STTR) use a phonetic keyboard to immediately show spoken words on a monitor or screen for real time communication. They provide a complete transcription of spoken words and include notes of environmental sounds, like laughter and applause. STTR use systems such as Palantype® or Stenograph® and may also referred to as Palantypists or Stenographers.

---

skills (e.g. Level 6 NVQ Diploma in Sign Language Interpreting, unit INT6E1, Support sign language interpreting through sight translations of routine written documents).

The vast majority of Palantypists and Stenographers in the UK were originally trained to work as Court Reporters in the legal system to record proceedings and provide transcripts when requested. Several STTRs do both Court Reporting and STTR work. To register with NRCPD as a speech to text reporter to work with the deaf or those with hearing loss, an individual must achieve the CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Speech to Text Reporting) and pass the NRCPD professional competence assessment.

Teacher of the Deaf

A qualified teacher, who is additionally qualified to teach deaf children. They provide support to deaf children, their parents and family, and to other professionals who are involved with a child's education.

Annex C – More information about Deafblind People

According to NHS Digital[94], by 31 March 2010, 88,500 people had registered with their local council as blind or partially sighted with an additional disability and of these, 25,300 (29 percent) were recorded as having a hearing impairment as their additional disability[95]. However, the total number of Deafblind people is not known, with estimates and official data varying by tens of thousands.

Deafblind UK[96] is one of the largest Deafblind charities. The organisation's submission estimates that the Deafblind population of the UK will reach 569,000 people by 2030[97], primarily due to age-related acquired Deafblindness, although up to a third of the deafblind population is of 'working age'. For a large proportion of the Deafblind community, spoken or written English may be the form of communication with which they are most comfortable. Initially this may be through clear speech using appropriate hearing aids, but if hearing loss becomes significant, then tactile communication in the Deafblind manual alphabet[98] or block alphabets99 may be increasingly required.

The type of communication support needed by Deafblind people depends upon many factors, including the communication method(s) the Deafblind person uses, how proficient they are with using them, how much vision and hearing they have and if they have additional impairments. There is no single solution that will work for all Deafblind people. A flexible approach to meeting Deafblind people's needs is essential.

SENSE is a national charity that supports and campaigns for children and adults who are Deafblind. Sense points out that although local authorities are legally required to

[94] Previously known as the Health and Social Care Information Centre
[95] People Registered as Deaf or Hard of Hearing - England, Year ending 31 March 2010, http://digital.nhs.uk/pubs/regdeaf10[96] http://deafblind.org.uk/
[96] http://deafblind.org.uk/

[97] https://www.sense.org.uk/content/sense-urgency)

[98] http://www.deafblind.com/card.html

[99] http://www.deafblind.com/block.html

identify Deafblind people in their area and keep a register[100], there are limited data available locally and nationally on the number of Deafblind people.

SENSE reports that the research carried out by Centre for Disability Studies estimates that there are 336,000 adults in the UK who experience longstanding difficulties with sight and hearing.[101] Two thirds of these people are over 70.

The majority of Deafblind people are able to use speech to communicate, however they may need aids, such as hearing aids and other amplification devices to be able to do so. Sense believes around 4,000 children, 33,000 adults aged 20-69 and 222,000 older people over 70 have more significant impairments and will need trained support to address the difficulties with communication, access to information and mobility that they will experience.

There is no research or data available on the number of Deafblind people using a particular method of communication. For example, it is not possible to tell how many Deafblind people use Deafblind manual to communicate. Sense estimates that around 3,900 people may benefit from a hands on BSL interpreter at some point in their lives[102]

NUBSLI's submission explains that Deafblind people often use one or more communication methods, depending on a number of factors, including:

- the degree of sight or hearing they currently have;
- whether they became deaf or blind first; and
- whether or not they used BSL before they became blind.

These communication methods include:

- Braille[103] which is a system of writing and printing for visually impaired people, in which arrangements of raised dots representing letters and numbers are

[100] *See Department of Health's Care and Support for Deafblind Children and Adults Policy Guidance,2014 available at* *https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/388198/Care_and_Support_for_Deafblind_Children_and_Adults_Policy_Guidance_12_12_14_FINAL.pdf*

[101] Robertson, J. & Emerson, E. *Estimating the number of people with co-occurring hearing and visual impairments in the UK*, Centre for Disability Research (CeDR), 2010

[102] This is based on a number of people with Usher Syndrome type 1. People with this condition are born deaf and they gradually lose their sight.

[103] https://www.sense.org.uk/content/alphabet-based-communication

identified by touch. It can be used by Deafblind people who have an understanding of written language.

- Moon[104] which is similar to Braille in that it is based on touch. Instead of raised dots, letters are represented by 14 raised characters at various angles. It is less commonly used than Braille, but easier to learn. The ease of use means that it can be used by some people with learning disabilities and people who become blind through ageing.

- Block - a method of tactile communication where the shapes of capital print letters are drawn with a finger onto the Deafblind person's palm.

- Deafblind manual - a form of tactile fingerspelling. Each letter of the alphabet has a sign that is made against the Deafblind person's hand. Words are spelt out, letter by letter.

- Tactile BSL (Hands—on) signing, an adaptation of BSL where the Deafblind person uses their hands to feel the signs.

- Visual frame signing - an adaptation of BSL where the signs are kept within the Deafblind person's field of vision.

- Lipreading which involves the Deafblind person watching the lip shapes, gestures and facial movements of the person they are talking to so that they get a fuller understanding of what they are saying. Lipreading is a method often used by people with useful remaining vision and an acquired hearing loss.

- Tadoma which involves a Deafblind person placing their thumb on a speaker's lips and spreading their remaining fingers along the speaker's face and neck. Communication is transmitted through jaw movement, vibration and facial expressions of the speaker. There are variations in the hand positioning,

[104] http://www.rnib.org.uk/braille-and-moon-tactile-codes/moon

and it is a method sometimes used by people to support their remaining hearing.

- Haptic communication – used to supplement the information a Deafblind person receives from their main receptive method of communication. It consists of tactile signs which describes the environment, emotional responses, descriptions of people and other additional information which would otherwise be provided by sight. The signs are given through touch, commonly to the back, but it can be anywhere on the body which does not interfere with other communication methods simultaneously being used.

The unique difficulties faced by Deafblind people often result in them needing support in more situations, and for longer, than people with a single sensory impairment. For example, Deafblind people may need communication support for even the simplest of interactions such as asking for a drink or the toilet, whereas a deaf person may be able to manage these situations by lipreading or asking people to write things down.

Deafblind people may also need support with mobility to get to places and find their way around them. In employment this may be facilitated through Travel to Work, where Access to Work[105] (ATW) pay the additional costs of travelling to work; and/or through a travel buddy, where ATW pay for someone to accompany an individual to and from work. This may also be provided through a communicator guide, who will both guide someone, and support communication.

A number of respondents raise issues about previous problems with Access to Work advisers' understanding of deafblindness, and the impact that has on

[105] Access to Work is a Government grant scheme administered by Jobcentre Plus which makes awards for practical support for people who have a disability, health or mental health condition in order to help them start working, stay in work, move into self-employment or start a business. https://www.gov.uk/access-to-work/overview

the Deafblind person and the interpreter working with them. Some respondents also feel that the true cost of professionals who have trained and qualified to have the specialist skills needed to work and communicate with Deafblind people are not taken into consideration when Access to Work awards are calculated, in particular under the first ATW Personal Budgets Trial, which ended in 2017. In response to issues like this, Access to Work is currently exploring whether the next iteration of its ATW Personal Budget trial can introduce 'Managed Personal Budgets' where the flexibility is retained by the individual but the finance is held by DWP, reducing the burden on the individual. In the meantime, Access to Work has set up specialist teams, including a Visual Impairment team. Most Deafblind ATW customers are now assisted by the ATW specialist Visual Impairment team which has received specific disability awareness training on deafblindness.

NUBSLI (National Union of British Sign Language Interpreters) surveyed its members to inform its response to the call for evidence. 109 people responded to the questions about interpreting with Deafblind people in NUBSLI's survey.

NUBSLI's survey responses suggest that a significant proportion of interpreters working with Deafblind people feel that the work no longer pays enough to be viable as part of a career, and so they have reduced or stopped their work in this area. NUBSLI states that, in order to reverse this trend, the true cost of procuring these specialist skills should be taken into account when funding decisions are made about support.

Annex D - The relevant qualifications

NRCPD states that only people who have successfully completed an approved course can join one of its Registers. Its website lists approved courses[106] for interpreters for Deafblind people, Lipspeakers, Notetakers, Sign Language Interpreters, Sign Language Translators and Speech-to-Text Reporters:

Approved courses for interpreters for Deafblind people

CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Deafblind Manual)

CACDP Level 4 Certificate in Deafblind Interpreting (Manual)

Approved courses for Lipspeakers

CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Lipspeaking)

Signature Level 3 Certificate in Lipspeaking

Approved courses for Notetakers

CACDP Level 3 Certificate for LSPs working with Deaf and Deafblind People (Notetaking)

Signature notetaking endorsement 2016

Approved courses for sign language interpreters

UCLAN Postgraduate Diploma in BSL/English Interpreting and Translation

Heriot-Watt University MA (Hons) BSL (Interpreting, Translating and Applied Language Studies)

Heriot-Watt University MA (Hons) Languages (Interpreting and Translating) (Graduates studying BSL and the amalgamated fourth year course)

[106] NRCPD Approved Courses: http://www.nrcpd.org.uk/approved-courses

Signature Level 6 NVQ Diploma in Sign Language Interpreting

SLI Advanced Diploma in Interpreting and Translation: BSL-English

IBSL Level 6 Diploma in BSL/English Interpreting Studies

IBSL Level 6 Diploma in Sign Language Interpreting Studies

Wolverhampton University BA (Hons) in Interpreting (BSL/English) (graduates who achieve a first class degree from September 2017 onwards*)

Queen's University Belfast MA in Interpreting

Durham University MA in Translation Studies (graduates successfully completing the professional pathway including MELA43930 addressed using spoken English and BSL)

As well as one of these language qualifications:

UCLAN Postgraduate Diploma in BSL/English Interpreting and Translation

Heriot Watt Graduate Diploma course with grade C or above in Module C40BV1 British Sign Language

Heriot-Watt University MA (Hons) BSL (Interpreting, Translating and Applied Language Studies)

Heriot-Watt University MA (Hons) Languages (Interpreting and Translating) (Graduates studying BSL and the amalgamated fourth year course)

Signature Level 6 NVQ Certificate in British Sign Language

SLI Advanced Diploma in Interpreting and Translation: BSL-English

IBSL Level 6 Certificate in British Sign Language Studies

Wolverhampton University BA (Hons) in Interpreting (BSL/English) (graduates who achieve a first class degree from September 2017 onwards

Another recognised Level 6 qualification in a relevant second language

Approved courses for sign language translators

Durham University MA in Translation Studies (graduates successfully completing the professional pathway including MELA43930 addressed using static and scrolling English and BSL)

Signature Level 6 Diploma in Sign Language Translation

Approved courses for speech to text reporters

One of the NRCPD eligibility assessments

NRCPD's website also allows individuals to search its registers by either the name or badge number of registrees and to find registered communication professionals by postcode and professional specialism[107],

Signature[108] is an awarding body for qualifications Level 1 to Level 6 in British and Irish Sign Language[109], Deafblind communication and other deaf communication methods.

Level 1 Award in British Sign Language

Level 1 Award in British Sign Language can be taken without any previous BSL experience at any level. This qualification allows learners to gain basic skills and confidence in the two areas of production and reception of BSL.

Level 2 Certificate in British Sign Language

This qualification will allow learners to participate in longer and more varied conversations than at Level 1. The specification has been designed to be consistent with the National Language Standards at Level 2

Level 3 Certificate in British Sign Language

[107] ibid
[108] Signature is a trading name of registered charity CACDP (Council for the Advancement of Communication with Deaf People)
http://www.signature.org.uk/

[109] British Sign Language from Level 1 to Level 6
http://www.signature.org.uk/british-sign-language

Level 3 Certificate in British Sign Language (BSL) caters for the learning needs of those who already have competence in BSL at Level 2. Successful learners must be able to demonstrate competence at Level 3 of the UK Occupational Language Standards (CILT, 2010). This means that the learner will be able to understand and use varied BSL in a range of work and social situations.

Level 4 Certificate in British Sign Language

Successful completion of this qualification can be used as evidence of the language skills needed, in order to be able to operate independently and at an advanced level in the target language. It is useful for those who work on a regular basis with Deaf people (e.g. social workers, teachers of the Deaf, communicators, voluntary workers, workers within Deaf organisations, schools, etc.), those who aspire to work in these contexts, and those who wish to expand their knowledge and skills in BSL

The completion of the Introduction to Interpreting unit of this qualification can be used as evidence of the interpreting skills needed in order to apply for registration as a trainee interpreter. It is important to note however that this alone does not allow a successful candidate to achieve Trainee Interpreter status, there are a number of other criteria that must also be achieved before applying for registration.

Level 6 NVQ Certificate in British Sign Language

Successful completion of this qualification can be used as evidence of the language skills needed in order to be able to operate at a professionally proficient level in the target language. It is useful for those who work professionally with Deaf people (for example teachers and lecturers in BSL, social workers, teachers of the Deaf, trainee interpreters, voluntary workers, workers within Deaf organisations, schools, etc.) or those who aspire to work in these contexts.

Notetaking

There are now two qualifications that are being delivered across the country: ·

OCNL (Open College Network London) Level 3 - Manual notetaking to support people with disabilities ·

OCNL (Open College Network London) Level 3 - Electronic notetaking to support people with disabilities.

These qualifications had been unavailable for some five years, but have now been reinstated and are being offered by a national organisation, Note-Able Notetakers Ltd[110].

[110] http://note-ableNotetakers.co.uk/

Annex E - Disabled Students Allowances (DSAs)

Disabled Students Allowances **(**DSAs)[111] are available to cover some essential additional expenditure that a disabled student is obliged to incur due to disability whilst undertaking a course of higher education. They are non-repayable and not means-tested. They are available to full-time and part-time undergraduates and postgraduates, and some distance learning students.

DSAs are administered by Student Finance England (SFE), a service provided by the Student Loans Company (SLC), which provides financial support on behalf of the UK Government to students from England entering higher education in the UK.

DSAs are not intended to cover disability-related expenditure which would be incurred even if not attending an HE course, nor are they intended to cover study costs that any student might have regardless of whether they are disabled.

All DSAs applicants undergo a formal assessment which identifies the support the student needs to undertake their course. This results in a Needs Assessment Report (NAR) which contains recommendations on the type and amount of support that each student requires, as well as quotes from suppliers for providing the help. The NAR and quotes are then agreed by SFE, who notify the student of the help available, and where to obtain it.

The student contacts the supplier to arrange the support, and any invoices are met by SFE, up to the student's agreed ceiling.

Due to recent changes in DSAs[112], Higher Education Providers are now expected to provide the least specialist non-medical help - that is, human support - as reasonable adjustments under the Equality Act (for example practical support assistance, or examination support). DSAs are still available for the more specialist help that a student might need – BSL interpretation is fundable by DSAs, as for example are

[111] https://www.gov.uk/disabled-students-allowances-dsas

[112] Disabled students in higher education: funding proposals: Consultation Outcome, July 2015 https://www.gov.uk/government/consultations/disabled-students-in-higher-education-funding-proposals

Communication Support Workers and Specialist Support Professional (SSP) for students with sensory impairments.

DSAs funding is only payable to support suppliers who are registered with the Disabled Students' Allowances Quality Assurance Group (DSA-QAG) [113], who administer quality assurance frameworks for providers on behalf of SFE. There is a range of mandatory qualification criteria for support workers providing support under DSAs[114].

[113] https://dsa-qag.org.uk/

[114] http://www.dsa-qag.org.uk/nmh-rates/1993-mandatory-criteria-for-nmh-registration-v2-7/file

Annex F – Technological aids and support

There is a growing number of technological aids and solutions to support or facilitate communication for deaf people, including:

Video remote interpreting (VRI) which provides an off-site sign language interpreter via a webcam or videophone to help two people in *the same* location communicate, like in a GP surgery.

Video Relay Service (VRS), where the parties are each located in different places.

Text Relay Service/Next Generation Text (NGT). The original Text Relay Service required the person with hearing loss to have a textphone to be able to access the service. Text relay is still used with a textphone, however NGT now enables access to the telephone system through a range of other ways including smartphones, tablets, laptops and PCs with an internet connection. For telephone conversations, also have remote captioning and re-speaking.

Speech to Text Software: Speech to text services that take advantage of internet connections for voice-recognition remote recording. Contributors highlighted recent improvements in generic speech to text software, such as Apple Siri, Google Voice, etc., which are free to use when connected to the internet and are fully implemented in mobile telecommunications such as iPhones/iPads and Android smartphones/tablets, respectively. In some circumstances, use of a mobile phone or tablet may reduce the need for personal interpretation by providing a text display of the hearing person's speech.

Digipens: Manual Notetakers' use of technology includes Digipens, which are similar to regular pens that record what is being written and, in some cases, convert the manuscript into text. This is helpful for some clients who wish to have a digitally available record of their notes.

Electronic notetaking (**ENT**), also known as computer-assisted notetaking (CAN), is a system that provides virtually simultaneous access to spoken information to people who are deaf. Using a software program, a Notetaker types a summary of the spoken information into a computer and the text is then projected on a screen or

transmitted to a second computer. The text also provides a written record of sessions, which is particularly useful for deaf and hard of hearing attendees.

Notetakers mostly work with specific software that allows them to record in a way to suit their client. Some of these software packages are enabled to operate through stream text, so it is possible for clients to attend meetings and conferences and have the Notetaker working remotely using only the audio feed provided by the client. This works well only where the microphone is close enough to the source of the audio (for example, it will not work where there is multi-party participation), and that the internet connection at both the source and receiving end are excellent. In either scenario, this enables the client to store the text in a format that suits them, which is editable and easy to interrogate for particular words/phrases.

Audio induction loop systems, also called audio-frequency induction loops (AFILs) or hearing loops, are an assistive listening technology for individuals with reduced ranges of hearing. There are several types of loops available – infra-red, room loop, counter loop and portable loop.

Under the Equalities Act 2011, public services are required to make "reasonable adjustments" for people with disabilities. While there are loop systems in place in many buildings, reports from Hearing Link[115] and other organisations have shown repeatedly that many are not working, not maintained properly or not even switched on. Not all hearing aid users have the appropriate fittings on their aids to use them.

Radio based communication support - Many deaf young people make use of radio aids which support communication by amplifying the sound of any speaker holding the microphone. Technology continues to improve with radio aids becoming increasingly powerful, discrete and available to use in a range of different scenarios

Pagers for emergency evacuation purposes,

Speech amplifiers,

[115] https://www.hearinglink.org/

Inductive couplers in telephones, which may make the caller's voice clearer for hearing aid users. Many telephones available on the high street have integral inductive couplers

Subtitles,

Digital sign boards (used in doctor’s surgeries and waiting areas, etc.)

Annex G – Access to Work

Access to Work (ATW) is the Government's discretionary award scheme to provide practical advice and support to both disabled people who are in work (or about to start work, including self-employment) and their employers. The scheme also supports eligible people who are engaged in specified pre-work activities, such as Work Trials, paid apprenticeships or work experience.

ATW is available to those aged 16 years or over who live and work in Great Britain and is intended to provide a level of support above the level of 'reasonable adjustments' which the Equality Act 2010 requires employers to make in the workplace to enable a disabled person to carry out their job.

The three core principles underpinning Access to Work are:

- **Additionality –** Support should be over and above what a non-disabled person would require in order to do their job and beyond the reasonable adjustments that an employer is legally obliged to make;

- **Meeting need -** Providing support that meets the customer's minimum needs;

- **Cost effectiveness -** Doing this in the most cost effective way.

ATW will make an award to contribute up to 100% of the approved costs of additional employment-related costs resulting from disability, such as:

- Special aids and equipment

- Adaptations to premises and equipment

- Support workers

- Travel to work and travel within work

- Communication support at interview

Where employees have been in post for more than six weeks, employers are required to share the costs of special aids and equipment and adaptations to

premises. The precise level of cost sharing is agreed between the employer and the Access to Work adviser. Ongoing awards tend to be granted for three years and are typically reviewed annually.

Access to Work is a discretionary award; it is not a statutory benefit to which eligible people have a legal entitlement. Applicants have no right to a formal appeal against DWP's decisions on their eligibility or level of award. Larger employers are required to make a financial contribution to some types of Access to Work support for their employees

Access to Work was launched in June 1994 and is delivered by the Department for Work and Pensions (DWP) through Jobcentre Plus.

Access to Work reforms – Capping awards

In March 2015 the Government announced[116] a range of reforms to the scheme, including the application of a new annual payment limit. With effect from October 2015 ATW would provide awards up to a limit set at one and half times the annual average salary figure published by the Office for National Statistics. This limit is up-rated annually in line with subsequent published average annual salary figures, so while in October 2015 this equalled a limit of £40,800 per person[117].

Customers with extant awards made prior to that date were be exempted from the new limit until April 2018, in order to allow individuals and their employers time to adjust.

An Equality Analysis[118] of the reforms was conducted by DWP to enable Ministers to fulfil the requirements placed on them by the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010. Using the data available at the time, this estimated that the application of an annual cap of £40,800 would affect around 200 people - fewer than 0.5% of the total ATW client-base as measured at that

[116] https://www.gov.uk/government/news/new-measures-to-support-more-disabled-people-into-work

[117] For awards made between 1 April 2016 and 31 March 2017 the up-rating increased the maximum annual amount to £41,400 and for awards made between 1 April 2016 and 31 March 2017 the maximum annual amount increased to £42,100, and so on.

[118] Equality analysis for the future of Access to Work, DWP, 2015 https://www.gov.uk/government/publications/future-of-access-to-work

time[119] - but that up to 89.5 percent of those predicted to be affected had 'Deaf or hearing loss' listed as their primary qualifying disability.

DWP committed to continue to monitor the impact of capping annual awards and to consider whether any changes would be necessary, should an adverse impact on employment outcomes for disabled people in general, or upon a particular group of disabled people, be identified.

The Equality Analysis also outlined three potential mitigations for the impact of the annual cap on customers likely to be affected by it:

'Access to Work does not subsidise or replace the provisions of the Equality Act. Employers will still be required to meet their commitments under the Act, including the legal obligation placed upon them to make reasonable adjustments for disabled employees and it may be the case that a fresh consideration of whether or not the support that was previously provided by Access to Work properly falls under the auspices of a reasonable adjustment means that any adverse impact upon disabled people is reduced. As mentioned previously, we are unable to quantify the extent to which this will mitigate any adverse impact as it depends upon employer behaviour, but any disabled employee who feels that their employer has not made reasonable adjustments can legally challenge that decision under the Equality Act 2010.

Secondly, High-value Award customers will be offered access to other support e.g. technology solutions and training to help them achieve independence, which may reduce their reliance on expensive support. Furthermore, the introduction of personal budgets and expert teams will deliver greater personalisation of support, enabling customers to use their awards in the most effective and efficient way.

[119] A detailed methodology review conducted by DWP Analysts has identified some technical issues in the way ATW statistics were previously compiled. Publication of ATW figures has been delayed. DWP will release a revised publication once its analysts have resolved the technical issues. The figures released in previous publications are therefore subject to change.

This is explained in the following statistical notice:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/553879/access-to-work-october-2016-statistical-notice.pdf

Finally, an offer of transitional protection will ensure that customers and their employers have time to adapt to the reduced award and to explore alternative solutions. The transitional protection offer for current award holders could extend:

> *Until the end of the current award, subject to a minimum of one year's protection for those whose awards are due to expire within twelve months.*
>
> *For three years from the date of announcement of any change*
>
> *For one year from the date of announcement.'*

(Page 12, Equality analysis for the future of Access to Work, DWP, 2015)

Access to Work reforms – use of the Crown Commercial Service (CCS) Language Services framework[120]

Another of the 2015 reforms with particular relevance to this review is the adoption of the newly developed Crown Commercial Service (CCS) Language Services framework for BSL and other contracted language services. The Equality Analysis outlines the impact of this:

'Customers could still be free to source support outside the Crown Commercial Service framework, so choice is not limited. Whilst rates payable will likely be reduced as a result of the introduction of the framework, customers will have the reassurance of quality support, as the framework stipulates that BSL Interpreters must be qualified NRCPD interpreters. Furthermore, customers will have the option of a personal budget, enabling them to use their support in the most efficient and effective way possible. There will be no arbitrary restriction on the numbers of hours of support available – as now a thorough examination of level of need and reasonable adjustments that can be put in place will inform the determination of an award level.

[120] For more information see paras **2.6 – 2.6.8** of **Part One: British Sign Language and communications provision**

‘In addition to addressing quality issues via the requirement for all interpreters to be NRCPD/SASLI registered, the CCS will monitor any anomalously low bids to ensure that the framework is not awarded on the basis of unsustainably low bids.’

‘The introduction of the framework is expected to have a positive impact on the Access to Work customer’s administrative overheads. Access to Work customers or their employers will no longer have to spend time booking interpreters to cover their requirements each week but can instead be confident that the support they need is in place for the foreseeable future. This will make it more convenient for them to access the support they need, increasing equality of opportunity. The growth of the market could be helped by ensuring there is suitable recognition for registered trainee interpreters where customers want to use them for roles appropriate to their competence – this will provide support to those trainees who otherwise could not afford to establish themselves.’

(Page 17, Equality analysis for the future of Access to Work, DWP, 2015)

Annex - H - Summary: The Organisation and Provision of British Sign Language/English Interpreters in England, Scotland and Wales, 2002[121]

The research project was commissioned by the former Department for Education and Employment (DfEE) in May 1999, for the Inter-Departmental Group on Disability, following the Social Services Inspectorate's report A Service on the Edge (Department of Health, 1997).

The overall aims were to map current BSL/English interpreter provision, obtain information on the advantages and disadvantages of the current systems of provision, explore the experiences of interested parties, and make recommendations. Specifically:

- Describe the current organisation of BSL/English interpreters and interpreting agencies in England, Scotland and Wales.

- Map the locations of registered qualified and trainee interpreters and interpreting agencies in each of these countries.

- Obtain information on the settings in which BSL/English interpreters are used.

- Explore the experiences of users of BSL/English interpreters, BSL/English interpreters and agencies engaged in the provision of interpreting services.

- Provide recommendations on how the current organisation of BSL/English interpreters could be improved and how current difficulties could be addressed.

Methodology: A mixture of desk based research, questionnaires, interviews, public meetings. Interviews and meetings held in Scotland, the North West of England, the

[121] http://webarchive.nationalarchives.gov.uk/20130128102031/http:/www.dwp.gov.uk/asd/asd5/IH102.pdf

English West Midlands, Wales, London.

Agencies (31 agencies):

- Copies of agencies' recent annual reports.
- Details about the interpreters they employed, and recent types, areas and levels of activity.
- Copies of information they provided to service users.
- Detailed returns of completed and unmet bookings for a two-week period.
- Structured and tape recorded interviews (26 - including those who hadn't replied to previous information requests).

Interpreters (372 interpreters) and organisations:

- Postal questionnaire distributed to all CACDP & SASLI registered qualified and trainee interpreters (372 questionnaires / 223 usable replies).
- Structured and tape-recorded interviews (14 interpreters).
- Public meeting in London to which all interpreters working in London were invited (5 attended).
- Semi-structured and tape-recorded interviews with officials of national organisations of BSL/English interpreters in Britain.

Deaf People & organisations:

- Structured and video-recorded interviews conducted in BSL with Deaf users of interpreting services (30 people).

- Public meetings with Deaf people on their experiences of obtaining and using interpreters and their views on how interpreting services could be improved (81 Deaf people attended)

- Semi-structured and tape-recorded interviews with officials of national D/deaf organisations.

Organisational users of interpreting services:

- Questionnaire circulated to organisations using the services of BSL/English interpreters (168 questionnaires / 84 responded in time).

- Telephone interviews with organisations employing BSL/English interpreters and related services to illustrate aspects of good practice (3).

Desk based research:

- Consulted and analysed a range of information on the provision of interpreting services in Britain.

Conclusions: (From overall conclusions, section 7[122]).

7.4 'There are difficulties in measuring the demand for interpreting services. This is because of variations in the ways in which requests for services were recorded, and potential double counting if more than one agency operating in an area was unable to meet the request for an interpreter.'

7.5 'The researchers identified two distinct groups of Deaf users of interpreting services: a) Deaf people employed in professional occupations who are frequent

[122] Section 7 - The Organisation and Provision of British Sign Language/English Interpreters in England, Scotland and Wales, 2002

users of such services and b) the majority of Deaf people, who are not employed in professional positions, who are occasional users.'

7.8 Conclusion. "In conclusion, the research showed that there was a shortage of BSL/English interpreters in England, Scotland and Wales.'

The researchers believe that the knowledge of this shortage influenced Deaf people's use of the existing interpreting services: when, how often and under what circumstances an interpreter was used.

'The limited number of professional interpreters, the geographical variation in provision and the varying standards of interpreting skills held, as well as organisational problems in the provision of interpreting services, provides Deaf people with limited access to services and organisations.'

Annex I - Conclusions

The Communications Market

1. The evidence submitted to the review demonstrates that the communication needs of Deaf people and people with hearing loss, whether adult or child, are complex.

2. Language and communication requirements should be addressed on an individual basis, and those that are required to make provision for deaf people should seek the views of individuals, as to what works best for them. There is no universal approach to addressing these needs and requirements will vary from person to person and across situations.

3. While this review references a range of data sources, it also highlights a lack of comprehensive information about supply and demand, including unmet demand, across the language and communications market as a whole. This makes it harder to identify the scale of demand or unmet demand and has implications for the planning of future service provision, as it is not possible to establish a baseline measure for the current market.

4. Although it is not possible to identify a single universal metric for volume of demand or the scale of unmet demand, the available data sources do give indications of a potential disparity between supply of British Sign Language Interpreters and demand for their services. For example, Census data suggests there are approximately 24,000 people who use British Sign Language as a first language[123]. There are currently 908 registered British Sign Language Interpreters, according to figures produced by the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD).

5. Submissions highlighted the consequences of deaf people not being properly supported, potentially impairing their access to healthcare, education, employment and leisure activities. These included potential examples in healthcare setting where inadequate support may have negative personal impacts for individuals, as well as serious legal implications for healthcare providers; or of deaf children not being provided with the support they need to achieve good outcomes.

6. There were also submissions highlighting examples of good practice in ensuring access. Consideration should be given to how good practice can be replicated more widely.

[123] This is just one estimate available for BSL users and may be an underestimate due to the methodology used within the census.

7. There was a range of evidence submitted to the review which made clear that instances of deaf people and people with hearing loss not being able to access language and communication support may be commonplace. The evidence also highlights geographical variations in the provision of support, and outlines some of the implications in areas where provision is particularly poor.

8. However, there was also evidence of demand not being met due to deaf people simply lacking awareness of the different ways in which communication support could be provided. Awareness of the range of communication support options may be particularly important for deaf young people who are moving into adulthood and employment.

9. Technology offers potential in terms of broadening the range and availability of language and communication support options, but its use needs to be considered and applied appropriately.

10. While the review looked at all forms of language and communication support, it generated a large amount of evidence relating to BSL interpreting. There are a number of specific conclusions worth highlighting in relation to this area, which include the following.

    - There are significant time and financial costs attached to training as a sign language interpreter. The numbers of people registering for entry level qualifications is falling, which will translate into fewer people progressing to a full qualification.

    - Agencies, particularly non-specialist agencies, have played an increasing role in the market for BSL interpretation and the review highlights a number of implications associated with this, including agencies not always understanding the specialist nature of BSL interpretation and the addition of agency fees in some cases considerably increasing the expense of interpreter bookings whilst at the same time lowering fees to interpreters.

Communication Support Workers

11. There is no agreed occupational definition of a Communication Support Worker's role, and no minimum level of skills required for an individual to identify as a CSW.[124]

[124] Since this review was established, the Department for Education has commissioned the National Sensory Impairment Partnership to work with ADEPT to develop such a framework for use in education.

12. Feedback from deaf people and service providers suggests that this can cause problems for commissioners in providing appropriate services.

13. There was consensus from respondents that use of CSWs who are not qualified as interpreters in Higher Education could be inappropriate.

14. There is evidence that demand for language and communication support may grow as a result of various factors such as:
    - the increasing numbers of people with hearing loss and
    - Government initiatives designed to improve access across the public, private and not-for-profit sectors (for example, the NHS Accessible Information Standard and the BSL (Scotland) Act (2015)).