

Jane Hutt MS CBE  
Cabinet Secretary for Social Justice, Trefnydd  
and Chief Whip  
Welsh Government

30 September 2025

Dear Jane,

**British Sign Language (Wales) Bill**

As part of Stage 1 scrutiny of the above Bill I have written to the Member in Charge for more information and with points of clarification. A carbon copy of this annex providing full details of these questions is set out below. These are being shared primarily for completeness, however I draw your attention to questions 11 and 12 which are likely to be more appropriate for you to answer as Cabinet Secretary. I would therefore like to request a response to these two questions and any others in the list that you consider to be relevant.

I would be grateful for a response at your earliest convenience and if possible, no later than 10 October 2025. This will enable us to consider your response ahead of our evidence session with you.

I look forward to your response.

Yours sincerely,



Jenny Rathbone MS

Chair of Equality and Social Justice Committee

Cc: Mark Isherwood, Member in Charge of the British Sign Language (Wales) Bill

# Annex

## General provisions of the Bill

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We note that you have described the legislation as “framework legislation” and would agree with this description. Critics of framework legislation point out that they lack detail specifying only the principle of a policy, leaving it to ministers and others to set out how the policy is to be given practical effect.

1. What are the main reasons for adopting a framework rather than a more prescriptive approach to the drafting of this Bill?
2. How did you take into account the potential risks of the framework approach and how are these risks mitigated?

Section 1 creates a duty on Welsh Ministers to promote and facilitate the use of British Sign Language (BSL).

3. Can you clarify how this section and in particular the words “promote and facilitate” should be interpreted in practical terms?

## National strategy and plans

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Sections 2, and 3 place a duty on Welsh Ministers to publish a national strategy and guidance on promoting and facilitating the use of BSL. However, the Bill is silent on the detailed information those documents are expected to contain instead requiring Welsh Ministers to set out these details after the bill is enacted (if passed by the Senedd).

4. Why were these details not included on the face of the Bill and why, in your view, is the proposed approach more appropriate?
5. Can you clarify the intentions behind these provisions including whether the strategy should cover both strategic and operational issues?
6. What assurances can you give that this flexibility cannot be used to undermine the Bill’s overarching aims and objectives?

Section 4 places a duty on listed public bodies to prepare and publish a BSL plan describing how it intends to promote and facilitate the use of BSL. These plans must describe how a public body intends to follow guidance issued under section 3 (or explain why it does not intend to do so), and must contain “such information as the Welsh Ministers may prescribe by regulations”.

7. Why is it more appropriate to set out details of what to include in these plans in secondary legislation rather than on the face of the Bill?

8. What role do you envisage the deaf community having in the development of BSL plans and how will the Bill achieve this?

#### Listed public bodies

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Section 8(2) of the Bill gives Welsh Ministers the power to add a devolved Welsh authority, remove a listed public body from those listed in section 8(1) or to amend the description of a listed public body in that list, subject to approval by the Senedd.

9. How often could and should these powers be exercised in your view?
10. How should Welsh Ministers consult on such proposals and what consideration has been given to specifying conditions or consultation requirements on Welsh Ministers (beyond those currently set out in section 8(3) before they can exercise these powers?

#### Costs and the Explanatory Memorandum

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The anticipated costs of implementing the national strategy or individual BSL plans are not included in the RIA. The EM states that this is because the details of those plans cannot be known at this stage as public bodies will have the ability to determine the contents of those plans in due course. Several organisations, including the WLGA have expressed concerns that they may struggle to deliver these plans without additional resources. We acknowledge that engagement with Deaf communities will be key to ascertaining what may be needed to implement the Bill. There are also likely to be benefits that arise from the Bill. However, although other public bodies will need to undertake their own modelling work, we see no reason why the Welsh Government cannot share more detailed information on the potential costs of various implementation scenarios to aid us in our scrutiny. We think it should be possible for the Welsh Government to model estimated costs by auditing current spending on communications, identifying which content or services it provides will potentially require BSL interpretation or translation and then quantifying the estimated cost (both routine and ongoing) of ensuring those are accessible in BSL. That should also help us to understand to what extent the Welsh Government is expecting all content and services to be available in BSL as standard or whether a more discretionary and targeted approach is likely.

11. Does the Welsh Government expect that all content and services it, and other listed public bodies provide, will need to be available in BSL routinely or is the approach likely to be more discretionary and targeted?
12. Please can you clarify the different implementation scenarios you are currently planning for and on the basis outlined above, provide us with illustrative estimated costs modelled on ensuring all Welsh Government communications are accessible in BSL?

Paragraph 253 states that “each public body will have the greatest understanding of their own needs”.

13. How will the Bill ensure that listed public bodies have the capacity, knowledge and expertise to adequately assess needs?
14. How does the Bill ensure that resources are targeted and that public bodies work together, strategically?

[ENDS]