



Submission to the National Disability Authority (NDA) on the Review of the Irish Sign Language Act 2021–2025

Submitted by: The Council of Irish Sign Language Interpreters (CISLI)

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Contact: Aoife Harrington cisli.ireland@gmail.com

Executive Summary

The Council of Irish Sign Language Interpreters (CISLI) is the national representative body for Sign Language Interpreters in Ireland. All CISLI members are registered with the Register of Irish Sign Language Interpreters (RISLI) as required by the **Irish Sign Language Act 2017**.

CISLI welcomes the opportunity to contribute to the National Disability Authority's second review of the Irish Sign Language (ISL) Act 2017.

As Interpreters (both employed and self employed), we are on the front lines of implementing the Act, witnessing firsthand both its achievements and its shortcomings across education, healthcare, legal, employment and community domains.

While the ISL Act has brought progress in recognising the linguistic and cultural rights of the Deaf community, significant systemic barriers remain.

These include inconsistent interpreting provision, inadequate funding, limited awareness among public bodies, the absence of a much needed monitoring and complaints mechanism, lack of Continuous Professional Development to enable Interpreters to work in high risk situations such as the Medical and Legal system and significant gaps in specialist training and governance for Interpreters (Deaf, Hearing and Coda).

This submission consolidates feedback from CISLI members who have direct daily experience of the implementation of the Act within the settings as described above.

Their insights and quotations highlight urgent reforms are needed to ensure that the ISL Act fulfils its intended purpose of the full and equal participation of Deaf people in Irish society through accessible, high-quality interpreting services.

1. Legal and Policy Context

The **Irish Sign Language Act 2017** established the recognition of ISL as a native and independent language of Ireland, mandating public bodies to provide ISL interpretation for equal access to services. Currently, the Act does not apply to the private sector.

Under the ISL Act 2017, the National Disability Authority (NDA) is charged with monitoring implementation and advising on improvements to ensure compliance with statutory obligations and alignment with principles of equality, inclusion, and non-discrimination.

CISLI, as the recognised professional body representing interpreters, has an ethical interest in ensuring that the legislative framework provides both effective service delivery for the Deaf community and safe, regulated conditions for interpreters in keeping with all other professionals such as Teachers, Medical and legal professionals.

2. Education

Members report both positive developments and ongoing structural issues in the education sector. The following quotes highlight some of this:

“It’s great to have the course for Deaf teachers, we need that to continue and more Deaf teachers to qualify. Also, ISL should be taught in primary school for all schools.”

“Rates in third-level interpreting are fixed through the tender process and do not pay enough to make them worth the drain on mental resources. I enjoy education work but the pay needs to be higher.”

“For Deaf education to flourish requires more Deaf people involved because of their lived experiences, plus more specialist training for interpreters.”

“Not enough qualified ISL teachers. The shortage and training of ISL teachers needs to be addressed as a matter of urgency, especially if ISL is to become a Leaving Cert subject.”

“Schools with Deaf staff need specific funding for interpreting. It is not covered under the Work & Access Scheme.”

Key issues identified include:

- Lack of specialist interpreter training for different educational levels (from early childhood to higher education)
- Inadequate remuneration for educational interpreting relative to workload
- Limited ISL teacher training and underpayment of ISL teachers
- Absence of dedicated funding streams for schools employing Deaf staff
- Discrimination in access to lifelong learning and ETB courses for Deaf participants

3. Community Access: The Voucher Scheme

The ISL Voucher Scheme is viewed positively but suffers from restrictive design and inconsistent implementation.

“The voucher scheme is a fantastic way for the Deaf community to access the same kinds of services as their hearing peers.”

“Being limited to five vouchers can be problematic, six hours for a wedding is too short and the fee isn’t high enough.”

“Deaf adults only allowed to attend five events a year, what is the rationale behind this limitation?”

“Information is not reaching rural and older Deaf people. Deaf children and Deafblind people are excluded.”

“Community members have waited up to nine weeks for confirmation of a booking.”

“Deaf parents who have hearing children should be allowed to have family vouchers so they can attend events together as a family”

“Why are Deaf children not allowed to have access to local school and community events through the voucher scheme. Hearing parents should be allowed to access the voucher scheme on behalf of their Deaf child. For example, a Deaf adult can go to a family funeral and book an Interpreter. A Deaf child is not allowed to book an Interpreter to attend a family funeral”

“Lack of appropriate social media promotion in all formats such as ISL, Signed English, Deaf Blind different forms of ISL communication, plain English to support the ISL versions, should be provided” In that way family and professionals working with these different groups can share information about the voucher scheme”.

Common themes include:

- Insufficient allocation (five vouchers per year per person)
- Exclusion of Deaf children and people with additional needs
- Inconsistent rates between agencies
- Delays and poor communication from service coordinators
- Limited rural awareness and information accessibility

CISLI strongly recommends expanding the scheme, improving communication channels and developing consistent national standards and rates. This should be done in consultation with Deaf organisations and the Interpreting profession to ensure clarity and transparency.

4. Remote Interpreting and IRIS

While remote interpreting (via IRIS) has improved access, members report major capacity and policy challenges.

“IRIS is always fully booked. Why is there no on-demand service after the pilot project many years ago?”

“Deaf people can only access IRIS by pre-booking, often waiting weeks to make a phone call.”

“Can you imagine telling the hearing population that they have to wait weeks to make a phone call. Can you imagine the public outcry, yet Government is telling Deaf people that is what they have to do. That is not equality. That is direct discrimination”.

“Interpreters who work in IRIS do a difficult job, care and attention needs to be maintained with their working conditions.”

“Many service providers still view interpreters as third parties for GDPR purposes. This is a barrier to access.”

“Can Government inform and change the GDPR regulations to state Interpreters are not third party and Deaf people phone calls should be accepted with a RISLI registered Sign Language Interpreter”.

“If Interpreters wanted to work for IRIS on an occasional basis, they cannot, because we have been informed that SLIS can only appoint Interpreters on a 17.5 hour schedule. Why? What is the rationale for this? If there was more flexibility, this will allow Interpreters in rural settings being able to provide this service, thus expanding supply provision. It makes no sense that a policy is restricting this service without any proof that 17.5 hours is the only way to make this service succeed”.

Recommendations include:

- Development of a national on-demand ISL interpreting platform, long overdue
- Review of GDPR guidance to reflect interpreters’ professional role
- Improved working conditions, flexible hours and employment standards for remote interpreters

5. Healthcare

Healthcare remains one of the most problematic sectors.

“Hospitals still very slow to book interpreters when needed. Staff not aware of their obligations under the ISL Act.”

“Healthcare establishments still expect the Deaf person to book the interpreter, a major barrier.”

“Interpreters do not have access to specialist health or mental health training, putting lives at risk.”

“There is no mentoring system or complaints process. This is deeply concerning. All parties deserve to be protected, including interpreters.”

Core concerns:

- Lack of training and awareness among healthcare providers
- No consistent policy requiring healthcare institutions to arrange interpreting.
- No specialist training or supervision framework for interpreters in medical or mental health settings
- Urgent need for a complaints mechanism and quality assurance system

6. Legal Settings

“Interpreters do not have access to specialist legal training. There are no quality standards, monitoring or complaints processes.”

“Every professional within the legal domain has a code of conduct, interpreters only have a voluntary one and non-enforceable.”

“Interpreters are placed in very vulnerable situations.”

“Legal interpreting should extend beyond the courtroom, to consultations, instructions, pre and post-trial support.”

The absence of structured training, standards, and accountability mechanisms poses risks to both Deaf clients and interpreters. How many cases have gone unnoticed where there has been a potential miscarriage of justice?

CISLI calls for:

- Statutory regulation of legal interpreting within the ISL framework
- Mandatory specialist training and CPD
- A clear complaints and disciplinary process similar to other regulated professions

7. Employment: Work and Access Scheme

“Paperwork is terrible, not easy or accessible.”

“There are interpreters refusing to use this scheme because of bureaucracy. It’s ironic, it’s called ‘Access’ when it’s not accessible.”

“30 hours a year wouldn’t even cover team meetings for one week. It is an insult.”

Key issues:

- Excessive administrative burden and inaccessible forms
- Severe under-allocation of interpreting hours
- Lack of digital systems for submitting invoices or applications
- Ignoring prior CISLI recommendations

CISLI recommends a full redesign of the scheme with streamlined digital processes, fair hour allocations and genuine consultation with Deaf and interpreter stakeholders.

8. Broadcasting and Media Access

“ISL programmes are still on in the middle of the night so my Deaf partner and I don’t get to watch them.”

“Why is RTE using people in England? We need Irish Deaf interpreters in Ireland.”

“More variety and visibility needed, ISL should be normalised on mainstream channels.”

“News for the Deaf three minute format has not changed in decades. This is an insult to the intelligence of Deaf people. Look to the UK BBC’s channel and see how often BSL Interpreters are used for live programmes. RTE, TG4 and Virgin could learn their model of good practice”

Recommendations:

- Ensure prime-time ISL content on Irish broadcasting channels, long overdue
- Prioritise Irish-based Deaf interpreters
- Develop appropriate national broadcasting standards regarding the use of Interpreters and Deaf Presenters

9. Broader Legislative Recommendations

“Every professional has strict rules, policies and procedures, Interpreters have none. They can say or do whatever they like. They have been allowed into high risk situations without any protection. Why is no one concerned about this?”

“Deaf people must be involved in decision-making.”

Members are calling for legislative and structural reforms:

- Inclusion of Deafblind individuals and Deaf people with additional needs in the Act to ensure they can be protected legally and services provided according to their needs
- Extension of interpreter access to Deaf parents of hearing children and hearing parents of Deaf children
- Inclusion of Cudas as an additional cohort to be protected under law with additional training pathways to be developed according to their native capacity as bilingual ISL/English users
- Development of a legally mandated national complaints mechanism for interpreters and service users
- Clear assignment of responsibility for ISL development, training, monitoring, mentoring and promotion of the profession
- Strengthened regulation and oversight of RISLI and more clearly defined professional standards

Conclusions and Recommendations

CISLI welcomes the NDA's review as an opportunity to strengthen the ISL Act and ensure meaningful equality for Ireland's Deaf community.

Based on member consultation, CISLI recommends that the NDA advise Government to:

1. Expand interpreter training and specialisation, particularly in education, health and legal sectors
2. Establish a statutory complaints and regulation mechanism for interpreters under RISLI
3. Increase funding and scope of the Voucher and Work Access schemes, with clear national consistency and digital accessibility
4. Develop an on-demand national remote interpreting service
5. Update GDPR policy guidance regarding the use of Interpreters
6. Mandate Deaf awareness training for all public sector staff, including Access Officers
7. Prioritise Deaf involvement in all ISL-related policy development and implementation ("Nothing about us without us")
8. Enhance public awareness and enforcement of obligations under the ISL Act, through national campaigns and mandatory reporting by public bodies

CISLI stands ready to work collaboratively with the NDA, Government departments and Deaf-led organisations to achieve these outcomes.