

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.