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Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cymwysterau Cymru

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Qualifactions Wales





Equality and Social Justice Committee

Via email: [REDACTED]

18 August 2025

Consultation on British Sign Language (Wales) Bill

Dear Committee Members,

As the independent regulator of non-degree qualifications in Wales, Qualifications Wales has responsibility for ensuring that qualifications and the Welsh qualifications system meet learners' reasonable needs.

Given our remit, Qualifications Wales welcomes the broad principles and provisions of the Bill and the duty on Welsh Ministers to promote and facilitate the use of BSL. We are of the view that this has the potential to contribute towards raising awareness of and the profile of BSL across Wales.

Qualifications in BSL

Our main role in relation to BSL is in facilitating a range of BSL qualifications at an appropriate level and size. In the last twelve months we have actively taken steps to establish a suitable range of BSL qualifications to recognise and certify learners attainment in BSL.

For example, we have recently extended the designation of BSL qualifications from Signature (an awarding body that specialises in BSL). This means that Signature's BSL qualifications can continue to be made available to schools and colleges across Wales. We know that these qualifications, particularly at Level 1 are important in providing the foundations of BSL for individuals who are beginning to learn the language.

Qualifications Wales

Q2 Building, Pencarn Lane
Imperial Park,
Newport
NP10 8AR
☎ 01633 373 222



[cymwysterau.cymru](https://www.cymwysterau.cymru)
[qualifications.wales](https://www.qualifications.wales)

Cymwysterau Cymru

Adeilad Q2, Lôn Pencarn
Parc Imperial,
Casnewydd
NP10 8AR
☎ 01633 373 222

Additionally, from September 2027 as part of our Skills for Life units we are introducing small ten to twenty hour BSL units. These units will span a range of levels from Entry Level 1 to Level 2. These flexible units can be taken either as standalone units or contribute towards a larger skills qualification. Given their size they should be manageable for schools to deliver, particularly those schools who have little or no experience of delivering BSL qualifications currently. As these units form part of the National 14-16 qualifications offer they will also be available in Cymraeg as well as English.

We have also committed to permitting the designation of any 9-1 GCSE in BSL developed for learners in England, if and when such a qualification becomes available. This means that learners in Wales would be able to access it.

A made-for-Wales BSL GCSE

As outlined in the explanatory memorandum to the BSL Bill you will be aware that in October 2024 we announced our decision to suspend the development of a made-for-Wales BSL GCSE.¹ This was due to a number of factors, the most significant being the lack of teachers who have both qualified teacher status and the BSL expertise to effectively deliver the qualification in schools and the likely low uptake of a full GCSE. We are continuing to work with key stakeholders including the National Deaf Children's Society and Signature to explore the challenges around BSL GCSE in more detail and how these might be overcome.

Conclusion

In conclusion although the BSL Act (Wales) will help to raise the status of BSL across Wales it will not directly address the main barrier preventing the introduction of a made-for-Wales GCSE BSL, i.e. an insufficient supply of suitably qualified teachers.

Yours faithfully



¹ [British Sign Language update | Qualifications Wales](#)

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Anabledd Cymru

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Disability Wales



Proposed British Sign Language (BSL) (Wales) Bill

Consultation: Response form

Name: [REDACTED]

E-mail: [REDACTED]

Are you submitting this response in a professional or personal capacity?:

Professional capacity (including on behalf of an organisation)

Are you responding on behalf of an organisation?

Yes

If responding on behalf of an organisation please give the organisation's full name

Disability Wales

Are you (your organisation) currently a provider of support/services for the Deaf community?

Yes

Please state your professional role with regard to support/services for the Deaf community:

Disability Wales (DW) is the national association of Disabled People's Organisations (DPOs) striving to achieve rights, equality and independent living of disabled people in Wales. Our DPO's and members include many from the deaf community that are BSL signers.

British Sign Language (BSL) (Wales) Bill: Consultation Questions

The need for legislation

The [British Sign Language Act 2022](#) requires the UK Government to issue guidance about the promotion and facilitation of the use of British Sign Language (BSL). This however only applies in England and not to the Welsh Government or public bodies in Wales such as councils or the NHS. The British Sign Language (BSL) (Wales) Bill aims to place equivalent specific duties on the Welsh Government and public bodies in Wales.

Question 1: Do you think there is a need for this legislation? Please provide reasons for your answer.

Yes, at Disability Wales, we wholeheartedly support this legislation in all its forms, as there is a clear and pressing need for it.

While the UK Government's enforcement mechanisms monitor progress toward implementing BSL at a national level, the devolution of responsibilities to Wales means that equivalent oversight is not currently in place. This legislative gap leaves Welsh signers without the same protections.

We believe that introducing mandatory reporting and measurable targets will reveal existing barriers and help drive meaningful change. This will ensure that BSL signers have equal access to transport, education, housing, employment, and all areas of public life in Wales, opportunities from which they are often currently excluded.

This legislation represents not a quick fix but a critical first step in building a framework to gather data, identify gaps, and foster the bilingual implementation of BSL throughout

Wales. It is a pathway toward greater inclusion, equity, and recognition for the BSL community.

Question 2: Do you agree or disagree with the goals that the Bill seeks to achieve? Please provide reasons for your answer.

We agree with the goals outlined in the Bill and firmly believe that this marks the first crucial step toward meaningful change in Wales.

The Bill's goals reflect a necessary commitment to ensuring that BSL users have equitable access to services, resources, and opportunities. By introducing specific duties for the Welsh Government and public bodies, the Bill acknowledges the importance of BSL as a language and the rights of those who use it.

This legislation lays the groundwork for addressing systemic barriers faced by BSL signers in Wales. Importantly, the Bill will create a shift toward creating a Wales that values linguistic diversity and access for all.

We believe this is an important Bill to begin dismantling the inequalities that BSL signers experience, ensuring that their needs are met in both policy and practice.

British Sign Language

Question 3: Do you agree that the Bill should include proposals to promote and facilitate the use of BSL and its tactile forms?

Yes

Question 4: Do you agree that the Bill should support the various Welsh regional dialects of BSL?

Yes

Question 5: Do you think that the term 'BSL users' should be replaced with 'BSL signers', recognising that BSL is a language which includes both deaf and hearing signers? Please provide reasons for your answer.

Yes, we call for the change of the linguistic term and stand in solidarity with the British Deaf Association for this request.

Question 6: Do you think that the term 'deaf BSL signers' can be used when referring to BSL users/signers who are medically or audiological deaf? Please provide reasons for your answer.

Don't know

Please see above response.

Deaf Communities

Question 7: Do you agree or disagree that deaf communities:

a) currently have a voice in the design and delivery of the public services that they use?

Please tick the answer that most applies and provide any comments.

Strongly disagree

From our discussions with Deaf and Disabled People's Organizations (DDPOs), far more work is needed to ensure meaningful involvement in the design and delivery of public services.

Too often, services are inaccessible to BSL signers/users, highlighting a lack of co-production during the planning stages. If BSL users/signers had been included from the outset, many of these barriers could have been avoided.

To drive meaningful and sustainable change, it is essential that BSL users/signers are actively involved not only in planning but also in the implementation of the actions stemming from this Bill. Their lived experience and insight are invaluable for creating truly inclusive services that meet their needs

b) should have a formalised voice in the design and delivery of the public services that they use, especially ones targeted at deaf people. Please tick the answer that most applies and provide any comments.

Strongly agree

Please see above responses

Question 8: Are there any specific communication methods used by deaf people that you would like the Bill to reference/include?

Please consult the Welsh Council for Deaf People for specific user's methods.

Barriers that exist for deaf people

Question 9: What do you believe are the main barriers that currently exist for deaf people and/or their families in the following areas. Please tick all that apply and provide information/examples on each area:

Education

Unlike other parts of the U.K there are no schools specifically for deaf children. This means often they are in mainstream schools that do not have the specialist support they need to excel in comparison to their hearing peers.

Health

Access to healthcare is often problematic for individuals who communicate via BSL due to a lack of interpreters and staff trained in BSL.

When vital health information is inaccessible, it creates anxiety and barriers to informed decision-making. Ensuring that all patients can understand and engage with their healthcare is critical.

To address this, Wales urgently needs increased funding to provide accessible health services, including the provision of BSL interpreters and bilingual communication support for those who need it.

Social Care

Similarly to healthcare the social care sector also has a lack of interpreters and staff trained in BSL.

This creates significant barriers to accessing vital support, leading to misunderstandings, delays in service provision, and unmet needs. Effective social care relies on clear and accessible communication. While gathering evidence for our response to Welsh Government's consultation on raising the maximum weekly social care charge, we were concerned to hear that a local authority had communicated with a Deaf BSL User in written format. This led to a serious misunderstanding about payment of care charges which caused considerable stress for the individual and their support worker.

Transport

The issue of inaccessible public transport for the Deaf community, particularly BSL signers, is a significant barrier in Wales, especially in rural areas. This lack of accessibility is compounded by the absence of clear communication regarding routes, stops, and instructions. The lack of accessible features in public transport systems affects not only BSL users but the broader Deaf community as well, highlighting a systemic issue that needs urgent attention.

Advocating for improved accessibility, such as BSL-interpreted announcements, visual cues, and accessible information systems on buses and other forms of transport, could make a meaningful difference. Addressing these gaps would not only ease the daily travel challenges faced by Deaf people but also align with a broader commitment to inclusivity and accessibility in public services.

Workplace

The inaccessibility of workplaces in Wales for BSL signers is a major barrier to employment for the Deaf community. Currently, many opportunities are provided by Disabled People's Organisations (DPOs), but the responsibility for creating accessible workplaces should not fall on charities and DPOs alone. There needs to be a proactive commitment from government and businesses to make workplaces accessible to the Deaf community, allowing greater access to employment.

Most disabled people, including those in the Deaf community, want to work, but systemic barriers, rather than their conditions prevent them from integrating into the workforce. This calls for improved employer education, stronger policies, public sector leadership, and collaborative efforts to remove these barriers.

Establishing a BSL Commissioner for Wales

The Bill proposes to establish a BSL Commissioner who would promote and facilitate the use of BSL, and would have the same powers as other minority language Commissioners such as in the [Welsh Language \(Wales\) Measure 2011](#).

Question 10: Do you agree or disagree with the proposal to establish a BSL Commissioner for Wales, and, do you have any different suggestions or alternatives? Please provide reasons for your answer.

Don't know

Many DPOs and disabled individuals in Wales are advocating for a broader Disabled People's Commissioner role. At Disability Wales, we focus on all disabled people, which means we cannot fully support this call without considering the needs and equity of all disabled people in Wales.

While we believe our organisation is well-equipped to provide advice and services, funding restrictions limit our capacity. We propose that increasing the capacity of DPOs and delegating more work and initiatives to include disabled people, while expanding opportunities for them, offers a viable alternative solution.

We also stress that these plans, decisions, and implementations must be coproduced with disabled people. Our concern is that a non-disabled Disability Commissioner and office, potentially led by non-disabled individuals, would undermine the very purpose of such an office. This issue is one we are working to address within our cross-party group on disability.

At our AGM on 11th December the Cabinet Secretary for Social Justice announced her intention to establish a Disability Rights Advisory Board to provide scrutiny and monitoring regarding progress with delivery of the Taskforce Action Plan. It is proposed that members of the Board will be selected via a Public Appointments process and it is vital that Deaf and Disabled people are represented on this Board.

Question 11: The proposed remit of the Commissioner would be to:

- **formulate BSL standards;**
 - **establish a BSL Advisory Panel;**
 - produce reports every 5 years in BSL, Welsh and English on the position of BSL in that period;
 - provide guidance and a process for public bodies to promote and facilitate BSL in their respective domains;
 - establish a procedure for the investigation of complaints.
-

Do you agree with the proposed remit of the Commissioner, and are there any other provisions you would like to include in the Commissioner's remit? Please provide reasons for your answer.

We agree that the above remit is required and understand why Deaf BSL Signers/Users call for such a role. However as indicated believe there are wider discussions about the role of a Commissioner in protecting the wider rights of Deaf and Disabled People.

Question 12: Do you agree that the BSL Commissioner and the BSL Advisory Panel members should be fluent users/signers?

Yes

Question 13: Do you think that the proposed BSL Commissioner and Advisory Panel should prioritise the following. Please tick all that apply and provide reasons for your answer.

Enabling deaf users/signers to lead the development of policies and implementation of services for BSL users/signers;

Early years language support for deaf children and their families;

Improving BSL provision in education;

Access to interpreters in public services.

All of the above

Question 14: Do you agree or disagree with the proposal to place a duty on the Welsh Government to prepare and publish an annual BSL report? Please provide reasons for your answer.

Yes

Yes, we completely agree with the proposal to place a duty on the Welsh Government to prepare and publish an annual BSL report. This would provide transparency, accountability, and a clear assessment of progress in meeting the needs of the Deaf community in Wales. In an ideal Wales, this duty would be extended beyond the Welsh Government to include both the public, private and third sectors, ensuring that accessibility and inclusion for BSL users are rolled out more broadly across Wales. This would foster a more inclusive society where the needs of the Deaf community are consistently addressed and supported.

Question 15: Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum?

No

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

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Bwrdd Iechyd Prifysgol Hywel Dda

Welsh Parliament

Equality and Social Justice Committee

Inquiry: Bil Iaith Arwyddion Prydain (Cymru)

Evidence from: Hywel Dda University Health Board



Welsh Parliament Consultation: British Sign Language (Wales) Bill

Hywel Dda University Health Board (HDdUHB) response (Submission via email)

1. Background

Purpose of the consultation

The Senedd's Equality and Social Justice Committee is undertaking Stage 1 scrutiny into the general principles of the British Sign Language (Wales) Bill. A copy of the Bill and its accompanying explanatory notes can be found on the Senedd's website.

The Committee would like to invite you to submit [written evidence](#) as part of its consideration of the general principles of the Bill. In responding to the consultation you may wish to give a view on the Committee's terms of reference.

Terms of reference

The Committee would like to hear your views on the general principles of the British Sign Language (Wales) Bill and the need for legislation to deliver the stated policy intention.

The closing date for submissions is **12 September 2025**.

Providing Written Evidence

The Senedd has two official languages, Welsh and English.

In line with the Senedd's Official Languages Scheme

(<https://senedd.wales/commission/senedd-commission-policy/official-languages/>)

the Committee welcomes contributions in both or either of our official languages, and we ask organisations that are subject to Welsh Language standards or schemes to respond in line with their own obligations. Please inform the Committee when submitting responses if you intend to provide a translation at a later date.

We are also welcoming responses in BSL – these can be submitted via video upload through this online form.

Please see guidance for those providing evidence for committees.

(<https://senedd.wales/senedd-business/committees/getting-involved-with-committees/>)

2. Capacity

Are you submitting this response in a professional or a personal capacity ?

Professional

Section 3B is only applicable to those responding in a PROFESSIONAL capacity

3B. About you / your organisation

If you are **submitting a response on behalf of an organisation** or as a professional please enter your details here.

If you are responding **on behalf of an organisation**, we will publish the name of the organisation but will not publish your name or contact details.

As you are responding in a professional capacity, are you responding on behalf of an organisation? *

Yes

Organisation

Hywel Dda University Health Board

Please provide the information below: *

Name

Role

Contact email address

Contact telephone number

Do you wish to receive email updates on the Bill's progress *

Yes, please

In which language(s) are you submitting?

I am submitting in English only

Submission

I wish to submit my response via email.

4. Your Views

The Committee would like to hear your views on the general principles of the British Sign Language (Wales) Bill and the need for legislation to deliver the stated policy intention. In coming to a view you may wish to consider the Bill's key provisions which consist of:

- A duty on Welsh Ministers to promote and facilitate the use of BSL;
- A duty on Welsh Ministers to publish a National BSL Strategy;
- A duty on Welsh Ministers to publish guidance;
- A duty on specified public bodies to publish BSL plans;
- The appointment of a BSL adviser;
- Reporting duties to be imposed on the public bodies and Welsh Ministers in relation to these duties;
- The appropriateness of powers in the Bill for Welsh Ministers to make subordinate legislation.

HDdUHB Response:

The Health Board supports the Bill's principles and its aim to enhance communication and inclusivity for BSL users, including patients, families, and staff. We welcome the requirement to publish a BSL plan within 12 months of the strategy's release but recommend alignment with the Welsh Government's refreshed All-Wales Standards for Accessible Communication to avoid duplication and ensure coherent governance and reporting.

You may also wish to consider:

- **Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them**

Lack of BSL interpreters and awareness.

There is a notable shortage of qualified BSL interpreters in Wales to meet the increased demand the BSL Bill will create. The number of qualified interpreters will need to be increased, with 24 hour/ 7 days a week provision to support the listed bodies in the provision of BSL interpretation and to produce published documents in BSL, particularly when listed bodies will be requesting BSL versions of their BSL plans and annual reports at the same time. The Explanatory Memorandum states there is a lack of interpreters, particularly in West, mid and North Wales but does not outline a strategy to address this crucial shortage.

The language used in the Bill is not definitive enough, for example, the Welsh Ministers are going to "encourage listed public bodies to promote and facilitate the use of BSL..." [section 2(1)(b)] and "requires public bodies to describe how they are going to follow the BSL guidance" or "explain why it does not intend to do so" [section 2]. This risks inconsistent implementation across Wales and fails to establish BSL as a right, rather than a recommendation. Also, allowing public bodies to opt out by explaining "why it does not intend to do so" creates a loophole that could be widely exploited. The Bill must include clearer obligations and accountability mechanisms. The Bill could be enhanced if it is clear in its description of the consequences if a listed body ignores the Bill.

There is conflict, occasionally, between different legislation and/or best practice. For example, the Welsh language commissioner favours fully bilingual materials, but this creates a conflict in terms of mixing languages in one product/information. A scenario could be that we use BSL but are then conflicted in terms of do we add subtitles (BSL users may find this distracting) and/or if we do add subtitles to a BSL resource, in Wales should these be in Welsh or English, or both in one product or as two products?

The Bill does acknowledge some of these challenges through its proposal to appoint a BSL Commissioner and issue guidance to public bodies, but further clarity on resourcing, assessment of in what circumstances translation is needed (i.e. would a media targeted piece of communication or a press release need translating) and implementation support would be beneficial.

- **The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation.**

The list of public bodies in section 8(1) of the Bill is too limited, omitting key services like public transport services, and Police. The delegated power for Welsh Ministers to amend this list is therefore welcome.

The Bill would benefit from clearer guidance on regional collaboration between public bodies, similar to the governance models under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and the Social Services and Wellbeing (Wales) Act 2014, as referenced in the Explanatory Memorandum.

- **Whether there are any unintended consequences arising from the Bill;**

Without additional funding, listed bodies may need to reallocate existing budgets to meet the Bill's requirements, potentially impacting other services—or risk non-compliance.

BSL interpretation costs are unpredictable and likely to rise with implementation. Recording BSL use among patients and staff will also require updates to NHS data systems such as Welsh Patient Administration System (WPAS) or Electronic Staff Records (ESR) which currently do not track and highlight BSL as a preferred language the same way they track and record Welsh speakers.

As detailed above, it may create complexities in adhering to other best practice in accessibility, for example, there is conflict occasionally between different legislation and/or best practice.

For example, the Welsh language commissioner favours fully bilingual materials, but this creates a conflict in terms of mixing languages in one product.

Without a clear plan or guidance to support other sign language users in the long term, such as Deaf refugees and asylum seekers the Bill may also unintentionally exclude them from effectively using services of the listed bodies.

- **The financial implications of the Bill.**

Financial implications are a key concern, as already highlighted in question 3 (unintended consequences of the Bill).

BSL training involves significant costs—course fees, staff time, and ongoing Continuing Professional Development (CPD). While initial funding is outlined, the Bill lacks a long-term strategy to embed BSL into workforce development. A national funding plan is essential for sustainability and consistency.

The impact on communications could be substantial, potentially requiring in-house BSL translators and appointing a BSL officer or a senior lead in each listed body all of which require funding. With limited accredited BSL professionals in Wales, recruitment would also be challenging.

Additionally, the Bill may conflict with existing accessibility standards, such as bilingual requirements, raising practical issues around subtitles and language formats in communication materials.

In addition to your views on the Bill, we would be grateful for any information you can provide in response to the following questions:

- **What provision is there currently within health services to meet the communication needs of Deaf BSL users?**

All staff have access to accredited interpreter and translation services and the health board's interpretation and translation policy outlines the importance of using BSL interpreters to support communication with patients and carers.

HDdUHB has an established Sensory Loss Health Action Plan aligned with the All-Wales Standards and Equality Act 2010, including actions to support communication needs of Deaf BSL users. For example, in 2025–26, we aim that “Our clinical staff and all other members of staff with direct contact with patients will be confident in how to communicate with people with sensory loss and access a BSL interpreter where needed”. This will be achieved by continuing to promote the health board's guidance on accessing Interpretation and Translation Services', Sensory Loss awareness course on Electronic Staff Record (ESR) and supporting staff to learn basic BSL through the in-house BSL staff lunch club and access accredited BSL training outside of the organisation.

Tools such as the “Can We Help” poster, ward iPads to access Language Line/online BSL interpreters', and a WPAS staff guide for identification and recording of BSL users and needs help to promote and facilitate the use of BSL.

The Health Board has started work to gather and report both the baseline and continuing improvement data on the number of patients who are BSL signers and aims to evidence service performance such as ‘How many requests for BSL interpreters were successfully provided’, ‘How many requests were not met’ and ‘How many DNA/CNAs recorded among BSL users where interpreters were booked’ through its bi-annual reporting mechanism and the organisation's Sensory Loss

Friendly Self-Assessment Checklist project. Qualitative feedback from staff and BSL signers on the use of BSL interpretation services are also gathered and reported in the Health Board Sensory Loss Annual Report.

The Health Board BSL Lunch Club for Staff is continuing to grow as a social group and support mechanism and encourages staff to learn basic BSL and those with BSL skills to maintain and share those skills.

- **How does this provision differ for: scheduled health appointments; emergency or urgent care; and Digital channels.**

In Primary Care, access to BSL interpreters is available in all practices but is not a standard practice across all GP, dental, optometry, and pharmacy services. Whilst there are ways of accessing practices via email, NHS app and in person, the majority of practices use telephone for booking urgent or same day appointments and people whose first language is BSL are excluded in being able to access the majority of appointments when they open up for the day. .

Many GP practices have information screens which provide information on community services and third sector information for reading and are used as visual call systems to alert patients in the waiting room when the clinician is ready for their appointment. Some have audio call systems only and some have neither. Some information/advert videos on information screens in practices will have subtitles but not a BSL interpreter on screen.

The Health Board strives to provide accessible content, with improvements made following a 2023 audit by the Government Digital Service. Our website is partially compliant with Web Content Accessibility Guidelines (WCAG) 2.1AA, with ongoing work to meet WCAG 2.2AA. Accessibility features include plain language, transcripts for media, and guidance for Deaf users via Relay UK and induction loops. We prioritise BSL materials for service consultations and promote them via multiple channels.

While we lack a reliable digital screen system, BSL videos have been used when available. Our appointment booking process includes preferred language and BSL interpreter needs. Interpreter access is generally reliable for planned appointments, and communication preferences are recorded in patient notes.

A barrier when accessing urgent/emergency care is that BSL interpreter provision is limited and the interpreter service that the health board commissions only provides BSL interpreters Monday to Friday 9am – 5pm which we have been advised is due to

the lack of interpreters. In addition, most BSL interpreters are based in the south-east of Wales, which creates a lack of local interpreters for West Wales and, where face to face interpreters are needed, increased costs/time due to the travel required by the interpreter.

- **Are there any current plans or projects within your organisation aimed at improving communication support for Deaf BSL users accessing health services?**

HDdUHB has several ongoing initiatives to improve communication support for Deaf BSL users. These include the Sensory Loss Friendly Self-Assessment Checklist, which helps services like Outpatients and Audiology meet All-Wales Standards and improve staff training, interpreter access, and recording of communication needs.

A staff guide for recording patients' sensory loss on WPAS has been developed and promoted, with efforts to increase data on Deaf and BSL users and ensure support is provided during hospital appointments. The Health Board Strategic Equality Plan includes an action to deliver a programme of awareness raising training on topics related to protected characteristics which are in addition to the mandatory requirements, including sensory loss. A number of training and staff awareness activities are in place to contribute to the above action as well as the Standards for Accessible Communication and Information for People with Sensory Loss. The Health Board's Sensory Loss Partnership Forum continues to collaborate across professional and community groups and use platforms like SharePoint, Teams channels, and social media to promote BSL-related information. National campaigns such as Sensory Loss Awareness Month, Deaf Awareness Week and Sign Language Week are actively supported.

Audiology services deliver mandatory deaf awareness training among clinical staff, and staff are encouraged to participate in Sensory Loss Awareness Month and BSL training.

The Communications and Engagement Team ensures accessible public communications, including BSL interpreter support at events. The "Contact Us" page provides information on Relay UK, hearing loops, and access to BSL interpreter services.

The Hywel Dda Post (Patient Hub) allows patients to manage appointments and is continually being developed to better meet sensory and communication needs, including Easy Read formats.

Bespoke engagement with Deaf groups includes BSL-interpreted consultations and materials. However, concerns remain that communications from other teams may not meet accessibility standards, especially digital platforms and patient letters.

- **What are the main barriers that health services face in improving communication support for Deaf BSL users**

Key barriers to supporting Deaf BSL users include limited staff understanding of BSL as a language and needs of BSL users, lack of funding for BSL and Deaf Awareness training, resistance to using communication technology, and inconsistent understanding of interpreter booking processes. Staff often lack more than basic BSL knowledge, and Deaf individuals may receive appointment letters without confirmation of BSL interpreter arrangements, sometimes causing confusion.

Unlike Welsh language, BSL is not currently recorded in patient or workforce data systems, hindering effective support. Interpreter costs and the requirement to publish reports in BSL under Section 6 of the Bill add further financial pressure.

Wales faces a significant shortage of qualified BSL interpreters, making short-notice bookings difficult and unreliable. A coordinated, Wales-wide interpreter booking system and investment in training are essential to meet the Bill's goals.

Generally, Public sector staff lack BSL awareness, highlighting the need for accessible, community-based training. Families also struggle to access BSL courses to support communication with Deaf children. The Bill could be strengthened by mandating referrals to BSL training for parents and carers.

Engagement activities are often delayed due to agency requirements for 4–6 weeks' notice and interpreter availability issues, including non-attendance despite advance booking.

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cyngor Sir Gâr

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Camarthenshire County Council



Eich cyf / Your ref:

Gofynner am / Please ask for:

Fy nghyf / My ref:

Llinell Uniongyrchol / Direct Line:

Dyddiad / Date: 8th September 2025

E-bost / E-mail: [REDACTED]

[REDACTED]
[REDACTED]
Second Clerk, Equality & Social Justice Committee
Welsh Parliament

Dear [REDACTED]

I write on behalf of Carmarthenshire County Council in response to the consultation on the general principles and the need for legislation regarding the proposed British Sign Language (BSL) (Wales) Bill. We appreciate the opportunity to contribute to this important process and recognise the significance of promoting and facilitating the use of BSL across Wales.

In principle, we strongly support the central objective of the Bill to advance equality and remove barriers for deaf people, their families, and BSL users. We believe that recognising BSL legally and promoting its use aligns with Wales's commitment to inclusivity, equal rights, and access to public services for all citizens.

The proposal to ensure BSL users are not treated less favourably than those who speak Welsh or English is both fair and necessary. This principle echoes broader equality legislation and complements Wales's bilingual ethos, respecting linguistic diversity and cultural heritage, and these are principles that are embraced in our Core Values.

We recognise that progress has been made in support services for deaf people, but more needs to be achieved, particularly regarding access to education, health, public services, and employment, so the reason why legislation is essential therefore, in our view, is to ensure the following:

- Establish a clear legal status for BSL, ensuring consistency and accountability across Wales.
- Mandate public bodies to consider the needs of BSL users proactively, not as an afterthought.
- Address disparities in opportunity and access that persist despite voluntary or piecemeal improvements.
- Provide a statutory framework for ongoing improvement, transparent monitoring, and enforcement.

Additionally, we welcome the proposal to establish a BSL Adviser. Such a post will be vital in championing the rights of BSL users, overseeing compliance, and providing expert guidance and advocacy.

In considering the potential benefits and implications of the Bill, we would include:

- Improve the accessibility of public information, services, and education for BSL users.
- Raise awareness about BSL and deaf culture among service providers and the wider public.
- Encourage training and capacity-building for frontline staff in BSL communication.
- Contribute to the removal of social and economic barriers faced by deaf individuals and their families.

However, as with any new legislation, we have to make sure that we are adequately resourced or we run the real risk of setting ourselves up to fail. Current budgets within Local Government are already stretched to the limit, so any additional duties are unlikely to be delivered adequately without additional resources. In this respect, here are some of the considerations that we believe need to be taken into account to support the effective delivery of the introduction of the Bill:

- Resourcing: Sufficient funding and resources for local authorities, schools, healthcare providers, and public bodies to deliver on new statutory obligations.
- Training: Investment in BSL training at all levels, particularly for those delivering public services.
- Engagement: Ongoing consultation with deaf communities and BSL users to ensure their voices remain central in policy development and delivery.
- Monitoring: Robust mechanisms to measure progress, identify gaps, and address challenges collaboratively.

Finally, we fully support the commitment to promoting the rights and well-being of BSL users and the general principles of the need for legislation as outlined in the consultation. As such, we look forward to further engagement as the Bill is developed and scrutinised.

Yours sincerely

[Redacted signature]

[Redacted name and title]

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cymdeithas Dehonglwyr Iaith Arwyddion

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Association of Sign Language
Interpreters



Written Evidence from ASCL Cymru to the Equality and Social Justice Committee British Sign Language (Wales) Bill – Stage 1 Scrutiny

1. The Association of School and College Leaders (ASCL) Cymru welcomes the opportunity to respond to the Equality and Social Justice Committee's Stage 1 scrutiny of the general principles of the British Sign Language (Wales) Bill.
2. The Association of School and College Leaders (ASCL) is a trade union and professional association representing 25,000 education system leaders, heads, principals, deputies, vice- principals, assistant heads, business leaders and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
3. Our response is based on the views of our members, obtained through consultation with ASCL Cymru Council, and prompted and unprompted emails and messages.
4. ASCL Cymru is committed to supporting inclusive education and ensuring that every learner can thrive, regardless of their background or means of communication.

General Principles and the Need for Legislation

5. We broadly support the general principles of the British Sign Language (Wales) Bill and recognise the importance of formal legislation to strengthen the status of British Sign Language (BSL) in Wales. We welcome the ambition to promote and facilitate the use of BSL and believe this will contribute positively to the inclusion and educational experience of Deaf learners.

Key Provisions

6. Duty on Welsh Ministers to Promote and Facilitate BSL

We support this duty as a key step in embedding BSL into Welsh public life. This national

leadership is essential in setting a positive tone and expectation across all sectors, including education.

7. National BSL Strategy

A well-designed strategy has the potential to provide direction and consistency in this area. It is vital that this strategy is co-produced with members of the deaf community, school leaders, representatives of the education workforce, trade unions and other stakeholders to ensure it is practical and effective in supporting learners and staff in schools and colleges.

8. Guidance and BSL Plans by Public Bodies

Clear and practical guidance would be essential for schools, colleges, and local authorities. Any BSL-related plans must be adequately resourced and supported with training, appropriate staffing, including BSL interpreters, and specialist input to ensure desired impact, and consistent approaches, especially in mainstream education settings.

9. Appointment of a BSL Adviser

We welcome the appointment of a BSL Adviser. The person appointed to this role must have strong links with both the deaf community and the education sector in Wales, to support joined-up policy and provision.

10. Reporting Duties

ASCL Cymru agrees that regular reporting will support transparency and accountability. However, reporting mechanisms should not increase workload or add unnecessary administrative burden on schools and colleges. Any data collection should be streamlined with existing systems wherever possible.

Additional Considerations

11. Barriers to Implementation

The availability of qualified BSL professionals, including interpreters and teachers of the deaf, is currently limited. Without a clear plan to expand and support this workforce, implementation of any strategy will be constrained. Additionally, time and capacity pressures in schools and colleges must be considered. This includes the recruitment and retention crisis, excess workload, the volume of reform currently being implemented and inadequate funding faced by schools.

12. Ministerial Powers and Subordinate Legislation

ASCL Cymru believes the delegated powers proposed for Welsh Ministers are appropriate, provided there is ongoing engagement with the education sector and sufficient time allowed for implementation of any new duties and responsibilities on schools and the workforce.

13. Unintended Consequences

There is a risk that schools and colleges may feel pressure to comply without adequate training or resources, which could lead to superficial implementation. To avoid this, strong support structures and clarity of expectations will be needed. This would include

a national approach high quality professional learning to ensure consistency across Wales.

14. As already mentioned, there is a risk that implementation of strategies to further develop BSL provision in schools may place more pressure on school leaders and other education workers. This may include increased workload and may impact upon strategies to reduce its volume.

15. Financial Implications

There will inevitably be cost implications, particularly relating to staff development, recruitment of specialist staff, and production of accessible materials. It is essential that additional funding that is sufficient to implement any new statutory duties placed on schools and colleges is provided and sustained within the education budget.

Conclusion

16. ASCL Cymru supports the general principles of the British Sign Language (Wales) Bill and recognises the importance of advancing linguistic rights and inclusion for deaf learners. We encourage the Welsh Government to work closely with the education sector to ensure that any new duties are realistic, well-supported, and appropriately funded to ensure long-term success.

We would be happy to provide any additional information as the Bill progresses.


ASCL Cymru Education Policy Officer
September 2025

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cwlwm

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Cwlwm



Hoffem ddiolch i chi am roi inni'r cyfle i ddarparu tystiolaeth ysgrifenedig ar gyfer y Bil Iaith Arwyddion Prydain (Cymru) | British Sign Language (Wales) Bill. Ymhellach i'n hymateb cynharach i Ymgynghoriad y Bil Arfaethedig ar Iaith Arwyddion Prydain (BSL) (Cymru), roeddem am ddarparu ymateb ysgrifenedig ar ran partneriaeth Cwlwm, gan ein bod yn teimlo ei bod yn bwysig iawn tynnu'ch sylw at leisiau plant, ymarferwyr a'r sector ehangach o ran y problemau presennol sy'n codi yn sgil gweithrediad Iaith Arwyddion Prydain (BSL). Mae CWLWM yn gonsortiw m o bum partner gofal plant a chwarae, sydd wedi ymrwymo i ddarparu gwasanaeth integredig, dwyieithog a fydd yn sicrhau'r canlyniadau gorau posibl i blant a theuluoedd ledled Cymru.

O safbwynt y blynyddoedd cynnar, mae ymarferwyr yn gweithio'n hynod galed gyda'r holl arbenigedd sydd ar gael iddynt i sicrhau bod y plant ifanc sydd angen cymorth BSL yn derbyn y gefnogaeth honno, a lleihau'r rhwystrau i fynediad at wasanaethau gofal plant ar gyfer gofalwyr a all fod yn F/fyddar Fodd bynnag, nid yw digon o gyllid neu hyfforddiant addas ar gael ar gyfer pob sefydliad gofal plant a chwarae sydd yn ceisio cefnogi plant ifanc sy'n F/fyddar neu sydd â nam ar y clyw. Mae hyn oherwydd bod cyllid a chyfleoedd hyfforddi yn cael eu darparu ar sail angen yn unig; er enghraifft, os bydd lleoliadau ar draws y sectorau blynyddoedd cynnar, gofal plant a chwarae yn ymwybodol bydd angen cefnogaeth ychwanegol ar blentyn fydd yn mynychu eu lleoliadau hwy, yna gallent dderbyn hyfforddiant er mwyn cefnogi'r plentyn hwnnw.

Er bod hyfforddiant i'r staff yn fuddiol, ac yn darparu gwell canlyniadau na dim hyfforddiant o gwbl, ni chaniateir digon o amser i'r staff ddysgu BSL i'r lefel sy'n eu galluogi i fodloni anghenion unigryw plentyn. Er gwaethaf ymdrechion gorau'r staff, golyga hyn gall y plentyn gollu rhyngweithiadau serfio a dychwelyd allweddol sydd, fel y gwyddom, yn hanfodol ar gyfer datblygiad plentyn. Felly, byddai cyfleoedd hyfforddi cyson, hirdymor a ariannir yn llawn ar sail barhaus er mwyn hyfforddi staff i ddefnyddio BSL yn gam pwysig wrth sicrhau bod plant â nam ar eu clyw yn profi'r holl fuddion gofal plant a'u bod yn derbyn cefnogaeth gan sefydliadau gofal plant a chwarae.

We would like to thank you for opening up the opportunity for written evidence to be provided for the Tystiolaeth Ysgrifenedig Bil Iaith Arwyddion Prydain (Cymru) | British Sign Language (Wales) Bill. Further to our previous submission to the Proposed British Sign Language (BSL) (Wales) Bill Consultation, we wanted to provide a written response on behalf of the Cwlwm partnership as we felt it was really important to bring to your attention the voices of children, practitioners and the wider sector with regards to the current issues facing British Sign Language (BSL) implementation. CWLWM is a consortium of five childcare and play partners, committed to delivering a bilingual integrated service that will ensure the best possible outcomes for children and families across Wales.

From an early years, childcare and play perspective, practitioners are working incredibly hard with all of the expertise at their disposal to ensure young children requiring BSL support are supported and reducing barriers for access to childcare services for caregivers who may be D/deaf. However, there is not enough adequate funding or training for all childcare and play settings who are seeking to support young children who are D/deaf, or who have hearing impairments. This is because funding and training opportunities are provided only on a needs basis, for example, if settings across the early years, childcare and play sectors are made aware of a child coming into their care who requires extra support, training will be provided on this basis.

Although the training for staff is of course beneficial and provides better outcomes than a complete absence of training, the time provided for staff to gain a grasp of BSL, enabling them to cater to the individual needs of the child in question is too short. This means, despite the best efforts of staff, the child may miss key serve and return interactions which we know is incredibly crucial for child development. Therefore, consistent, long-term and fully funded training opportunities for staff to train in BSL on an on-going basis would be an important step in ensuring children with hearing impairments experience the full benefits of childcare and support from childcare and play settings.

Long term funding for free training and 'drop-in' sessions across Wales to support practitioners to practise BSL would be useful. This would encourage



Byddai'n ddefnyddiol pe ddarperir cyllid tymor hir i ariannu hyfforddiant am ddim a sesiynau 'galw heibio' ledled Cymru i gefnogi ymarferwyr i ddefnyddio BSL. Byddai hyn yn eu hannog i ymgorffori defnydd BSL i'w hymarfer bob dydd, fel bod plant yn ei dysgu ym mhob lleoliad (neu gyfuniad o leoliadau) y maent yn eu mynychu. Byddai hyn yn arwain at ddefnydd ehangach o'r iaith yn yr hirdymor, gan wneud i'r rheini sydd â nam ar eu clyw deimlo eu bod yn cael eu cynnwys o'r cychwyn cyntaf.

Mae hyn yn ategu'r pwynt ehangach a godwyd yn barhaus gan y sector ynghylch diffyg y cyngor sydd ar gael i staff wrth iddynt gefnogi plant ag Anghenion Dysgu Ychwanegol (ADY). Rydym yn cydnabod nad yw cymorth ar gael yn gyson ledled Cymru, ac er mae yna enghreifftiau da o gymorth, rydym wedi derbyn adborth gan ymarferwyr nad ydynt yn teimlo eu bod wedi derbyn cefnogaeth ddigonol.

embedding the use of BSL so that children learn it in whatever setting (or combination of settings) they attend, meaning that there is long term and wider use of the language, making those who have a hearing impairment feel included from the outset. This builds on the wider point raised continually by the sector regarding lack of advice available for staff in helping children with Additional Learning Needs (ALN). We recognise support is not consistently available across Wales, and although there may be good examples of support, we have had feedback from practitioners that they do not feel adequately supported.

[Redacted] Prif Weithredwr / Chief Executive Mudiad Meithrin
[Redacted] Prif Weithredwr / Chief Executive Clybiau Plant Cymru Kids' Clubs
[Redacted] Prif Weithredwr / Chief Executive Blynyddoedd Cynnar Cymru / Early Years Wales
[Redacted] Pennaeth Cytundebau a Phrosiectau / Head of Contracts and Projects Coram Pacey Cymru
[Redacted] Rheolwraig Gweithrediadau Cenedlaethol / National Operations Manager NDNA Cymru



 <p>Clybiau Plant Cymru Kids' Clubs</p> <p>www.clybiauplantcymru.org</p>	 <p>mudiad meithrin</p> <p>arbenigwyr y blynyddoedd cynnar Welsh early years specialists</p> <p>https://www.meithrin.cymru/</p>	 <p>NDNA*</p> <p>National Day Nurseries Association</p> <p>*Brighter thinking for early years</p> <p>https://www.ndna.org.uk/</p>
 <p>corampacey cymru</p> <p>https://www.corampacey.org.uk/get-involved/pacey-in-wales/</p>	 <p>https://www.cwlwm.org.uk/</p>	 <p>Early Years Wales Blynyddoedd Cynnar Cymru</p> <p>https://earlyyears.wales/</p>

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cyngor Bwrdeistref Sirol Caerffili

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Caerphilly County Borough Council



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

(We would be grateful if you could keep your answer to around 500 words).

We support the general principles of the British Sign Language (BSL) (Wales) Bill, particularly its aim to promote and facilitate the use of BSL across public services in Wales. While the Equality Act provides a legal framework for accessibility, it lacks the specificity and clarity needed to ensure equitable access for BSL users. The Bill offers an opportunity to address this gap by placing explicit duties on Welsh Ministers and public bodies.

However, we believe that the successful implementation of these principles will require significant investment in resources, training, and infrastructure. Without this, the Bill risks creating expectations that cannot be met, potentially undermining trust among Deaf communities. The Bill must also recognise the diversity within the Deaf community, including regional dialects and tactile forms of BSL, and ensure that any measures taken are inclusive and representative.

We also note the importance of ensuring that Deaf individuals have a meaningful input/contribution in the design and delivery of services. While public bodies are keen to engage, there is often a lack of effective links with Deaf communities, resulting in inaccessible consultation processes. The Bill should therefore support mechanisms that enable genuine participation and co-production.

In principle, the Bill is a positive step forward, but its success will depend on how well its provisions are resourced, implemented, and monitored.

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?

(We would be grateful if you could keep your answer to around 500 words).

The Bill's key provisions are broadly workable and align with its stated policy intentions. However, their effectiveness will depend on how they are operationalised and supported.

The proposed duties on Welsh Ministers to promote BSL, publish strategies and guidance, and appoint a BSL adviser are welcome. These measures can help embed BSL into the fabric of public service delivery. Similarly, requiring public

bodies to publish BSL plans and report on progress introduces accountability and transparency.

Nonetheless, we are concerned about the potential strain on already stretched services. Many public bodies lack the internal capacity and expertise to meet these new duties without substantial support. The Bill must therefore be accompanied by clear guidance, funding, training opportunities and ongoing support.

The appointment of a BSL adviser and the establishment of reporting duties are positive steps, but expectations must be managed carefully. The experience of implementing the Welsh Language (Wales) Measure 2011 shows that such roles can generate high expectations that are difficult to meet without adequate resources.

Overall, the provisions are sound, but their success hinges on practical support and realistic timelines.

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?

(We would be grateful if you could keep your answer to each section to around 500 words).

1 - A duty on Welsh Ministers to promote and facilitate the use of BSL

We support the principle of placing a duty on Welsh Ministers to promote and facilitate the use of BSL. This aligns with the broader goals of equality and inclusion and mirrors the approach taken with the Welsh Language. However, we caution that such a duty must be supported by clear guidance, funding, and infrastructure to avoid creating unrealistic expectations. When the Welsh Language Standards came in, public bodies were already in a position to put these in place due to previous Welsh Language Schemes and Acts, which meant the Welsh language already had a solid foundation to build upon and progress from. However, there is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill, such as a programme similar to Welsh Assembly Government's BSL Futures Project from 2004. Caerphilly County Borough Council was one of the host organisations.

Promotion alone is insufficient without practical measures to ensure accessibility. Ministers must lead by example, embedding BSL into government communications and services. This includes ensuring that information is available in BSL and that BSL users are actively involved in shaping policy.

The duty should also recognise the diversity of BSL users, including regional dialects and tactile forms, and ensure that promotion efforts are inclusive. Without this, the policy risks marginalising parts of the Deaf community.

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

Publishing a national strategy is a vital step in ensuring consistency and accountability. We support this provision, provided the strategy is developed in consultation with Deaf communities and public bodies.

The strategy must be realistic, resourced, and include clear timelines and outcomes. It should also address the barriers identified in education, health, social care, and other public services. Guidance should be practical and tailored to the varying capacities of public bodies.

There is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill, such as a programme similar to Welsh Assembly Government's BSL Futures Project from 2004. Caerphilly County Borough Council was one of the host organisations.

There is a significant lack of capacity within the British Sign Language (BSL) interpreter market to meet current and growing demand. Despite increasing awareness and legal obligations around accessibility, the supply of qualified BSL interpreters remains insufficient. This shortage is impacting service delivery across sectors, with organisations frequently unable to secure interpreters when needed. The limited availability is compounded by regional disparities, high demand for specialist skills, and retention challenges within the profession. Urgent action is needed to address this capacity gap and ensure equitable access for BSL users.

We recommend that the strategy include mechanisms for monitoring progress and sharing best practice. It should also be reviewed regularly to reflect evolving needs and feedback from BSL users.

3 - A duty on Welsh Ministers to publish BSL guidance

We agree that Welsh Ministers should publish BSL guidance to support public bodies in meeting their duties. This guidance must be accessible, co-produced with Deaf communities, and reflect the lived experiences of BSL users.

Guidance should cover areas such as communication standards, interpreter access, staff training, and inclusive consultation methods. It should also provide clarity on terminology, recognising that not all BSL users are signers and that identity preferences vary.

To be effective, the guidance must be supported by training and resources. Without this, public bodies may struggle to implement it meaningfully.

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

We support the requirement for public bodies to publish BSL plans, as this introduces transparency and accountability. However, we are concerned about the capacity of public bodies to meet this duty without additional support and where this responsibility will lie within organisations.

Many services are already stretched, and developing meaningful BSL plans will require investment in staff training, interpreter services, accessible communication tools and recruitment. This could possibly be seen to sit with existing equalities teams, many of which are already responsible for ensuring compliance with Welsh language legislation.

Plans must be co-produced with Deaf communities and reflect local needs, including regional dialects and tactile forms.

We recommend that the Bill include provisions for support and oversight to ensure that plans are not tokenistic but lead to real improvements.

5 - The appointment of a BSL adviser

The appointment of a BSL adviser is a positive step, but expectations must be managed. The adviser should be a fluent BSL user and have a deep understanding of the challenges faced by Deaf communities.

We recommend that the adviser work closely with public bodies, providing practical support and facilitating engagement with Deaf communities. The role should be clearly defined, with realistic responsibilities and sufficient resources.

The adviser should also help coordinate the development of national strategy and guidance, ensuring consistency and alignment with the needs of BSL users.

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

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

(We would be grateful if you could keep your answer to around 500 words).

The powers granted to Welsh Ministers to make subordinate legislation under the Bill appear appropriate, provided they are exercised transparently and with meaningful consultation. These powers will be necessary to adapt and refine the implementation of the Bill over time, especially as the needs of BSL users evolve and as public bodies develop their capacity.

However, we recommend that any subordinate legislation be subject to robust scrutiny and co-production with Deaf communities and relevant stakeholders. This will help ensure that regulations are practical, inclusive, and aligned with the lived experiences of BSL users.

Clear parameters should be set to prevent overreach and ensure that subordinate legislation supports, rather than complicates, the delivery of services. It should also be accompanied by guidance and impact assessments to help public bodies understand and implement changes effectively.

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

There are several barriers to implementation that must be acknowledged:

- **Resource constraints:** Many public bodies are already stretched and may struggle to meet new duties without additional funding and staffing.
 - **Lack of awareness and training:** Staff may not have the knowledge or confidence to engage effectively with BSL users.
-

- **Accessibility of information:** Current systems and processes often fail to provide information in accessible formats for Deaf people. This will take significant resources in way of time and financial investment.
- **Limited engagement mechanisms:** Public bodies may lack established links with Deaf communities, making co-production difficult. This is already a barrier when running consultations and engagement exercises.
- **Insufficient capacity in the BSL interpreter market:** There is a well-documented shortage of qualified BSL interpreters, which poses a major challenge to implementing the Bill's provisions. Public bodies may struggle to secure interpreters when needed, particularly in rural areas or for specialist services. Without investment in interpreter training, recruitment, and retention, this gap will continue to hinder effective service delivery and equitable access.

The Bill partially addresses these barriers through its provisions for guidance, strategy, and reporting, but more explicit commitments to funding, training, and support are needed.

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

(We would be grateful if you could keep your answer to around 500 words).

We have serious concerns about the financial implications of the Bill. While the goals are commendable, achieving them will require substantial investment in interpreter services, staff training, accessible communication tools, and engagement mechanisms.

Current systems and processes often fail to provide information in accessible formats for Deaf people. This will take significant resources in way of time and financial investment. It could also result in investment into software systems to enable Deaf people and users of BSL to receive information in their preferred format.

A major and often overlooked financial consideration is the lack of capacity within the BSL interpreter market. There is a well-documented shortage of qualified interpreters, and demand is already outstripping supply across many sectors. This shortage is particularly acute in rural areas and for specialist services. Without

targeted investment in interpreter training, recruitment, and retention, public bodies may struggle to meet the Bill's requirements. This could result in delays, reduced service quality, and increased costs as organisations compete for limited resources.

The proposed establishment of a BSL adviser and Advisory Panel, while valuable, will also incur significant costs. These must be carefully managed to avoid diverting resources from frontline services.

The Explanatory Memorandum should provide a more detailed and realistic assessment of these costs, including long-term funding commitments. Without this, public bodies may be unable to meet their obligations, leading to frustration among BSL users and reputational risks for the relevant public bodies, and ultimately Welsh Government.

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

We would like to raise the following additional points:

- **Terminology:** The Bill should be sensitive to how individuals identify, avoiding rigid labels like “deaf BSL signers” which may not reflect personal preferences. It's important to recognise that a Deaf person is not necessarily the same as a BSL user. While many Deaf people use BSL, not all BSL users are Deaf. For example, some hearing individuals may have grown up in Deaf families and learned BSL as their first language. In such cases, BSL may be their preferred or primary language.
- **System/process changes:** Implementing the Bill will require significant changes to internal systems, which may be complex and resource intensive.
- **Expectation management:** The Bill must be clear about what is achievable and ensure that expectations are aligned with available resources.

Anything else?

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cymdeithas Dehonglwyr Iaith Arwyddion

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Association of Sign Language
Interpreters



ASLI Response to the BSL (Wales) Bill Consultation

Introduction

The Association of Sign Language Interpreters/Translators (ASLI) is the professional membership association for British Sign Language interpreters and translators in the UK. Our members work across Wales in education, health, justice, employment, and community settings. We exist to represent and promote the profession, and we bring the unique perspective of practitioners who work daily with Deaf BSL users and see the barriers they face in accessing services and opportunities.

ASLI strongly welcomes the introduction of the British Sign Language (Wales) Bill. Wales has a proud record of supporting linguistic minorities, but unlike Welsh and English, BSL has until now lacked equivalent statutory protection. This Bill offers a long overdue opportunity to place BSL on an equal footing as a language of Wales.

However, our members are clear that legislation alone will not deliver equality. Without workforce investment, the duties in the Bill risk being aspirational rather than deliverable. Interpreter shortages are already a structural barrier across Wales, and unless the Bill is accompanied by ring-fenced funding and measurable workforce targets, Deaf people will continue to face exclusion in practice.

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

We support the general principles of the Bill. Recognition of BSL in law is an important step towards reducing entrenched inequalities faced by Deaf people in Wales.

The Bill responds to Wales' obligations under the UN Convention on the Rights of Persons with Disabilities, which requires state parties to provide professional interpreters, promote the learning and use of sign languages, and support the cultural and linguistic identity of Deaf communities. The Bill also supports the Well-being of Future Generations (Wales) Act, where Deaf people have so far been excluded from many public bodies' efforts.

However, we stress that interpreter shortages are a structural barrier to implementation. Public bodies cannot deliver equal access if there are not enough interpreters, translators, or BSL teachers. Unless this is addressed, legal recognition will not lead to real-world change.

What are your views on the Bill's key provisions, in particular are they workable and will they deliver the stated policy intention?

The Bill is more ambitious than its English counterpart and, in some respects, stronger than the Scottish Act. Its framework — ministerial duties, national strategy, public body BSL plans, a BSL Adviser, and reporting duties — is coherent and workable.

However, these duties risk being aspirational if not underpinned by measurable outcomes and sufficient resources. For example:

- The duty on Ministers to promote and facilitate BSL lacks specific outcomes.

- A national strategy without time-bound targets will not deliver systemic change.
- Public body BSL plans may become descriptive exercises unless tied to measurable progress and subject to independent scrutiny.

We welcome the creation of a BSL Adviser role and feel they must be a BSL signer. Their independence and resources must be guaranteed if the role is to have impact.

We also note that the Bill includes a duty on Welsh Ministers to publish guidance. This is a critical component of successful implementation. The guidance should include best practice standards for service provision, interpreter engagement, and community consultation. Without clear and practical guidance, public bodies may struggle to interpret their obligations, leading to inconsistent delivery across Wales.

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

The greatest barrier is the national shortage of qualified BSL interpreters, translators, and teachers. Even if listed public bodies commit to delivering their plans, the shortage will prevent meaningful change.

To overcome this:

- Ring-fenced funding must be allocated to interpreter training, mentoring, and CPD.
- Bursaries should be provided to widen access to the profession.
- Interpreter training programmes in Wales must be expanded and supported.

- The national strategy should include clear workforce development targets, such as increasing the number of qualified interpreters within a set timeframe and supporting retention through professional standards and fair conditions.

Without these measures, the Bill risks reinforcing the “Deaf Legal Illusion” — law that looks progressive on paper but fails to deliver in practice.

There is also a risk that without sufficient workforce investment, public bodies may resort to inadequate or tokenistic provision, which could undermine trust within the Deaf community. To avoid this unintended consequence, the Bill must be accompanied by robust workforce planning and accountability mechanisms that ensure duties translate into meaningful access.

What are your views on the assessment of the financial implications of the Bill?

The financial memorandum outlines administrative costs but does not fully address the investment required for workforce expansion. Without ring-fenced resources for interpreter training and development, the duties will be undeliverable.

Future financial planning should explicitly include:

- Interpreter and translator training and CPD.
- Training of BSL teachers to underpin interpreter education.
- Development of accessible BSL resources and materials.

This investment is not optional: it is a precondition for successful implementation.

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

We recommend that the national BSL strategy include measurable and time-bound workforce targets. Progress should be tracked, reported on, and independently scrutinised.

We also urge that the list of listed public bodies be expanded to include Estyn, Qualifications Wales, higher and further education institutions, Transport for Wales, and other key organisations.

Deaf BSL users should expect equal access across all areas of public life.

Finally, reporting duties must focus on outcomes rather than activities. Independent monitoring, including from the BSL Adviser, is essential to avoid the risk of “tick-box” compliance.

We also wish to comment on the powers granted to Welsh Ministers to make subordinate legislation. These powers appear appropriate, provided they are exercised transparently and with meaningful consultation. They should be clearly defined to prevent scope creep and ensure that any future regulations remain aligned with the Bill’s original intent to promote linguistic equality for Deaf BSL users.

Conclusion

ASLI strongly supports the BSL (Wales) Bill but emphasises that recognition alone is insufficient. Interpreter shortages are a structural barrier to equality, and unless addressed, the Bill’s duties will remain

aspirational.

We call for:

- Ring-fenced funding for interpreter and translator training.
- A national BSL strategy with clear, measurable workforce targets.
- Independent monitoring to ensure reporting focuses on real outcomes.

With these measures in place, the Bill can move beyond symbolism to deliver genuine transformation, ensuring that Deaf BSL users in Wales enjoy equal access to public services and full participation in Welsh society.

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

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Dr Rob Wilks

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Dr Rob Wilks



BSL (Wales) Bill

Consultation Response for the Equality and Social Justice Committee

Dr Rob Wilks



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

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(We would be grateful if you could keep your answer to around 500 words).

Unlike Welsh and English, which enjoy strong legal and cultural protections, British Sign Language (BSL) lacks equivalent recognition, leaving deaf people 'limited twice' by the dominance of both spoken languages. Welsh BSL signers also faces additional challenges from limited education provision, restricted access to information and services, health inequalities, poor mental health outcomes, and the decline of traditional deaf spaces such as clubs (Wilks, 2024). These inequalities highlight the precarious position of deaf people in Wales and the urgent need for stronger legal and policy measures.

Since 1999, the struggle for BSL recognition has been a long-drawn out process, and the Welsh Government's formal recognition of BSL as a language in 2004 and the BSL Futures project which aimed to increase BSL teaching capacity and train more interpreters (Welsh Government, 2014), failed to address the systematic and structural issues faced by BSL signers in Wales. Despite the recognition of BSL by the Scottish Parliament in 2015, the UK Parliament in 2022, and the commitment by the Northern Ireland Assembly to legislate for BSL and Irish Sign Language (ISL) since 2016, Wales has lagged behind in legislating for BSL, despite its robust track record for the protection of language minorities, namely the Welsh language.

Therefore, the introduction of the BSL (Wales) Bill and the recognition of BSL in Welsh law is long overdue. The Bill will go some way to recognise BSL not just as a language, but also for having symbolic and cultural value in Welsh life and culture, on par with Welsh and English. It also takes a step towards recognising Welsh BSL signers not just as a disability group, but also a language minority.

Wilks (in press) has undertaken a systematic and comparative review of the UK's sign language law, and likens each of the UK's four nations to animal symbols to reflect the strengths, challenges, and opportunities for BSL recognition across the UK. Therefore, Scotland is the 'barking dog,' England is a 'caged lion,' and Northern Ireland a 'steadfast elk.' Wales is currently described as a 'roarless dragon.'. The BSL (Wales) Bill provides an opportunity for Wales to give the dragon back its roar, but this will only be the case if the public body duties proposed by the Bill are substantive, otherwise it risks reinforcing the Deaf Legal Illusion, which refers to law that appears progressive but in practice delivers little meaningful change for deaf people (Wilks, forthcoming).

The Equality and Social Justice Committee (the Committee) is reminded of Wales' obligations under international law, namely the Convention for the Rights of Persons with Disabilities (United Nations, 2006), which stipulates that state parties should:

- provide professional sign language interpreters to facilitate accessibility;
- accepting and facilitating the use of sign languages;
- recognising and promoting the use of sign languages;
- facilitate the learning of sign language;
- promote the linguistic identity of deaf communities;
- take appropriate measures to employ teachers; and
- recognise and support of deaf people's specific cultural and linguistic identities, including sign languages and deaf culture.

The BSL (Wales) Bill is therefore crucial in terms of meeting these obligations in respect of BSL signers in Wales.

Further, the Committee is reminded of Wales' obligations under the Well-being of Future Generations (Wales) Act 2017, and that to date, Welsh deaf BSL signers have been excluded from the efforts undertaken by public bodies to meet those obligations. (Wilks, 2024).

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? 388

(We would be grateful if you could keep your answer to around 500 words).

Taken together, the Bill's provisions provide a coherent framework that has the potential to significantly improve the position of BSL in Wales. The combination of ministerial duties to promote and facilitate BSL, a requirement to publish a national strategy and guidance, public body BSL plans, oversight by a BSL adviser, and a reporting cycle, creates a more structured package than elsewhere in the UK. This approach is more ambitious than the English Act, which imposed minimal duties, and in some respects stronger than the Scottish Act, which relies heavily on non-binding planning mechanisms.

The duties on Welsh Ministers represent an important step forward, but they risk being aspirational unless underpinned by measurable outcomes. A national strategy will only be effective if it contains specific, time-bound targets. Guidance

for listed bodies will provide useful direction, but the impact of this provision will depend on how seriously public bodies take the guidance.

The requirement for public body BSL plans is one of the Bill's strongest provisions, moving beyond the Scottish model by imposing a clear statutory duty. However, its effectiveness is undermined by the ability of bodies to explain why they are not following the guidance, and by the omission of key bodies such as Estyn, Qualifications Wales, the Ombudsman, further and higher education institutions, and Transport for Wales.

The creation of a BSL adviser role is welcome, especially with the requirement that the post-holder must be a BSL signer. In many respects the adviser could perform some of the functions of a commissioner, but independence and resources will be crucial. If under-resourced or overly controlled by Ministers or the civil service, the role may struggle to have impact. The advisory panel also has potential.

The reporting duties on public bodies and Ministers are workable in theory, but there is a danger that they become descriptive exercises. To deliver the policy intention, reporting must be tied to progress against measurable targets, rather than simply recording activities. Independent evaluation or commentary from the adviser would provide the transparency needed to make these reports meaningful.

In conclusion, the Bill's provisions are broadly workable and aligned with its policy intention, but success will depend on whether they are delivered with sufficient ambition, resourcing, and independent scrutiny. Without these elements, there is a real risk that the Bill will remain symbolic rather than transformative.

1 – A duty on Welsh Ministers to promote and facilitate the use of BSL 384

It is important to be aware that there are different standards currently in force or proposed around the UK. The Scottish Act requires Scottish Ministers to 'promote, and facilitate the promotion of, the use and understanding' of BSL, whereas the English Act requires the Secretary of State to 'report on the promotion and facilitation of BSL by ministerial government departments.'

The Sign Language Bill in Northern Ireland will require that the Department for Communities must promote the 'greater use and understanding of BSL and ISL'

and that individuals in the deaf community have a 'general entitlement' to use either language 'as necessary or convenient in the course of everyday activities.' The Bill also requires the Department of Communities to promote the 'deaf community's culture.'

The BSL (Wales) Bill requires the Welsh Ministers to 'promote and facilitate the use of BSL,' which is most similar to the Scottish Act which imposes the duty on Scottish Ministers. It is stronger than the English Act, which only imposes a duty to report on the promotion and facilitation of BSL, rather than a duty to promote and facilitate BSL. The Northern Ireland Bill will only impose a duty to promote on one government department, but gives deaf individuals the right to use BSL or ISL in everyday activities, and also includes a duty to promote deaf culture, not just BSL and ISL. This right-giving provision is a significant development in UK sign language law.

In terms of the BSL (Wales) Bill, there is a danger that this duty will only extend to symbolic awareness-raising, and therefore more detail may be required to be included in the Explanatory Memorandum. The duty to promote should include active steps to raise the visibility and status of BSL, and the duty to facilitate should include removing barriers so that BSL can actually be used by deaf individuals throughout Wales.

The duty on Welsh Ministers to promote and facilitate the use of BSL does not currently have any measurable outcomes. In its present form, the obligation is framed in broad terms without specifying what success would look like, how it would be monitored, or who would be accountable. Without measurable outcomes, the duty risks becoming symbolic rather than substantive, making it difficult to assess whether real progress is achieved for deaf BSL signers.

2 - A duty on Welsh Ministers to publish national strategy and guidance 264

The duty to publish a national strategy and guidance is welcome as this will provide the framework for the implementation of the Bill. This combines the measures within the Scottish Act, which provides for a national plan to be produced every six years, and the English Act, which requires the Secretary of State to issue guidance about the promotion and facilitation of the use of BSL. The guidance in the English Act will, however, only provide advice for government departments, although it may be used wider afield once published.

The BSL (Wales) Bill provides that the national strategy be reviewed at least once every six years. While it can be argued that a six-year review cycle is too long, the fact that strategy can be reviewed at any time during the six-year period and the Welsh Ministers have to publish a progress report at least once every three years mitigates this.

Similarly to the duty on Welsh Ministers to promote and facilitate the use of BSL, the national strategy should include measurable, time-bound targets. This will avoid the national strategy becoming symbolic rather than substantive, a criticism that has been levelled at the English Act's annual BSL reports (Wilks, in press).

Section 2(4) states that before publishing the national strategy, and any revised version of it, the Welsh Ministers must consult the BSL adviser and 'any other persons they consider appropriate.' While the latter group is a useful catch-all, a requirement that the national strategy should be co-produced with the Welsh deaf community, who are the primary users of BSL, should be expressly stated.

3 - A duty on Welsh Ministers to publish BSL guidance 132

While BSL guidance for listed public bodies will indeed be useful in terms of establishing best practice and minimum standards, there is a risk that such guidance will result in tokenism rather than substantive outcomes, a tick-box exercise rather than transformative change.

Section 4(1)(b) states that listed public bodies should describe, as part of their BSL plan, how it intends to follow the BSL guidance or explain why it does not intend to do so. While this sub-section will generate accountability on the part of the listed public bodies, it is not clear what the consequences of non-compliance would be, suggesting that there will be minimal to no enforceability in terms of the BSL guidance.

A stipulation that the BSL guidance should be co-produced with the Welsh deaf community should be included.

4 - A duty on specified public bodies to publish BSL plans 395

The duty on listed public bodies to publish their own BSL plans is welcome and is similar to the duty on listed authorities under the Scottish Act. The requirement that listed public bodies review their plans if so directed by the Welsh Ministers is also welcome. The Northern Ireland Bill stipulates in section 3 that all prescribed organisations must take 'all reasonable' steps to:

- ensure that information and services provided by the organisation are as accessible to individuals in the deaf community as they are to individuals who are not in the deaf community, and
- offer or facilitate the use of BSL and ISL for the benefit of individuals in the deaf community in accessing information and services provided by the organisation.

This 'all reasonable steps' requirement goes considerably further than the Wales Bill and should be considered for inclusion.

The listed public bodies must consult with any persons it considers appropriate prior to publishing its plan or revised version, pursuant to section 4(6). The Welsh deaf community should again be expressly mentioned here.

Section 8 sets out which persons are listed public bodies for the purposes of the BSL (Wales) Bill. While we welcome the inclusion of local authorities, health boards and other health authorities, and NHS Trusts, this list is considerably shorter compared to say, the Scottish Act's. It is important to add the following public bodies from the outset:

- Children's Commissioner for Wales
- Citizen Voice Body for Health and Social Care (Llais)
- Education Workforce Council
- Estyn
- Fire and Rescue Authorities
- Further Education Institutions
- Future Generations Commissioner for Wales
- Higher Education Funding Council for Wales
- Higher Education Institutions
- Natural Resources Body for Wales
- Older People's Commissioner for Wales
- Public Services Ombudsman for Wales
- Qualifications Wales
- Senedd Commission
- Social Care Wales
- Standards Commissioner for Wales
- Transport for Wales
- Welsh Language Commissioner for Wales

The following should be also added, but their inclusion is not as much of a priority:

- Arts Council for Wales
- Auditor General for Wales
- Commission for Tertiary Education and Research
- Commission on Justice in Wales
- Design Commission for Wales
- National Adviser for Violence against Women and other forms of Gender-based Violence, Domestic Abuse and Sexual Violence
- National Library of Wales
- National Museum Wales
- Sports Council for Wales
- Wales Audit Office

This will ensure that a wide range of public bodies are accountable to BSL signers in Wales in all walks of life and the necessary steps taken to address many of the inequalities and barriers that Welsh deaf BSL signers experience.

5 - The appointment of a BSL adviser 378

The original draft Bill made provision for the appointment of a BSL Commissioner, which has been removed from the current draft Bill and replaced with a BSL adviser. Comparative evidence from the UK and beyond shows that the most effective governance models, including the Welsh Language Commissioner, are those built on a statutory foundation, with independent scrutiny powers, the authority to investigate, enforce, and influence public bodies, and direct accountability to the communities they serve. By contrast, advisory-only structures (such as stakeholder groups or non-statutory panels) consistently lack the influence or continuity to deliver sustained improvements. These models have often resulted in symbolic recognition without the tools for real change.

Within this context, the appointment of a BSL adviser is very welcome. This provision sets the BSL (Wales) Bill apart from its counterparts in Scotland, England and Northern Ireland. The role of the BSL adviser is clearly set out in section 5(4) to provide information to advice to the Welsh Ministers, to any 'person promoting and facilitating the use of BSL in Wales,' and to consult the BSL advisory panel. Section 5(7) is also particularly welcome, as it requires listed public bodies to provide the adviser with any information that they may so request, and if they do not, to explain why to the BSL adviser in writing (section 5(8)).

Schedule 1 makes it clear that the BSL adviser will become an employee of the Welsh Government. The Welsh Government may also 'provide the BSL adviser with such staff, accommodation, equipment and other facilities as the Welsh Ministers consider necessary for the exercise of the BSL adviser's functions.'

This too, is welcome, although assurances regarding their independence as an employee of the Welsh Government would be appreciated.

In essence, the role of a BSL adviser is not dissimilar to that of a commissioner. For completeness, the BSL adviser:

- Should be a deaf BSL signer, as opposed to being 'able to communicate effectively in and uses BSL', in order to ensure that the role is undertaken by an individual with lived experience of being deaf and a fluent BSL signer;
- Should have the authority to investigate, enforce and report on the listed public bodies; and
- Should be accountable to the Welsh deaf community in the exercise of their functions.

6 - Reporting duties to be imposed on the public bodies and Welsh Ministers in relation to these duties. 128

The proposals to impose reporting duties on the Welsh Ministers and the listed public bodies are acceptable and consistent with UK sign language law. However, thought should be given as to how to reduce the risk of 'descriptive reporting', as has been the case in Scotland and England (Wilks, in press). There should be a focus on measurable outcomes rather than activities within the reports.

The BSL adviser could be required to produce an annual report which would ensure accountability and progress in relation to the national strategy and BSL plans. This would allay concerns that work towards achieving the outcomes set out in the national strategy and BSL plans will peak in years two and five in each reporting cycle rather than consistently throughout the six years.

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate Legislation? 207

(We would be grateful if you could keep your answer to around 500 words).

The proposed powers for Welsh Ministers to make subordinate legislation is important, not only in terms of adding or removing public bodies from the list, but also to make provisions in order to enact goals within the national strategy. This is particularly important as the removal of barriers for Welsh deaf BSL signers will

not always be straightforward and may require the power of the law to ensure that the necessary changes are made.

A concern is that decisions by Welsh Ministers to make subordinate legislation will invariably be politically motivated, depending on the priorities of the political party with a mandate to run the Welsh Government. It is therefore important that such powers are exercised with clear safeguards, transparency and accountability, and that the Welsh deaf community is consulted effectively, to ensure that implementation remains consistent with the purpose of the primary legislation rather than short-term political interests.

The flexibility afforded to the Welsh Ministers in section 8(2) to add or remove public bodies to or from the list is welcome, and the requirement that they consult the BSL adviser and 'other persons as the Welsh Ministers consider appropriate,' is sensible. Again, a requirement to consult with the Welsh deaf community in particular should be added.

Are there any barriers to the implementation of the Bill's provisions and does the Bill take account of them? 234

A number of barriers will challenge the implementation of the Bill's provisions. Even if the listed public bodies commit to increasing the visibility of BSL, there is currently a shortage of qualified BSL-English interpreters and translators, and BSL teachers, meaning demand will outstrip supply. The Bill's objectives also depend on strengthening deaf education in Wales, yet no systematic bilingual education infrastructure presently exists. At community level, the decline of deaf clubs and other deaf spaces has weakened opportunities for intergenerational transmission of BSL.

Within public services, cultural competence remains limited, with many providers defaulting to tokenistic measures such as occasional interpreting or captioning rather than developing deaf-centric, language-concordant services. Unconscious bias and entrenched audist attitudes also risk undermining delivery, especially when weighed against competing budget pressures. Furthermore, most public information is still not available in BSL, and translation capacity remains scarce.

A critical barrier to the Bill's success is the national shortage of qualified BSL-English interpreters. Without addressing this, the new duties risk becoming aspirational rather than deliverable. To overcome this, ring-fenced funding is needed to support interpreter training and continuous professional development.

The national strategy should also set clear workforce targets to expand capacity over time. The BSL adviser could play an important role by advising on interpreter workforce planning, qualifications, and standards.

Without tackling these systemic issues across education, health, justice and community infrastructure, the Bill's duties risk being undermined in practice.

What are your views on the assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum? 89

(We would be grateful if you could keep your answer to around 500 words).

The assessment of financial implications in Part 2 provides a helpful outline of the anticipated administrative costs for Welsh Ministers and listed public bodies. However, as the Explanatory Memorandum itself notes, the wider implementation costs are not yet quantifiable and will depend on the national BSL strategy and the plans developed by public bodies. It will be important that future financial appraisals take account of the need to invest in workforce development, interpreter provision, BSL education and BSL materials, as these will be critical to achieving the Bill's objectives.

Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum? 446

A number of additional points arise in relation to the Bill and the Explanatory Memorandum.

First, the Bill risks offering BSL signers weaker protection than other groups in Wales. Welsh speakers, children, and older people all benefit from independent commissioners with statutory powers. By contrast, deaf people are reliant on an adviser whose powers and independence are less clear. At present, the Bill's Schedule suggests that the Adviser will have sufficient resources and visibility to avoid being a token role, but more assurances may be needed in this regard.

Second, the framing of the Bill is critical. BSL must be positioned as a language right, not simply an access tool. Deaf people in Wales are often 'limited twice' by the dominance of English and Welsh, yet unlike those languages, BSL has little statutory protection. Corpus work by the Deaf Health Wales project shows the richness of BSL in Wales with regional and generational variation, as well as cultural practices such as mouthing Welsh place names. This confirms that BSL is a living, diverse language within Wales' multilingual landscape and it should be recognised as such.

Third, the Bill should be explicitly aligned with the Future Generations Act well-being goals. Promoting BSL directly advances a healthier Wales (by reducing health inequalities), a more equal Wales (by removing systemic barriers to participation), and a Wales of vibrant culture and thriving Welsh language (by acknowledging BSL as part of the nation's multilingual heritage). Embedding this alignment would provide policy coherence and demonstrate that the Bill is not operating in isolation but contributes to the broader vision of a sustainable Wales.

Fourth, the list of public bodies omits important public bodies, notably Estyn, Qualifications Wales, the Education Workforce Council, Transport for Wales, the Public Services Ombudsman, and further and higher education institutions. If not included during the legislative process, the process for expanding the list will be left largely to ministerial discretion, with no guarantee of consultation with the deaf community. A stronger mechanism for expansion, or at least a requirement for consultation, would give greater confidence in the Bill's reach.

Fifthly, the Bill is silent on independent monitoring. Without clear requirements for external review, or for the adviser to report directly to the Senedd, there is a risk that public body plans and ministerial strategies will become descriptive exercises rather than drivers of systemic change. Sustainable funding for interpreter training, BSL teachers, and linguistic research is also essential if the Bill is to achieve more than symbolic recognition.

Finally, consideration should also be given to how deaf people can raise complaints if duties are not met, whether through the Public Services Ombudsman or another mechanism.

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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 Dr Kate Attfield | Evidence from Dr Kate Attfield

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

The general principles of the Bill are extremely sensible, and really important.

Please can we change the initial introduction of the Bill, which currently states:

"About the Bill

British Sign Language (BSL) is a language that uses gestures, handshapes, facial expressions and body language to convey meaning and which, in its tactile forms, can also use touch."

The reason why the above description needs to be changed is because it is a condescending, and misleading, description of BSL.

Imagine if you described English like this: 'English is a language that uses mouthing, shouting, moderate sound and whisper, gestures and body language to convey meaning, and which in its tactile forms, can also use touch.' I would suggest that this description does not effectively get across that English is a useful means of communication, that it holds credibility, or that it has any intellectual basis or planned system.

The current description does not convey that signed /gestural attempts of any of Makaton, sign supported English, or total communication are not being included in this category (none of these are independent whole languages, and none equal to the attributes of BSL). There are also over 300 signed languages around the world, which makes this description rather inadequate.

Instead BSL should be introduced like this:

'British Sign Language (BSL) is a signed language that has its own grammar that is different to English and Welsh. This means that BSL has its own syntax, morphology and phonology.'

I'm sure the Welsh general public can cope with difficult terms - if not, they can always look these up.

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?

Legislation in this area, with these general principles, is essential. These are an excellent beginning to a sustained strategy that will eventually ensure meaningful acceptance of Deaf people, Deaf people's membership of society, and Deaf people's proactive contribution to societal progress and GDP.

Currently most of society does not recognise that Deaf people exist, or that they have an independent language that is real. So organisations do not tend to consider Deaf people and their language in their general service provision, or in attempting to access Deaf people's contribution for their output. The BSL Bill (and Act) Wales is desperately needed to challenge this backward situation.

I believe that [REDACTED] would make an excellent BSL adviser, specifically appointed for the BSL Bill.

I recommend that the BSL advisory panel specifically advises public organisations about their BSL plans, so that these are in keeping with Deaf people's own priorities for their access, contribution, and ultimately for their citizenship.

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

Yes, depending on several key aspects.

It depends on the quality of the advice given to Welsh Ministers on this.

It also depends on how much long-term funding is invested into this whole area, to make a meaningful and sustained difference to Welsh Deaf people's lives.

A research team will need to thoroughly, and continuously, consult with the Welsh Deaf community and Deaf academics to ascertain what their priorities are in relation to the promoting and facilitating of BSL.

Deaf people (adults and children) need their own BSL linguistics education and training, in order to have a high grammatical command of their own language. This will enable them to access overall education more easily, and subsequently to secure employment that matches their intellectual capacities. This must be Welsh Gov funded; Deaf people largely cannot afford such training and education, as they have had an artificial learning ceiling placed on them, are thereby generally undereducated, and so under-employed, thus not having available money to invest in themselves.

hearing people equally need to be given full opportunities to learn BSL to a fluent level, and also be taught BSL linguistics. Anyone trying to learn BSL currently finds it very difficult to access adequate courses. Professionals who are experts in their own fields need to be able to learn BSL - in order that BSL can become a normal working language of Welsh society. It is also very expensive to learn BSL - perhaps this could be Welsh Gov funded /supported.

Organisations need to incorporate Deaf considerate and BSL policies and practices, and themselves promote and facilitate the use of BSL for existing staff, new employees and customers. They will need expert advice to be able to do this.

Prisons, the police, mental health centres, homelessness services, hospitals and health centres, social services, care experienced children's services and other services involving vulnerable people (as well as other public services) absolutely must be allocated expertise relating to Deaf people, and that is provided in BSL. Deaf people must be able to fully express themselves and converse in their own natural language directly with professionals.

It is not sufficient to presume that any investment can be in hearing BSL interpreters; we need to get past this assumption.

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

Yes, IF a dedicated team is allocated generous resources, staff support, expertise and funded time to produce these.

3 - A duty on Welsh Ministers to publish BSL guidance

Yes, as above.

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

Yes, as above.

5 - The appointment of a BSL adviser

Yes this is a workable solution. And yes they will surely deliver the stated policy intention, IF you support this appointee with generous training, financial investment and staff support.

I recommend [REDACTED]

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

Yes, as above.

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

Definitely appropriate - this is well considered. This will support mechanisms behind the stated principles to work in practice.

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

I think barriers would be limits on sustainably funding this Bill, and/or a lack of support across the Equality and Social Justice Committee, or even the Welsh Gov itself.

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?

I am delighted that this Bill is currently in progress. This is a huge step forward for the whole of Welsh society.

Anything else?

I would like to be involved in the advisory panel (although I do have a full time academic post).

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 Aled Thomas | Response from Aled Thomas

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

I support the general principles of the Bill. The legislation in the area of Sign Language needs to be strengthened.

What are your views on the general principles of the Bill and the need for legislation to deliver the stated policy intention?

The Bill would enable this support to be unconditionally available, on a statutory basis.

What are your views on the key provisions of the Bill (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

It is a duty on Welsh Ministers to strengthen the statutory support in order to be able to promote and facilitate the use of British Sign Language.

2 - A duty on Welsh Ministers to publish guidance

The publication of guidance at government level will make a big difference to the lives of people who use British Sign Language on a daily basis.

3 - A duty on Welsh Ministers to publish BSL guidance

As above

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

I agree

5 - The appointment of a BSL adviser

I agree

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

I agree

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation?

It is appropriate for Welsh Ministers to be able to make subordinate legislation.

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

There are no obvious barriers.

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

It doesn't matter about the financial cost. The people need this legislation and that is a cost worth paying.

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

No

Anything else?

No

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 Jodie Gallagher-Smith | Evidence from Jodie Gallagher-Smith

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

I feel strongly that the government needs to support the inclusivity of BSL across Wales, BSL should be mandatory in primary education and optional at GCSE level in schools. One of the issues is that to learn BSL, in terms of training through each accredited level there is an large expense that many can't afford. There should be more readily available opportunities to learn and teach BSL, and the government needs to provide a platform for this. The principle of the bill is very important, and the implementation needs to be focused around providing learning opportunities, and awareness.

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?

Legislation is important to ensure workplaces and schools have opportunities to learn and use BSL. Staff should be supported to have time and funding to learn BSL and children should learn BSL from primary school age. The policy is essential to create a more inclusive society in Wales, where nobody is disadvantaged or left out.

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

This is essential to deliver the policy intention

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

This is also essential to show a cohesive and seamless response for the need for BSL to be mandatory when providing services

3 - A duty on Welsh Ministers to publish BSL guidance

This is essential

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

This is important for the public to become more aware of BSL

5 - The appointment of a BSL adviser

This is essential and would provide meaningful insight into the difficulties of learning, teaching and practicing BSL in Wales

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

This needs to be done for the policy to be taken seriously

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

The powers are appropriate and Ministers legislation needs to make workplaces inclusive of BSL

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

The cost of learning BSL, the availability of courses, the learning time, the inability for teachers to feel confident teaching BSL without training, the lack of interpreters and sign teachers available

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

I feel that the Bill is essential the importance of this means financial investment needs to be made

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

No

Anything else?

No

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 Coleg Brenhinol y Seiciatryddion Cymru | Evidence from Royal College of Psychiatrists Wales

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

RCPsych Wales is pleased to support this Bill.

We agree with the aim of the Bill to institutionalise the promotion and facilitation of BSL, thereby ensuring that BSL is integral to public services and removing barriers to access. The barriers faced by Deaf people using mental health services are manifold, persistent and well documented (Terry, 2024; Shank & Foltz, 2019). Although well-intentioned, existing measures, such as the All Wales Standards for Accessible Communication and Information for People with Sensory Loss first introduced in 2013, have fallen short in delivering much-needed improvements for their intended population.

More needs to be done to ensure that Deaf people can access mental health information in an accessible format and communicate with services through inclusive systems. Greater Deaf awareness training is also required among health professionals, alongside an increase in the capacity of, and training provision for, interpreters. We hope this Bill will serve as a vital catalyst for addressing the long-standing inequities faced by Deaf mental health patients in Wales.

RCPsych Wales is pleased to be working with the All Wales Deaf Mental Health and Well-being Group, through our Dyfodol Programme and in collaboration with the NHS Wales Joint Commissioning Committee, to review mental health services for Deaf people. We endorse the group's aim of achieving effective and high-quality mental health and wellbeing services for Deaf individuals in Wales. The Bill should complement the commitment in the Welsh Government's new Mental Health and Wellbeing Strategy Delivery Plan to develop an implementation plan to improve support for people with sensory loss across all health services.

References

Shank, C. & Foltz, A. 2019. Health and wellbeing for deaf communities in Wales. Scoping for a Wales-wide survey. Bangor University. Available at: <http://deaf-communities-wales.bangor.ac.uk/index.php.en>

Terry, J., Meara, Rh. & England, R. 2024. "They still phone even though they know I'm deaf": exploring experiences of deaf people in health services in Wales, UK. *Journal of Public Health*. Vol. 46, No. 3, pp. e520-e527. Available at: <https://doi.org/10.1093/pubmed/fdae112>

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?

We believe that legislation is needed to deliver the stated policy intention of the Bill. If it isn't progressed, Wales risks becoming the only UK nation without equivalent legislation.

Currently, deaf patients in Wales often have to travel to England for mental health treatment, as specialist services are not available locally. This is particularly unacceptable given that deaf people are twice as likely to experience mental health problems compared with the general population (Terry et al, 2021). The proposed Bill offers a right-based approach to addressing this.

References

Terry, J, Redfern P, Bond J, Fowler-Powe M, Booth C. 2021. Deaf people Wales: Hidden inequality. Available at: www.swansea.ac.uk/media/Deaf-People-Wales_Hidden-Inequality-2021.pdf

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

We agree with these provisions.

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

We agree with these provisions. It will be important that the National BSL Strategy and associated guidance align with other existing and future frameworks e.g., the new Mental Health and Wellbeing Strategy and the forthcoming Disabled People's Rights Plan.

3 - A duty on Welsh Ministers to publish BSL guidance

We agree with these provisions.

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

We agree with these provisions.

5 - The appointment of a BSL adviser

We agree with these provisions, and particularly welcome that the person appointed as adviser must be able to communicate effectively in, and use, BSL. Both the adviser and the supporting panel should be able to draw on external expertise (e.g., RCPsych Wales in relation to mental health) to ensure decisions and approaches are fully informed and effective. It is

equally important that the supporting panel brings lived experience, ensuring services are shaped by the perspectives of those directly affected.

The lack of progress made over recent years in improving Deaf people's access to, and experiences of, mental health services indicates that the voice of lived experience has not been sufficiently reflected thus far in the design and delivery of said services. Welcome efforts are being made to address this, such as through Bangor University's Deaf Health and Well-being Wales project, launched last year, which aims to co-design, co-construct, implement, and evaluate community-led solutions for the Deaf community in Wales. The College's National Collaborating Centre for Mental Health has also produced guidance on co-production in mental health commissioning, which may offer further useful information on which to draw (NCCMH, 2019).

References

National Collaborating Centre for Mental Health. 2019. Working Well Together: Evidence and Tools to Enable Co-production in Mental Health Commissioning. Available at: <https://www.rcpsych.ac.uk/docs/default-source/improving-care/nccmh/working-well-together/working-well-together---evidence-and-tools-to-enable-co-production-in-mental-health-commissioning.pdf>

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

We agree with these provisions.

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

We are content that the powers in the Bill for Welsh Ministers to make subordinate Legislation are appropriate.

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

We share concerns previously expressed about the shortage of qualified BSL interpreters in Wales, which the Bill itself is silent on. Every effort should be made to rectify this as a matter of priority through the Welsh Government's National BSL Strategy and BSL Guidance and Listed Public Bodies' BSL Plans.

We are mindful of the need to support the development of accessible, culturally sensitive health services and enhance the Deaf cultural competence of health professionals and administrative staff. Involving Deaf people in the co-design and co-development of mental health services will be key in this regard.

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

Against a backdrop of financial pressures, listed public bodies must be adequately resourced to implement and fulfil the requirements of the Bill.

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

Anything else?

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 David Reader | Evidence from David Reader

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

I am extremely pleased that the Senedd is finally taking this step towards achieving equality for deaf people and BSL. The Bill will eventually be transformational for future generations of deaf people in Wales.

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?

Legislation is the best instrument for ensuring compliance and cooperation.

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

My professional experience included mental health & deafness and so I look forward to Ministers working with the deaf community, including specific groups with an interest in mental health & deafness, to ensure providers deliver services in BSL.

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

Clearly the key here is that strategy and guidance are implemented and evaluated rigorously.

3 - A duty on Welsh Ministers to publish BSL guidance

Again, guidance without monitoring and funding runs the risk of tokenism.

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

In collaboration ofcourse with deaf people.

5 - The appointment of a BSL adviser

This role should have the same status as the Welsh Language Commissioner.

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

What might be the sanctions/consequences for poor performance and who will examine such reports?

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

Seems entirely appropriate that experience and learning from the Bill should trigger subordinate legislation.

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

I don't have a view on this.

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

Can't comment.

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

No

Anything else?

No

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 Dr Julia Terry | Evidence from Dr Julia Terry

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

I welcome the overall aim of the Bill, which is to promote and facilitate the use of British Sign Language (BSL) in Wales. The Bill has the potential to improve equality, accessibility, and inclusion for BSL users by placing duties on Welsh Ministers and public bodies, which does not currently exist at present.

I have focused my research career on the health inequalities that Deaf people, particularly BSL users experiences, because they are such a disadvantaged population.

The general principles align with commitments to human rights and equal opportunities. However, the success of the Bill will depend on sufficient resources, clear guidance, and strong accountability measures.

In summary, I support the intent of the Bill but highlight the need to ensure it is fully implemented in practice. Welsh language users have an active offer, BSL users do not and are continually disadvantaged across all areas of society, so a BSL Bill and accompanying structures are needed by law.

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?

I support the general principles of the Bill. It recognises BSL as an important language of Wales and seeks to improve equality, accessibility, and inclusion for Deaf people. By placing duties on Welsh Ministers and public bodies, the Bill creates a clear framework for promoting and facilitating BSL.

The principles are sound, but their success will depend on effective implementation, sufficient resources, and meaningful involvement of the BSL community.

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

This duty is welcome and sets an important tone. Its effectiveness will depend on how it translates into concrete actions such as awareness campaigns, training, and service

provision. It will also ensure that far more Welsh ministers are Deaf aware, and know about the impact of inequalities that Deaf people experience.

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

A National Strategy will be essential to provide a clear, long-term framework. It should set measurable objectives and be co-produced with BSL users. This will help to ensure that people can seek guidance to ensure implementation, and also that Deaf people are more aware of their rights.

3 - A duty on Welsh Ministers to publish BSL guidance

Guidance will help public bodies understand their responsibilities. It will be important for the guidance to be practical, accessible, and consistent across Wales, which will be of huge benefit to many organisations in health, care, education and the third sector.

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

Requiring BSL plans is a positive step, but smaller organisations may need additional support to meet this duty. Monitoring and accountability will be key. Time and again we are seeing organisations welcome the idea of publishing their plans, and guidance in BSL, as currently they have little knowledge on how to do this.

5 - The appointment of a BSL adviser

An adviser can provide expert oversight and ensure the voice of the BSL community is central. Independence and representation will be critical. I would strongly suggest this appointment is a BSL native user, and that the panel is comprised mostly of Deaf BSL users.

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

Reporting will increase transparency. It will be important that reporting requirements are proportionate and that findings lead to action, not just paperwork. Please recall here the Accessible Communication Standards from 2013 that have been almost non-existent, requiring a full overhaul.

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

It is reasonable for Welsh Ministers to have powers to make subordinate legislation, as this allows flexibility. Safeguards should ensure transparency and scrutiny, so that significant decisions are subject to appropriate oversight.

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

Potential barriers include funding, the availability of qualified interpreters, and the need for training across public services. There may also be challenges in ensuring consistent practice

across different bodies. The Bill should be backed with resources and a strong implementation plan. There needs to be significant investment in training and encouraging new BSL interpreters as well as Deaf BSL translators and Deaf BSL tutors. We have many people with strong knowledge and skills who lack the support and resource to gain qualifications and develop; so their skills and knowledge transfer can be of wider benefit.

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

The financial memorandum recognises costs, but there is a risk they may be underestimated. Public bodies may face additional expenses for training, interpretation, and reporting. These costs should be seen as an investment in equality, but realistic resourcing is crucial.

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

We need to change societies views about deafness. When parents are told their child is deaf in the early years, being told 'I'm sorry' as the first thing families hear is not acceptable. We need to recognise the value and contribution of Deaf individuals as with people across all populations. Please know that all our health and social care professional programs in Wales have a way to go in preparing all new workers to be Deaf aware. Investing in Deaf role models in Wales, preparing and supporting Deaf people to teach BSL, to work with deaf children and young people, and to closely support older Deaf people is key. We have many untapped resources.

Anything else?

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 Y Ganolfan Arwyddo Golwg Sain | Evidence from The Centre of Sign-Sight-Sound

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

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

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

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

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

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.

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?

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 Cyngor Bwrdeistref Sirol Wrexham | Evidence from Wrexham County Borough Council

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

We recognise the need for the introduction of the British Sign Language (Wales) Bill and support its overarching principles to promote and facilitate the use of BSL across Wales, and that the Bill represents a vital step forward towards improving accessibility, inclusion, and equality for Deaf communities and BSL users.

The Bill rightly acknowledges BSL as a distinct language and would affirm the cultural and linguistic identity of BSL users in Wales by sending out an important message to Deaf BSL signers that their language is valued and their rights to linguistic access recognised.

Without this Bill, the Welsh Government and public bodies in Wales will have significantly weaker statutory duties, placing Deaf BSL signers in Wales at a disadvantage compared to those in other UK nations.

The Bill will go beyond the Equality Act, by protecting, promoting and facilitating BSL as a language it will also bring Wales in line with UK and Scottish legislation ensuring that Deaf BSL signers in Wales are not at a disadvantage compared to those in England and Scotland.

The Bill will help raise awareness and visibility of BSL and will ensure there is greater understanding and awareness of BSL as a language in its own right.

The Bill will also ensure policy makers and service providers consider the language needs of Deaf BSL signers and the barriers they face when designing services in public sectors which will help address language deprivation and social exclusion.

The Bill will help address these issues in Wales by introducing legal requirements to promote and facilitate the use of BSL in Wales.

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?

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

The duty placed on Welsh Ministers by the British Sign Language (Wales) Bill helps to build a more inclusive Wales by promoting and facilitating the use of British Sign Language (BSL), by acknowledging the cultural identity of the Deaf community and affirms their right to access public life on equal terms.

The Bill and these measures ensure that BSL is not just acknowledged but embedded throughout Welsh Governance and public service delivery.

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

Production of a national strategy will help ensure a consistent approach, strategic clarity and a clear framework for the implementation and delivery of the Duty. It is essential that this is developed with key stakeholder input (listed bodies), to ensure it can offer realistic and deliverable measurable goals and timelines.

3 - A duty on Welsh Ministers to publish BSL guidance

The duty placed on Welsh Ministers to publish guidance on British Sign Language (BSL) is a significant step towards inclusion and equality in Wales and the introduction of formal guidance has the potential to support BSL users to have full access to public services, education and civic life. It is essential that this is developed with key stakeholder input (listed bodies), to ensure it can offer realistic and deliverable, measurable goals and timelines.

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

The requirement for public bodies to produce and publish plans and to report on progress supports transparency and long-term impact.

We welcome the ability to work in partnership with other listed bodies, which will help manage listed bodies' resources, as well as BSL resource, and will help minimise duplication. However, it is not clear how often a listed body must publish / revise a Plan (there is reference to the National Strategy being up to 6 years) and whether this is dependent on the National Strategy.

However, there is the potential to improve efficiency by the provision of co-ordinated and expert central support to assist listed bodies, while still maintaining the ability to 'localise' Plans.

As well as expertise and knowledge, this should also include access to resources for the drafting, consulting and publishing of BSL Plans: this amount of work being undertaken at the same time across listed bodies has the potential to overwhelm the already limited local BSL qualified interpreter resources, and risks listed bodies being unable to deliver on the requirement of publishing a Plan.

5 - The appointment of a BSL adviser

The creation of a BSL adviser and advisory panel is positive. It ensures that decisions are informed by people with lived experience and expertise within the Deaf community ensuring expert oversight, which is essential for maintaining standards and addressing any regional disparities in interpreter availability.

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

The requirement to report will reflect a strong commitment to inclusion, accountability, and cultural recognition.

As such this Duty should also apply to Welsh Government/Welsh Ministers in order to provide evidence as to progress with delivery of the National Strategy in terms of costs and deliverables, as well as impact.

In terms of listed bodies, the costs outlined in the Memorandum are significant, within the context of current financial situation in the public sector. Without central resource or additional Welsh Government funding to support the

reporting requirement, and the monitoring and assessment mechanisms which would make it meaningful, this risks being an exercise which by necessity superficial and does not add value.

The memorandum states that the implementation reports must be published within 12 months of the day on which they publish their BSL Plan (or revised version) and this is unrealistic. Any meaningful performance reporting would require monitoring and assessment mechanisms to be meaningful, and this should take place with 12 months of data. Most other such Plans require reporting within 12 months of the end of each reporting year. i.e. annual reporting on 2024-25 must be published during 2025-26.

We would also highlight our experience of the Anti-Racist Wales Action Plan (ARWAP) where central structures, support and co-ordination, including training for listed bodies, were not in place at the beginning of the Plan, and the negative impact that this has had on the realistic delivery and focus of that Plan.

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

The power to make subordinate legislation allows the Welsh Government to adapt the Bill's implementation over time, which will enhance its long-term viability.

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

We support the views of the WLGA as included in the memorandum in terms of the capacity to deliver on the aims of the Bill, and feel that Welsh Government should lead on developing capacity and resource in advance on placing duties on listed bodies (section 208 onwards).

Key issues are:

- Capacity to deliver duties set out in the bill, the additional resources local authorities would need to implement the changes, set within the context of existing financial pressures in other statutory areas.
- Councils will need to allocate additional resources and funding to meet this new duty to provide qualified BSL interpreters and creating BSL friendly materials.
- Extent of unqualified costs.
- Recruitment and retention of suitably skilled individuals to support the provisions set out in the bill.
- Lack of availability and access to BSL interpreters - as recognised within the Bill addressing any shortage of qualified BSL interpreters in Wales and ensuring high standards of interpretation being readily available is key.
- As noted in the memorandum – there is already a shortage of BLS interpreters across critical service areas, and for urgent and unplanned needs. Increases in capacity should be used to focus on these areas where the risks of safeguarding issues, with long-term negative impacts on health, education, and mental well-being, are highest.

As recorded in the Memorandum, there is already a significant shortage of qualified British Sign Language (BSL) interpreters in Wales, including North Wales. The bill focuses on devolved services, particularly health, social care and education, which will mean councils will have direct responsibility for providing interpreters in these critical areas, often where BSL users face the most barriers.

As stated in the memorandum, there is already a critical lack of interpreters available for short-notice and unplanned situations like emergency care.

The Wales Interpretation and Translation Service (WITS) has highlighted a shortfall of interpreters, especially for urgent, unplanned needs.

The demand for interpreters outweighs the supply, with a typical booking time of 3-4 weeks with the lack of available BSL interpreters to provide support at short notice and during emergency care incidents.

Research undertaken by Welsh Government also found instances / circumstances where some interpreters are reluctant to work, such as police interviews, owing to the level of scrutiny involved and the possibility of being required to attend court. There is also a need for more qualified teachers and resources to train new interpreters and address this shortage so careful consideration on how this is addressed before the bill is implemented is essential.

This deficit already leads to significant barriers for the Deaf community when accessing public services, resulting in potential negative health, educational, and social outcomes.

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

Whilst the Bill sets out strong foundations, we believe successful implementation will depend on adequate funding being made available to public bodies to successfully implement.

The Bill requires public bodies not only to produce BSL plans and report on progress there will be the need to hire interpreters and translators, train staff in BSL awareness whilst also updating digital and physical infrastructure to accommodate BSL users.

Given current budget pressures within Local Authorities, Local Authorities would not be able to absorb any additional costs without diverting funds from other essential services.

Full funding for costed principles must be provided if the aims of the Bill are to be delivered.

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

Inclusive consultation – Ongoing and meaningful engagement with listed bodies throughout the Bill's development and implementation phases.

Monitoring and Evaluation – Guidance on clear mechanisms for evaluating the effectiveness of the Bill, the National Strategy and the Plans.

Anything else?

A Welsh version of our written response will follow at a later date. It will be with you by early next week

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 Cyngor Sir ddinbych | Evidence from Denbighshire County Council

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

The British Sign Language (Wales) Bill, which aims to promote and facilitate the use of British Sign Language (BSL) across Wales has key objectives we agree with in principal. Those are:

- Recognise BSL as a language in its own right.
- Promote and facilitate its use in public services.
- Improve access to education, healthcare, and other services for BSL users.
- Ensure BSL users are not treated less favourably than Welsh or English speakers

We agree with the Bill as it aligns with the Well-being of Future Generations (Wales) Act 2015 and The UN Convention on the Rights of Persons with Disabilities (CRPD).

There is a proposal to establish a Commissioner to formulate BSL standards, investigate complaints and monitor and report on usage every 5 years. It will be interesting to learn from you how this aligns with, or is different to, the role of the Equality Commissioner, Eryl Besse, appointed Equality and Human Rights Commission's new Welsh Commissioner and also other independent commissioners for Wales, including Rocio Cifuentes, the Children's Commissioner, and Rhian Bowen-Davies, the Older People's Commissioner for Wales, who champion the rights of children and older people respectively.

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?

Our view is that Legislation will help deliver policy intentions by turning broad goals into enforceable actions. Legislation gives the Senedd and public bodies the legal power to act. Without it, policy goals may remain aspirational or voluntary. Laws make certain actions mandatory, ensuring consistent implementation. Legislation defines who must do what, by when, and how. This clarity helps us avoid confusion and ensures accountability. Legislation includes mechanisms for reporting, oversight, and enforcement. This helps track progress, identify gaps, and ensure compliance. Laws can help align national policy with international commitments, such as human rights conventions or climate agreements.

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

Yes, placing a duty on Welsh Ministers to promote and facilitate the use of British Sign Language (BSL) is workable, especially when supported by a structured policy framework and stakeholder engagement. The Welsh Government already has experience with similar duties under the Welsh Language (Wales) Measure 2011, which requires Ministers to promote and facilitate the Welsh language. The duty aligns with the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to work toward a more equal and inclusive Wales. Promoting BSL contributes directly to these national well-being goals.

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

We believe that these are workable and national strategy and guidance are essential tools to support the rollout of the British Sign Language (Wales) Bill, ensuring that its goals are implemented effectively and consistently across Wales.

A BSL route-map will outline specific actions to promote and facilitate BSL, set goals, identify priorities and provide a timeline. National guidance will ensure public bodies understand their legal duties, best practice and develop and implement BSL plans.

3 - A duty on Welsh Ministers to publish BSL guidance

Producing BSL guidance as part of the rollout of the British Sign Language (Wales) Bill offers several important benefits that help ensure the legislation is implemented effectively, consistently, and inclusively across Wales. We believe this is an important element that will provide clarity, consistency and support which will enable careful monitoring and improvement.

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

We believe the duty on public bodies to publish BSL plans under the British Sign Language (Wales) Bill is widely seen as a positive and workable step toward improving accessibility and inclusion for Deaf BSL users. Requiring public bodies to publish BSL plans ensures that their commitments to BSL are visible and measurable. This duty complements existing obligations under the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to work toward a more equal and inclusive Wales. Publishing BSL plans supports these goals. By setting a standard for planning and reporting, the duty helps avoid a postcode lottery in BSL provision. It ensures that Deaf people in all parts of Wales can expect similar levels of access and support.

We would welcome your thoughts on how this additional publication work may be funded, mindful local authorities budgets are reducing every year.

5 - The appointment of a BSL adviser

There are benefits of a BSL advisor. A BSL Adviser would bring specialist knowledge of BSL, Deaf culture, and accessibility issues, helping to guide Welsh Ministers and public bodies in implementing the Bill effectively. The Adviser could ensure that BSL-related policies are consistent and aligned across sectors like education, health, and local government. This helps avoid fragmented or uneven provision. The Adviser could help track progress, identify gaps, and recommend improvements, supporting accountability and continuous development. However, establishing and maintaining the role may require additional funding, especially if the Adviser is expected to lead large-scale initiatives or oversee multiple sectors. The effectiveness of the Adviser depends on their authority and integration within government structures. If the role is too limited or advisory-only, it may lack the power to drive real change. There may be concerns about duplication with other equality or accessibility roles unless the Adviser's remit is clearly defined and coordinated.

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

By setting a standard for planning and reporting, the duty helps avoid a postcode lottery in BSL provision. It ensures that Deaf people in all parts of Wales can expect similar levels of access and support. Reporting duties will provide clarity, consistency and support which will enable careful monitoring and improvement.

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?

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

Primary challenges for local authorities are the reduced capacity in resources to respond to this and discharge our potential duties around this and other Welsh Government initiatives whilst still maintaining our statutory functions and providing services to our communities. We would welcome any funding and / or advice taking this forward.

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

As above, we envisage challenges for local authorities are the reduced capacity in resources to respond to this and discharge our potential duties around this and other Welsh

Government initiatives whilst still maintaining our statutory functions and providing services to our communities. We would welcome any funding and / or advice taking this forward.

Anything else?

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 Cyngor Sir Fynwy | Evidence from Monmouthshire County Council

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

We, generally, do not think there is a need for this Bill. The Equality Act should be sufficient to ensure all protected characteristics are treated fairly and with equity. This includes the use of BSL. We agree that there should be provision to promote and facilitate the use of BSL and its tactile forms in Wales; improve access to education, health and public services in BSL and, support the removal of barriers that exist for deaf people and their families in education, health, public services, support services and in the workplace. We also agree that we should ensure that deaf communities have a voice in the design and delivery of services to ensure they meet their needs. In Monmouthshire, we are working towards Access for All Forums which would include the views of deaf communities in the design and delivery of services that they use.

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?

The promotion and facilitation of the use of BSL is welcomed as well as the publication of a national strategy and guidance. However, we would like a clearer understanding of what the duty of a Welsh Minister would be. If the idea is to be on a par with the Welsh Language Measures, this would take an enormous amount of resource that Public Bodies do not have. The idea is useful but we have serious concerns about the costs and level of expectation, and the resources needed if it were to be on a par with the Welsh Language Measures, which are very costly and time consuming. Albeit completely necessary. Welsh Government needs to be seen to lead by example. We feel there should be a report from WG assessing their internal progress.

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

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

3 - A duty on Welsh Ministers to publish BSL guidance

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

5 - The appointment of a BSL adviser

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

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?

As a Public Body, we feel deaf people should be able to access all services equitably. However, barriers do exist within all areas given current resources. We address these on a 121 basis, providing BSL when it is asked for or needed. The cost, resources and capacity for staff needs to be taken into account and will be a major barrier. Public services will need to be given significant resources to meet the expectations and any standards agreed. We would need to give consideration to many system/process changes, which would put strain on many already stretched managers.

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

As already mentioned, the financial implications are substantial and resources will need to be given to Public Bodies in order to carry out the duties of this Bill.

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

Anything else?

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 Dr Christopher Shank | Evidence from Dr Christopher Shank

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

As a linguist at Bangor University, who is working with an interdisciplinary team of deaf and hearing researchers documenting the Welsh dialect of British Sign Language (BSL), I wish to use my expertise and your respective time, to help address any doubts, questions, or concerns the nature of signed languages as actual languages and to support that position that BSL users, in Wales, are an important indigenous linguistic and cultural minority within Wales and therefore deserve the rights and protections afforded by the BSL (Wales) bill. The bill is long overdue, and it will go a long way towards recognizing and providing critical support for this important and to date, often overlooked and under resourced, minority community.

Following the groundbreaking work of William Stoke (1960), signed languages have since been recognized as natural languages around the world. Research has shown that they display distinct and language specific phonology (handshapes, movement, orientation), morphology (word formation processes), syntax (word order and sentence structure), and semantics (meaning). These linguistic systems are rule-governed and allow users to express abstract, complex ideas, just like spoken languages (Sutton-Spence & Woll, 1999). They are languages in their own right and often not mutually intelligible. For example, BSL is not intelligible with American Sign language (ASL); they are different languages.

Furthermore, just like spoken languages, one sees regional and dialectal variation within signed languages and even within signed language communities. For example, in spoken British English we have well known dialects such as Cockney, Scouse, Black Country and Gorgie. Each is identifiable by idiosyncratic pronunciation patterns, vocabulary, grammatical constructions and so forth. Numerous studies in the UK from the 1990s onwards have shown that BSL also exhibits clear regional and dialectal variation with documented regional variation and differences in things such as lexical items, fingerspelling, and phonological features. For example, (Stamp et al. 2015; Stamp et al. 2014; Schembri et al. 2018) have documented region-specific variants in number and colour signs in eight different areas in the UK. Research by (Brown and Cormier 2017; Sutton-Spence et al. 1990) has shown differences in fingerspelling with deaf communities in Birmingham, Bristol, London, Manchester, Glasgow, and Belfast. More recent research conducted in Leeds by Blount (2018) has revealed clear local variation in the lexicon where younger signers sometimes

adopt or borrow forms from other regions. And finally other research on BSL has shown that, much like spoken languages, variables such as age also plays a central role: older signers retain traditional, regionally marked variants, whereas younger signers favour more standardized forms.

Signed languages also coexist with their spoken community 'counterparts' and are often shaped and influenced by the cultural and environmental domains in which they are used. Wales is no exception. Our project, the Deaf Health Wales project, is the first of its kind to identify, document, and categorize the Welsh dialect of BSL. While still early in the project, our research has shown that a distinct Welsh BSL dialect not only exists, roughly 20-25% of the signs are distinct from standard BSL, and we have also documented regional variation and influences from Welsh language and culture. Many deaf Welsh culturally self-identify as 'Welsh' as one would expect, and this is often represented in their signed language usage. They are an under-recognized, often overlooked, indigenous minority language and cultural group within Wales. The BSL (Wales) Bill is an important step in recognizing, validating, and protecting their linguistic presence, rights and identities and their contributions to the Welsh social, political and cultural landscape.

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?

I approach this bill and its provisions as linguist with expertise in language use, variation and change, as well as the intersection of language, culture and identity; so, with respect to delivering the stated policy intentions I take a more theoretical approach, one guided by reviewing literature and assessing the bills provisions relative to other similar bills and provisions. All in all, I think the bill, which has clearly been guided by similar acts such as that in Scotland, establishes a good framework that should help to elevate the status, recognition and support for the use of BSL in Wales.

I am particularly encouraged by the proposed BSL advisor role and that it requires that the post holder be a native BSL user. This is a very important step in my opinion. It is essential that a deaf community member be in this position, and that they are a BSL user (Foltz, Cuffin & Shank, 2022; Foltz & Shank, 2020). In my professional opinion, as a linguist who has had training and experience working with language minority communities, this type of representation and voice is absolutely critical if the advisor is to have any legitimacy with the community that they represent and advocate for. The deaf Welsh community is not homogeneous in thought, opinion or identity; however, community representation and voice are essential for the person in this role and for that one must have a BSL signer in the post.

Achieving the bill's provisions and goals will require support, resources, community engagement, oversight and clear communication both to and from the deaf community. This will not be easy, but I think it is achievable with what has been proposed.

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

I think that, while well intentioned, when it comes to minority languages, 'promotion and facilitation' aspects, are often the weakest elements and prone to falling well short of goals or targets. Minority languages by definition are spoken by a minority of the population, and in the case of BSL users in Wales there anywhere from 4,000 – 7,000 BSL users (Shank & Foltz, 2019) which is admittedly a small number and one that, if one is not diligent with oversight, review and required reporting and targeted outcomes, promotion and facilitation efforts can be the first to suffer from budget cutbacks because the public, writ large, doesn't see the priority or need. I think that more robust steps will need to be taken to raise the status, visibility, awareness and opportunities to use BSL in Wales and this will in turn require aggressive monitoring and accountability. I think clearer targets and outcomes are needed to help tighten up this element of the bill.

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

I agree with and very much support this provision. It is both welcome and needed. As one who works with in a University environment, we are guided by 1,5- and 10-year guidance plans and strategies. I do think the six-year review cycle is too long and should be shortened to every 2 years or 3 years, for at least the first 6 years of implementation. This is an ambitious bill and the provisions within it may require adjustments and changes following consultations with community members. Community needs and requirements do change, especially as recognition and support and visibility is achieved. This bill will be impactful on deaf Welsh citizens lives in both known and unanticipated ways. I would prefer to see earlier review and assessment to that if substantive changes need to be proposed there is time to do it in accordance with Welsh government policies, regulations and timelines.

3 - A duty on Welsh Ministers to publish BSL guidance

No comments. I trust others who are more knowledgeable and experienced will provide feedback here.

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

No comments. I trust others who are more knowledgeable and experienced will provide feedback here.

5 - The appointment of a BSL adviser

I would refer back to my answer to ‘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?’

In that section I indicated my support for the advisor role and the importance that the person appointed be a native, 1st language, BSL user. In reviewing the provisions, the role seems to be well set out in terms advisory and consultation duties and / responsibilities. I am also pleased to see that the post is an employee of the Welsh government and with it will enjoy the rights, protections, accommodations, line management, and opportunities afford a government employee. The BSL advisor role is not meant to be symbolic, but it will be a symbol of sorts for inclusion and accommodation, and it will also function as a role model for other deaf BSL users who wish to work for the Welsh government.

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

No comment. Again, I trust others who are more knowledgeable and experienced will provide feedback here.

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

No comment. Again, I trust others who are more knowledgeable and experienced will provide feedback here.

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

No comment. Again, I trust others who are more knowledgeable and experienced will provide feedback here.

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

No comment. Again, I trust others who are more knowledgeable and experienced will provide feedback here.

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

I have some final comments regarding the bill and accompanying explanatory memorandum.

To return to my opening statement regarding the linguistic and cultural identity of the Welsh deaf community, and its creation and use of a Welsh dialect of BSL; we have ample and

growing evidence that BSL users are part of and contribute to the unique cultural identity of Wales and as such their voices, contributions and lives need to be acknowledged and afforded the same opportunities and protections as the Welsh hearing population. This bill would help to accomplish this. There are issues that remain such as the lack of qualified BSL interpreters in Wales, the critical lack of BSL translators in Wales, inadequate systems for making and tracking complaints when it comes to health and social services, and a general lack of deaf awareness in both the public and private sector. Too often the hearing world looks at deafness as a disability and something to be fixed or cured. The deaf, BSL users, and their communities are culturally vibrant, linguistically innovative, and these citizens have the same hopes, dreams and aspirations as their hearing counterparts. This bill and its provisions will not fix everything, there is still a great deal of work to be done; however, it is a very positive step in the right direction and, to be honest, it is long overdue in Wales.

Anything else?

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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 Cymdeithas Llywodraeth Leol Cymru (CLILC) | Evidence from Welsh Local Government Association (WLGA)

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

We agree in principle with the principles of the Bill, however, as highlighted in previous consultation responses we remain concerned about implementation. In particular there are concerns over the sufficiency of BSL translators/interpreters available which will have a significant impact on the deliverability of duties in the Bill. There is also no detail on what will be included in the National Strategy and therefore what the Local Plans that will be developed will need to look like. Importantly, there remains a need to identify what funding will be made available to support the local plans and the delivery of the strategy and the plans that come from the guidance.

There are challenges beyond the individual public bodies reach and therefore we welcome a national approach if it achieves its aim of increasing the number of translators in Wales for BSL, making it more accessible as a result. The risk currently is that without an increase in the number of BSL translators, demand will continue to increase and along with it increased costs and expectations which will struggle to be met.

We have previously set out the need for the Bill to align with existing Equality legislation. Whilst we recognise the need for the Bill as laid out in the Explanatory Memorandum, we continue to believe that the reporting mechanisms for public bodies would be more efficient and timelier if they are delivered through the annual equality reporting mechanisms.

We note that the Explanatory Memorandum states that the legislation will create parity with the UK and Scottish parliaments. Whilst there are many similarities with the Scottish legislation, the duties on the public sector outside of national government would appear to be exceeding the limitations of the legislation that applies to England, where councils are only encouraged to take into consideration BSL users and where guidance from the UK Government is not yet in force.

Please note we have only used BSL user in this context as that is the term used throughout the British Sign Language Act 2022, we acknowledge in Wales the use of the term BSL signer is the appropriate terminology.

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?

We acknowledge the general principles and welcome the clear links between the draft Bill and Equalities legislation as described in the Explanatory Memorandum. We also note that it is made clear that the Bill is only regarding BSL and does not take into consideration comorbidities that may occur for Deaf or those with hearing loss or other reasons for using BSL.

It is difficult to state if the legislation will deliver the policy intention given that the delivery elements will be down to the national strategy and guidance, along with the local plans. The detail of which is not covered by the Bill and is yet to be developed. These parts as well as the cost of developing and reporting on the strategy and plans will need to be fully funded and resourced. We note that there is mention of the involvement of BSL signers and the BSL adviser in the development of the strategy and guidance, we would hope there will also be engagement with local government and other public bodies.

In regards specifically to the Social Services and Wellbeing (Wales) Act 2014, at paragraph 109, it states that the Bill will complement the Act by facilitating the use of BSL. There is already a requirement to use the language of choice through equalities to reduce inequities.

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

We agree with this duty in principle as long as it leads to changes that are fully funded, sustainable and not subjected to the current sufficiency issues which we highlight further in later questions.

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

We agree with the principle of having a national strategy and for guidance to be produced however, it is essential that any new expectations or requirements through the national strategy need to be fully funded for the public bodies to deliver.

It is also important to recognise that if there is a delay between the launch of the national strategy and the release of guidance for local plans, it could place further strain on interpreter availability and reduce the time public bodies have to consult. While Welsh Government has 18 months to develop the strategy, public bodies only have 12 months to act. Since no timeline is set for issuing the guidance, any delay could further constrain local timelines. We would therefore urge the requirement that the guidance be published either with the strategy or within one calendar month, as implied in paragraph 304 of the Explanatory Memorandum, to ensure public bodies aren't disadvantaged by delays beyond their control.

It is particularly important for the national strategy to be deliverable. For example, we understand from the British Deaf Association that it takes up to seven years for someone to train to be a BSL translator. This means that to increase the number of BSL translators will require longer than the length of the first strategy. In paragraph 55 of the Explanatory Memorandum a target increase of BSL interpreters by 42 to 64 since 2004 has not yet been achieved with the number remaining at 54 (paragraph 54).

At present there is no known Wales-based training provision for BSL/English interpreting and no university-level programme for sign language interpreting in Wales. Consequently, candidates in Wales generally need to train in England. There is also no defined end-to-end pathway in Wales from learning BSL as a language, through interpreter training, to entry into professional practice. Unlike spoken languages (which can be studied in school and funded via established routes), BSL learning is typically self-funded with no access to Student Finance.

We are also aware that Qualifications Wales suspended the development of a BSL GCSE in Wales due to a shortage of qualified teachers; no official repository for BSL in Wales which would enable a centralised means for developing new signs; and regional dialect differences. The latter of which is likely to be an issue with most BSL translators being based in South East Wales, and the programme to develop BSL into AI being taken forward by a University in England. These are all factors that will impact on the sufficiency of BSL translators needed to be able to deliver on the duties contained in the Bill.

3 - A duty on Welsh Ministers to publish BSL guidance

We agree with the principle of having a national strategy and for guidance to be produced however, it is essential that any new expectations or requirements through the national strategy need to be fully funded for the public bodies to deliver.

It is also important to recognise that if there is a delay between the launch of the national strategy and the release of guidance for local plans, it could place further strain on interpreter availability and reduce the time public bodies have to consult. While Welsh Government has 18 months to develop the strategy, public bodies only have 12 months to act. Since no timeline is set for issuing the guidance, any delay could further constrain local timelines. We would therefore urge the requirement that the guidance be published either with the strategy or within one calendar month, as implied in paragraph 304 of the Explanatory Memorandum, to ensure public bodies aren't disadvantaged by delays beyond their control.

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

We note that whilst councils are included that the regulators Social Care Wales, Estyn and Care Inspectorate Wales are not included, along with Llais.

The public bodies that are named in the Bill are all devolved, however, as a result of legislation there may be expectations raised with BSL signers around reserved public bodies such as the police, probation and the criminal justice system for whom none of the duties in the Bill will

apply, and where they may need to rely on the existing equality legislation for their rights to communicate in their language of choice with acknowledgement of their separate and independent culture.

WLGA welcomes the option for public bodies to work together in collaboration to prepare their plans (paragraph 176) due to the limited number of deaf organisations and individuals to be engaged with. How this may be delivered is likely to differ across the regions. Whilst the Explanatory Memorandum anticipates this resulting in only 11 consultation events rather than the 34 that would be required if each were to do their own (paragraph 328), this number may be lower than will actually be delivered unless the Bill ties the development to either the footprints of Public Service Boards or the Regional Partnership Boards, which would then define the collaborative areas to those of the Local Health Board areas. It will be important to ensure that there is engagement with deaf communities from each council area to influence the development of their own local plan which they each will have to deliver.

We understand the duty to publish BSL plans and we have added comment under other questions in regards to the practicalities and the risk of constrained timelines if the guidance is not issued in a timely way after the national strategy.

5 - The appointment of a BSL adviser

We welcome this development which is in line with our January 2025 consultation response, ensuring the increased prominence of BSL and the ability for public bodies and the Welsh Government to be challenged and best practice to be promoted in an appropriate way. Building on the experience of the VAWDASV adviser role appears to be an appropriate mechanism, particularly while there remains sufficiency concerns and a need for an increased awareness of BSL and opportunities to increase occasions for it to be used.

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

The reporting requirements could benefit from greater clarity, as they may not be fully aligned as currently set out. Our understanding is that Welsh Government will report on progress of the strategy after three years, and again ahead of a new strategy (potentially 2030/31 if the Bill passes into legislation in 2026), with the strategy published in 2027/28. In the meantime, councils and other public bodies on this timeline will have to publish their plans in 2028/29 and update on progress after one year in 2029/30 and then not again until they are due to refresh the plans.

Whilst these timelines will mean information on one year delivery is with Welsh Government for their mid-strategy report, the reality is that delivery of the plans themselves will only be for one year and not three at that point. There is a risk this would not provide enough detail and in subsequent years may mean more being asked of councils and other public bodies to fill this data and knowledge gap. Consideration should be given to incorporating the reporting

mechanisms on progress on the delivery plans with the equality reporting that is carried out on an annual basis. This should assist in keeping additional costs down and ensure that delivery of plans remains a focus throughout its delivery period. It would also allow more timely interventions if there were new barriers and issues that would benefit from a national solution or from the BSL Adviser and Panels intervention and support.

Utilising the existing reporting mechanisms for equalities for all except the review or update year, would also allow consistent reporting across Wales that could be utilised by the BSL Adviser and Panel on a more frequent basis. It could be done whilst maintaining and acknowledging the differences between disability and communication in the equality's legislation, and the separate language and culture of BSL, but without adding a large amount of additional demand, and it potentially links in with existing job roles where the Welsh language duties and reporting sits alongside equalities in Equality and Welsh Language Officers and/or Managers.

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

The powers as laid out in the Bill and Explanatory Memorandum would appear to be appropriate and in line with other legislation.

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

There are a number of barriers to the implementation of the Bill, some of which we have already highlighted around sufficiency of BSL translators and the potential resource implications for any delivery elements and lack of resources.

We also note the research explained in paragraph 56 of the Explanatory Memorandum that found that interpreters are reluctant to work on police interviews due to the level of scrutiny and the possibility of needing to attend court. Whilst police are outside the remit of this Bill, the same issue may also become apparent when it comes to safeguarding reporting and the engagement and response required by council employed social workers, which could add a barrier when trying to protect the most vulnerable. The Bill does not attempt to resolve or mitigate these barriers in its current form.

Recognising this barrier, together with the Non-Police Personnel Vetting (NPPV3) requirement, the Wales Interpretation and Translation Service (WITS) funds NPPV3 vetting and works collaboratively with the Police Approved Interpreter Translator (PAIT) scheme for interpreters undertaking police work, helping to reduce entry barriers and support safe, compliant provision across the justice system.

The Explanatory Memorandum goes into detail around the barriers of short notice provision and the challenges it provides especially in light of the sufficiency issues of BSL translators. However, it does not provide any possible solutions or explanations for how the Bill will improve this situation. A shortage of BSL translators is likely to mean they have more filled diaries and less time and opportunity to pick up short notice or emergency (so immediate) demands on their already committed time.

The Explanatory Memorandum raises issues with the WITS and its ability to deliver BSL provision. WITS sources professional interpreters and translators for the public sector throughout Wales in over 150 languages including BSL. Whilst there is always more that can be done to promote the service and ensure all those who work in public bodies who may need it, know how to access it, the issues around sufficiency around the number of BSL translators is likely to be a contributing factor. In one twelve-month period over 8% of requests made to the service were for BSL interpretation, making it the third most frequently requested language which they still achieved a 96.2% allocation rate for. To put this into context over a year each registered BSL translator in Wales (total 54) would have needed to accept on average just over one request a week for every week of the year, with no accounting for holidays and other planned or unplanned leave. This may partially explain why one of the interpreters who responded to the January 2025 consultation is quoted as mentioning burn out within the profession (paragraph 59).

The concerns raised about WITS in the Explanatory Memorandum appear to stem primarily from a national workforce shortfall rather than the commissioning model itself provided WITS and other Language Service Providers receives the request for translation.

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

We noted the commitment in plenary given by Jane Hutt MS Cabinet Secretary for Social Justice, Trefnydd and Chief Whip on the 16 July 2025 that:

“Welsh Government will provide the costs, as you have outlined, for the first year, in full, for 2026-27 of £214,300.” (306: Plenary 16/07/2025 - Welsh Parliament)

In 2026/27 all the costs of delivery are with the Welsh Government, the second year 2027/28 is when costs to other public bodies will begin and there is no confirmation of funding towards this. It is important to note that the figures included for the BSL plans are based on National Joint Council Services paycales (paragraph 326) for 2024/25 figures. These paycales have since been subjected to a 3.2% increase for 2025/26 and therefore the figures provided in table 9 (page 87) are already out of date and provide lower resource implications when compared with what will be required.

It should also be noted that in the Explanatory memorandum (paragraph 330) that no costs have been assigned for the implementation of the plans due to these being dependent on the requirements that will be set out in the to be developed national BSL strategy. It is essential that these are costed and fully resourced.

In paragraph 210 of the Explanatory Memorandum, it states:

“The WLGA estimated that preparing BSL plans and conducting performance reviews would cost around £790,000 a year over the first 5 years, although costs would decrease in subsequent years. This estimated cost is explored further in the Regulatory Impact Assessment.”

This appears to be a mis-interpretation of the response to question 15 of the WLGA response to the consultation that ended in January 2025, where we shared the figure from the explanatory memorandum that was part of that consultation and questioned some of the claims, the original WLGA response stated:

“The EM [Explanatory Memorandum] identifies there will be additional costs for public bodies to report on their BSL usage, but there is no recognition that it is not just the costs but also the resources of staff to pull reports together adding a burden to workloads when councils are facing large staff cuts. Estimates that the preparation of BSL plans and performance review for public bodies to report would be around £790,000 a year over the first five year period with costs lower in future years. There is no detail on how much lower these are expected to be and there are only cost estimates around the plans and not for delivery of services or the provision of providing BSL interpretation for complaints or engagement activities. This estimate would appear therefore to be low. It is essential that any new requirement placed on councils is fully funded or risks drawing from other essential services.”

The concerns around the actual financial implications remain

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

In the terms of the Explanatory Memorandum in paragraph 6 (page 1) it tries to differentiate between BSL signers (anyone who signs), Deaf BSL Signers (medically or audilogically deaf) and deaf (lower case for those with hearing loss). We agree with the term BSL signers rather than BSL users for the same reason we refer to Welsh speakers. If BSL is the third language in Wales, then the most important thing is that all BSL signers have the same opportunities regardless of their diagnosis. There is a risk that by trying to separate out the different groups that make up BSL signers that it creates exclusion itself, when the aim of the Bill is for better awareness, use and inclusivity. This is demonstrated on page 4 in paragraphs 10, 11 and 12 of the Explanatory Memorandum which identifies only Deaf (those medically or audilogically deaf) as using BSL as their first and primary language and connecting Deaf and hearing individuals and for whom raising the profile will be beneficial. The UK Government 2022 report on BSL included statistics that suggests only 57.6% of BSL signers are Deaf (figures excluded

translators and other professional BSL signers), which could mean that over 40% of BSL signers are excluded from the anticipated benefits as a result of the Bill.

The Explanatory Memorandum on a number of occasions (for example paragraph 366) makes reference to education achievement through the grades achieved in core subjects of English/Welsh and Maths. Whilst Maths would be fitting with the remainder of the content of the document, the inclusion of English/Welsh which are described as second and third languages for BSL signers may not be as appropriate. For BSL signers, BSL may be their first and sometimes only fluent language it may, therefore, be more comparable to other language GCSEs rather than ones in which their hearing counterparts are fluent in one or both comparative languages.

In the section that focuses on Specific Impact Assessments under Justice System Impact Assessment (paragraphs 334-339) it identifies that there will be no impact on the justice system in England and Wales. However, youth offending services are delivered through council services in Wales, which is one of the listed public bodies and therefore would possibly fall within the scope of the duty. The Welsh Government also have the supporting youth justice services to prevent offending: prevention framework and Female Offending Blueprint for Wales, both of which bring together currently reserved public bodies, including police and probation, and devolved public bodies including councils. As raised previously, the interplay between devolved and reserved bodies and potential impact on any new duty would need to be considered. Additionally, the UK Labour Government manifesto in 2024 included a commitment to explore the devolution of probation to enable a more locally responsive service. Should devolution of probation occur, this could result in this justice service moving within the scope of the duty.

Anything else?

There is limited mention of alternative provision to deliver BSL translation in the Bill or Explanatory Memorandum. There are some digital solutions either already available or under development. For example, Video Relay Service has been used with varied success in some councils, and whilst it only uses standard BSL rather than local dialects it provides one potential solution to the barriers and sufficiency issues. There have also been developments around the use of AI translation, with the University of Surrey being funded to deliver a programme to develop BSL/English translation. However, this is a number of years from delivering and we understand would currently exclude Welsh/BSL translation. We note the inclusion of the need for additional resource to be considered to develop digital products and services raised by Digital Healthcare Wales (DHCW) but it is equally important to ensure that local government is also involved, with an opportunity to engage with the Local Government Chief Digital Officer alongside DHCW in any discussions to ensure parity across public sector provision.

There are also some concerns about the lack of inclusion of the Welsh language and the possible impacts of the legislation as it is currently drafted. For example, the Explanatory Memorandum includes information on Sign Supported English, however, there is no mention of its Welsh language equivalent Sign Supported Welsh despite both being included in other Welsh Government department documents, such as the Sign languages and sign systems produced by Education Wales.

A review of the NRCPD website, the organisation where BSL interpreters are registered, highlights this discrepancy where there is no mention of British Sign Language and Welsh, only “British Sign Language/English Interpreters and Translators.” We anticipate that there will be some of the 54 who are bilingual in English and Welsh, but without these figures and with most translators being based in the South East of Wales there is no guarantee that there are any BSL/Welsh translators, which may be an area that will require further exploration as part of the first national strategy in order to meet the requirement of not treating Welsh less favourably than English.

Under the heading Additional Learning Needs and Education Tribunal (Wales) Act 2018 (paragraphs 115 to 117) there is a focus on the decrease in Individual Development Plan (IDP) for children with hearing impairments reported by parents of Deaf children as well as from the Additional Learning Needs (ALN) register. The explanatory memorandum suggests that this decrease is leading to disadvantages. However, it does not acknowledge the information in September 2022 from the Minister for Education and Welsh Language that SEN had been over-reported or inappropriately categorised in the past and that ALN was correcting this. Our inclusion of this is not because we believe this is always the case but to note that it would also be helpful to reflect this within the Explanatory Memorandum.

We welcome and hope for the continuing engagement with WLGA as the Bill progresses and the increased engagement and discussion regarding BSL through this legislative process as a first stepping stone to increasing the awareness of BSL across Wales.

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 Addysg a Gwella Iechyd Cymraeg | Evidence from Health Education and Improvement Wales

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

As a Special Health Authority with a leading role in the education, training, development and shaping of the healthcare workforce in Wales, we plan, commission, and deliver education and training for a wide range of health professional groups. We have an organisation committed to providing inclusive and equitable experiences for our workforce, the current NHS Workforce and its future workforce. We are supportive of the general high-level principles outlined in the proposed bill; however, we have several areas that we have outlined in this submission for consideration. The information we have provided should be taken into context with other NHS Wales organisations, in addition to our role as a Special Health Authority.

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?

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

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

The provision of BSL for our workforce, students and trainees, where identified and requested, falls within the requirements of the Equality Act 2010, The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, and The Public Sector Equality Duty (PSED). They are currently referred to as 'reasonable adjustments' within the legislation. HEIW is committed to adhering to legislation; however, we understand that our commitment to those we work with is to do the right thing. Across NHS Wales, guidance on the provision of reasonable and tailored adjustments is outlined in Section 8 of the NHS Wales Managing Attendance at Work Policy. However, there is a lack of clarity on guidance on how those who are Deaf or hard of hearing can access support, specifically for those who do not consider themselves 'disabled', therefore do not feel the provision of reasonable adjustments relates to them. In addition, there remains a general lack of clarity on 'reasonable', which opens this up to interpretation for those supporting individuals, specifically the influence of financial constraints in the public sector, levels of provision of BSL support and the quality of that provision. HEIW would therefore welcome a specific national strategy and guidance for the public sector; however,

this guidance would need to address, where possible, any ambiguity and lack of clarity, which can be barriers to organisations providing the best quality services and experiences.

3 - A duty on Welsh Ministers to publish BSL guidance

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

All public sector organisations are required under the PSED to have a Strategic Equality Plan (SEP). Although we consider that there should be a duty for public bodies to publish a BSL plan, this should be incorporated into a SEP and not as a 'stand-alone' action plan. As an example, the original requirements to publish a plan for the Anti-racist Wales Action Plan (ARWaP), LGBTQ+ Action plan, etc., have identified an overly burdensome administrative and bureaucratic process, which has limited the time and opportunity for those responsible for implementing the plans to be able to support the tangible delivery of the plans, whilst working within financial and other extreme pressures and growing demands. In addition, separate plans were identified that limited the impact of an intersectional approach, which we consider a key element of the work on equity and equality. Therefore, we would like to see an agreement that all national equality plans are incorporated under the provision of an integrated SEP rather than stand-alone plans.

5 - The appointment of a BSL adviser

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

Although reporting is vital for outlining progress, it also highlights achievements and risks. Reporting duties should be incorporated into the existing responsibilities for the PSED, namely publishing an Annual Equality Report, publishing a 4-year SEP and through the current bi-annual NHS Wales equality reporting framework to the Welsh Government. No unnecessary further administrative burden must be placed on organisations as a result of this bill. More detailed considerations need to be given to the use of a standardised reporting requirement for NHS Wales organisations, as it is currently unsuitable for some organisations due to the different nature of services provided by each organisation, particularly those that are special authorities, such as HEIW. An overabundance of excessive reporting beyond what is required for assurance can hinder the ability to deliver the necessary changes and services, particularly when combined with limited personnel, financial resources, and time constraints.

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?

A key consideration based on our organisation's experiences with other equality legislation is the ambition versus the real-life complexity of the change that is needed. For example, the

aspiration of the ARWaP with a focus on 'action not words' with short deadlines for health and social care to make significant cultural, operational, and physical changes resulted in an enquiry and an eventual readjustment of the actions and timescales. It is important that this is considered as part of this bill. We understand, through engagement with our staff, students, trainees, and communities, the barriers they face, which indeed need to be mitigated as soon as possible. However, the practicality of these measures also needs to be considered. These need to be more clear in the bill, Specifically, the following areas should be acknowledged and considered:

- Lack of capacity and resources (physical and financial) within the public sector to implement the requirements of any proposed BSL standards.
- Shortage of BSL interpreters across Wales and the wider UK
- Consistency of the quality of BSL interpreters and providers, both in terms of quality of service and products.
- Clarity on education provision, with a broader focus on responsibilities of providers other than early years, primary and secondary education, to include universities and further education providers.
- Requirements on Higher Education Institutions (HEIs) from Wales and those outside of Wales from whom we procure education and training for NHS Wales undergraduate, postgraduate and Continuous Professional Development (CPD) activities

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

Although the projected assessment of the financial implications of the bill outlines the implementation and delivery of the bill itself, further consideration needs to be given to the financial implications of the day-to-day delivery of BSL provision, whether interpretation or translation services. This needs to be considered by organisations as part of strategic budget setting based on funding provided by the Welsh Government. With the launch of other national equality action plans, there was no provision for the financial implications and resources needed to implement the requirements of the plans. Evidence provided at the ARWaP enquiry on behalf of NHS Wales identified that, under strict financial constraints, spending on provision and resources to support equality was minimal or non-existent across some organisations. Faced with a focus on allocation of financial resources, which understandably needs to support extreme pressures and demands on public services, there is a risk that, in reality, there will be little or no financial resources to deliver meaningful change and services on an operational basis. This could have a detrimental impact on the sustainability of the longer-term ambitions of this bill.

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

Given the shortage of BSL interpreters and providers across the UK, an increased demand for services in Wales following the bill could see providers increase the costs of services and provisions, limit access or impact the quality of the services available, which would work against the aims and ambitions for the bill in the short, medium and long term. In other equality-related legislation, there is often an acknowledgement of how an increased understanding and awareness of one area could benefit others. Although there is acknowledgement and detail of how this bill will support other legislative plans in Wales, there appears to be very little in the bill regarding how providing a national strategy for BSL relates to existing national equality plans and how the bill will directly or indirectly impact individuals who may not have the same clarity around a strategy, guidance and adjustments, such as those who identify as neurodivergent or neurodivergent and do not consider that a disability.

Anything else?

We already have experience in procuring translation services from leading providers in Wales; however, the experience and feedback from users have been mixed at best regarding the reliability and quality of the provision, as we have come to understand that some of this work is outsourced to private individuals due to an increased demand, which this bill would contribute to. This has had a significant impact on individuals who rely on BSL translation to undertake studies or manage engagement and consultation activities, resulting in delays, additional administrative work, and increased financial implications. Therefore, we would recommend that the bill incorporate specific guidance around the governance and quality of the provision to ensure both BSL providers and individuals who use the service are all supported and understand their roles and responsibilities.

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cymdeithas Pobl Fyddar Prydain

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: British Deaf Association



British Sign Language (Wales) Bill

British Deaf Association stage 1 submission to the Equality and Social Justice Committee

Introduction

1. We warmly welcome the Bill. As evidenced by the submissions to Mark Isherwood MS's 2024-25 consultation on his proposal for a Bill, there is a pressing need for legislation.
2. The Bill as published will bring a new government focus on information in BSL and will enable deaf signers to be seen as the solution rather than as a problem.
3. Sign Language legislation is important to Welsh signers. It is a formal acknowledgement of and a sign of respect for signing communities as a distinct part of Welsh life. It recognises Welsh signers as a linguistic minority group with our own distinct culture and aspirations. The legislation follows similar support from the Scottish Parliament, the UK Parliament and the Northern Ireland Executive which is promoting its own legislation.
4. British Sign Language is a visual-gestural language with a distinctive grammar and syntax using handshapes, facial expressions and movement to convey meaning. It is an indigenous language to the UK and has been part of recorded history since at least the 17th century. It is estimated to be the preferred language of between 5,600 and 7,300 people in Wales.
5. The British Sign Language (Wales) Bill is a strong Bill that provides a clear foundation to drive progress for deaf signers across Wales.

A new focus on information in BSL

6. 98 out of 111 respondents to the official consultation on the Bill (November 2024 – January 2025) said that 'education' provided a 'main barrier' for deaf people in Wales. 97 out of 111 said the same about 'health.' Barriers include a lack of deaf awareness, a failure to grant BSL provision, a shortage of BSL-signing staff, and obstacles to deaf signers entering careers in these sectors.
7. These problems persist despite the Public Sector Equality duties in the Equality Act 2010 and despite the 2013 All Wales Standards for Accessible Communication and Information for People with Sensory Loss. A new approach is needed, above and beyond an 'access' perspective and towards inclusive leadership.
8. The BSL (Wales) Bill will not change this overnight. But it will require local authorities and NHS bodies to examine their approach and to consider, identify and plan how

they can promote and facilitate the use of BSL and to report on their progress. We would expect and recommend that this process will actively involve BSL signers in Wales who can contribute to the prioritisation and to the solutions.

9. This approach, required by law, will incentivise public bodies towards good practice and hopefully create a 'ratchet' effect as each successive plan can be better than the one before.

Deaf signers as the solution, not the problem

10. Historically, deaf signers have been made to feel like a burden to public bodies in our country. Yet, we bring a lifetime of experience and expertise which can only assist public bodies in the production of their improvement plans and the delivery of services through BSL.
11. According to the consultation findings, nearly all respondents disagreed that deaf people 'currently have a voice in the design and delivery of the public services they use'. Most agreed that deaf people 'should have a formalised voice in the design and delivery of the public services that they use'.
12. The Bill will encourage good practice in genuinely giving authority over our lives to deaf signers in Wales. It is our expectation that Welsh Ministers and listed public bodies will wish to develop strategies and plans which are genuinely grounded in the experiences and aspirations of the Welsh signing communities. We do not believe that it is appropriate, possible or efficient for non-signers to lead on determining the path of our future lives. Instead, we wish to see genuinely deaf-led solutions. BSL services should be designed, managed and evaluated by those who will use these services. This extends to the leads within each department or public body tasked with creating that body's BSL Plan. We strongly believe that each such person should themselves be a deaf signing professional. We strongly believe this will maximise value for money and impact of the BSL Plan.
13. An example of the need for this is demonstrated by the different processes employed by the Scottish Government in the development of the first and second BSL National Plans. The first national plan (2017-23) was very substantially co-created through a National Advisory Group, which had one deaf and one deaf-blind co-chair. The second plan (2023-29) did involve consultation with deaf communities, but it was then "edited down" within the civil service. For Scottish deaf signers, this led to understandable disappointment. It is our reflection that the National Advisory Group was the more effective way to give strength to the voice, experience and aspirations of signing communities.
14. Deaf-led solutions are authentic, responsive and efficient. As an example, the Welsh Government set up a BSL Stakeholder Group to inform the development of a

Welsh Government BSL ‘route-map’ to promote and facilitate BSL and improve outcomes for Welsh Deaf signing communities. This Stakeholder Group is co-chaired by a deaf signer from the British Deaf Association and a deaf signing civil servant. This work has progressed well and at good pace, partly because of constructive engagement with Welsh deaf signers. It has also been very helpful that the two co-chairs, while each having distinct professional roles, share the same language, both literally and metaphorically - in terms of their culture and life experience. This has enabled much more rapid progress.

Support for the general principles of the Bill

15. The Bill is not fundamentally about – and should not be seen as being about - access to ‘mainstream society’ for members of a disabled community. It is about saying that the lives and aspirations of deaf signers have equal value in Wales. It is about respect for a specific cultural minority within Wales and the language that we use. It will start to bring about a transformation in the lives of deaf signers.
16. As such, the high-level duties on Welsh Ministers to promote and facilitate the use of BSL are about a vision for Wales more than they are about specific actions. Wales has a proud record of support for the Welsh language; we believe that the same arguments apply to British Sign Language.
17. We support the structure of the Bill: the high-level duty, the creation of a National BSL strategy, the appointment of a national BSL adviser and panel and the expectation of listed body BSL plans. Together, this approach creates a strong and progressive framework to drive and enable the next steps in the lives of Welsh deaf signers.

Suggestions and issues that the committee might wish to consider

18. While we strongly support the Bill, we hope that the committee will wish to consider the following issues. Not all of these may require amendments to the Bill – it may be that Ministerial assurances or legal clarification would be helpful. We raise these points in a desire that committee process will lead to confidence in the strength of the Bill.
19. We would appreciate clarity on what the National BSL strategy will cover. It is important that the BSL “strategy” addresses strategic, high-level issues. But we believe strongly that Welsh Ministers must also provide clarity about the practical and measurable steps that they will take as departmental Ministers to promote and facilitate the use of BSL. For example, there is a clear need for specific measurable actions in the field of education, including actions within the responsibility of Welsh Ministers. **We request that the committee ask the Minister to confirm that a**

single document – the national BSL strategy – is intended to cover both strategic and operational issues.

20. There is a balance to be drawn between the speed of developing BSL plans and the capacity to do them well. The fundamental tension is around the capacity of the Welsh deaf signing community to lead the development of the plans and thereby to have authority over our lives and the delivery of our aspirations. Too many plans will overwhelm the capacity of Welsh deaf signers to play a leadership role; too few will cause a failure in the delivery of vital and urgent improvement. We believe that it is critical that the Welsh Government acknowledges and responds to this tension. For the avoidance of doubt, we believe that the priority should be genuinely Deaf-led planning – and we think that the BSL adviser can play a helpful role here. The alternative, of hearing non-signers deciding “what deaf people need” is not a recipe for progress. **We request that the committee press Ministers on how they intend to ensure that the development of BSL plans is led by those who understand the aspirations of deaf signers. For example, Ministers might provide advice through guidance issued under section 3(a) of the Bill.** It would be helpful for the committee to press Ministers on their understanding of the capacity of deaf signing communities in Wales and what steps they could take to develop a deaf leadership cohort.
21. It is important to understand the approach that the BSL Adviser is able to take. Realistically, some parts of Welsh government (whether nationally or locally) will respond well to the Bill, when enacted, and some will be less effective. It is important that the BSL Adviser has the ability and the resource to work pro-actively to address specific or thematic issues and to report accordingly. It is important that the Adviser is empowered to “speak truth to power.” **We request that the committee review how Welsh Ministers expect the BSL Adviser to engage with deaf signers in Wales and to address and report on any deaf community concerns about the implementation of the Bill.**
22. The Bill rightly says that its BSL Adviser must be able to communicate effectively in and use BSL. We would go further than this. We would hope that the Adviser will bring direct personal experience of the Welsh deaf signing community and its culture. We also believe that members of the panel appointed to assist the adviser should be required to have a sufficient understanding of BSL to be able to use it fluently in panel meetings. It is an important symbol and a matter of practical efficiency that BSL should be the language of the panel. **We request that the committee consider how the Bill can embed expertise in the lives of Welsh signers into the person of the Adviser and the membership of the panel.**

23. We are not clear why the list of public bodies has a particular focus on local authorities and health bodies – as opposed to education bodies for example. Responses to Mark Isherwood MS’s consultation showed that education was the most frequently cited source of barriers for deaf people. In this regard, we note the absence of education bodies such as Estyn (whose role includes evaluating deaf education) and Qualifications Wales (with its responsibility to monitor exam boards) from the Bill. Likewise, the bodies responsible for higher and adult education. Other national bodies have important responsibilities covering aspects of the support and education of deaf babies, children and young people. We also note that other important bodies are not on the list in section 8 of the Bill. We observe that the Welsh Government publishes a Register of devolved Welsh public bodies and statutory offices and that the Future Generations Commissioner lists 56 public bodies in Wales subject to the duties of the Wellbeing of Future Generations Act. We also note the range of bodies listed in the BSL Scotland Act, which includes courts, regulators and commissioners. We would give some priority to bodies like the Public Service Ombudsman for Wales, Transport for Wales, the Senedd Commission (noting that the Scottish Parliament Corporate Body is covered by the BSL Scotland Act).
24. We do appreciate that there is a need to prioritise areas for the development of BSL plans, if only so that their development can be led by deaf signers. Our preference would be to have a smaller number of plans, developed through a Deaf-leadership approach, rather than more plans subject at worst to a less effective “consultation.” As such, we do not expect all the bodies whom we would aspire to have BSL plans should be required to produce plans immediately. But it would be helpful to understand the rationale for prioritisation and to be assured that “second priority” bodies would be added to the list in due course. We also note and applaud that some Scottish bodies have volunteered to produce BSL plans, for example Food Standards Scotland - there may be a helpful path forward here. **We request that the committee consider how and when education functions affecting deaf children, particularly Estyn and Qualifications Wales, can be brought within the remit of the Bill. We request that the committee seek clarity on how and when additional bodies will be expected to produce BSL plans.**

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: RNID Cymru

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: RNID Wales



Senedd Cymru | Welsh Parliament

Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

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

You do not need to answer every question, only those on which you wish to share information or have a view.

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

(We would be grateful if you could keep your answer to around 500 words).

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?

(We would be grateful if you could keep your answer to around 500 words).

We strongly support the proposed Bill and believe that the legislation is necessary to achieve the desired change and equality for BSL users in Wales.

This Bill would give BSL users in Wales legal recognition of their distinct language and cultural identity, and would bring Wales in line with other UK Nations who have BSL legislation. Including the British Sign Language (Scotland) Act 2015, the British Sign Language Act 2022 of Westminster, and the Northern Ireland Sign Language Bill which is currently going through the Assembly with the support of their Government.

This legislation is needed to address the significant and persistent inequality experienced by BSL users in Wales. Deaf BSL users in Wales, of which there are estimated to be between 5,600 and 7,300¹, continue to face significant barriers in everyday life, due to the lack of access to public services – including healthcare,

¹ (Bowen & Holtom, 2020)

local authorities and education – as well as employment and wider cultural and social life. Despite the limited data on the experiences of deaf BSL users in Wales, RNID analysis of census data shows that one in three (38%) of BSL users of working age are economically inactive, highlighting how they are further from the labour market than people with hearing loss more widely, and the general population.²

We believe the draft Bill is strong, wide-reaching and has the potential to go further than existing legislation, but only if effectively implemented in collaboration with the deaf community. We know that significant effort is needed to achieve this, and to ensure that the provisions and duties within the Bill have the required strength and detail; and that public bodies and Ministers are equipped with the right support and guidance to meaningfully implement the Bill.

There is also significant effort needed to improve the wider population's understanding and awareness of BSL. RNID's ***It Does Matter*** report looked at public attitudes towards deaf people, and of the general public who took our survey, 34% said they didn't know how to communicate with a BSL user. This lack of understanding and awareness has a significant impact on deaf BSL user's daily lives.

We also believe that this Bill and the priorities within it are closely aligned with existing Welsh Government priorities, including the Strategic Equality Objectives and the More Equal Wales goal within the Wellbeing of Future Generations Act.

We look forward to supporting this Bill and its implementation.

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?

(We would be grateful if you could keep your answer to each section to around 500 words).

We welcome the statutory framework to promote and facilitate the use of BSL within Wales and believe this is a vital step towards inclusion and recognition for the deaf community.

We believe that the proposed provisions provide a clear and coherent structure and mechanism which should achieve the intended policy aims of the Bill. We expand on each of these below, and believe that, taken together, these provisions provide a strong framework to implement and enforce the Bill.

² RNID analysis of 2021 census data.

Throughout the legislative process we want to see a strong commitment to the following approaches:

- Principles of co-production or participatory policy making with deaf BSL users in Wales, to ensure their needs are understood by the Ministers and public bodies whose duty it is to meet them;
- Clear, measurable and timely goals tied to the national BSL strategy and BSL plans to ensure implementation is meaningful and reporting processes are grounded in targets. This should also align the BSL strategy and plans with wider Welsh Government objectives and strategies, e.g. the Strategic Equality Plan, etc;
- Identification of key immediate barriers that could undermine the impact of the Bill; for example, the lack of interpreter workforce in Wales. BSL interpreters play a crucial role in ensuring that services and institutions can meet the needs of deaf BSL users, and while it's not a silver bullet, without action to address the dwindling interpreter workforce in Wales, we may not be able to progress at the desired pace.

1 - A duty on Welsh Ministers to promote and facilitate the use of BSL

We welcome the duty on Welsh Ministers and believe this is a necessary provision to ensure there is cross-government understanding and awareness of the Bill and the needs of the deaf community.

We want to see this provision result in measures to raise the visibility and availability of BSL both within Government and more widely. For example, during the Covid-19 pandemic, the principle was established to ensure BSL access during Government announcements, so that when the First Minister spoke to the nation, there was always an interpreter present. Since 2023, this has lapsed, without consultation. We would like to see a recommitment to this principle and provision of BSL.

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

We also welcome the duty for a national BSL strategy to be published by Ministers, and for this to be consulted on and laid before the Senedd. However, provisions within this Bill include multiple strategies and plans that will no doubt overlap and intersect. Implemented properly, this has the potential to create a robust and integrated structure to ensure the promotion and facilitation of BSL, however there is a slight risk that this process could become overly complex. To avoid this, the national BSL strategy put forward by Ministers must be robust and include clear goals, timelines and mechanisms for accountability, as well as clearly setting out how the BSL plans of Government and other public bodies interact with and report to the strategy.

While a clear cohesive strategy for implementation is essential, there is also a need for leadership on prioritisation of time and resource, in collaboration with the BSL

using community, to ensure this Bill has the desired impact. We would encourage Members to consider how the national strategy could achieve this, and how it can identify the priority areas that need focus within the first six year period.

This strategy should take into account the work that has already taken place on BSL policy across the last year. Since January, a group of deaf BSL signers working or living in Wales, as well as professionals from representative organisations, have been convened by Welsh Government to form the BSL Stakeholder Group and develop a BSL route map. This work was intended to provide a short-medium term action plan of interventions needed to improve the position of BSL users in Wales. We hope that this work can lay some of the foundations for the development of a national BSL strategy and BSL plans across Government and public bodies.

3 - A duty on Welsh Ministers to publish BSL guidance

The provision for Ministers to publish BSL guidance is crucial to the success of the Bill and has the potential to address the challenges faced by public bodies and services in ensuring and delivering BSL access.

We know from conversations with some public services, that there is a desire to improve BSL provision, but a lack of knowledge or understanding on how to approach the issue, and a lack of clear guidance and information on how to provide quality BSL communication and information. This is feedback from public bodies who are already engaged and understand the need for BSL information and communication; there are even more services that are further behind on this journey and do not understand the need for BSL, nor how to provide it. This Bill compels them to understand the need to promote and facilitate BSL, and the guidance equips them. Guidance from Welsh Government and the BSL Adviser would provide a framework for BSL provision, improving consistency and quality across public services. We want to see an obligation, alongside this guidance, to ensure public bodies utilise it and apply it to their service provision.

This guidance must be co-produced with BSL users and experts, and must be published before the development of BSL plans by public bodies, to ensure guidance is embedded throughout. We are keen to explore further how co-production can be embedded in the implementation process, with consideration of potential capacity and resource challenges for deaf BSL users and representative organisations. We'd urge the committee to consider this and potential models. In Scotland, for example, a group was appointed by Government who worked with the local authorities for the purpose of co-production, particularly regarding community engagement. This may be something to consider within the role of the Advisory group, or sub-groups addressing specific need.

Within the UK Act, Section 3 includes provision of guidance to be published by the Secretary of State to inform departments on how they can improve their provision of BSL communication. This has not been enacted through secondary

legislation, and each department has published their own plan without the guidance, which has resulted in inconsistent actions across departments. Wales should learn from this process and ensure that the guidance is in place before the plans are developed to ensure that they meet the needs of deaf BSL users.

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

This duty is essential to embed BSL provision and inclusivity across public services and to achieve equality for BSL users. Public bodies, including health boards, local authorities and education institutions provide the everyday services that deaf BSL users rely on, and therefore public bodies' BSL plans are crucial for implementation of the Bill and achieving desired policy aims in a way that improves the lives of BSL users.

Plans should be, ideally co-produced, or developed in conjunction with, BSL users. Where public bodies are localised, plans should be consulted on and informed by local priorities and needs. Co-production should be the goal, but we want to acknowledge the capacity challenge this may pose to individuals and smaller organisations, and consider a scalable model to aim for. We believe that the guidance should be co-produced as a priority, as this should form the basis of public bodies' BSL plans.

It is essential that these plans include measurable objectives, clear timeframes for delivery, and interact with the national BSL strategy. These plans should also highlight how engagement with BSL users has or will take place, and how their views have been taken into account within the plan.

Crucially, public bodies must also be supported with resources and training to implement these plans effectively, including training for staff, and guidance on how BSL plans must integrate with other reporting priorities and duties. We welcome the estimated costs provided in the explanatory memorandum, and this must be a continued conversation to understand how resource can be most efficiently and effectively allocated.

Finally, regarding public bodies, we share the concern of other organisations and individuals that there are significant omissions within the current proposed list. Most notably, education providers and regulators, like Estyn and Qualifications Wales, but also bodies like the Public Services Ombudsman for Wales whose responsibility it is to regulate public services and escalate complaints; which is a significant need of BSL users. While we understand there will need to be prioritisation of how this legislation is rolled out and implemented, we would urge the committee to consider how, when and which public bodies should also be subject to this legislation.

5 - The appointment of a BSL adviser

We support the appointment of a National BSL Adviser and agree with the importance that the appointed Adviser be able to communicate effectively and

fluently in BSL. We would add that the following criteria should also be considered for the appointment of that role;

- They should have a firm understanding of the needs of the Deaf community and the day to day experiences of deaf BSL users in Wales
- They should have experience of working within the Deaf community and, either formally or informally, representing the views and interests of BSL users
- They should have a strong understanding of Welsh Government and policy-making, to ensure they are able to achieve the maximum impact in role.

The role of the Adviser will be crucial in informing and advising Welsh Ministers, and be an essential conduit between Government and deaf BSL users across Wales.

While we welcome this role, we want to highlight the weight of responsibility this places on one individual to represent the views of BSL users in Wales, therefore the National Adviser role must be supported by a strong framework, including the proposed BSL Advisory Panel, and clear structures and resource to regularly engage with and feed back to BSL users in Wales.

This also must include appropriate resource for the BSL Adviser to effectively undertake their duties, and we welcome clarity within the Bill and explanatory memorandum on remuneration and facilities for the exercise of the Adviser's functions.

It is unclear at this stage how the Adviser will be expected to liaise with public bodies, but we would like to see the BSL Adviser be able to directly engage with them to support their plan development and implementation, or to intervene when there are concerns.

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

We support the annual reporting requirements laid out in the Bill and would recommend reports be concise, accessible to BSL users and reflect ongoing monitoring. Reports should highlight progress against clear, measurable targets, as well as highlighting challenges or setbacks, and areas for further focus and improvement. We hope with this framework, annual reports will then be used to track and highlight progress over several years.

It's crucial that this reporting process be meaningful to public bodies and to Welsh Government. We don't want them to view it as a tick box exercise, but as a way to engage with the learnings and areas of improvement for promotion and facilitation of BSL.

These reports should embed a learning approach. Analysis by the BSL Adviser, supported by the BSL Advisory panel, should highlight thematic learnings,

challenges, successes and opportunities from across Wales and different public bodies, to ensure successful approaches are embedded consistently, and that BSL plans are reflective of and respond to persistent challenges, informing ongoing approaches.

We would also like to see reports on actions taken within Government departments to promote and facilitate BSL. Since the Welsh Government undertook a BSL audit provided by BDA in 2022, there has been a lack of clarity on progress to improve BSL provision within Welsh Government. Reporting on Government activity too allows us to ensure progress at all levels of public life in Wales, and to have a full picture of progress for scrutiny and improvement. This would also align with elements of other UK legislation. For example, the Scottish BSL Act (2015) where Section 4 of the Bill requires progress reports to be laid before the Scottish Parliament and published publicly every 6 years. The reports document measures taken and outcomes attained in relation to the National BSL Plan and the Authority Plans, as well as including examples of best practice or poor performance. Within the UK British Sign Language Act 2022, Government departments are required to publish BSL plans and report on each department's BSL provision and promotion.

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

(We would be grateful if you could keep your answer to around 500 words).

We support the powers within the Bill and believe they are sufficient to deliver the stated policy aims, provided they are exercised transparently and in consultation with the deaf BSL using community.

We particularly welcome the ability for Ministers to add or remove public bodies from the list, as highlighted above, we would like to see this legislation expand to a broader list of public bodies to ensure the rights of BSL users are upheld across all aspects of daily life. All public services should be accessible to deaf BSL users, and therefore the list should reflect that, although we understand there will need to be prioritisation of the most urgent areas for implementation.

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

As highlighted throughout our response, we do not underestimate the significant effort needed to implement and ensure the effectiveness of this Bill, and this effort is needed across Government, public bodies, the Adviser and Advisory panel, and supporting stakeholders, including BSL users themselves and representative organisations like ourselves.

We believe the statutory framework set out in the Bill provides the structure needed to potentially go further than other UK legislation if effectively implemented.

As we have raised elsewhere, our only concerns are;

- That there must be clear, measurable and time-bound targets throughout the national strategy and BSL plans to drive progress;
- That each of the Bill's provisions has a clear purpose and is situated within the wider statutory framework; to ensure the numerous strategies, plans and guidance work together rather than create a confusing and complex structure;
- That the BSL Bill must be embedded within wider Welsh Government policy and legislation to ensure public bodies are aware of how their duties under the BSL (Wales) Bill, also contribute to wider goals, for example the Wellbeing of Future Generations Act's 'A more equal Wales' goal.
- That a test and learn approach must be embedded throughout implementation, to ensure that plans are responsive to and reflective of challenges and successes in achieving the aims of the Bill.
- That currently, the list of public bodies within the Bill is not adequate to address the challenges faced by BSL users in every aspect of their life. We would like to see this list expanded to include organisations like the Public Services Ombudsman, and crucially, education institutions like Estyn.
- That the National BSL Adviser is appropriately resourced to carry out their duties, including remuneration, provision of facilities including staff, and appropriate powers to compel or investigate public bodies.
- That effort is needed to tackle immediate challenges that could compromise the success of the Bill; for example, the provision of BSL interpreters and Video Relay Service (VRS) technology. We know these things are not a silver bullet, but they will be needed in the short-term to address immediate challenges of BSL access and provision.
- There is currently a lack of clarity about enforcement powers within the Bill, and what action can be taken by the BSL Adviser, Advisory Panel and Welsh Ministers if they feel that public bodies are falling short of their duties under the Bill. We would welcome further clarity on powers to investigate and intervene in these instances.

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

(We would be grateful if you could keep your answer to around 500 words).

The assessment of financial implications within the explanatory memorandum is helpful in estimating some of the anticipated costs of implementation. This needs further exploration to understand the resource needed by public bodies to meet

their duties within the Bill, and this should be an ongoing discussion throughout the legislative process and during implementation.

We also welcomed the commitment by the Cabinet Secretary for Social Justice of £240,000 in funding for the year 2026/7 made in the Senedd in July. This will support initial rollout of the legislation and support for public bodies.

Throughout this inquiry, we would encourage the committee to consider how processes can be streamlined to most efficiently use resource and ensure that funding is allocated in a way that has the biggest direct impact on BSL users; for example, aligning BSL reporting duties with existing duties, such as the Wellbeing of Future Generations reporting process, reporting on Welsh Government equalities plans, or Welsh Language reporting duties.

While we understand the existing cost pressures faced by public bodies, the inequality faced by BSL users in Wales already poses a cost to public services and the Welsh economy, due to their poorer health and economic outcomes.

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

Anything else?

The Bill will not address all the barriers faced by BSL users in Wales, and we particularly want to draw attention to the barriers in healthcare that have a hugely detrimental effect on people's quality of life, as demonstrated by our findings in our [2025 Still Ignored: The Fight for Access Healthcare](#) report.

With NHS trusts and health boards listed public bodies under the Bill, this is one of the key areas we want the BSL (Wales) Bill to address. Some key findings are below – although we were not able to provide a separate specific breakdown by BSL user respondents, 18% of those surveyed were BSL users, and broadly our research showed that they faced even more significant barriers than deaf people or people with hearing loss who did not use BSL:

- 1 in 4 (25%) of deaf people and people with hearing loss in Wales have been denied the information and communication support they need at NHS appointments, despite being legally entitled to it.
 - 1 in 5 (18%) said a health condition was made worse due to this lack of accessible communication.
 - Almost 1 in 10 told us they have avoided calling an ambulance or going to A&E due to this lack of access.
-

- More than half (56%) have had to rely on either a partner, children, family or friends to interpret or relay information for them at an appointment. These individuals may also not be equipped with the right language to adequately translate medical information – this is a **patient safety issue**, and also strips **them of their privacy, dignity and independence** when accessing healthcare.
- **Despite the All Wales Standards for Accessible Communication and Information being introduced more than a decade ago in 2013**, only 1 in 5 (18%) agreed that their information and communication needs are met more often now than a decade ago.

The report also revealed challenges to accessing communication support handled through the Wales Interpretation and Translation Service (WITS) who book interpreters and other support – but confirmation and information regarding the booking is rarely shared with BSL users.

We expect the BSL Bill to be a step in the right direction as health boards and NHS trusts are listed public bodies under the Bill, but further action must be taken in order to address these issues and ensure deaf people have access to healthcare.

The revised and strengthened All Wales Standards are due to be published in the coming months, and this provides a key opportunity for both these areas of work to align on shared priorities, and work closely with health boards to support implementation.

Further details of RNID's recommendations to Welsh Government, NHS Wales, Health Boards, Trusts and other public bodies can be found in our [Still Ignored](#) report, and encourage policy makers to engage with us if they would like more evidence and information.

We want to end by saying that we are in strong support of the draft Bill, and believe that it provides a potentially strong framework to significantly improve the lives of BSL users in Wales. Implementation will now be crucial, and alongside other charities supporting deaf BSL users, and BSL campaigners, we hope to support Welsh Government and other public bodies to meet the duties set out in the Bill, and improve access, as well as the linguistic and cultural rights of deaf BSL users.

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Bwrdd Iechyd Prifysgol Cwm Taf
Morgannwg

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Cwm Taf Morgannwg University Health
Board





GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board



Cyfeiriad Dychwelyd/ Return Address:

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
Pencadlys
Parc Navigation,
Abercynon
CF45 4SN

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University Health Board
Headquarters
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Ffôn/Tel: [REDACTED]

Eich cyf/Your Ref:

Ein cyf/Our Ref:

PM/RH/TLT

Ebost Email:

Dyddiad/Date:

[REDACTED]
12 September 2025

Chair
Equality and Social Justice Committee

Dear Chair

British Sign Language (Wales) Bill

I appreciate the opportunity to submit written evidence on behalf of Cwm Taf Morgannwg University Health Board (CTMUHB) regarding the Stage 1 scrutiny of the British Sign Language (Wales) Bill (the "Bill"). As a Local Health Board, CTMUHB qualifies as a "listed public body" under section 8(1)(b) and is consequently directly subject to the responsibilities outlined in the Bill.

1) Our position on the general principles and need for legislation

CTMUHB supports the Bill's primary objective of promoting and facilitating British Sign Language (BSL) use in Wales. Establishing a clear duty for Welsh Ministers to promote BSL (s.1) and to publish a national BSL strategy within 18 months of its commencement (s.2(2)(a)) will provide the necessary direction and coherence to drive improvements across the public sector. The associated duties to provide guidance to designated bodies (s.3) and to require those bodies to develop BSL plans (s.4) are essential for translating national ambitions into tangible operational changes.

We particularly appreciate the requirement that the national strategy, ministerial reports, and plans from listed bodies be available in BSL and establish a BSL Adviser and panel to enhance specialist input, coordination, and accountability (ss.5-7; Sch. 1).

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You are welcome to correspond with the Health Board in Welsh or English. We will respond accordingly and this will not delay the response.

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Recommendation: To maximise impact and prevent duplication, we suggest that the Bill and/or accompanying guidance explicitly align with the All Wales Standards for Accessible Communication and Information for People with Sensory Loss (2013). These standards already mandate that each Health Board maintain an implementation plan, overseen by a senior officer, with progress monitored and reported to the Board. This alignment will facilitate the integration of BSL duties with existing sensory loss standards and the reasonable adjustment framework of the Equality Act.

2) Observations on key provisions

- a) National Strategy & Guidance (ss.2–3): The proposed 18-month timeframe for Welsh Ministers to publish the strategy is reasonable, provided that early engagement with Health Boards, Deaf communities, and interpreting providers is prioritised. We advocate for mandatory consultation with the BSL Adviser during the strategy's development and revision (s.2(4)).
- b) Listed Body BSL Plans (s.4): The Bill mandates that each listed body publish a plan within 12 months following the release of the national strategy. This is achievable if timely guidance and template tools are provided, such as data standards for recording communication needs, model booking pathways, and workforce benchmarks. CTMUHB continues efforts to enhance services for individuals with sensory loss, particularly those who are hearing impaired.
- c) Adviser and Information Powers (s.5, s.7(3)): We endorse the BSL Adviser's remit and the authority granted to Ministers to request information that supports statutory reporting (triennial ministerial reports per s.7(2)(a)). Clear guidance on proportional data returns will be beneficial in managing reporting burdens.

3) Potential barriers to implementation & whether the Bill addresses them

a) Interpreter Workforce and Market Capacity

The demand for qualified British Sign Language (BSL) interpreters in Wales significantly exceeds the current supply, especially for complex clinical situations and during out-of-hours services. The absence of a systematic workforce pipeline and commissioning support poses a substantial risk of unmet demand and escalating costs. While the proposed Bill facilitates strategic guidance, it fails to address the necessary market development and funding mechanisms.

Recommendation: Leverage the national strategy to devise comprehensive workforce solutions, procurement methodologies, and contract management frameworks throughout Wales. This could include regional frameworks, opportunities for joint commissioning, training bursaries, and prioritisation protocols specifically designed for urgent and sensitive clinical scenarios.

b) Costs and Resourcing

Our EDI lead has identified that the implementation of a BSL provision, comparable to the existing Welsh Language services, will necessitate

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dedicated resources, thorough reporting mechanisms, and an enhanced translation capacity. Currently, translation services for all languages, with the exception of Welsh, are sourced from third-party providers. Both pre-booked and emergency interpreting services are operational, and staff undergo training to adequately address the needs of D/deaf patients. All significant modifications to services will be subject to equality assessments.

c) Digital Readiness and Infrastructure

The effective implementation of BSL interpreting services depends on the availability of reliable on-demand video interpreting solutions at the point of care. CTM currently offers a scheduled service that requires pre-booking ahead of appointments and procedures. While this system requires strengthening, there is a clear directive discouraging the use of family members for clinical interpretation. The Bill should be enhanced with guidelines that outline minimum digital capabilities and risk management protocols for urgent care situations.

d) Data and Monitoring

The consistency in documenting patients' communication needs across healthcare systems is variable. We advocate for nationally standardised data fields and coding specific to BSL communication requirements to bolster planning, appointment booking, and reporting as mandated under sections 6-7 of the Bill. The Bill will enable this through ministerial guidance.

4) Appropriateness of delegated powers

The Bill's powers for regulation-making and guidance—particularly in amending the list of public bodies and prescribing plan content and reporting—seem appropriate and proportional, provided consultation with the BSL Adviser and relevant stakeholders as outlined. Additionally, utilising Senedd approval or annulment procedures for regulations (s.9) is also deemed suitable.

5) Potential unintended consequences

- a) Parallel reporting burden. Without alignment to existing sensory-loss and equality standards, bodies could face duplicative reporting (e.g., separate Board reporting cycles and overlapping datasets). Aligning cycles and templates via guidance would mitigate this.
- b) Equity across communication needs. Prioritisation protocols may be needed to balance urgent clinical needs across different interpreting modalities (BSL, spoken languages), especially in surge periods, so BSL users do not experience delays or, inadvertently, deprioritisation versus other statutory needs.

6) Financial implications

There will be recurrent costs for:

- a) Increased volumes of BSL interpreting (pre-booked and on-demand),
- b) Core staffing to implement and monitor the BSL plan and guidance compliance,
- c) Training and awareness for clinical and administrative staff,

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d) Digital enablement (devices, licences, support).

Our initial review notes that cost and resource within a narrow specialist field are the principal constraints; national funding and shared frameworks would materially reduce risk and variation.

7) Responses to the Committee's specific questions

a) Current provision to meet the communication needs of Deaf BSL users

Scheduled health appointments

- CTMUHB can pre-book qualified BSL interpreters through our contracted provider arrangements, ensuring interpreter presence for clinics and planned procedures.
- For scheduled settings, we also make information available in accessible formats and maintain local processes to avoid reliance on family members for clinical interpretation.

Emergency or urgent care.

- CTMUHB is not able to provide 24/7 access to on-demand interpreting.

b) Current plans or projects to improve communication support

- **Staff training & awareness.** We continue to raise awareness and offer training opportunities to teams on the barriers faced by deaf patients and how to effectively use external interpreting providers.
- **Equality impact assessment (EqIA).** Before implementation, all significant plans or projects across services undergo EqIA to identify and address communication barriers, including BSL users and other groups.

c) Main barriers to further improvement

- **Interpreter availability,** particularly short-notice, out-of-hours and for complex clinical contexts.
- **Sustainable funding** for increased interpreting volumes and core staffing to run BSL plans and reporting.
- **Digital and estate consistency** so that every clinical point of care can reliably access video interpreting with a reliable and readily available digital translation service for BSL
- **Consistent data capture** of patients' communication needs to enable proactive booking and monitoring.

8) Deliverability of CTMUHB's BSL plan under the Bill

Subject to timely ministerial guidance and reasonable transitional funding, CTMUHB would aim to:

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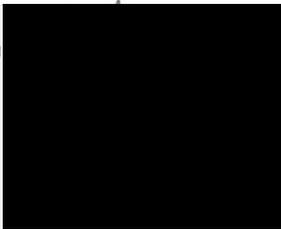
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- Publish our BSL Plan within 12 months of the national BSL strategy (s.4(2)); engage appropriately; and make it available in BSL.
- Implement booking pathways for scheduled appointments and explore options with NHS WALES on resource opportunities within the urgent care domain, including on-demand digital BSL access 24/7 and embedding training and EqIA processes.
- Report within 12 months of plan publication on progress and any gaps, and contribute data for the triennial ministerial reports (ss.6–7).

Closing remarks

The Bill attempts to establish a robust legislative framework to enhance equity for Deaf BSL users. By aligning with current sensory loss standards and offering clear guidance and support for workforce and digital preparedness, Health Boards can achieve significant and sustainable improvements in access, safety, and overall experience.

Yours sincerely



Prif Weithredwr/Chief Executive

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Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cymdeithas Genedlaethol Plant Byddar

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: National Deaf Children's Society



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Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

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

You do not need to answer every question, only those on which you wish to share information or have a view.

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

(We would be grateful if you could keep your answer to around 500 words).

The National Deaf Children's Society warmly welcomes the general principles of the British Sign Language (Wales) Bill. The current legislative picture in Wales in relation to BSL is unequal. Reserved services are legally bound to the Westminster BSL Act 2022, yet no comparable legislation exists in the devolved context. This is despite legislation for BSL being in place in Scotland since 2015 and similar legislation for both BSL and ISL currently progressing through the Northern Ireland Assembly with Executive backing. We have spoken in the past of our concern that this imbalance results in deaf communities in Wales feeling let down and ignored by their institutions.

Whilst it is commendable that the Welsh Government formally recognised BSL in 2004, it is not a substitute for a legally binding framework to promote and facilitate BSL. Given this context, we believe that the Bill not only sends a positive message to BSL signers in Wales, but it also creates the potential for signers to use BSL more in their everyday lives. We especially welcome the recognition of Members that this is inherently a Bill which is of a linguistic nature, and not a Bill in relation to accessibility. BSL is not a simple communication aid, but a rich language with its own culture, history and complexity. Under the current legal framework where access to BSL is viewed primarily as an accessibility matter, we have unfortunately been told by our members that they hit barriers when accessing public services through BSL as it is viewed as one of many options of communication support rather than as a language in its own right.

The Consortium for Research in Deaf Education (CRIDE) 2024 report stated that there are 2,227 deaf children in Wales, although the report itself acknowledges that due to issues in the data outside of its control that the number is likely higher. As an organisation we believe that parents of deaf children should be given enough knowledge and ability to make an informed choice on what is best for their child – until the child is old enough to make decisions for themselves. Many parents have unfortunately told us that due to a lack of local provision, BSL being a language of choice for their child is simply not practical regardless of whether it would be the best for the child. This is an unsustainable position. It is our hope that the provisions of the Bill will strengthen access to BSL in communities in make it easier for children and their families to gain access to the language.

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?

(We would be grateful if you could keep your answer to each section to around 500 words).

Overall, we believe that the Bill’s key provisions provide a significantly stronger framework compared to the similar pieces of legislation currently in place in England and Scotland. The main risk of the legislation in its current form is that the measures that the Bill outlines, such as the duty on Welsh Ministers to promote BSL or duties of specified public bodies to publish BSL plans, become performative in nature. However, providing the role is given enough resource, we believe that the proposed BSL Adviser has the potential to mitigate this risk. We also welcome the requirement for the Welsh Government’s national strategy to be laid before the Senedd, as it enables an additional level of political scrutiny.

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

We welcome the requirement for Welsh Ministers as a collective to have the duty to promote and facilitate the use of BSL. By focusing on the Ministers as a whole rather than primarily through an equality and social justice angle, we hope that this will result in a wider inclusion and consideration of BSL in policy areas such as education, healthcare and public transportation. We also note that this angle is similar to the duties the Welsh Ministers have under the Welsh Language (Wales) Measure 2011, where responsibility for the Welsh language is shared by all rather than a sole Minister with a Welsh language remit. We acknowledge however that the duty itself within the Bill appears more symbolic compared to the standards set out in the Welsh Language (Wales) Measure 2011, and lacks any targets or measurables. It is important therefore for this duty to not be viewed in isolation,

and instead as a duty which is expressed through the duty for Welsh Ministers to publish a national strategy and accompanying guidance.

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

We welcome the duty on Welsh Ministers to publish a national strategy and accompanying guidance. As previously referenced, we also strongly welcome the requirement for the national strategy to be laid before the Senedd as this will increase the level of political scrutiny both the Welsh Government's commitments and its progress in meeting them. We also welcome the requirement for the national strategy to be produced in consultation with the proposed BSL Adviser, although we would stress the need also for the strategy to be produced in a model of co-production with Welsh BSL signers. Whilst we acknowledge that long term change cannot be a rushed process and that practice will take time to embed, we do have concerns over the frequency of the national strategy publication cycle as currently outlined. Under the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 - which the BSL Bill has drawn some comparisons to due to the inclusion of the BSL Adviser - the Welsh Ministers have a duty to produce a VAWDASV national strategy every five years, with this at the time of the legislation's passage representing a full Senedd term. The Senedd Cymru (Members and Elections) Act 2024 changed the length of a Senedd term to four years, yet the BSL Bill's current proposal is for the BSL national strategy to be published once every six years. Whilst we note that the three-year reporting cycle may mitigate any risks associated with this, as well as knowing the benefits of a long-term strategy, we are conscious that it could result in the national strategy being revised due to political reasons rather than to allow the strategy to respond to emerging issues. As such, we would ask the Committee to consider whether the Bill's duty on publishing a national strategy should be aligned to Senedd terms, as is currently the case in the VAWDASV Act.

3 - A duty on Welsh Ministers to publish BSL guidance

Whilst we agree that the duty on Welsh ministers to produce BSL guidance is necessary, a significant measure of the effectiveness of the guidance will be based on whether the guidance produced is statutory, and how much of the guidance is co-produced with BSL signers. People who sign know what is needed to improve their experiences with public services, and we would strongly urge the Welsh Government to include members of the community when drafting the guidance. This would likely be facilitated by the BSL Adviser.

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

We agree with the proposed duty on specified public bodies to publish BSL plans, although we like other organisations question the lack of inclusion of bodies such as Qualifications Wales, Estyn and Medr. Given local authorities will be required to produce their own plans, which will by extension mean schools will be required to work towards the aims of the Bill, it does not make sense to us to not include the body that is responsible for overseeing schools, or in Medr's case, the body with responsibility for sixth forms. We would strongly encourage the Committee to consider expanding the number of named public bodies in order to avoid any potential inconsistencies. The Bill in its current form also relies on the Welsh Ministers being the final authority on whether a listed public body has produced a robust enough plan, highlighted by the extract in Section 4 (3) (b) of the Bill. We believe that the BSL Adviser should also have a say in this process and should also be named in the Bill in this area.

5 - The appointment of a BSL adviser

The appointment of a BSL Adviser is a welcome addition to the Bill and sets it apart from similar legislation in other parts of the UK. We additionally welcome the assurance that the Adviser will be somebody who is able to communicate effectively in BSL. Whilst the framework of the position will result in the Adviser being an employee of the Welsh Government, we would like to see an addition to the legislation which underlines that the Adviser is able to act independently of the Welsh Ministers, and we would expect that any preferred candidate be subject to a pre-appointment scrutiny session with the Equality and Social Justice Committee, similar to the VAWDASV Adviser. We acknowledge that this position has come into being following a compromise on the previously proposed BSL Commissioner, and whilst it is still a strong feeling within the community that a Commissioner role would be more suitable and would give BSL parity with Welsh, we concede that this is a strong replacement for the proposed Commissioner provided the office is given the necessary tools. In relation to the supporting BSL advisory panel which will exist to support the Adviser, we strongly urge the inclusion of representatives of deaf children and their families in order to ensure that their specific needs and viewpoints are addressed. This would additionally be in line with Article 12 of the United Nations Convention on the Rights of the Child.

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

Whilst these duties are a positive step and one that we agree with, we also believe that the BSL Adviser should be involved with these reports in order to ensure that it does not become a neglected exercise. The involvement of the Adviser will ensure that the Welsh Government and listed public bodies are accurately

challenged in the development in their reports, and that they give a realistic picture of what success have taken place, what areas need to be reviewed, and also what learning is there for the organisation in question as well as other public bodies. The Bill in its current form makes this provision for Welsh Government reports, however no similar provision appears to be in place for the listed public bodies.

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

(We would be grateful if you could keep your answer to around 500 words).

The powers listed in the Explanatory Memorandum are mostly appropriate in form and scope, although we would like to flag a concern with the powers under Section 4 (1) (c). We do not disagree with the proposal of this provision being via a negative procedure, however given this section is in relation to the content required in the BSL plans of listed public bodies, we would expect to see a requirement for the BSL Adviser to be consulted by the Welsh Ministers. We understand that this will likely be the “de jure” practice, although we feel it would be best for this to be explicitly stated in the Explanatory Memorandum. Given this is already a requirement in the other set of powers under Section 8 (2), we hope this will be an uncontroversial amendment.

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

There are significant barriers to the Bill’s implementation, most notably in relation to the number of interpreters and the availability of BSL education. However, we believe that these barriers can be overcome providing there is a political will to do so. Whilst it is important to stress that this is a Bill in relation to linguistic rights of a pre-existing community rather than accessibility for learners, in order for the Bill to be successful public services will need to consider how they improve access to BSL for learners in order to support the growing needs of the workforce as the Bill’s impact becomes more widespread. The Welsh Government’s national strategy must take this into account, and local authorities must be supported in facilitating an expansion in education and training. This also goes beyond education and training, but also into technological advancement. Listed public bodies will need to consider how they make their systems more accessible to BSL signers. Failure to do this will result in the Bill’s aims being purely symbolic rather than deliverable.

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

(We would be grateful if you could keep your answer to around 500 words).

Whilst the assessment of the financial implications within the Explanatory memorandum is useful in assessing the administrative costs of the legislation, by its own admission it cannot quantify the true cost over a ten-year period for both the Welsh Government and listed public bodies – as such we expect the overall cost to be higher to accommodate for improvements to education, training, access and implementation. However, we strongly believe that the benefits of the Bill for the signing community will justify the costs over the period specified, and that the overall cost will likely go down over time as practices become embedded.

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

N/A

Anything else?

In preparation for this consultation, we asked our members and supporters to contribute to a survey of what BSL means to them. Of the responses we received, there was an overwhelming amount of support for BSL as a language in its own right, with many parents of deaf children stressing the positive impact on their ability to communicate with their children.

“As a family we need BSL. My child can only communicate with BSL.”

“It's their only form of communication - it means everything to them”

Additionally, our supporters highlighted that given BSL's status as a language, it cannot break or fail as other communication methods can. Given that BSL is unfortunately currently viewed as one method of many in terms of communication support rather than a language in its own right, we believe this stresses the need for a specific focus on BSL as a method of communication on par with English and Welsh. It is the hope of our supporters that the Bill rectifies this.

“(BSL) is very important... hearing technology can fail or break and with long waits in the NHS ... to have equipment replaced... can leave children without communication.”

In terms of healthcare in particular, there was a considerable emphasis on the need for BSL to be supported. Deaf children have just as much a right to know what is happening to them in a healthcare setting as their hearing peers, and an expansion of support for BSL in the healthcare system would enable this. Currently, too often parents are expected to interpret for their children rather than healthcare professionals explain what is happening themselves.

"Using BSL (healthcare professionals) can communicate directly with the young person..."

However, many families also stressed how difficult it can be to learn BSL due to a lack of local availability and the current high costs attached. Given the vast majority of deaf children are born to hearing families, this can potentially lock deaf children out of a language and culture that is their own. As such, there was an overwhelming amount of support in our survey for the Bill to make BSL more accessible for families so that deaf children are not priced out.

"BSL learning should be funded. We're funding BSL privately, but we can't afford it"

"The cost of BSL learning is prohibitive for many families"

"Increasing the use of BSL supports the dignity of deaf people"

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 Cyngor Dinas Casnewydd | Evidence from Newport City Council

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

Newport City Council welcomes the general principles of the British Sign Language (Wales) Bill and supports its aim to promote and facilitate the use of BSL across Wales. Building on its recognition as an official language in 2022, the Bill marks a significant step toward improving accessibility, inclusion, and equity for Deaf communities.

We support the Bill's emphasis on national leadership, accountability, and visibility. However, successful implementation will depend on addressing key barriers, including interpreter shortages and financial pressures on public bodies.

A national strategy with measurable outcomes, timelines, and support mechanisms will be essential. We also recommend alignment with other national strategies, such as the forthcoming Disabled People's Rights Plan for Wales, to ensure coherence and avoid duplication.

Overall, the Council supports the Bill's principles and welcomes the opportunity to contribute to its development.

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?

The Bill's key provisions are broadly workable and well-intentioned, but their success will depend on how they are implemented and supported.

1. **Duty on Welsh Ministers to promote and facilitate BSL:** This is essential and should be backed by investment in interpreter training, public engagement, and awareness-raising. National leadership will help drive consistency across sectors.
2. **National strategy and guidance:** A coherent strategy is vital. It should align with other national plans, be co-produced with Deaf communities, and include support mechanisms for public bodies
3. **BSL guidance:** Clear, practical guidance is needed to help public bodies understand their responsibilities. It should be supportive rather than overly prescriptive, allowing flexibility for different organisational contexts.

4. BSL plans by public bodies: Plans should be proportionate to organisational size and embedded within existing frameworks, such as Strategic Equality Plans, to avoid duplication and promote coherence.

5. Appointment of a BSL adviser: This is a positive step. The adviser should be a BSL user with strong links to Deaf communities, and their role should include monitoring, advocacy, and capacity-building.

6. Reporting duties: These should align with existing reporting mechanisms under the Equality Act 2010 and Welsh Specific Duties. Welsh Government should lead by example by publishing its own internal progress report annually.

In summary, the provisions are workable but require sustained investment, co-production, and alignment with existing frameworks to deliver the stated policy intention effectively.

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

This duty is essential and should be supported by sustained investment in BSL awareness, interpreter training, and public engagement. National leadership will help drive consistency and visibility across sectors

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

While a national strategy will provide clarity and direction, we recommend that it be coherent with other relevant national strategies, such as the forthcoming Disabled People's Rights Plan for Wales, to ensure alignment and avoid duplication.

We also recommend that the strategy be co-produced with Deaf communities and include measurable outcomes, clear timelines, and mechanisms for supporting local authorities in implementation.

3 - A duty on Welsh Ministers to publish BSL guidance

Clear guidance is vital to ensure public bodies understand their responsibilities under the Bill. However, the guidance should be practical and supportive rather than overly prescriptive, allowing flexibility for different organisational contexts and capacities.

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

To avoid duplication, streamline reporting, and ensure alignment with equality objectives, we recommend that BSL plans be proportionate to organisational size and capacity, and that they be embedded within existing equality and accessibility frameworks, such as Strategic Equality Plans under the Equality Act 2010 and Welsh Specific Duties.

5 - The appointment of a BSL adviser

The appointment of a BSL adviser is a positive and welcome step. However, to ensure credibility and meaningful impact, the adviser should be a BSL user with strong links to Deaf communities.

Their role should encompass monitoring, advocacy, and capacity-building across sectors to support effective implementation of the Bill.

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

We recommend that the reporting duties for public bodies be aligned with existing mechanisms under the Equality Act 2010 and the Welsh Specific Duties. This would help reduce administrative burden and promote coherence across statutory reporting frameworks.

In addition, Welsh Ministers and Welsh Government should be seen to lead by example. We suggest that Welsh Government publish its own internal assessment of progress in implementing the Bill annually. This would demonstrate accountability and reinforce its leadership role in advancing BSL inclusion.

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

The powers proposed for Welsh Ministers to make subordinate legislation appear appropriate, provided they are exercised transparently and in consultation with Deaf communities and relevant stakeholders. Subordinate legislation will be essential to ensure the Bill remains responsive to emerging needs, technological developments, and evolving best practice in inclusive communication.

We recommend that any regulations or guidance developed under these powers be co-produced with BSL users and subject to regular review. This will help ensure that subordinate legislation supports meaningful implementation and avoids unintended barriers.

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

While the Bill is well-intentioned, several practical barriers may affect implementation:

- **Interpreter availability:** A shortage of qualified BSL interpreters in Wales will limit public bodies' ability to meet demand.
- **Funding and resources:** Local authorities, including Newport City Council, face significant budget constraints and rising demand for statutory services. Implementation will require sustained investment in training, technology, and service adaptation.
- **BSL in education:** Unlike the Welsh language, BSL is not embedded in the education system, including early years provision. Inconsistent teaching outcomes affect early language development and future interpreter availability.

· Awareness and cultural change: Embedding BSL in public services will require ongoing staff training and cultural change, especially in organisations with limited prior engagement with Deaf communities.

The Bill acknowledges some of these challenges but could go further in outlining how Welsh Government will support public bodies. We recommend that the national strategy include a workforce development plan, funding commitments, and a communications campaign to raise awareness and promote BSL inclusion.

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

While the financial assessment in Part 2 of the Explanatory Memorandum provides a useful starting point, it may underestimate the long-term costs associated with meaningful implementation, particularly given the budget pressures currently faced by local authorities.

We recommend that the financial assessment be revisited in close consultation with local authorities and service providers to ensure it accurately reflects the scale of investment required to deliver the Bill's aims effectively and sustainably.

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

While the Bill should promote consistency and accountability, we recommend a flexible framework that allows for proportional implementation, co-produced solutions, and ongoing dialogue with Deaf communities.

A rigid approach may not reflect the diverse needs of BSL users and capacities of public bodies.

Anything else?

Newport City Council is committed to supporting the principles of the British Sign Language (Wales) Bill and improving outcomes for BSL users.

We welcome the opportunity to contribute to the development of the Bill and recommend ongoing engagement with local authorities.

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 Prifysgol Caeredin | Evidence from University of Edinburgh

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

We are in support of the general principles of the Bill, but we have learned from progress with the BSL Act in Scotland that there needs to be accountability mechanisms built into the Bill for it to achieve its stated aims. There needs to be clear governance in the reporting pathway as what will happen to public bodies if the stated objectives are not met or are denied or procrastinated on. There needs to be incentives for public bodies to progress with integrating BSL into Welsh institutions and everyday life.

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?

See above.

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

This is particularly important in many contexts. For example, in Health there is a paediatric cochlear implant centre in Cardiff. The current website for parents mentions sign language as helpful in some cases. It is important that staff in a CI centre use BSL because some of the children will use it as their stronger language. Recognition to the positive benefit of already having a well-established language should be made (e.g. spoken Welsh, BSL). This is a small example, but it is noticeable in Scotland that the CI centre was not included on the list of organisations which had to make a BSL plan, and the staff have only recently accepted that BSL is a possible option for children with CIs.

In Education, it would be helpful if the Welsh Government would implement a programme of employing BSL tutors for the early years to teach parents BSL. And to ensure that as many as possible of them have a career route into teaching too. Monitoring and supporting the BSL level of teachers of deaf children will also encourage more of the workforce to offer bilingual BSL/English provision.

Facilitation has economic consequences and affects all government departments.

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

This is clearly essential and plans will need to be published in BSL, English and Welsh.

3 - A duty on Welsh Ministers to publish BSL guidance

Policy advice will be very helpful for practitioners. Currently Welsh teachers of deaf children (ToDs) follow the English department of Education ToD competencies as far as we know. There is a very low level of expectation of BSL use for ToDs, although the English government may soon increase the level of BSL above Signature level 1, it has not happened yet. It would be helpful if the Welsh government could consult (through BSL, English and Welsh) to establish what level of BSL a specialist teacher of deaf children should have, given that some deaf children will be studying up to A levels using the language. Maybe a proportion of ToDs should have much higher levels. Or perhaps the provision of more multilingual resourced schools which deaf children attend would allow learning in BSL, English and Welsh to flourish.

Similarly, for the Welsh exam board: policy advice could support the agency in planning how deaf signing candidates could take exams using BSL, both for understanding the question and providing their responses. Clearly this would not apply in subjects such Welsh, English, Spanish etc. Centrally produced exam papers in BSL are important to consider.

Policy and implementation advice is crucial. This has been lacking in Scotland after the 2015 Act.

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

The approach in Scotland was to collect the plans together on one website then note which councils had not managed to provide BSL versions, for example. The implementation advice noted above should include guidance for public bodies for what will happen if they do not update their plan or propose or carry out any meaningful actions.

5 - The appointment of a BSL adviser

We support this provision but would also propose a BSL advisory committee with nominations available for deaf BSL signers from across Wales, and from different communities. There should not be limitations on who can stand – engagement with deaf advocacy groups is a positive advantage. The advisor can liaise with the civil service in all departments. From our experience in Scotland, it is important that this person is not isolated and browbeaten by senior civil servants from across the administration. Appointing more than one deaf signing BSL adviser would be preferable.

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

The listed public bodies are all sound but do not include educational institutions. Schools, universities and colleges should also be included as listed public bodies, otherwise BSL will not be integrated into educational institutions, only healthcare and civil life. There needs to be strong compliance mechanisms to encourage or give incentives for public bodies to produce and enact feasible BSL Plans, not just keep avoiding it.

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

See other answers re the need for compliance mechanisms.

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

Yes, uncertain funding support. There is no funding allocated for public bodies to create BSL Plans or roll out the activities expected of BSL Plans. In Scotland there was initially money for creation and consultation of plans in BSL, but no money for implementation. This led the local plans to be extremely cautious, waiting for future government funding. The result has been extremely slow change. Most councils have continued to provide cut and paste plans waiting for national government to act or provide funds.

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

See above.

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

NA

Anything else?

Thank you for the opportunity to consult on the BSL (Wales) Bill. We wish the Senedd Cymru every success in this endeavour.

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 Cyngor Bwrdeistref Sirol Merthyr Tudful | Evidence from Merthyr Tydfil County Borough Council

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

The general principles of the British Sign Language (BSL) (Wales) Bill are supported, particularly its aim to promote and facilitate the use of BSL across public services in Wales. The Bill offers an opportunity to address any current gaps in legislation by placing explicit duties on Welsh Ministers and public bodies. Successful implementation of these principles will require significant investment in resources, training, and infrastructure. Without this, the Bill risks creating expectations that cannot be met. The Bill must also recognise the diversity within the Deaf community, and ensure that any measures taken are inclusive and representative. Ensuring that Deaf individuals have a meaningful input/contribution in the design and delivery of services is important. The Bill should support mechanisms that enable genuine participation and co-production. In principle, the Bill is a positive step forward, but its success will depend on how well its provisions are resourced, implemented, and monitored.

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?

The Bill's key provisions are broadly workable and align with its stated policy intentions. The effectiveness of the key provisions will depend on how they are operationalised and supported. The proposed duties on Welsh Ministers to promote BSL, publish strategies and guidance, and appoint a BSL adviser are welcomed. These measures can help embed BSL into the fabric of public service delivery. Similarly, requiring public bodies to publish BSL plans and report on progress introduces accountability and transparency.

There are concerns about the potential strain on already stretched services. Many public bodies may lack the internal capacity and expertise to meet these new duties without substantial support. The Bill must therefore be accompanied by clear guidance to ensure consistency in implementation across Wales, funding, training opportunities and ongoing support. The appointment of a BSL adviser and the establishment of reporting duties are positive steps, and expectations must be managed carefully. Adequate resources are required to ensure implementation is effective. Overall, the provisions are sound, and their success hinges on practical support and realistic timelines.

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

The principle of placing a duty on Welsh Ministers to promote and facilitate the use of BSL is supported. This aligns with the broader goals of equality and inclusion. The duty must be supported by clear guidance, funding, and infrastructure to avoid creating unrealistic expectations. There is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill. Promotion alone is insufficient without practical measures to ensure accessibility. Ministers must lead by example, embedding BSL into government communications and services. This includes ensuring that information is available in BSL and that BSL users are actively involved in shaping policy. The duty should also recognise the diversity of BSL users and ensure that promotion efforts are inclusive.

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

Publishing a national strategy is a vital step in ensuring consistency and accountability. This provision is supported, provided the strategy is developed in consultation with Deaf communities and public bodies. The strategy must be realistic, resourced, and include clear timelines and outcomes. It should also address the barriers identified in education, health, social care, and other public services. Guidance should be practical and tailored to the varying capacities of public bodies. There is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill. There is a lack of capacity within the BSL interpreter market to meet current and growing demand which will have an impact on implementing the bill. Specialist skills are required and the capacity gap should be addressed. The strategy should include mechanisms for monitoring progress and sharing best practice. It should also be reviewed regularly to reflect evolving needs and feedback from BSL users.

3 - A duty on Welsh Ministers to publish BSL guidance

Welsh Ministers publishing BSL guidance to support public bodies in meeting their duties is supported. This guidance must be accessible, co-produced with Deaf communities, and reflect the lived experiences of BSL users. Guidance should cover areas such as communication standards, interpreter access, staff training, and inclusive consultation methods. It should also provide clarity on terminology, recognising that not all BSL users are signers and that identity preferences vary. To be effective, the guidance must be supported by training and resources. Without this, public bodies may struggle to implement it meaningfully. It is also vital that guidance is produced to ensure there is a consistent approach to implementation across all public bodies.

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

The requirement for public bodies to publish BSL plans, as this introduces transparency and accountability is supported. There are concerns about the capacity of public bodies to meet this duty without additional support and where this responsibility will lie within organisations. Many services are already stretched, and developing meaningful BSL plans will require investment in staff training, interpreter services, accessible communication tools and recruitment. This could possibly be seen to sit with existing equalities teams who are already stretched, with growing demands and an increase in duties places upon us, the allocation of funding and resources is something which is essential to ensure effective delivery of any new pieces of legislation or plans.

Plans must be co-produced and reflect local needs. The Bill should include provisions for support and oversight to ensure that plans are not tokenistic and lead to real improvements.

5 - The appointment of a BSL adviser

The appointment of a BSL adviser is a positive step, and expectations must be managed. The adviser should be a fluent BSL user and have a deep understanding of the challenges faced by Deaf communities. The adviser should work closely with public bodies, providing practical support and facilitating engagement with Deaf communities. The role should be clearly defined, with realistic responsibilities and sufficient resources. The adviser should also help coordinate the development of national strategy and guidance, ensuring consistency and alignment with the needs of BSL users.

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

How public bodies and Welsh Ministers need to report should be identified, with expectations being realistic. Also guidance and templates developed to assist in reporting to ensure consistency. Alignment of reporting duties would be helpful with an important consideration given to resources and capacity within teams to be able to deliver the increasing duties.

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

The powers granted to Welsh Ministers to make subordinate legislation under the Bill appear appropriate, provided they are exercised transparently and with meaningful consultation. These powers will be necessary to adapt and refine the implementation of the Bill over time, especially as the needs of BSL users evolve and as public bodies develop their capacity. Any subordinate legislation should be subject to robust scrutiny and co-production with Deaf

communities and relevant stakeholders to ensure that regulations are practical, inclusive, and aligned with the lived experiences of BSL users. Clear parameters should be set and should also be accompanied by guidance and impact assessments to help public bodies understand and implement changes effectively.

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

Resource constraints - Many public bodies are already stretched and may struggle to meet new duties without additional funding and staffing. Lack of awareness and training - Staff may not have the knowledge or confidence to engage effectively with BSL users. Training should be provided to public bodies to ensure effective implementation. Accessibility of information - Current systems and processes often fail to provide information in accessible formats. This will take significant resources in way of time and financial investment. Limited engagement mechanisms - Public bodies may lack established links with Deaf communities which is a barrier and can make co-production difficult. Insufficient capacity in BSL interpreters: Shortages of BSL interpreters can impact the delivery of any action plans. The Bill partially addresses these barriers through its provisions for guidance, strategy, and reporting, but more explicit commitments to funding, training, and support are needed.

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

There are concerns about the financial implications of implementing the Bill. While the goals are commendable, achieving them will require substantial investment in interpreter services, staff training, accessible communication tools, and engagement mechanisms. As above, shortages in qualified interpreters and systems and processes not always able to provide information in accessible formats for deaf people will impact delivery and incur costs. There will be financial investment required in implementation.

The proposed establishment of a BSL adviser and Advisory Panel, while valuable, will also incur significant costs. These must be carefully managed to avoid diverting resources from frontline services. The Explanatory Memorandum should provide a more detailed and realistic assessment of these costs, including long-term funding commitments. Without this, public bodies may be unable to meet their obligations, leading to frustration among BSL users and reputational risks for the relevant public bodies, and ultimately Welsh Government.

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

Consistency in approaches – guidance is essential to ensure that a consistent approach is delivered across Wales. Training would be welcomed and a support infrastructure set up. Managing expectations - The Bill must be clear about what is achievable and ensure that expectations are aligned with available resources. System/process changes - Implementing the Bill will require significant changes to internal systems, which may be complex and resource intensive. Terminology - The Bill should be sensitive to how individuals identify, avoiding rigid labels like “deaf BSL signers” which may not reflect personal preferences. It's important to recognise that a Deaf person is not necessarily the same as a BSL user. While many Deaf people use BSL, not all BSL users are Deaf. For example, some hearing individuals may have grown up in Deaf families and learned BSL as their first language. In such cases, BSL may be their preferred or primary language.

Anything else?

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 Undeb Cenedlaethol Cyfieithwyr ar y Pryd Iaith Arwyddion Prydain | Evidence from National Union of British Sign Language Interpreters

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

We agree with the need for a BSL bill to ensure that the Deaf community can access information in their first language and participate fully in every aspect of society—one of the requirements of the UNCRPD. Deaf people face many barriers in daily life that could easily be removed with the right support. Unfortunately, we do not believe that this bill goes far enough to achieve that. As we have already seen with the Scottish BSL Bill and the BSL Act, such legislation lacks teeth and is not delivering the change the Deaf community and its supporters anticipated.

We would also like to raise the issue of this being a Private Member's Bill. It is concerning that this approach is being adopted by both the UK Parliament and the Welsh Parliament, as it makes it very difficult for the bill to be reviewed or amended. Private Members' Bills are not a priority, and we believe that, rather than improving conditions for the Deaf community, this approach does them a disservice. While we do not doubt the Minister's commitment in bringing this bill forward, we still believe it is ill-advised, as it provides no additional funding or enforceable duties

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?

Overall, we do not believe this bill will bring about any meaningful change to the lives of the Deaf community or improve provision. It is too weak and risks becoming a token gesture. Stating that a public body intends to do something is very different from ensuring it actually happens, and we are concerned that no real action will be taken.

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

This duty as worded is too weak to deliver real change. "Promote" and "facilitate" are vague, unenforceable terms; they allow ministers to celebrate pilot schemes and social-media campaigns while everyday services remain inaccessible. What the Deaf community needs is a clear, enforceable duty to provide BSL access across health, education, justice and other

devolved functions, backed by statutory standards, ring-fenced funding and meaningful sanctions for non-compliance.

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

Publishing a strategy and guidance is simply paperwork unless it creates legally enforceable rights. Without statutory standards, earmarked funding and clear sanctions for failure, the document will sit on a shelf while Deaf people still face refused appointments, delayed education support and no BSL access in court. A national strategy must be accompanied by a concrete duty to deliver BSL access in every devolved service, with individuals able to challenge breaches and obtain redress.

3 - A duty on Welsh Ministers to publish BSL guidance

Guidance alone changes nothing: it carries no legal force, no budget and no penalty for ignoring it. Unless the Bill sets clear, measurable duties—specifying where, when and to what standard BSL must be provided—and creates an independent mechanism to monitor, audit and sanction non-compliance, provision will stay patchy and Deaf people will still be treated as second class citizens.

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

A plan on paper is worthless without teeth. The Bill must spell out who will enforce the plans, what sanctions apply if a body fails to meet its BSL commitments, and how individuals can trigger a formal remedy. Without statutory penalties, budget ring-fencing and a named enforcement agency with power to fine or intervene, public bodies will continue to treat BSL provision as optional.

5 - The appointment of a BSL adviser

We welcome the creation of a BSL adviser post, but the Bill must define the role precisely: statutory independence, power to audit public bodies, authority to issue binding improvement notices, and direct access to ministers and the Senedd. If the adviser is merely asked to “encourage” or “review” voluntary plans, the post becomes a fig-leaf. Real change requires the adviser to oversee enforceable standards, publish compliance league tables and trigger financial or legal sanctions when services remain inaccessible.

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

Reporting duties are pointless if no one acts on the reports. The Bill must require:

1. Annual, public-facing reports from every listed body, laid before the Senedd and published in BSL video and English/Welsh text.
2. A single national dashboard (maintained by the BSL adviser) that aggregates data, ranks compliance and flags persistent failures.

3. Mandatory remedial timetables for any body falling below statutory benchmarks, with the adviser empowered to trigger external inspection or financial penalties if improvements are not delivered within three months.

4. A joint Senedd committee hearing each year where ministers and top-tier failing bodies can be questioned in BSL and English, with unedited evidence published.

Without these follow-through mechanisms, reporting becomes an exercise in reputational protection, not accountability.

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

Delegating more power through subordinate legislation is premature when the primary Bill itself sets no enforceable standards, allocates no ring-fenced funding and creates no sanction regime. Subordinate regulations can only flesh out duties that already have legal bite; they cannot conjure up the missing backbone. Until the parent Act imposes clear, justiciable rights to BSL access and an enforcement mechanism with penalties, any future regulations risk being as toothless—and as easily ignored—as the clauses they supplement.

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

Yes—there are three built-in barriers the Bill simply ignores.

1. Capacity gap: councils and health boards already struggle to recruit registered BSL interpreters; the Bill offers no workforce plan, training fund or salary incentives, so most bodies will be unable to meet even the vague “promotion” duty.

2. Cost vacuum: it imposes new planning and reporting obligations without attaching a penny of funding; smaller authorities will either plead financial impracticality or divert money from front-line services, fuelling resentment and non-compliance.

3. Enforcement void: there is no designated tribunal, regulator or ombudsman to hear individual complaints, no fines for non-compliance, and no power to compel emergency provision (e.g. an on-call interpreter for a midnight birth). The Bill therefore takes no account of the very barriers—staff shortages, budget pressure and lack of legal leverage—that have scuppered every previous well-meaning language initiative.

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

This highlights the weakness of this bill. The costing seems to focus on the amount needed to produce guidance and staffing for producing this. No funding is being given to establish new service provision, meaning that public bodies would be expected to find money within existing budgets. This is impossible. Full access and BSL provision need to be properly funded.

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

Our overriding fear is that the Bill will entrench the very exclusion it claims to remedy. By creating a mirage of action—strategies, guidance, future plans—it gives public bodies a ready-made defense (“we’re working on it”) when a Deaf person is refused an interpreter today. Without an immediate, individual, enforceable right written into the primary legislation, every tribunal or county-court claim will be met with the response, “Compliance is coming via our forthcoming BSL plan,” kicking real access ever further down the road. In effect, the Bill risks replacing the present, patchy but occasionally winnable equality-duty arguments with a statutory excuse for delay.

Anything else?

The Bill repeats the two fatal design flaws already visible in the Scottish and Westminster legislation: it imposes new legal duties without a single pound of new money, leaving councils and health boards to fund interpreters and video-relay services from shrinking baseline budgets; and it locks those duties inside a Private Member’s Bill, guaranteeing that any future amendment will languish at the bottom of the parliamentary pile. Like the Equality Act’s watered-down “reasonable adjustments” clause, the vague verbs: “promote”, “facilitate”, “have regard to”—give courts an escape hatch and public bodies a shield. Before proceeding, every sponsor of this Bill should read Maartje De Meulder’s “A Barking Dog That Never Bites? The British Sign Language (Scotland) Bill”: it catalogues how identical promises produced strategy-launch photo-ops but zero enforceable rights, and warns that without upfront funding, statutory standards and a route for individual enforcement, Wales is poised to replicate Scotland’s paper triumph and practical failure.

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Iechyd Cyhoeddus Cymru

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Public Health Wales



Public Health Wales is the national public health agency in Wales and exists to protect and improve health and well-being and reduce health inequalities for people in Wales.

Public Health Wales is pleased to provide this written submission to the British Sign Language (Wales) Bill consultation on 12 September 2025. Public Health Wales is the national public health agency in Wales and exists to protect and improve health and well-being and reduce health inequalities for people in Wales. We are one of the 11 organisations that make up NHS Wales.

This submission reflects considerations that focus on the delivery of our strategic priority to deliver excellent public services within the Health Protection and Screening Services directorate.

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

Public Health Wales welcomes the British Sign Language (Wales) Bill and are committed to the promotion and use of British Sign Language within the delivery of excellent public health services. The current provision and facilitation of BSL within public health services considers the requirements placed upon public bodies under the Equality Act 2010. The proposed British Sign Language (Wales) Bill will strengthen this provision and reflects the formal recognition of BSL.

Public Health Wales HPSS Directorate recognises the importance of providing equitable communication support for people who are D/deaf and use BSL. While significant strides are being made in terms of information provision and stakeholder engagement, challenges remain. These include workforce limitations; interpreter/translator capacity; funding; procurement infrastructure and mechanisms for quality assurance. Effective implementation of the Bill has the potential to address these challenges and ensure that high quality accessible health communication becomes standard practice across all services.

What are your views on the Bill's key provisions, in particular are they workable and will they deliver the stated policy intention?

A duty on specified public bodies to publish BSL plans

It is noted that Public Health Wales will be required to prepare and publish a BSL plan within 12 months of publication of the National BSL Strategy. This will require identification of dedicated staff resource to develop, engage with the D/deaf community and publish the strategy including in BSL format. This has additional costs, as identified within the financial implications of the Bill Explanatory Memorandum. To effectively implement this additional funding allocation to PHW is required.

Collaborative approaches will be required across health services to develop plans with the D/deaf community and supporting organisations and ensure people are aware of the support and the resources available to them.

Additional questions

What provision is there currently within health services to meet the communication needs of Deaf BSL users?

Scheduled Health Appointments: Public Health Wales Screening Division facilitate the use of BSL interpreter services for scheduled health appointments which are pre-arranged using the services of the Wales Interpretation and Translation Services (WITS). Face to face interpreters must be pre-booked and Public Health Wales are committed to provision of BSL interpreters through WITS though acknowledges the known capacity limitations in this provision.

Emergency or urgent care: Emergency or urgent care provision of services such as within a health protection response would look to provide services to Deaf BSL users on a case by case basis.

Digital channels: Public Health Wales Screening Division provides a range of screening information in multiple formats, including BSL, aligned to the patient journey. A systematic programme of work is underway to address any gaps in provision of available materials to ensure equitable access to information. This work is ongoing.

Public Health Wales Vaccine Preventable Disease Programme have the following resources available or in train in BSL:

- RSV Older Adults in BSL Video
- Get vaccinated against Shingles BSL Video
- Protection against Meningitis and Septicaemia (MenACWY) BSL Video
- Protect your baby against rotavirus infection BSL Video
- BCG vaccine for babies and Children BSL video

Under development:

- New BSL resource being produced in line with changes to children's schedule and CYP programmes.
- Further BSL resource will be produced for Covid Booster , Flu, RSV and Shingles once complete.

Are there any current plans or projects within your organisation aimed at improving communication support for Deaf BSL users accessing health services?

Public Health Wales Screening Division and Vaccine Preventable Disease Programme are committed to ensuring public information is consistently available in Welsh, English, and BSL. This is vital to ensure accessible, alternate formats can support informed decision-making on take up of public health services including screening and vaccination.

To improve communication support for deaf BSL users Public Health Wales work in close collaboration with organisations such as RNID and the British Deaf Association (BDA). These partnerships are integral to the co-production and dissemination of high quality BSL resources. Stakeholder communications, including outreach to third-sector partners and health professionals, are being used to raise awareness of the newly available materials.

To improved access to accessible resources QR codes are being incorporated into printed screening materials as standard practice. These link directly to BSL video content, allowing service users to access information in their preferred format at key points in the screening pathway, for example, about invitations or result notifications.

What are the main barriers that health services face in improving communication support for Deaf BSL users?

BSL Translation of Information

Translation and production of BSL resources are cost-intensive and must be funded from existing budgets. Updating BSL materials requires re-filming and re-editing, which incurs additional costs not faced with written translations.

Unlike Welsh language services, there is currently no national BSL procurement framework. Services must independently source and commission translators, resulting in inconsistent costs and administrative inefficiencies.

Public Health Wales would support the development of a centralised system for development of BSL translation of information provision and would commit to utilising such a central function.

BSL interpretation provision

There is limited workforce capacity within BSL interpreters with a small pool of NRCPD-registered BSL translators in Wales, particularly those with knowledge of Welsh dialects. This creates bottlenecks and risks around capacity, delays, and cost escalation when developing this type of information.

Services, unless they have a BSL QA advisor, have no way of quality assuring BSL information and rely on accredited translators to guide us. However, our experience has led us to work closely with translators to ensure they understand the technical accuracy of the health information to be conveyed and not deviate from this. This can often be labour intensive and can lead to delays.

While face-to-face interpretation is considered best practice, availability can be inconsistent. Expansion of on-demand services (e.g., Insights App, VRI, VRS) could help mitigate this issue but requires central investment. A "Once for Wales" approach to

deploying VRS and VRI systems would provide a more inclusive and standardised communication pathway.

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 Cofrestri Cenedlaethol o Weithwyr Cyfathrebu sy'n gweithio gyda Phobl Fyddar a Dallfyddar | Evidence from National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD)

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

The National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD) welcomes the opportunity to respond to the consultation on the British Sign Language (Wales) Bill. As the voluntary regulator for sign language interpreters, translators, lipspeakers, speech-to-text reporters and other professionals who support Deaf and Deafblind people, our mission is to protect the public by setting and maintaining standards of professional practice. We maintain a register of practitioners who are appropriately trained, qualified and committed to a code of conduct, and we provide a complaints process to uphold accountability.

NRCPD strongly supports the principles underpinning the Bill. The statutory recognition of British Sign Language in Wales would be an important step towards ensuring that Deaf people who use BSL are treated fairly and equitably in their interactions with public services. Recognition provides more than symbolic value: it establishes a legal framework that requires public bodies to take account of the communication needs of BSL users and to plan services accordingly. The principle of placing duties on public bodies is particularly welcome, as it should reduce systemic barriers in areas such as education, healthcare, and justice, where access to high-quality communication support is vital for participation, safety and fairness.

We also welcome the Bill's emphasis on participation and accountability. Involving Deaf people in the design, delivery and monitoring of BSL strategies ensures that services reflect real community needs rather than assumptions made on their behalf. Mechanisms for transparency and reporting will help ensure that commitments are implemented in practice and not confined to aspirational statements. This is consistent with NRCPD's own commitment to involving stakeholders in setting professional standards and policies.

While we support the general principles, we believe it is important to recognise the challenges that will determine whether the Bill achieves meaningful change. One of the most pressing issues is workforce capacity. There are shortages of qualified BSL/English interpreters and translators across the UK, and this is particularly pronounced in certain specialist fields such as healthcare, mental health, and legal interpreting, as well as in tactile communication for Deafblind people. If public bodies are to meet their new duties, there must be investment in interpreter training, bursaries and continuing professional development to ensure an adequate supply of practitioners.

Quality assurance is another key consideration. It is not enough for public bodies to provide BSL support in principle; it must be delivered by professionals who are appropriately trained, registered and accountable. NRCPD therefore recommends that the Bill and its accompanying guidance should encourage or require the use of NRCPD-registered professionals. This would provide assurance to service users that their interpreters or translators meet recognised standards and that an independent complaints process is available if things go wrong.

Finally, the Bill must be backed by effective enforcement and sufficient resources. Duties on public bodies will only be meaningful if there are mechanisms to monitor compliance, report on progress and provide remedies when obligations are not met. Funding will be essential both to support public bodies in meeting their new responsibilities and to invest in the professional workforce that will be required to deliver them.

In conclusion, NRCPD supports the general principles of the BSL (Wales) Bill. Legal recognition, statutory duties and stronger accountability represent important progress towards equality for Deaf and Deafblind people in Wales. However, the success of these principles depends on investment, professional standards and enforceable mechanisms. NRCPD stands ready to work with the Welsh Government, the Senedd and the Deaf community to e

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?

The general principles of the British Sign Language (Wales) Bill are strongly welcomed. The Bill aims to recognise British Sign Language formally in Wales, to require public bodies to plan and report on how they will facilitate its use, and to give Deaf people a stronger voice in the design and monitoring of public services. These principles are important because they move beyond aspiration and towards practical measures that can deliver equality of access. For too long, Deaf people in

Wales have faced systemic barriers to healthcare, education, justice and everyday public services. By placing duties on public bodies, the Bill acknowledges that communication rights must be actively safeguarded if Deaf people are to participate fully in Welsh society.

Recognition of BSL in legislation is a necessary step towards addressing these inequalities. Symbolic recognition is not enough on its own, but it provides the legal and political foundation for meaningful change. The proposed duties, reporting requirements and oversight mechanisms give shape to this recognition and provide a structure for monitoring progress. Without legislation, progress would likely remain inconsistent, depending on the goodwill of individual public bodies rather than on a shared statutory obligation. Legislation therefore gives the policy intention force, consistency and accountability.

The Bill also reflects the principle that Deaf people themselves should be central to decision-making about services that affect them. The emphasis on participation, co-production and transparency is entirely consistent with best practice in equality and language policy. It is also aligned with international standards such as the UN Convention on the Rights of Persons with Disabilities, which highlights the need for States to recognise and promote sign languages. By embedding the voices of BSL users into the governance structures envisaged by the Bill, Welsh Government can ensure that services are shaped by lived experience rather than assumptions.

At the same time, it is important to recognise that legislation is only effective if it is matched by resources and enforcement. The principle of placing duties on public bodies will only deliver the intended outcomes if there is an adequate supply of qualified communication professionals, sufficient funding to meet demand, and clear expectations about quality. Without these elements, there is a risk that duties will be fulfilled in name only, through inconsistent or substandard provision. To address this, the Bill should be accompanied by a commitment to workforce development, including investment in interpreter training, bursaries and professional development opportunities. It should also encourage or require public bodies to use registered professionals, ensuring that service users can rely on consistent standards and an independent complaints process.

In summary, the general principles of the Bill are sound and necessary. Legal recognition of BSL, duties on public bodies and mechanisms for accountability are the only realistic means of delivering the stated policy intention: to promote and facilitate the use of BSL, and to secure equality for Deaf people in Wales. Voluntary measures alone cannot achieve this; legislation is required to guarantee consistency, transparency and fairness across all public services.

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

The proposed duty on Welsh Ministers to promote and facilitate the use of British Sign Language (BSL) is a central and welcome provision of the Bill. It recognises that real change requires leadership at the highest level of government, and that responsibility for promoting BSL cannot rest solely with individual public bodies or with the Deaf community itself. By placing a statutory duty on Ministers, the Bill ensures that the promotion of BSL becomes a matter of national policy, embedded across all areas of government, rather than being treated as an isolated or optional consideration.

The principle of ministerial responsibility is workable and appropriate. Ministers have the authority to set strategic priorities, allocate funding, and coordinate cross-departmental action. A duty on them to promote and facilitate BSL would provide the necessary political leadership to ensure consistency of approach across Wales. It would also help align policy on BSL with wider Welsh Government commitments, including equality, human rights, and the promotion of the Welsh language. In practice, this duty could underpin a national strategy for BSL, setting clear goals, timescales and expectations, and ensuring that progress is regularly monitored and publicly reported.

The success of this provision will, however, depend on how it is operationalised. Simply imposing a duty without specifying the mechanisms for delivery risks creating an obligation that is symbolic but lacks substance. To make the duty workable, Ministers must be required not only to promote awareness of BSL but also to facilitate its practical use across public services. This requires investment in workforce development, including training more qualified interpreters, translators, and other communication professionals, and supporting their ongoing professional development. Without sufficient capacity in the workforce, efforts to facilitate the use of BSL in public services may falter, leading to unmet duties and frustration for Deaf service users.

Equally important is the question of quality. Promotion of BSL must not be interpreted narrowly as providing “any” BSL support, but rather as ensuring that support is effective, accurate and safe. Ministers should therefore be expected to facilitate the use of registered professionals who meet nationally recognised standards. Encouraging or requiring the use of NRCPD-registered practitioners would give Deaf people confidence that their rights are being upheld by

competent professionals, and it would provide a safeguard through an independent complaints process if things go wrong.

Another important aspect is accessibility beyond interpreting. Promoting and facilitating BSL should include creating more BSL resources in public communications, such as government announcements, educational materials and health information. It should also involve promoting opportunities for BSL learning, particularly for families of Deaf children and for frontline staff in key services. This would help to build a more inclusive society where the use of BSL is normalised and valued.

In conclusion, the duty on Welsh Ministers to promote and facilitate the use of BSL is both workable and essential for delivering the Bill's policy intention. It will only succeed, however, if it is matched by clear strategic planning, adequate funding, investment in the professional workforce, and a commitment to quality and accountability. With these conditions in place, ministerial leadership can drive meaningful progress towards equality for BSL users in Wales.

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

The proposed duty on Welsh Ministers to publish a national strategy and accompanying guidance for the promotion and facilitation of British Sign Language (BSL) is an essential component of the Bill. It provides the mechanism through which the overarching duty to promote BSL can be translated into practical, coordinated action. Without a strategy and clear guidance, there is a risk that the general duty will remain aspirational, with no clear roadmap for delivery or consistency across Wales.

A national strategy is workable because it offers a framework for both Ministers and public bodies. It ensures that efforts to improve access for BSL users are not fragmented or dependent on local discretion alone, but instead align with national goals. A strategy could, for example, set out a vision for increasing the visibility of BSL in public life, raising awareness among non-signers, developing the BSL-using workforce, and embedding standards of quality and accountability across all public services. It could also provide measurable targets and timescales, enabling progress to be monitored and publicly reported, which is critical for ensuring accountability.

The inclusion of guidance alongside the strategy is equally important. Public bodies often want to meet their equality duties but may lack the expertise or clarity about how best to provide for BSL users. National guidance issued by Ministers can help bridge this gap, offering practical direction on issues such as

when and how to book interpreters, how to ensure information is made available in BSL, and how to involve Deaf people in consultation and co-production. Guidance can also reinforce the expectation that services should use registered and regulated professionals, thereby safeguarding quality and protecting the public.

For this duty to be effective, the strategy and guidance must be developed in genuine partnership with the Deaf community and with organisations that represent and regulate communication professionals. Co-production is vital not only for legitimacy but also for practicality: those who use BSL, and those who provide interpreting and other communication support, have the expertise to identify barriers and propose workable solutions. Ministers should therefore commit to structured engagement and consultation at every stage of the strategy's development and review.

Another factor that will determine the success of this duty is resourcing. A national strategy can only be credible if it is backed by appropriate investment. This includes funding for interpreter training programmes, bursaries for students, continuing professional development opportunities, and initiatives to encourage retention in the workforce. It also requires resources for public bodies to implement the guidance, ensuring they have the capacity to deliver the standards set out in the strategy. Without sufficient funding, the risk is that the strategy becomes a well-intentioned document that is not matched by delivery on the ground.

In conclusion, a duty on Welsh Ministers to publish a national strategy and guidance is both workable and necessary to achieve the Bill's stated policy intentions. It provides a structured, coordinated, and transparent approach to promoting BSL across Wales, ensuring that national leadership translates into local action. To deliver meaningful change, however, the strategy and guidance must be co-produced, supported by adequate resources, and underpinned by a commitment to quality and accountability in service provision. With these elements in place, this duty has the potential to deliver substantial progress towards equality for BSL users in Wales.

3 - A duty on Welsh Ministers to publish BSL guidance

The proposal to place a duty on Welsh Ministers to publish BSL guidance is a vital provision of the Bill, as it provides the practical framework by which the overarching duties can be delivered consistently across Wales. While legal recognition and a national strategy create the foundation for progress, it is detailed guidance that translates these principles into workable actions for public

bodies and ensures that BSL users experience meaningful change in their daily lives.

Guidance issued by Ministers is workable because it provides clarity and consistency. Public bodies are often committed to equality and accessibility but lack expertise in how to meet the specific needs of BSL users. For example, questions arise about when interpreting support should be provided, how to commission services effectively, or how to produce information in BSL. Without central guidance, responses may vary widely, leading to a postcode lottery of provision. National guidance would set minimum expectations, share best practice, and give service providers confidence that they are acting lawfully and appropriately.

Such guidance would also help embed quality standards. NRCPD's experience shows that while many public bodies wish to use BSL interpreters, not all are aware of the importance of booking registered professionals who are qualified and accountable. Guidance should therefore make clear that interpreters, translators, and other communication professionals must be appropriately trained and registered with an independent regulator. This would protect service users by ensuring competence and by providing access to a complaints process if something goes wrong. Guidance should also highlight the risks of using unqualified individuals, particularly in high-stakes settings such as healthcare, legal proceedings or education, where accuracy and confidentiality are critical.

Another area where guidance will be essential is co-production. Ministers should use guidance to set expectations around involving Deaf people in the design and review of services, ensuring that their lived experience informs policy and practice. Practical tools for consultation, accessible formats, and engagement processes tailored to BSL users could all be included in this guidance. In doing so, Ministers would help public bodies to move beyond compliance and towards genuine partnership with the Deaf community.

Guidance should also cover wider aspects of facilitation, beyond interpreting. This might include the use of BSL in government and public communications, the development of BSL learning opportunities for families of Deaf children and frontline staff, and the creation of BSL resources in health and education. By highlighting these areas, Ministers can encourage innovation and ensure that the promotion of BSL is not narrowly interpreted but understood as part of building an inclusive society.

For guidance to be effective, it must be kept up to date and reviewed regularly. The needs of BSL users, technological developments, and professional standards

evolve over time. A statutory duty on Ministers to publish and periodically review guidance would help ensure that it remains relevant and impactful. The process of drafting and revising guidance should be transparent, consultative and co-produced with both BSL users and the professional community.

In conclusion, a duty on Welsh Ministers to publish BSL guidance is both workable and essential to achieving the stated policy intention of the Bill. It provides the practical instructions needed for consistent implementation, safeguards quality, and ensures that public bodies have the tools they need to deliver equitable services. With clear, co-produced, and regularly updated guidance, this provision can drive meaningful progress towards equality for Deaf people in Wales.

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

The duty on specified public bodies to publish BSL plans is a crucial provision of the Bill, as it ensures that national strategy and ministerial leadership translate into practical, measurable action at the local and organisational level. While recognition of BSL and duties on Ministers provide direction, it is the policies and day-to-day practices of health boards, local authorities, education providers, and other public services that most directly impact the lives of Deaf people in Wales. Statutory BSL plans are therefore both workable and essential to achieving the Bill's policy intention of promoting equality and accessibility.

The primary value of requiring public bodies to publish BSL plans is accountability. Deaf service users often experience inconsistent access to services depending on their location or the organisation they approach. Published plans will ensure that each listed body clearly sets out how it will promote and facilitate the use of BSL, covering areas such as access to interpreting services, communication in BSL, staff training, and meaningful engagement with the Deaf community. Public availability of these plans allows both Ministers and the public to monitor commitments and assess whether services meet users' needs.

A key component of these plans must be Deaf Awareness training. NRCPD emphasises that such training should be delivered only by Deaf BSL users who are appropriately trained to provide professional instruction. This ensures that the content is authentic, accurate, and sensitive to the lived experience of Deaf people. Furthermore, public bodies should commit to working with organisations that are representative of the Deaf community when developing and delivering their BSL plans. Co-production in this way ensures that services are informed by the perspectives of those who use BSL, resulting in plans that are practical, relevant, and capable of improving real-world outcomes.

The duty is workable because many public bodies already produce equality or language plans. The BSL plan can be integrated into existing frameworks, while ministerial guidance can provide templates, best practice examples, and clarity on expectations. Plans should contain specific, measurable actions and timescales rather than general statements of intent. Regular reporting and review mechanisms should also be incorporated to track progress and allow adjustments where necessary.

Adequate resourcing is essential to ensure that BSL plans are meaningful. Public bodies need funding to commission qualified interpreters and translators, support professional development, and implement staff training delivered by appropriately trained Deaf BSL users. Without sufficient resources, there is a risk that BSL plans may become symbolic documents rather than instruments of tangible change.

In conclusion, the duty on specified public bodies to publish BSL plans is both practical and necessary to achieve the Bill's stated policy intention. If underpinned by ministerial guidance, co-production with representative Deaf organisations, high-quality Deaf-led training, measurable actions, and sufficient resources, these plans can provide consistent, accountable, and high-quality services for BSL users across Wales, ensuring that equality is delivered in practice.

5 - The appointment of a BSL adviser

The proposal to appoint a BSL Advisor is a vital provision of the Bill, and NRCPD strongly supports it. For the role to be meaningful and effective, the Advisor must be a native BSL user with lived experience of Deafness. This ensures that the advice provided is informed by authentic understanding of the communication, cultural, and practical needs of the Deaf community. Lived experience is not merely desirable but essential, as it allows the Advisor to identify real-world barriers, anticipate challenges in service delivery, and offer practical solutions that reflect the perspectives of BSL users themselves.

A BSL Advisor in this model would provide independent expert guidance to Welsh Ministers and public bodies on the promotion and facilitation of BSL. This includes input into national strategy, ministerial guidance, and the development of BSL plans by listed public bodies. By having direct experience of using BSL as a first language, the Advisor can ensure that policies are accessible, culturally appropriate, and truly reflective of the needs of Deaf people, rather than being based on assumptions or external interpretations of what is required.

The role is workable provided that the appointment criteria are clear and robust. The Bill should explicitly require that the Advisor be a native BSL user with lived experience of Deafness and should outline expectations regarding expertise in communication, equality, and engagement with public services. This clarity helps to ensure that the position is filled by an individual who can provide credible and authoritative advice, enhancing confidence among both the Deaf community and public bodies.

The Advisor should also have a defined remit that includes supporting co-production, reviewing policy implementation, advising on quality standards for interpreting and communication services, and facilitating engagement between public bodies and the Deaf community. By linking this role closely to the strategic framework of the national strategy, guidance, and BSL plans, the Advisor can ensure that Ministerial duties and public body actions are coordinated, consistent, and informed by lived experience.

Another key aspect is independence. The Advisor should have the autonomy to make recommendations, highlight gaps in provision, and report concerns without being constrained by administrative or political pressures. Independence will ensure that the role functions as a genuine safeguard for the rights of BSL users and enhances accountability for both Ministers and public bodies.

Resourcing is also critical. The Advisor must have sufficient capacity, support staff, and budget to carry out research, engage with stakeholders, and contribute effectively to policy development. Without adequate resources, even a highly qualified and experienced Advisor would be limited in their ability to influence outcomes.

In conclusion, the appointment of a BSL Advisor who is a native BSL user with lived experience of Deafness is both workable and essential to delivering the policy intentions of the Bill. This role ensures that the voice of the Deaf community is central to decision-making, that guidance and strategies are culturally and linguistically appropriate, and that the promotion and facilitation of BSL in Wales is informed by authentic experience. If properly resourced, empowered, and integrated into the strategic framework, the Advisor can provide critical oversight and guidance, ensuring that the Bill achieves meaningful, sustainable impact for BSL users.

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

The imposition of reporting duties on both Welsh Ministers and specified public bodies is a critical provision of the Bill, as it ensures transparency, accountability, and the ability to monitor progress in promoting and facilitating British Sign Language (BSL) across Wales. While duties, strategies, guidance, and plans set expectations, reporting provides the mechanism by which implementation can be evaluated, gaps identified, and continuous improvement encouraged. Without robust reporting, there is a risk that commitments could remain symbolic rather than resulting in tangible improvements for Deaf BSL users.

Reporting duties are workable and appropriate provided that they are clearly defined and proportionate. For Welsh Ministers, reporting on the implementation of national strategy and guidance allows for oversight of progress across all public bodies and ensures that strategic leadership is visible and accountable. Regular ministerial reporting also demonstrates political commitment, signals priority, and creates opportunities to address systemic issues that may hinder the delivery of BSL services. By establishing a formal reporting cycle, the Bill ensures that progress is not only monitored internally but can also be scrutinised by the Senedd and the public.

For public bodies, reporting on BSL plans is equally essential. It enables organisations to demonstrate how they are fulfilling their statutory duties, including the practical steps taken to facilitate access to BSL, deliver high-quality communication support, and engage with the Deaf community. Reports should include measurable actions, timetables, outcomes, and any challenges encountered, thereby providing a clear picture of how obligations are being implemented. Publishing these reports ensures transparency and allows Deaf people to hold public bodies accountable for the services they provide.

The effectiveness of reporting duties depends on alignment with other provisions of the Bill. Reports should be informed by co-production with the Deaf community and consultation with organisations representing Deaf people, ensuring that outcomes reflect lived experience and that areas of concern are clearly highlighted. Reports should also consider quality standards for interpreting and communication support, including the use of registered professionals, and should reflect workforce capacity, training initiatives, and accessibility of services.

To be practical, reporting requirements must be supported by clear guidance and templates provided by Welsh Ministers. This ensures consistency in the information reported, comparability across organisations, and efficiency in the reporting process. At the same time, reporting should not be overly burdensome, as excessive bureaucracy could divert resources away from service delivery. A balance must be struck between accountability and practicality.

Resourcing is also a critical factor. Public bodies must have sufficient capacity to collect data, monitor progress, and produce reports that are accurate and meaningful. Similarly, Ministers require resources to collate, review, and publish reports, and to provide follow-up guidance or intervention where gaps are identified. Adequate funding and support are therefore essential to ensure that reporting duties achieve their intended purpose.

In conclusion, the introduction of reporting duties for both Welsh Ministers and specified public bodies is both workable and essential to delivering the Bill's policy objectives. Transparent, consistent, and accountable reporting ensures that the promotion and facilitation of BSL is not symbolic, but measurable and enforceable. When combined with co-production, adequate resourcing, and clear guidance, reporting duties provide a mechanism to track progress, identify challenges, and drive continuous improvement, ultimately securing meaningful access to BSL for Deaf people across Wales.

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

The powers granted to Welsh Ministers to make subordinate legislation under the Bill appear appropriate, provided they are exercised within clearly defined limits and with accountability. Subordinate legislation, or secondary legislation, is a standard mechanism in modern statutory frameworks, enabling Ministers to provide the detailed rules, procedures, and technical arrangements necessary to implement the primary legislation effectively. Given the complexity and practical nature of promoting and facilitating British Sign Language (BSL), it is reasonable that Ministers should have the ability to fill in operational detail without requiring a separate Act of the Senedd for every adjustment or specification.

The powers are particularly important for ensuring flexibility and responsiveness. For example, BSL provision and services may need to adapt over time in response to changes in professional standards, emerging technology, or the needs of the Deaf community. Subordinate legislation allows Ministers to update, refine, or extend certain aspects of duties, guidance, or reporting requirements efficiently, ensuring that the law remains relevant and capable of delivering real-world outcomes without being constrained by rigid statutory wording. This flexibility is especially important given the need to reflect best practice in communication provision, workforce development, and co-production with the Deaf community.

At the same time, the appropriateness of these powers depends on the safeguards and limits included in the Bill. Subordinate legislation should be confined to operational or procedural matters and must not alter the core

principles of the Bill, including the statutory recognition of BSL, the ministerial duties to promote and facilitate its use, or the duties imposed on public bodies. Clear drafting restrictions and parliamentary oversight, such as requiring scrutiny by the Senedd, are essential to ensure that Ministers' powers are exercised transparently and do not undermine the intent of the primary legislation.

Another factor is consultation. Given that BSL users are the primary beneficiaries of the Bill, any subordinate legislation that affects service delivery or operational requirements should be developed in genuine consultation with the Deaf community and organisations representing their interests. This ensures that secondary legislation remains practical, culturally and linguistically appropriate, and responsive to the needs of the people it is intended to serve. Subordinate legislation without meaningful consultation risks creating technical requirements that are disconnected from lived experience or difficult for public bodies to implement effectively.

Finally, resourcing and clarity are key considerations. Ministers' powers to make subordinate legislation are workable only if accompanied by guidance, templates, and support to ensure public bodies can comply. The legislation should provide sufficient detail on the scope, procedures, and review mechanisms for subordinate legislation to avoid ambiguity or inconsistency in its application.

In conclusion, the powers for Welsh Ministers to make subordinate legislation under the Bill are appropriate and necessary to ensure the law is practical, adaptable, and capable of being implemented effectively. Provided that limits are clearly defined, parliamentary scrutiny is applied, and meaningful consultation with the Deaf community is undertaken, these powers support the delivery of the Bill's policy intentions without compromising its core principles. Subordinate legislation can therefore provide an essential mechanism to translate the strategic and principle-based provisions of the Bill into workable, high-quality practice across Wales.

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

From NRCPD's perspective, there are several potential barriers to the effective implementation of the Bill's provisions. While the Bill establishes a strong framework for promoting and facilitating British Sign Language (BSL) in Wales, its success will depend on addressing practical challenges related to workforce capacity, professional standards, co-production, funding, and monitoring.

A key barrier is workforce capacity. There is an existing shortage of qualified BSL interpreters, translators, and other communication professionals in Wales, particularly in specialist areas such as healthcare, mental health, legal contexts, and tactile communication for Deafblind people. The Bill places new duties on public bodies to facilitate BSL, but if there are insufficient trained professionals to meet demand, obligations may be unfulfilled or implemented inconsistently. NRCPD notes that the Bill does not explicitly address workforce development or provision of additional training and recruitment initiatives, which are critical to making the statutory duties workable.

Quality and standards represent another potential barrier. Public bodies may attempt to meet their obligations by using unqualified or inexperienced communicators, especially if there are cost or availability pressures. NRCPD emphasises that only appropriately trained, registered professionals should be used, and that the Bill should explicitly support this standard. While the Bill creates duties for public bodies and Ministers, it does not currently specify mechanisms to ensure that professional standards are maintained or that service users have recourse if quality is inadequate. This is a potential gap that could limit the Bill's effectiveness in practice.

Co-production and meaningful engagement with the Deaf community are essential to ensuring that policies reflect real needs. NRCPD welcomes references to consultation and participation but notes that the Bill does not mandate structured frameworks for co-production, nor does it specify that public bodies must work with representative Deaf organisations. Without clear guidance, there is a risk that consultation may be tokenistic or inconsistent, undermining the Bill's intent to centre the voices of BSL users.

Resourcing is a further barrier. Public bodies will require funding to implement BSL plans, provide interpreting services, train staff, and develop accessible resources. While the Bill sets duties, it does not explicitly allocate funding or outline mechanisms for ensuring public bodies are supported to meet them. Without sufficient resources, duties may remain aspirational rather than achievable.

Finally, monitoring and enforcement may present challenges. Although the Bill requires reporting by both Ministers and public bodies, NRCPD notes that the effectiveness of these mechanisms will depend on the clarity, frequency, and accessibility of reporting, as well as the capacity of Deaf users and representative organisations to scrutinise outcomes. Weak enforcement could reduce accountability and limit the Bill's impact.

In conclusion, while the Bill sets out a strong framework for promoting and facilitating BSL, NRCPD identifies several practical barriers to implementation, including workforce shortages, quality assurance, co-production, resourcing, and enforcement. The Bill recognises some of these issues in principle but does not fully address how they will be mitigated. To maximise the effectiveness of the legislation, additional provisions or accompanying policies should be considered to strengthen workforce development, ensure the use of registered professionals, mandate meaningful co-production, and provide adequate resourcing and monitoring mechanisms. Addressing these barriers is essential to ensure that the Bill delivers its intended outcomes for BSL users in Wales.

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

From NRCPD's perspective, the most significant financial implication of the Bill relates to workforce development. The Bill places statutory duties on Welsh Ministers and specified public bodies to promote and facilitate the use of British Sign Language (BSL) and to ensure that services are accessible to Deaf and Deafblind people. These duties cannot be delivered effectively without a sufficient number of qualified, trained, and registered communication professionals, including interpreters, translators, lipspeakers, speech-to-text reporters, and specialists in Deafblind communication.

Workforce shortages are well-documented across Wales and the UK, particularly in specialist areas such as healthcare, mental health, education, legal proceedings, and tactile communication. Addressing these gaps will require a comprehensive, long-term investment strategy, including funding for initial training, bursaries for students, continuing professional development, and retention initiatives. The financial implications of this are substantial but essential if the Bill's objectives are to be met. Without sufficient capacity, public bodies may struggle to fulfil their statutory duties, resulting in inequitable access for BSL users and potentially undermining the credibility of the legislation.

Quality assurance is another critical consideration with financial implications. NRCPD emphasises that only appropriately trained, registered professionals should provide communication support. Ensuring the workforce meets this standard may require additional investment, particularly if unqualified or inadequately trained providers are currently in use and need to be replaced or upskilled. While the Explanatory Memorandum references workforce costs in broad terms, it does not fully capture the scale of investment required to achieve

a sustainable, high-quality workforce capable of meeting the Bill's statutory obligations across all public services.

Developing workforce capacity also involves indirect costs, such as supporting professional regulation, quality monitoring, and engagement with the Deaf community to ensure services meet real-world needs. For example, co-production and feedback mechanisms may require dedicated staff time and resources to facilitate consultation with representative Deaf organisations and service users. These costs are necessary to ensure that workforce development aligns with user needs and that the services delivered are culturally and linguistically appropriate.

NRCPD notes that workforce development is not a one-off cost but an ongoing requirement. New professionals must be recruited and trained continuously to replace those retiring or leaving the sector, to respond to increased demand from public bodies implementing their BSL plans, and to maintain high standards of practice. This means financial planning must account for sustained investment over several years rather than assuming a single initial expenditure.

In conclusion, from NRCPD's perspective, workforce development is the critical financial consideration underpinning the delivery of the BSL (Wales) Bill. To achieve the Bill's objectives, investment must ensure there are sufficient numbers of trained, registered, and qualified communication professionals. Without this, statutory duties on Ministers and public bodies cannot be met, and the policy intention of equitable access to BSL services risks not being realised. Adequate, sustained funding for workforce training, retention, and quality assurance is therefore essential to the effective implementation of the legislation.

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

From NRCPD's perspective, while the BSL (Wales) Bill provides a strong framework for promoting and facilitating British Sign Language, there are several additional issues and considerations that merit attention to ensure the legislation is fully effective and deliverable.

Firstly, workforce development is a recurring theme that is underrepresented in the Explanatory Memorandum. The Bill places new statutory duties on Welsh Ministers and public bodies to facilitate the use of BSL, yet the Memorandum provides limited detail on how the shortage of qualified communication professionals will be addressed. As highlighted in previous responses, this includes interpreters, translators, lipspeakers, speech-to-text reporters, and specialists in Deafblind communication. Without a sustained, funded programme to expand

and maintain the professional workforce, there is a real risk that statutory duties will be difficult or impossible to meet in practice.

Secondly, quality assurance and professional standards are not sufficiently emphasised. The Bill would be strengthened by explicitly encouraging or requiring public bodies to use registered and qualified professionals. This ensures services are delivered safely and effectively and provides users with recourse through an independent complaints mechanism if services fall short. While the Explanatory Memorandum references costs and staffing considerations, it does not fully consider the financial and operational implications of maintaining high professional standards.

Thirdly, meaningful co-production with the Deaf community should be explicitly recognised and resourced. While the Bill references participation, the Explanatory Memorandum provides little detail on how public bodies and Ministers will engage with representative organisations or incorporate lived experience into strategic and operational decisions. Co-production is critical not only for legitimacy but also for practical effectiveness: policies and BSL plans designed without genuine engagement risk being disconnected from the real needs of the users they are intended to support.

Fourthly, accessibility and inclusivity require further attention. The Bill should explicitly recognise the needs of Deafblind people who use tactile BSL, as well as the wider diversity of communication preferences within the Deaf community. The Explanatory Memorandum does not fully reflect these considerations, which are crucial for ensuring the legislation delivers equitable outcomes across all BSL users.

Finally, enforcement, monitoring, and evaluation mechanisms could be made more explicit. While reporting duties are included, it is not clear how compliance will be reviewed, whether there will be consequences for non-compliance, and how progress will be measured against the Bill's stated policy intentions. Clear mechanisms for evaluation and feedback are essential to ensure the legislation achieves practical, measurable improvements rather than symbolic recognition alone.

In conclusion, NRCPD welcomes the Bill's overarching aims and its focus on equality, accountability, and the promotion of BSL. However, the effectiveness of the Bill will depend on addressing workforce shortages, ensuring quality and professional standards, embedding meaningful co-production, recognising the needs of all BSL users including Deafblind people, and clarifying monitoring and enforcement arrangements. Addressing these additional issues will significantly

strengthen both the Bill and the accompanying Explanatory Memorandum, ensuring that the intended policy outcomes can be achieved in practice.

Anything else?

NRCPD welcomes the principles and provisions of the BSL (Wales) Bill, but we would like to emphasise that the success of the legislation will depend heavily on meaningful co-production with the Deaf community and collaboration with experienced, representative organisations. While the Bill references participation and engagement, it is essential that these are not treated as tokenistic or advisory exercises but as central to the design, implementation, and monitoring of all BSL-related policies and strategies.

Co-production is key because Deaf people are the experts in their own lived experience and the use of BSL. Policies and strategies developed without their input risk being impractical or misaligned with real-world needs. This applies to all aspects of the Bill, including the development of national strategy and guidance, the creation of BSL plans by public bodies, reporting mechanisms, and workforce development initiatives. To be effective, these processes must actively involve Deaf BSL users and draw upon their expertise to ensure that services are accessible, culturally appropriate, and genuinely responsive.

Equally important is working with organisations that are representative of the Deaf community and have established experience in delivering BSL-related services and advocacy. These organisations possess in-depth knowledge of local and national challenges, the practicalities of providing high-quality communication support, and the strategies that have been effective in engaging with Deaf people. NRCPD has long collaborated with such organisations and recognises that their involvement in co-production ensures policies are grounded in practical reality, maintain high professional standards, and address the diverse needs of BSL users, including those who are Deafblind or have complex communication requirements.

Continuing and building on existing collaboration is critical. Many representative organisations have already been working closely with Welsh Government, public bodies, and professional regulators to develop best practice and improve service delivery. The Bill should explicitly encourage and facilitate ongoing engagement with these organisations, ensuring that their expertise continues to inform policy development and service improvement. This also strengthens accountability, as representative organisations can provide independent oversight and feedback on whether statutory duties are being met in practice.

Furthermore, co-production should extend to workforce development. Training programmes, Deaf Awareness initiatives, and the professional development of interpreters, translators, and other communication specialists should be designed and delivered with input from Deaf BSL users and representative organisations. This ensures that training is relevant, culturally informed, and capable of producing a workforce that can meet the requirements of the Bill.

In conclusion, NRCPD emphasises that co-production and collaboration with experienced, representative organisations are central to the success of the BSL (Wales) Bill. These elements are not optional enhancements but core mechanisms for ensuring that policies are effective, practical, and responsive to the needs of BSL users. By embedding structured, meaningful engagement with the Deaf community and its representative bodies across all stages of policy and implementation, the Bill can achieve its stated aim of promoting and facilitating BSL in a way that is equitable, high-quality, and sustainable.
