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Senedd Cymru | Welsh Parliament

**Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee**

**Bil Iaith Arwyddion Prydain (Cymru) | British Sign Language (Wales) Bill**

Ymateb gan COS - The Centre of Sign-Sight-Sight | Evidence from COS - The Centre of Sign-Sight-Sight

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### **What are your views on the general principles of the Bill?**

I welcome the principles of the Bill, they are more robust than those of England and Northern Ireland, but does not give equal standing to English and Welsh.

The appointment of a BSL advisor (who I assume will be a Deaf BSL user) is imperative providing they are involved in all aspects of the Bill and not just a figure head.

### **What are your views on the Bill's key provisions (set out below), in particular are they workable and will they deliver the stated policy intention?**

While many of these principles could be encouraged through policy or guidance alone, legislation provides the teeth to make them real.

Legislation ensures that this intention isn't just aspirational but actionable, by using terms like "must" "report" "measurable".

Mandating BSL Action Plans: Public bodies must develop and publish strategies to promote and support BSL.

Monitoring & Reporting: Regular reporting requirements keep progress transparent and measurable.

Embedding in Governance: Instead of being an optional "add-on," BSL becomes part of organisational policy-making and service design.

Driving Cultural Change: Over time, a legal framework shifts attitudes and practices across sectors (health, education, employment, justice).

### **What are your views on the Bill's key provisions (set out below), in particular are they workable and will they deliver the stated policy intention?**

#### **1 – A duty on Welsh Ministers to promote and facilitate the use of BSL**

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This cannot be a token gesture of attending a Deaf Awareness course and ministers and staff thinking that is enough. The scrutiny needs to be robust and the responsibility of someone who fully understands the language and culture of the Deaf Community

## **2 - A duty on Welsh Ministers to publish national strategy and guidance**

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The strategy will give a framework for the Bill's implementation. The 6 year cycle seems in itself far too long. Allowing the strategy to be "reviewed" does not go far enough, in essence it gives Minister's permission to pop it on a shelf, take it down, tick a "I have reviewed this" box and pop it back on the shelf.

## **3 - A duty on Welsh Ministers to publish BSL guidance**

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This cannot be a token gesture of attending a Deaf Awareness course and ministers and staff thinking that is enough. The scrutiny needs to be robust and the responsibility of someone who fully understands the language and culture of the Deaf Community

## **4 - A duty on specified public bodies to publish BSL plans**

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This is not robust enough. Where are organisations funded by Welsh Government such as LLAIS, Higher Education bodies, Qualification Wales, other Commissioners.

## **5 - The appointment of a BSL adviser**

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An advisor is a step down from a Commissioner, again showing that Welsh Government places more emphasis on Welsh than BSL.

The Advisor must be a Deaf BS user, be given authority to review reports, investigate complaints, enforce guidance and be accountable to the Deaf Community of Wales.

## **6 - Reporting duties to be imposed on the public bodies and Welsh Ministers in relation to these duties.**

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Who will review these reports, will they be published in an accessible format, what will they report against?

Measurable Outcomes need to be established to ensure bodies are reporting on the same outcome.

These should be used to establish a "Best Practice" guide for bodies, developed by the Advisor and BSL Stakeholder group.

## **How appropriate are the powers in the Bill for Welsh Ministers to make subordinate Legislation?**

## **Are there any barriers to the implementation of the Bill's provisions and does the Bill take account of them?**

The lack of qualified BSL interpreters and translators

The lack of knowledge within public bodies

The lack of understanding of their rights within the Deaf Community at a grass roots level

**What are your views on the assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?**

**Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum?**

There is a lack of rights that are given to the Welsh language, BSL is being treated as a "favour".

This Bill is about language, not access, it is not a disability issue.

**Anything else?**