

## Committee Report – second BSL Plan 2025-2031

<b>Report to:</b>	SMT
<b>Report by:</b>	Claire Stephen, Head of Policy and Information
<b>Meeting Date:</b>	19 February 2025
<b>Subject/ Title:</b> (and VC no)	BSL Plan 2025-2031 – (VC 223169)
<b>Attached Papers</b> (title and VC no)	C2 British Sign Language BSL Plan 2025-2031 v01 DRAFT (VC207429)

### Purpose of report

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1. To seek Senior Management Team (SMT) approval of the Scottish Information Commissioner's BSL Plan 2025-2031.

### Recommendation and actions

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2. I recommend that the SMT:
  - (i) Approve and publish the Scottish Information Commissioner's BSL Plan 2025-2031.
  - (ii) Continue to monitor and take up any opportunities to consult further with D/deaf and deafblind communities.

### Executive summary

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#### Summary

3. The British Sign Language (Scotland) Act 2015 requires listed authorities in Scotland to publish plans every six years, showing how they will promote, and facilitate the promotion of the use and understanding of BSL in Scotland. These plans will take account of local circumstances and consider how best to respond to BSL users' needs within local communities, organisations or services.
4. The Scottish Government published its second BSL national Plan, (slightly delayed) on 6 November 2023. Refer to [British Sign Language \(BSL\): national plan 2023 to 2029 - gov.scot](#) this means that listed authorities in Scotland, including this office, are required to publish their second BSL Plans to cover \*2025-2031 (\*due to the delays with this second national plan).
5. When drafting our second BSL plan, we consulted with British Deaf Action Scotland. If approved, we would be in a position to commission a BSL video version and publish it, along with a text version, of our Plan on our website in compliance with our duties under sections 5 and 7 of the British Sign Language (Scotland) Act 2015.
6. Further consultation with deafblind communities may be possible as this is a living document and we have taken up an offer from the Ethical Standards Commissioner to participate in a further consultation process with a group of listed authorities (who are mostly regulators).

### Risk impact

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## **Committee Report – second BSL Plan 2025-2031**

7. The risks associated with non-delivery of appropriate communication and equalities activity are recognised within our existing risk management frameworks. The Commissioner's BSL Plan helps to mitigate these risks. There is also a risk that the Commissioner will not have sufficient and appropriate resources available to meet relevant commitments in the BSL Plan and the SMT will also consider ways that this risk can be mitigated when developing the implementation plan.

### **Equalities impact**

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8. The British Sign Language (Scotland) Act 2015 aims to reduce inequality and barriers experienced by speakers of BSL in relation to public sector functions and services. The focus of the Commissioner's second BSL plan is therefore on ensuring equitable access to the Commissioner's functions and services.

### **Privacy impact**

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9. No new direct privacy impacts are identified within this report. However, the SMT may wish to consider whether a Data Protection Impact Assessment is required at this time.
10. As with the Commissioner's first BSL Plan, there are privacy impact implications in providing interpreting support to individuals to access the Commissioner's services and functions. These must be accounted for via confidentiality provisions in the Scottish Parliamentary Corporate Body (SPCB) and Scottish Government contracts for interpreting services.

### **Resources impact**

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11. Meeting commitments set out in the Commissioner's second BSL Plan may require additional resources, depending on the final actions, as set out in the agreed implementation plan. The actions required will need to be scoped, discussed and agreed by the SMT, as a whole, as part of an agreed implementation plan for 2025-2031. This implementation plan should factor in resource limitations and requirements for the proposed actions; and projected future costs which may be included in future budget submissions to the Scottish Parliamentary Corporate Body.

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

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12. Delivery of the commitments in the Commissioner's second BSL Plan form part of, and are reflected in, our current operational plan and beyond.
13. As stated above, to ensure commitments are met, it is recommended that the specific actions required are now mapped in an implementation plan, to be agreed by the Senior Management Team, and that associated projects and business as usual impacts are captured in the ongoing operational plan for relevant periods.

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

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14. None identified.

### **Consultation and Communication**

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## **Committee Report – second BSL Plan 2025-2031**

15. The second BSL Plan (2025-2031) was developed after contacting the Scottish Parliament, engaging with “The Alliance” for their advice, researching how other regulators were approaching this work and consulting with D/deaf communities including a meeting with British Deaf Action (BDA) Scotland. As many commitments in the plan depend on greater engagement with BSL users, we expect to conduct further consultation as we strive to deliver the BSL plan objectives, including an consultation initiative currently being organised by the Ethical Standards Commission.

## **Publication**

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16. I recommend that this committee report is published in full.