

# Integrated Impact Assessment – Summary Report

---

Each of the numbered sections below must be completed  
Please state if the IIA is interim or final: FINAL

**1. Title of proposal**

The City of Edinburgh Council British Sign Language Plan 2024-2030

**2. What will change as a result of this proposal?**

The plan provides a framework for action over the next six years towards the ambition to make Scotland the best place in the world for British Sign Language (BSL) signers to live, work, visit and learn

**3. Briefly describe public involvement in this proposal to date and planned**

The development of the plan has been informed by the [extensive consultation carried out to inform the development of the national plan](#) which included forty-three community consultation events. We used this material to develop a draft vision, outcomes and actions for Edinburgh for our second BSL plan.

We then asked people for their views on these at three consultation events in Edinburgh, two in person, attended by around 30 people in total, and one on-line session, attended by 5 people. People attending included BSL users (around 25) as well as other stakeholders. We also made our draft plan available on the Council's Consultation Hub, and invited people to provide their views by email or through discussion.

**4. Is the proposal considered strategic under the Fairer Scotland Duty?**

No

**5. Date of IIA**

25 April, 2024

**6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)**

<b>Name</b>	<b>Job Title</b>	<b>Date of IIA training</b>
Eleanor Cunningham	Lead Policy Officer	2019
Susan Shippey	Strategic Planning and Commissioning Officer	2018
Ruth Baxendale	Senior Policy and Insight Officer	
Lynsey Robinson	ASL Service Leader	May 2022
Beata Skobodzinska	Diversity Officer	

## 7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	2022 Census results - pending	We have limited information about the size of the BSL population and its characteristics at present. Publication of the 2022 Census will provide some of the information needed.
Data on service uptake/access	NA	Figures on BSL users are including within deaf categories – again, evidence is limited
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Across Scotland, 43.4% of leavers from publicly funded mainstream and special schools with a <b>hearing impairment</b> had 1 pass or more at Higher or better in 2022/23. This compares to 57.1% of all 2022/23 leavers.	<p>People whose first language is BSL can face barriers as a direct result of being excluded from communication and this can have negative impacts on every aspect of life including education, employment and access to healthcare. Broad</p> <p>The attainment figures suggest that career prospects might be impacted, with consequences for income.</p>
Data on equality outcomes	NA	<p><b>Children</b> who are BSL users can face challenges at school as they are learning in a language, English, which is not their first language and which is in a different modality (using speech and hearing rather than signing), so their communication needs are greater than and different to hearing learners with English as an additional language; and these children miss out on much of the incidental learning to which hearing peers have access.</p> <p>The need for interpreters and communication support workers at school can also affect the child's social interactions in the classroom as their presence unintentionally effects interactions with others</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p><a href="#"><u>Social isolation and loneliness</u></a> – groups at increased risk include D/deaf and Deafblind BSL users</p>
Research/literature evidence		
Public/patient/client experience information		<p>The Scottish Government carried out extensive consultation to support the development of the National Plan, which included an online consultation, which received 80 responses, and 43 community events.</p> <p>Feedback from BSL users and stakeholders highlighted a range of issues and challenges that BSL users face:</p> <ol style="list-style-type: none"> <li>1. BSL interpreters, teachers and tutors – there are limited numbers and consequently challenges in accessing this support which impacts on all areas of life including health care, education and leisure</li> <li>2. Finding information on: accessing services and supports</li> <li>3. The accessibility of communication e.g. official letters (fines etc)</li> <li>4. Behaviours of others stemming from lack of awareness including from front line staff</li> </ol> <p>The isolation that BSL users can face (all ages)</p>
Evidence of inclusive engagement of people who use the service and involvement findings		<p>As noted above, Scottish Government consultation to support the development of the National Plan; three consultation events in Edinburgh, two in person, attended by around 30 people in total, and one on-line session, attended by 5 people; draft plan available on the Council's</p>

<b>Evidence</b>	<b>Available – detail source</b>	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		Consultation Hub. Feedback was used to develop the actions to be included in the plan.
Evidence of unmet need		See above (Public/patient/client experience information)
Good practice guidelines		<a href="#">Goals of Scottish Government's British Sign Language (BSL): national plan 2023 to 2029</a> ). <a href="#">BDA Charter for British Sign Language</a>
Carbon emissions generated/reduced data	NA	
Environmental data	NA	
Risk from cumulative impacts		Disadvantages faced by BSL users will be compounded by characteristics including sex, age, race and disability, including neurodiversity, which may lead to additional challenges for people in using BSL.
Other (please specify)		
Additional evidence required		Need for improved data on the needs and supports provided to BSL users.

**8. In summary, what impacts were identified and which groups will they affect?**

<b>Equality, Health and Wellbeing and Human Rights</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <p>The plan provides the framework to support the delivery of continued improvements in:</p> <ul style="list-style-type: none"> <li>the accessibility of information and communication on topics such as benefits, employment and support available</li> <li>access to BSL interpretation</li> <li>inclusion in schools for pupils and their parents</li> <li>knowledge and awareness among staff and more broadly e.g. school pupils through deaf awareness training</li> </ul>	<ul style="list-style-type: none"> <li>All protected characteristic groups including age (older people, young people)</li> <li>Vulnerable people who need support</li> </ul>

<b>Equality, Health and Wellbeing and Human Rights</b>	<b>Affected populations</b>
<ul style="list-style-type: none"> <li>• the support and choice for hearing parents of deaf children through the BSL tutor and sessions for families</li> <li>• opportunities to engage in activities including museum tours, voting etc</li> </ul>	
<p><b>Negative</b></p> <ul style="list-style-type: none"> <li>• Use of digital material and technology (e.g. via phone app, YouTube) risks disadvantaging people who do not have digital access or confidence in using it; and people experiencing poverty who might lack access to digital technology and connectivity</li> <li>• Use of written materials risks disadvantaging BSL users who have low levels of literacy</li> <li>• Needs to deaf/blind – need to include tactile BSL too or additional support for BSL users who have LD (e.g. Makaton)</li> </ul>	<ul style="list-style-type: none"> <li>• Older people</li> <li>• People experiencing poverty</li> <li>• People with low levels of literacy</li> <li>• Race - people whose first language is not English</li> <li>•</li> </ul>

<b>Environment and Sustainability including climate change emissions and impacts</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>- Via more use of public transport</li> <li>- Better access to info on fuel efficiency</li> </ul>	All
<p><b>Negative</b></p> <ul style="list-style-type: none"> <li>- None identified</li> </ul>	

<b>Economic</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>- Through actions to increase attainment at school and employment for BSL users</li> <li>- Through opportunities for engagement in cultural and social activities</li> </ul>	<ul style="list-style-type: none"> <li>- Young people</li> <li>- People of working age</li> <li>- All</li> </ul>
<p><b>Negative</b></p> <ul style="list-style-type: none"> <li>- None identified</li> </ul>	

- 9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?**

No

- 10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

The plan will be translated into BSL and published alongside the English version on the Council's website

- 11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

No

- 12. Additional Information and Evidence Required**

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

NA

- 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
Ensure that a choice of format is available for communications and information for BSL users	Accessibility working group	Ongoing	May 2025

**14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

No

**15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

- Progress with the implementation of the plan will be reported on an annual basis; this will be supported through the workstream to develop Identify key data needed across the Council to support the monitoring and delivery of the plan.

**16. Sign off by Head of Service**

**Name: Gillie Severin**

**Date: 8 May 2024**

**17. Publication**

Completed and signed IIAs should be sent to:  
[integratedimpactassessments@edinburgh.gov.uk](mailto:integratedimpactassessments@edinburgh.gov.uk) to be published on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)  
**Edinburgh Integration Joint Board/Health and Social Care**  
[sarah.bryson@edinburgh.gov.uk](mailto:sarah.bryson@edinburgh.gov.uk) to be published at [www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/](http://www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/)