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Peredur Griffiths MS
Chair, Finance Committee
Senedd Cymru
Cardiff Bay
CF99 1SN

27 November 2025

Dear Peredur,

British Sign Language (Wales) Bill

Thank you to the Finance Committee for your scrutiny of the British Sign Language (Wales) Bill ("the Bill") during Stage 1 and for the report which was published on 10 November 2025. I have set out my response to the Committee's conclusions and recommendations at Annex A.

It has not been possible for me to accept all of the Committee's recommendations, and I have provided reasons for this in the detailed response at Annex A. However, I would like to make the general point that should the Bill progress through the legislative process, I will continue to develop the RIA and will, of course, publish a revised RIA as appropriate.

Lastly, I wanted to make you aware that I will also be writing to the Chairs of the Equality and Social Justice Committee and the Legislation, Justice and Constitution Committee with respect to their Stage 1 Reports, and will copy the letters to all three Committee Chairs.

Regards

Mark Isherwood MS
Member of the Welsh Parliament for North Wales

Annex A

Response from Mark Isherwood, MS to the Finance Committee's Report on the British Sign Language (Wales) Bill

Conclusion 1. The Committee is broadly content with the financial implications of the Bill as set out in the Regulatory Impact Assessment, subject to the comments and recommendations in this report.

Conclusion 2. The Committee welcomes the collaborative approach between the Member in charge and the Welsh Government in developing the costs of the Bill, and considers this a model of good practice for future non-government Bills.

Conclusion 3. The Committee believes that the approach of estimating the costs of the Bill by drawing on comparable legislation makes effective use of existing data and methodologies and that this has produced a clear and credible overview of the financial implications of the Bill.

Response: Noted

I am happy that the Committee is broadly content with the financial implications of the Bill set out in the Regulatory Impact Assessment, as outlined in Conclusion 1. My response to the specific comments and recommendations made by the Committee are set out separately within this response.

I very much welcome, and appreciate, the Committee's Conclusion 2 regarding the collaborative approach between me as Member in charge of the Bill and the Welsh Government in developing the costs of the Bill. I am extremely grateful to the Cabinet Secretary for Social Justice in working closely with me on developing the Bill. This collaborative approach has been invaluable across all aspects of the Bill's development, and I look forward to that collaboration continuing as the Bill progresses through the Senedd's legislative process.

I also very much welcome the Committee's Conclusion 3. In developing the RIA, a significant amount of work was undertaken, including looking at comparable legislation and existing data, and I truly believe that the costs set out in the RIA are as robust and as complete as I could have possibly made them.

Recommendation 1. The Committee recommends that the Member in charge works with the Cabinet Secretary to analyse the cost benefits of the Bill and updates the Regulatory Impact Assessment to include further information on these benefits, including how they will be analysed and when they are anticipated to be delivered.

Response: Accept

I would be very happy to work with the Cabinet Secretary, where possible, to further analyse the cost benefits of the Bill.

However, as I set out in the Regulatory Impact Assessment, the benefits flowing from the Bill will very much depend on the detail and content of the National BSL strategy and the BSL plans. The strategy and plans will be the primary documents that will determine how BSL is promoted and its use facilitated in Wales. Without knowing the full detail of what those key documents will contain, it will not be possible to fully, and accurately, quantify the cost benefits.

I have been clear throughout this process that this is very much a framework Bill and as such, the detail of the BSL Strategy and Plans should be left for Welsh Government and local public bodies to agree. I have also been clear that in developing the BSL strategy and plans, it would be essential to consult the Deaf community and to engage with the BSL Adviser (to be established under the Bill). Much of that work can only be undertaken once the Bill has been enacted.

Recommendation 2. The Committee recommends that the Member in charge works with the Welsh Government to clarify how its existing and planned BSL policies will interact with the provisions of the Bill, to determine whether the cost estimates set out in the Regulatory Impact Assessment accurately reflect additional financial requirements, or whether some costs may already be covered through existing commitments.

Response: Accept

I would be very happy to work with the Cabinet Secretary, where possible, to clarify how its existing and planned BSL policies will interact with the provisions of the Bill.

As has been outlined during the Bill scrutiny, Welsh Government has been undertaking work in relation to BSL policy during the time I have been developing the Bill. This includes the establishment of the BSL stakeholder group that has now completed its work and has recently made specific recommendations.

The Government has also committed to developing a 'BSL route map' which will be a significant piece of work that will help towards the development of the BSL strategy etc. As a consequence of this work, I'm confident that this will not result

in additional costs above the estimates included within the RIA for producing a BSL strategy. If there was a reduction in costs of producing the BSL strategy, it is unlikely to be significant. It may also be that the BSL advisor and advisory panel can focus more time and effort on developing the details of the strategy because the route map will already be in agreed. All of this work, I believe, compliments the provisions of the Bill rather than there being any cross-over of work.

I don't believe that any of the work undertaken by the Welsh Government would fall within the costs estimate set out in the rest of the RIA, as these are specifically about the requirements on the face of the Bill, i.e. the development of the BSL Strategy, BSL plans and establishment of the BSL Adviser and panel.

There will inevitably be some cross over between on-going BSL policy in Welsh Government and the actions that fall from the strategy and plans. This can only accurately be assessed once the detail of the strategy and plans is known

Recommendation 3. The Committee recommends that the Member in charge works with the Welsh Government to provide further clarity on the costs arising from the Bill for listed public bodies, particularly in relation to the implementation of BSL plans.

Response: Reject

The RIA already considered by the Committee sets out the costs for listed public bodies in developing the BSL plans that are required under the Bill. I am content that the costs provided in this respect are accurate. However, in relation to the costs to listed public bodies in implementing the Bill, this will very much depend on the content and detail of the National BSL strategy and the BSL plans.

It will be for each of the listed public bodies to determine the contents of its own BSL plan. Each of the listed public bodies will have the greatest understanding of their own needs, whether that be within their defined local authority or health board areas, or more nationally for those listed public bodies that have a national role.

It will not be possible for the BSL plans to be developed in isolation, as listed public bodies will first need to consider the National Strategy and associated guidance before developing and finalising their plans. Without knowing the full detail of what those key documents will contain, the costs attributed to implementing them must be counted as unquantified.

Recommendation 4. The Committee recommends that the Welsh Government conducts a post-implementation review of the Bill and for it to include an assessment of the overall costs and benefits of the Bill and whether this meets the expected costs set out in the Regulatory Impact Assessment

Response: Noted

Whilst this recommendation is directed towards Welsh Government, rather than me as Member in charge of the Bill, I do not believe that a full 'post-implementation review' would be necessary.

Section 7 of the Bill already contains a statutory reporting provision that requires Welsh Ministers to prepare and publish a report that assesses the progress made in promoting and facilitating the use of BSL in accordance with the Act. Section 7 reports are required to be published at least once in every period of 3 years.

This reporting provision is broadly in line with the statutory review provisions within the Public Services Ombudsman (Wales) Act 2019, to which the Committee referred in the report.

As such I do not believe a separate post implementation review would be necessary.

I agree that an assessment of the overall costs and benefits of the Bill, and whether this met the expected costs set out in the Regulatory Impact Assessment could be beneficial. However, that will be for the Cabinet Secretary to consider and respond to.