

ACTION ON **HEARING** **LOSS**

Access to communication support for people with hearing loss **Policy statement**

Our position

Appropriately qualified communication support should be provided for people with hearing loss when required. All professionals should be registered with NRCPD¹, the National Registers of Communication Professionals working with deaf and deafblind people, to ensure minimum standards of service are provided.

Introduction

This policy statement outlines the main issues for people with hearing loss when accessing communication support. It also includes our stand on the issues and suggests what actions need to be taken to improve access².

We use the term 'people with hearing loss' throughout to refer to people who are deaf, deafened and hard of hearing.

Background

People with hearing loss may require communication support to effectively participate at appointments, in meetings, or at other events. This could be at a GP or hospital appointment, during training, at a parents evening or at a job interview. Communication professionals provide services that facilitate effective communication between one or more deaf or deafblind people and hearing people in a particular situation.

The need for communication support may vary depending upon the situation. For example, in some situations such as on a one to one basis with a familiar person, the deaf person may not need communication support if they are able to lipread effectively. However, in other situations, the same individual may struggle to lipread, and therefore will need communication support. This may be

¹ In Scotland, sign language interpreters may be registered with SASLI, the Scottish Association of Sign Language Interpreters.

² Please note that, like many policy documents, this statement reflects the issues relevant at the time of writing. Over time this may be subject to change, such as new legislation, and we may review and amend the document.

due to the accent of the speaker, the speed, or content, of the conversation, the lighting, the size of the group and familiarity with the subject, for instance. It is then, important to check with the person with hearing loss as to whether they need communication support.

Types of communication support

There are several different kinds of communication support and what is required will depend upon the preferences of the individual with hearing loss.

The main forms of communication support are:

- Sign language interpreters – enable communication between deaf sign language users and hearing people. In the UK this usually involves spoken English and British Sign Language (BSL), although use of spoken Welsh and Irish Sign Language (ISL) are also possible.
- Lipspeakers – repeat what is said without using their voice, so others can read their lips easily.
- Speech-to- text reporters – type verbatim (word for word) accounts of what is being said and the information appears on screen in real-time for users to read.
- Notetakers – produce a set of notes for people who can't take their own because they are lipreading or watching a sign language interpreter. They are most commonly used in schools, colleges and universities, but also at work, on training courses and at other events. An electronic notetaker takes notes using a laptop whereas a manual notetaker takes handwritten notes.
- Deafblind interpreters – use a mixture of methods to communicate with someone, depending on the individual's level of sight and hearing.
- Sign language translators – translate written English into BSL and vice versa. For example, for use on websites.

A common mistake can be to arrange the wrong type of communication support. For example, people may assume that all deaf people use BSL. However, many deaf people have English as their first language and therefore will prefer to communicate in English through a lipspeaker, notetaker or speech-to-text reporter. However, for some BSL users, English may be their second language and therefore they would require a BSL interpreter rather than communicating in English. It is, then, vital that the person with hearing loss is asked their preferred form of communication support.

Qualifications

We recommend that all communication professionals working with deaf and deafblind people in the UK be part of the National Register of Communication Professionals (NRCPD). In Scotland, some sign language interpreters may be registered with the Scottish Association of Sign Language Interpreters (SASLI). This ensures that the communication professional:

- has a full criminal record check
- is held accountable to a code of conduct
- is suitably insured
- keep his or her skills current through compulsory continuing professional development
- is competent in accordance with the national occupational standards held by the Council for Administration (CfA).

NRCPD introduced new categories of language service professionals in February 2012. There is one registered professional category in each discipline for those registered professionals who have met safe-to-practise standards. There is also one trainee category in each discipline for those who are on a NRCPD-approved programme of training. Trainee communication professionals can sometimes be used for less complex bookings. .

We recommend regular checks of communication professionals to ensure they are NRCPD-registered.

Availability of communication support

There is a shortage of communication professionals that means it may be more difficult to arrange communication support in some areas of the UK and at short notice. However, communication professionals are used to travelling to deliver the service. We would encourage people to book support as far in advance as possible, to ensure the correct support is available at the time and date you need it. It is also important to be flexible with the appointment time to ensure communication support can be booked.

There is a growing number of deaf immigrants in the UK and this may necessitate two interpreters. One interpreter would work from spoken English to BSL and the other, (who may be a deaf interpreter), would work from BSL to the other signed language.

For short events, only one communication support professional will be required. However, for longer events, it is likely you will need to book two. If you book through a reputable and knowledgeable agency they should be able to advise you. It is good practice to provide the communication support professional with information about the event in advance, including any presentation slides, particularly where technical or specialist language will be used. It is also necessary to give the communication support professional and the person with hearing loss regular breaks.

Sign Language Interpreters

There is sometimes confusion around the qualifications for BSL interpreters. BSL qualification levels such as 'BSL Level' 3, 4 or 6 are often mistaken for interpreting qualifications but these generally refer to language levels and do not give evidence of any experience or training as an interpreter. Interpreter training is vital as it develops the skills and techniques required to ensure that communication between deaf and hearing parties is accurate and effective. The skill level will be guaranteed through NRCPD registration.

Different assignments may require different minimum skill levels. It is important that the interpreter is appropriately qualified and experienced for the job. This is critical in medical assignments where the quality of information communicated between medical staff and patient, (and vice versa), is predominantly determined by the capabilities of the interpreter. There has been a significant increase in spoken language agencies now offering BSL interpreting. Their knowledge, experience and access to BSL interpreters varies considerably. Using the services provided by NRCPD-registered professionals clearly demonstrates a commitment to provide equal access under human rights and disability discrimination legislation. Indeed, within the criminal justice system it is a contractual requirement to use only NRCPD-registered interpreters.

In some cases, people who use BSL will be used to having a family member interpret for them. Whilst the presence of family members is certainly welcomed, a registered interpreter is essential if a health professional is to be safe in delivering their duties. The family member is unlikely to be a trained interpreter and therefore may not interpret some important information – or could interpret it inaccurately. They may also find it difficult to remain impartial or to ask very personal questions.

Patient choice allows for a sign language user to indicate a preferred interpreter, who should be a registered professional.

Funding

For people in work, they may be able to get funding for communication support through Access to Work. Please see information on our [website](#) for more information and our [policy statement](#) on Access to Work.

Sign Language Translators

There have been concerns regarding the skill level of sign language translators. However, there is now a registration category of Registered Sign Language Translators. In early 2012, 14 translators qualified as the first professionals to hold this qualification in the UK and were trained through Action on Hearing Loss, funded by The Nominet Trust. The funding also enabled us to develop a [buyer's guide](#) to BSL translation for the internet. This will help organisations and individuals to identify and choose good suppliers of translation services.

Awareness

Awareness of communication support is relatively low among people who lose their hearing later in life. It is therefore important that people with hearing loss are made aware of all the forms of support that are available to them. It is also important that service providers make it clear that they can provide communication support when required and explain how this can be done.

The Law

The Equality Act requires service providers and employers to make changes, where needed, to make their service accessible for disabled customers. Such changes are known as 'reasonable adjustments'.

Reasonable adjustments are required where a

- provision, criterion or practice, or
- physical feature, or
- absence of auxiliary aid or service

puts a disabled person at a substantial disadvantage.

The disabled customer cannot legally be charged for these adjustments. For further information regarding the [Equality Act](#) please see our factsheets.

Service providers have to anticipate what adjustments will be necessary; they have to be proactive rather than reactive. Providing communication support is one way that service providers can ensure their service is accessible to people with hearing loss.

What adjustments are required for a person with hearing loss to access a service will vary depending on their individual level of hearing loss, their specific needs and their preferred method of communication. For example, someone with mild hearing loss may be able to follow a conversation with a member of staff with a combination of their hearing aids and lipreading. In this case, the adjustments needed would be to ensure that the member of staff knows how to communicate with someone with hearing loss, for example by turning to face them when talking and not covering their mouth

However, for some profoundly deaf people who use BSL, English will be their second language. A BSL interpreter may therefore be necessary to aid communication and would probably be considered a reasonable adjustment in many situations. An interpreter would enable both parties to understand what the other is saying and, particularly in a medical situation, ensure that an accurate examination is undertaken and the correct diagnosis and prescription given.

What is reasonable, then, depends on the communication needs of the individual with hearing loss as well as the size and resources of the service. This should be decided on a case by case basis and ultimately, only a court is able to decide what is reasonable.

At Action on Hearing Loss we would consider the provision of communication support as a reasonable adjustment for some people with hearing loss and we would recommend that organisations ensure that their staff know how to arrange this communication support should it be requested.

The service provider has an anticipatory duty, which means thinking in advance about when language service professionals may be

required, and making the arrangements necessary to ensure that communication professionals are used effectively.

Evidence

As of February 2012, there were 1,078 communication professionals registered with NRCPD, including 969 sign language interpreters.³

In our Annual Survey of members 2005, 38% of respondents had been prevented from taking part in some activities due to their hearing loss.

Recommendations

We would like services and employers to do the following:

- Have policies and procedures in place to enable communication support to be booked as and when required.
- Raise awareness of how to book communication support among people with hearing loss.
- Only use communication professionals who are registered with the National Register of Communication Professionals (NRCPD) or with SASLI for sign language interpreters in Scotland.
- Ask the individual with hearing loss what kind of communication support they would prefer.
- Regularly audit the communication professionals to ensure they are NRCPD (or SASLI) registered.

We also urge the government to invest in the development of communication support professionals to ensure people with hearing loss are adequately supported.

References

The Action on Hearing Loss website has lots of information about communication support.

<http://www.actiononhearingloss.org.uk/supporting-you/communication-support.aspx>

We also can book communication support if you need it

³ CACDP Registration Newsletter March 2008; in this document 'fully qualified' indicates MRSLI, this figure does not include interpreters who meet the criteria but who have chosen not to register with the Independent Registration Panel. They may be 'Full Member' of the Association of Sign Language Interpreters (ASLI). http://www.nrcpd.org.uk/registration_updates.php?news_id=39

<http://www.actiononhearingloss.org.uk/supporting-you/communication-support/book-communication-support.aspx>

Association of Sign Language Interpreters for England, Wales and Northern Ireland www.asli.org.uk/

Scottish Association of Sign Language Interpreters
www.sasli.co.uk

The registration body for all communication professionals
www.nrcpd.org.uk

Annual Survey of members
www.actiononhearingloss.org.uk/annualsurvey