



Office for
Equality and
Opportunity

Minister for Women and Equalities
Cabinet Office
70 Whitehall
London
SW1A 2AS

29 November 2025

HM Coroner Penelope Schofield
The Coroner's Office,
Woodvale,
Lewes Road,
Brighton
BN2 3QB

Dear Ms Schofield,

Your ref: 2025-0494 - Imogen Nunn: Prevention of future deaths report

Thank you for the Regulation 28 report of 9th October 2025 sent to the Department for Education (DfE), the Cabinet Office and Department for Work and Pensions regarding the death of Imogen Alice NUNN ('Immy'). I am replying as the Minister for Women and Equalities and Secretary of State for Education and on behalf of the Minister for Social Security and Disability.

I would first like to express how saddened I was to read of the circumstances surrounding Immy's death, and I offer my sincere condolences to her family and friends. The circumstances you describe in your report are concerning and I am grateful they have been brought to my attention and the attention of my Ministerial colleagues through your enquiries.

Through your discussions with NRCPD, the voluntary regulator for language service professionals, you are raising concerns regarding the national shortage of British Sign Language (BSL) interpreters, the procurement process for contracting language services, industry regulation and lack of availability of BSL qualifications and training.

In preparing this response, my officials have made enquiries with Crown Commercial Services, the UK's biggest public procurement organisation and an executive agency of the Cabinet Office, and the Department for Business and Trade. They have also worked with our British Sign Language Advisory Board to ensure we adequately address your concerns.

As Minister for Women and Equalities, my role is to promote equality of opportunity for all individuals and to work to reduce disparities. I work with the Minister of Social Security and Disabilities to champion the rights of Deaf and disabled individuals, in line with our manifesto commitment. We engage with a wide range of Deaf and disabled individuals and

organisations and collaborate closely with the [Lead Ministers for Disability](#), who are responsible for championing the interests of Deaf and disabled people in their department.

Following the passage of the BSL Act in 2022, the BSL Advisory Board was created to advise the Government on key issues impacting the Deaf community in their everyday life. To address the issues raised by the Deaf community, the Board also established subgroups to focus on particular priorities, including health and social care and education.

Last week the BSL Advisory Board published a detailed report titled ['Locked out: Exclusion of deaf and deafblind British Sign Language users from health and social care in the UK'](#). This report is the culmination of 3 years of work, bringing together Deaf and Deafblind people, professionals, and researchers from across the country.

The report examines the experiences of Deaf and Deafblind BSL people within the health and social care system, and provides evidence-based recommendations to improve accessibility and inclusion across NHS and social care services.

The findings echo some of the issues you have raised - a workforce shortage of BSL interpreters and 'patchwork provision' across the country. It provides numerous recommendations for government departments to address these findings, including giving BSL users greater control over interpreter bookings, the establishment of a national video relay service and issuing guidelines for interpreter provision.

It is my hope that the evidence presented in this report and its recommendations can provide government departments with a blueprint for improving health and social care service provision for the Deaf community.

Turning to the specific concerns you raised, I'll start by sharing with you details regarding opportunities for individuals to undertake BSL qualifications and training.

The DfE is introducing a GCSE in BSL. As well as learning how to sign effectively, the GCSE will give students an understanding of the history of sign language in the UK. Together, this content should give pupils a broad understanding and appreciation of the language. We hope that the development of this unique qualification creates an important step towards not only fostering greater recognition of BSL as a language, but also encouraging more students to consider developing their skills in this language at a higher level in the future. We are committed to developing a qualification that benefits both students and the wider deaf community.

The department has worked closely with subject matter experts to develop the subject content for the new qualification, and public consultations have been held over the years to get us to the current stage.

In November this year, following a second consultation and detailed collaborative working with organisations and people across deaf and hearing communities, Ofqual, the independent regulator, set out the rules for the assessment of the GCSE. Exam boards are now able to develop detailed specifications which will form the basis of course content

to be taught in schools and colleges. These new regulations mark a further step towards a qualification that could connect communities.

With regard to what is currently available for those who want to learn BSL, qualifications are available across several levels - from BSL Level 1 qualification, ideal for anyone who wants to learn basic language skills through to Level 6, being equivalent to an honours degree and the highest certification. The awarding body Signature is a leading provider of accredited BSL qualifications. To be accredited to become an interpreter, and to register with NRCPD, an individual must have an approved Level 6 BSL qualification or its equivalent.

There are funds available for adults who want to learn new skills through our Adult Skills Fund. However, the Adult Skills Fund mainly focuses on lower level skills, so whilst funding is available (if all the correct criteria is met) for adult learners to study BSL qualifications, the fund only covers adult learners up to level 3 or equivalent.

Given that BSL interpretation qualifications are a higher-level qualification, it must be noted that Higher Education (HE) is different to the other areas of funding. The Higher Education Sector is autonomous and independent of government and sets its own curricula as part of a demand led market.

The DfE, through the Strategic Priorities Grant (SPG), provides a large annual grant to the Office for Students (OfS), subject to governmental terms and conditions. For 2024–25 it totalled £1.456 billion (with £450 million in capital funding over three years). However, we recognise that there is no explicit mention of BSL or BSL-specific funding in the SPG guidance or allocations, so there is no ring-fenced funding for BSL courses at HE institutions.

You raised in your report concerns about the lack of availability of BSL qualifications and training. As the above shows, there are routes to achieve the professional qualifications needed to become a qualified interpreter, however I recognise that there are gaps in the funding model that might support this route for some individuals.

The BSL Advisory Group's Education Subgroup has to date prioritised focusing on issues relating to the education of Deaf children. They have supported DfE and Ofqual as part of the BSL GCSE consultations, and earlier this year met with Stephen Morgan MP, the (then) Minister of Early Education to discuss their priorities.

I will ask officials in the DfE to consider the issues raised above and to work with the BSL Advisory Board to consider the changes required to enable more individuals to study BSL to a level sufficient to become a BSL Interpreter.

I will now address specifically your concerns around the procurement provision for interpreters and industry regulation.

Government procurement addresses the need to buy goods and services more efficiently and cost-effectively through its Crown Commercial Services (CCS), a business unit that

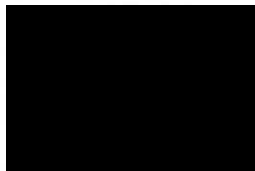
utilises its commercial expertise to help buyers in public sector organisations, including government departments and local governments, by providing commercial agreements and procurement expertise. However, their commercial agreements are optional routes to market. A challenge to procuring BSL interpretation lies in the very nature of the fragmentation of the BSL interpreter market, with many interpreters registered as freelance or sole traders and not necessarily affiliated with an agency.

With regards to industry regulation, the UK Government's preference is for industries to self-regulate, in order to promote economic growth, innovation, and competitiveness by reducing the administrative burden on businesses. This is currently the case for BSL interpreters, where the NRCPD mandates qualifications, standards and continuing professional development for those included on their accredited persons list. For most professions, there is no evidence to suggest that mandated industry regulation would increase the numbers of professionals entering that profession and/or elevate the status of that profession beyond what a non-statutory model of regulation already does.

That said, I acknowledge the concerns raised by NRCPD regarding procurement practices and the status of the profession and recognise the need to encourage more professionals into the industry, and I will be raising these issues with the BSL Advisory Board and asking them to work with NRCPD to consider ways in which improvements can be made.

I want to thank you for bringing your concerns to my attention and I hope this response addresses them. I will continue to work alongside my Ministerial colleagues, the BSL Advisory Board, Deaf people and their representative organisations, to continue to make tangible improvements for the Deaf community. I am confident that we can take steps towards improving the services provided to those most in need.

With all best wishes,



Minister for Women and Equalities and Secretary of State for Education