

EQUALITY IMPACT ASSESSMENT

Policy, practice, process or service title:	British Sign Language action plan – SRUC
Policy, practice, process or service lead/ owner:	Equality, Diversity and Inclusion (EDI) Lead
Others involved in EqlA assessment group	Assessment group included: The EDI Lead was supported by a number of colleagues to inform this assessment.
Policy, practice, process or service implementation date:	06/05/2024

1 Framing the policy, practice, process or service

1.1 Briefly describe the outcomes, aims and purpose of the policy, practice, process or service:

Development of SRUC’s British Sign Language action plan is a legislative requirement under the BSL Scotland Act, and it must support the aims of the National British Sign Language Plan 2023–2029 which was published on 6 November 2023. SRUC’s action plan aims to take meaningful action to improve the experiences of people who use British Sign Language.

1.2 Is the policy, practice, process or service new or being changed, reviewed or stopped?

Review

1.3 Who is affected by this policy, practice, process or service?

Current and future students (including their families). Current and future employees. Actions may also impact on visitors, other partners and the general public.

1.4 Are there any other SRUC policies that may be affected by this policy, practice, process or service?

The BSL action plan may require a review and change of current SRUC policies and practices. This will be managed under the BSL plan and by relevant policy owners.

2 Evidence relevant to the policy, practice, process or service including consultation

The information you gather in this section will:

- help you to understand the importance of your policy, practice, process or service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 Evidence: Set out in the table what you know about the experiences of people in terms of each equality group. Consider the diversity within each group (e.g. experiences of people from different religions or faiths) as well as the differences between groups. There may also be cumulative barriers experienced by people when you look at more than one group together (e.g. experiences of women of different minority ethnic groups, so the intersectional impact of sex and race).

You can add more rows to present the evidence if required.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
<p>Disability, however we recognise the importance of the Deaf community and the culture around BSL, and that BSL is a recognised language in Scotland.</p>	<p>1 National Deaf Children's Society</p> <p>2 Education (Additional Support for Learning) (Scotland) Act 2004</p> <p>3 2018 Supporting the achievement of deaf young people in further education 2012.</p> <p>4 Blog on the impact of the BSL (Scotland) Act 2015 on deaf education</p> <p>5 BSL National Plan 2023-29 consultation analysis</p>	<p>In Scotland, Wales and Northern Ireland support for deaf college students is not funded by local authorities. This means your child will need to discuss their support arrangements with their college before they start. The shared personal stories talk about the importance of having support in place from the start, knowing where to find support, and deaf awareness among staff and other students. One personal story mentioned the importance of a fire pager, captions in videos (1).</p> <p>Duties of education authority in relation to children and young persons for whom they are responsible (2)</p> <p>(1)Every education authority must—</p> <p>(a)in relation to each child and young person having additional support needs for whose school education the authority are responsible, make adequate and efficient provision for such additional support as is required by that child or young person, and</p> <p>(b)make appropriate arrangements for keeping under consideration—</p> <p>(i)the additional support needs of, and</p> <p>(ii)the adequacy of the additional support provided for, each such child and young person.</p> <p>(2)Subsection (1)(a) does not require an education authority to do anything which—</p> <p>(a)they do not otherwise have power to do, or</p> <p>(b)would result in unreasonable public expenditure</p> <p>Deafness is not in itself a learning disability. Using data to track progress of D/deaf students. Supporting deaf students in course selection by providing relevant</p>

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	<p>6 Lived experience as shared via Deaf Action or college search.</p> <p>7 Progress with BSL action plans in Scotland's Local Authorities by the British Deaf Association.</p> <p>8 British Sign Language Interpreting in Scotland: landscape review, QMU</p> <p>9 New BSL signs to use in science and technology</p> <p>10 Educational Attainment Gap – NDCS response to call</p>	<p>information, staff ability to communicate with deaf learners, providing communication support, early planning before starting at college. Understanding the use of technology and alternative strategies where this is inadequate. Information on provision in the teaching environment and funding options. Clear information on arranging communication support for open days/ induction.(3)</p> <p>Be mindful of wording on websites. Inclusion of classroom learning is a possible gap in action plans. Call on colleges and universities to share practice.(4)</p> <p>Scottish Government's consultation on the revised action plan received a total of 80 responses, in addition to 40 community consultation events. Amongst consultation respondents, 36% were BSL users, 50% were not BSL users, and 14% preferred not to say. Responses were received from individuals, local councils, academic institutions, public body representatives (including executive agencies, NDPBs, NHS, etc.), third-sector service delivery organisations, and organisations representing the deaf, deafblind, and BSL communities. Key themes from the consultation (5) include:</p> <ul style="list-style-type: none"> - Importance of collecting data within current data gathering systems - Criticism of engagement not being in BSL, absence of feedback forms in BSL - Desire to see clear outcomes and actions in strategies and plans - Low availability of interpreters, especially in rural areas. - Need to improve BSL users access to the workplace and promoting Access to Work - Quality of BSL tuition should increase appropriately with age - Priority areas for accessibility and awareness on BSL included healthcare, social care, transport, emergency services and education. Includes mandatory BSL training for all staff in these settings.

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	<p>for written evidence (2021)</p> <p>11 SRUC data</p>	<ul style="list-style-type: none"> - A call to improve our use of assistive tech (this came mainly from organisations) - Importance of sharing BSL culture and ensuring access to cultural events through BSL - Need to improve mental health support for BSL users, tailored for LGBTQI+ community, young people and elderly. Link between deafness and isolation and loneliness. - Need for BSL accessible information and complain mechanisms - The most frequently discussed theme was reducing barriers to communication for BSL users across Scotland. - The fifth theme called for increased efforts to address stigmatisation and improve awareness of BSL language and culture. - Mixed response to contactScotland BSL – okay for phone calls but not in depth or personal discussions where a face to face interpreter is preferred. <p>The need for early consideration of communication support. Being transparent about the support an institution can offer and the scope of the support (e.g. course work, exams etc). It helps to have clarity on the full course and time spent in lectures, practical, tutorials etc to then understand the support you need. Ask about funding in advance and via the SAAS. It is important to have everything in place before student life starts. The importance of students knowing about funding both externally and that the institution can arrange. The importance of being able to engage socially at college and university – having an interpreter available for those moments is important (6).</p>

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		<p>Key points from the British Deaf Association review of progress against BSL action plans in local authorities (7):</p> <ul style="list-style-type: none"> - Link to BSL support and videos needs to be on the home page as other pages can be difficult to find – see Welcome to Argyll & Bute Council Argyll and Bute Council (argyll-bute.gov.uk) - Connecting with local BSL clubs and communities is positive and build relationships - Confusion about different communication methods and when to use them - Concerns about budgets for some actions in terms of making information accessible, and to deliver on training. - Covid accelerated a move to accessible digital information - Employing Deaf people can have a positive impact on culture and practice <p>Scottish government commissioned a landscape review of BSL interpreting in Scotland, undertaken Queen Margaret University. Challenges include geographic availability, financial impact, consistency in timetabling to allow for planning/ booking interpreters, variation in fees, interpreter expertise to operate in tertiary education sector, booking systems/ processes (8)</p> <p>List of new BSL signs to use in the curriculum covering astronomy, biology, chemistry, computing science, cyber security, data science, environmental science, geography, mathematics, physics (9)</p> <p>Quotes Scottish Government figures that there is a significant attainment gap for deaf learners. College seems to be a popular destination for deaf learners and the</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		<p>NDCS note concerns about the consistency of approach in college settings and success of transitions into sustainable employment. Also note lower percentage of working age people in employment (58%) compared to non-disabled working age population (80%). Need to increase deaf awareness among employers (10).</p> <p>SRUC does not hold employee data in relation to British Sign Language and anecdotally do not have any employees who require a BSL interpreter. We do hold data about students however numbers are too low to report specifically on attainment or outcomes (11).</p>
Age		We recognise that people of different ages will likely have different experiences and where possible we have looked at evidence around age (i.e. experiences of students who tend to be around 16 – 24 years of age) in our evidence gathering and consultation.
Race		We did not find evidence of specific differences in impact by race but understand that in other colleges there have been cases where interpreters for sign languages other than BSL have been required.
Sex		We did not find evidence of specific differences in impact by sex.
Trans status/ Gender Reassignment		We did not find evidence of specific differences in impact by trans status.
Sexual orientation		We did not find evidence of specific differences in impact by sexual orientation.
Religion or		We did not find evidence of specific differences in impact by religion.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Belief		
Pregnancy or maternity		We did not find evidence of specific differences in impact by pregnancy and maternity.
Marriage or civil partnership		We did not find evidence of specific differences in impact by marriage and civil partnership.

2.2 Consultation and stakeholder involvement: Speaking to people who will be affected by your policy, practice, process or service can help clarify the impact it will have on different equality groups. Describe below what you learned from the consultation/ involvement. Consultation can take time so make sure that you build this into your policy, practice, process or service review/ development timeline.

26 February 2024: Review of actions in the 2018–2024 plan with action owners. Initial discussions led to a set of draft actions (version 0.2 of the action plan). The majority of incomplete actions were rephrased and carried forward.

March 2024: student engagement on draft actions and insight into lived experience. Key points include:

- Suggestion to have a signing student/ staff on the internal BSL working group
- Communication: student to student is ok although people can ask inappropriate questions about a person's deaf identity. Communication could be improved, for example on field trips. Sometimes the environmental conditions aren't ideal to support communication (too dark for signing/ lip reading), or external people involved in the trip aren't prepared for a deaf student and the required communication support.
- Personal support: can be a 'lumpy' process. The College can come across as unprepared for a signing student i.e. don't understand common barriers, and don't have structures in place e.g. challenging to get subtitles on content.
- Day one experience: could be improved in terms of communication support.

- Agreed with action to increase offer of communication support in standard communications and felt that BSL interpreter as an explicit example would be a welcome addition to that message.
- BSL culture: agreed that there had been some good examples and more would be welcome. More posters with finger spelling would help, more people using the BSL signs they know even if not fluent would be great, development of a glossary of common words for courses in sign language would also help to embed understanding/ awareness of BSL as a language.
- Video captions are okay for a short time but not for over 10 minutes – sometimes whole lectures are captioned and this is exhausting (up to 2 hours).
- Idea to support signing students do video about their experiences in a lecture to showcase good practice.
- General BSL training and finger spelling is positive. Felt it is mandatory for first aiders to be able to do basic and relevant signs should they need to support a signing employee or student. Deaf people can have increased co-morbidities around heart problems.
- Fire alarms – importance of being alerted to fire alarms and to consider improvements.
- Meetings: where person needs subtitles this should not be said to everyone attending. Makes person feel singled out and reluctant to attend future meetings. Mainstream the use of accessible features.
- Was very positive about the mental health support received.

18 March to 3 April – SRUC wide engagement including specific engagement with the Senior Leadership Team

Employee engagement, including people with a hearing impairment

- Commercial team have contact with a lot of people with hearing impairments – this might present an opportunity to share practice across SRUC.
- Concerns about budget for the action plan but also for interpreters, especially for FE students. This needs to be clarified with suppliers identified and ready to be used.
- Need guidance for staff about how to book and use interpreters.
- Training is required on BSL awareness



- Important to understand how assistance technology can support deaf students, what does all the tech do and how does the student access it/ staff use it. This can include the tech that students have in place e.g. cochlear implants/ hearing aids and what these devices do (acknowledging that some of this will be very person specific).
- Could SRUC consider supporting the purchase of hearing aids with better tech features in the same way that that staff are supported with glasses. NHS hearing aids can be limited but to buy privately is very expensive.
- Acoustics in some meeting rooms is not ideal for people with hearing impairments.
- Could SRUC provide hearing impaired/ deaf lanyards to provide visual clues to people and to prompt consideration of communication needs.
- Training is very important
- Could we create an internal deaf/ hearing impaired community, especially when it comes to sign language and practising.

SLT input

- Draft action plan looks proportionate
- Good idea to scope deaf communities around our campuses
- Agreement to add in consideration of technology and what is available.

HE/ FE institution engagement event organised by Edinburgh Napier University and with a Deaf member of staff.

- Importance of ringfencing budget for BSL actions
- Understanding touch points in both staff and student journey is important
- Potential data gap in terms of where our young deaf learners are and how best to engage with them to ensure they understand their options for both college and university
- Translation of web content is a common action – prioritising content that highest traffic
- Could the sector collaborate on a BSL video about report and support – efficiency and shared messaging. What are the other opportunities?

- Can we do better with D/deaf role models or current students/ staff in order to showcase what we do to other young learners or potential employees.
- D/deaf people are good with their hands – can that be a focus for programmes that are about retraining?

2.3 Record here if you need to undertake a full equality impact assessment based on your evidence above.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality		Proceed to sign off (step 5) to agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups	Y	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups		Proceed to Step 3: complete full EqIA

3 Impact on equality groups and changes to policy, practice, process or service

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- **Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010?** How will this be mitigated?
- **Is there potential to advance equality of opportunity between people who share a characteristic and those who do not?** How can this be achieved?
- **Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not?** How can this be achieved?

3.1 Does the policy, practice, process or service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics? In the tables below, record the impact of the policy, practice, process or service, as it is planned or as it operates, might have on each equality characteristic and describe what changes in policy, practice, process or service or actions will be required to mitigate that impact or to take advantage of a positive impact.

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
Age	Potential for discrimination			x	SRUC's BSL plan contains actions that will impact on students who tend to be age 16 – 24 years. Our BSL working group will include student association representation to
	Potential to advance equality of opportunity			x	
	Potential to foster good relations			x	

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any
					ensure a student perspective is captured.
Disability	Potential for discrimination	x			Continuation of actions from our previous BSL action plan incorporates many of the priorities within the national BSL action plan. The full list of actions SRUC will take are summarised in our BSL Plan 2024-2030 published document which is translated into BSL. This has been informed by the evidence gathered under this impact assessment. Some key actions include: On the back of this refreshed evidence review and engagement with employees we have focused training at staff, students and relevant first aiders where this is directly needed to support students/ staff who are BSL users, We will also undertake work to better engage with and understand the Deaf communities around our campuses, including working with local council stakeholder groups.
	Potential to advance equality of opportunity	x			
	Potential to foster good relations	x			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any
					<p>Our new HR system will enable us to collect data on employees who use BSL which will provide meaningful data on which to base future employment focused actions.</p> <p>We have prioritised translations and understanding of the student journey to focus on policies that ensure access to justice, first day arrangements and high traffic information.</p> <p>For employees we will focus on recruitment and clarifying communication support for those using our policies, and accessing employee support.</p>
Race	Potential for discrimination			x	
	Potential to advance equality of opportunity			x	
	Potential to foster good relations			x	
Sex	Potential for discrimination			x	
	Potential to advance equality of opportunity			x	
	Potential to foster good relations			x	
Gender Reassignment	Potential for discrimination			x	
	Potential to advance equality of opportunity			x	

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any
	Potential to foster good relations			X	
Sexual orientation	Potential for discrimination			X	
	Potential to advance equality of opportunity			X	
	Potential to foster good relations			X	
Religion or Belief	Potential for discrimination			X	
	Potential to advance equality of opportunity			X	
	Potential to foster good relations			X	
Pregnancy or maternity	Potential for discrimination			X	
	Potential to advance equality of opportunity			X	
	Potential to foster good relations			X	
Marriage or civil partnership (in employment only)	Potential for discrimination			X	
	Potential to advance equality of opportunity			X	
	Potential to foster good relations			X	

3.2 Think about and describe below how your assessment impacts on your policy, practice, process or service review or development timeline including but not limited to:

- The cost for translation of SRUC's BSL Plan 2024-2030 as required under legislation has been accounted for in 2024-25 budgets. Further budget needs will be identified by relevant action owners from their own budgets and over the course of the 6 year plan.

3.3 Record the outcome of this assessment below having considered the potential or actual impacts of your policy, practice, process or service on equality groups. Choose from one of the following (mark with an X or delete as appropriate):

Note: You must take action to remove barriers or take advantage of positive opportunities BEFORE the policy, practice, process or service goes live.

Please select (X)	Implications for the policy, practice, process or service
	<p>No major change: Your assessment demonstrates that the policy, practice, process or service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
X	<p>Adjust the policy, practice, process or service: You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy, practice, process or service when implemented.</p> <p>We have adjusted our action plan in line with evidence and engagement</p>
	<p>Continue the policy, practice, process or service: The policy, practice, process or service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.</p>
	<p>Stop and remove the policy, practice, process or service: The policy, practice, process or service will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

4 Monitoring the policy, practice, process or service impact and further actions

It is important to continue to monitor the impact of your policy, practice, process or service on equality groups to ensure that your actual or likely impacts are those you recorded. Your monitoring information will also inform a future review of the policy, practice, process or service.

4.1 Record in the table below how you intend to monitor the impact of this policy, practice, process or service on equality groups. In the table below you should:

- list the relevant measures,
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to (e.g. committee, ELT, Board) and how often.

Measure	Lead department/ individual	Reporting (where/ frequency)
n/a action plan will be monitored by the BSL working group which will include communicating with staff and students on progress and encouraging feedback.	BSL working group	EDI Committee – quarterly. To staff and students – every 6 months

4.2 Record further actions or changes required after the policy, practice, process or service is implemented in the table below. Make it clear if there are no outstanding actions.

Action	Lead department/ individual	Action target date
n/a – action plan itself contains all SRUC’s actions and commitments that will be delivered over the 6 year action plan.	EDI Lead will have overall oversight	Plan runs from May 2024 to April 2030.



5 Sign off and future review

Equality impact assessments must be signed off by the relevant Head of Service/ Department, even where an EqlA is not required. Also note here when you plan to review the policy, practice, process or service and accompanying EqlA which should be no later than 5 years from policy, practice, process or service implementation.

5.1 Senior Responsible Owner/ Committee sign off.

Job/ Committee title: Executive Leadership Team

Date: 15/04/2024

5.2 Equality impact assessment review date.

Date: 06/05/2030

The BSL action plan will be monitored throughout the 6 year term which may require the equality impact assessment to be reviewed at an earlier date.

Document control		
Document control:	V0.1	
Date policy, practice, process or service live from:	6 May 2024	
Review/ Approval Group:	Executive Leadership Team	
Last reviewed:	n/a	
Review cycle:	6 years in line with legislation.	
Document change log		
Version/ Author	Date	Comment
V1.0 – L Baggott	04/04/2024	