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Regional Representative (Wales)

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Jenny Rathbone MS
Equality and Social Justice Committee
Senedd Cymru
Cardiff

Via email

Dear Jenny,

RE: British Sign Language Bill (Wales)

As the current regional contact for the Association of Sign Language Interpreters and Translators in Wales (ASLI), I have been asked to respond to the questions you raised with colleagues that have been working alongside the various committees scrutinising the BSL Bill.

While my colleagues are providing you with individual responses, they also felt it would be appropriate for a collective response from a member organisation and the wider profession that also includes non-ASLI members, such as colleagues who belong to VLP (Visual Language Professionals).

I write to you in my role as the local ASLI representative, with the board's approval, but also as a qualified and registered BSL/English interpreter, senior practitioner and a teacher/assessor of trainee interpreters.

I will address each question in turn, occasionally referencing work/research done already in collaboration with Welsh Government at the BSL Stakeholder Group. I am sure you are aware that soon they will be publishing a BSL 'route map' setting out a number of short- and long-term activities to improve the lives of the sign language using community here in Wales.

I hope you find these answers useful in your ongoing scrutiny of the BSL Bill.

- 1. The number of BSL interpreters in Wales - are there enough to satisfy demand at present?**

Objectively speaking, there are not enough BSL language professionals in Wales to satisfy demand – this includes BSL/English interpreters, BSL translators, Deafblind interpreters and intralingual (relay) interpreters.

There has been a decrease in numbers in the last 3 years, from 55 to 54, despite new people entering the profession in Wales. The number of interpreters in Wales is just under 4% of the total population of interpreters in the UK. Approximately two thirds of interpreting/translation colleagues are based in South Wales, with the remainder in North Wales. Mid Wales has 1 interpreter.

There are 6 qualified translators in Wales, working from English to BSL, however 2 of them are not currently registered or working as such.

While agency work, managed by organisations such as WITS, can cover interpreting for public services with a high completion rate, many Deaf people and public facing organisations often find it difficult to find interpreters for their respective needs. This ranges from professional Deaf people in employment, to people in the community accessing services, needing interpreters on an emergency basis in health or social care or in rural settings.

Arguably, and with respect, the questions here should be: are there enough highly skilled and experienced interpreters/translators working in a *range* of domains and, also, is the workforce representative of the diversity of the BSL using community? The answer to both these is: no.

Currently, the 54 interpreters (not all of whom are full time) that cover the entirety of Wales are consistently trying to fulfil any and all work, but many might avoid public facing, high level, high demand work in favour of private, low strain, low stress work. There is a place for both of these types of work, but historically low strain, low stress work would be covered by trainees, freeing experienced colleagues to undertake the more high demand work.

South Wales simply does not have the throughput of trainees into the profession to allow this to happen. In North Wales there are a small number of trainees moving through training on an annual basis given the proximity to the University of Central Lancashire (UCLAN) where interpreter training is currently available.

As additional context: trainees are limited to the type of work that they can undertake and cannot accept work in criminal justice, legal domains, mental health, social services and most medical settings. They cannot undertake work that involves a diagnosis or consent for treatment/surgery or where there might be life-altering decisions to be made. This means that these high strain jobs are covered by experienced interpreters, of which there are relatively low numbers.

Furthermore, since 2020 there has been a marked rise in the number of online video remote interpreting agencies. Many colleagues now work either part or full time for these VRI services, meaning that the availability for face-to-face interpreting is actually diminishing.

In terms of representation, the majority of the workforce is white, heterosexual, middle-class women between the ages of 35 and 60. There are two interpreters of colour in the entire country, 1 male and 1 female. Of the 54 interpreters in Wales, there are only 9 men. These workforce demographics do not reflect the demographics of the Wales Deaf BSL community, particularly in relation to gender, sexual orientation, ethnicity, race and religion. We are also not spread out equally across the geography of Wales.

2. What would the impact of the Bill have on the demand of BSL interpreters?

It would increase the demand for all BSL language professionals, not just BSL/English interpreters. We anticipate the number of assignment requests to go up in all areas, particularly in translation work (from English into BSL).

We have made it clear to Welsh Government that we do not believe a fast-track approach to increasing the numbers of BSL professionals is the correct approach, despite other non-interpreting organisations arguing the case.

A previous attempt at flooding the market with more interpreters, via the BSL Futures Project, was *partially* successful at its completion. However, of the 30 individuals trained via the programme, less than a third remain actively working in Wales.

It is our experience that a structured training programme is the only way forward, one that systematically and gradually increases the number at a sustainable rate. We argue that the shortest amount of time one might need to train an interpreter/translator is, at minimum, 18-24 months, once they have the requisite BSL and English qualifications in place as well as some experience of interpreting/translating. Those who attend training without any interpreting/translation experience (e.g. after a career change) may well need further development opportunities before they can qualify.

3. Whether there are any obstacles facing your profession?

Specifically for Wales, the obstacles facing the profession (and barriers to entering the profession) are:

- a) There is no investment in Deaf people, and specifically children, to a) be educated or trained in their own language and b) then, as adults, deliver BSL classes as a bona fide teaching career.
- b) BSL classes (Levels 1 through 6) *may* eventually generate a very small percentage of learners who move into the interpreting profession. Most people stop learning BSL between levels 1 and 3.
- c) There has been a steady decline in the number of available BSL classes; this impacts on the number of people training in the language to eventually consider a career.
- d) In Wales, there are no training centres or academic routes into the profession.
- e) As a direct consequence of the above there is very little throughput of trainees into Wales, particularly in the south, to counteract the number of people leaving the profession, retiring, moving out of Wales etc.
- f) BSL/English interpreting or translation is never promoted as a first career of choice. Most people fall into it as a second or third career, often later in life.
- g) Geography is often an issue – colleagues face driving from one end of the country to the other to undertake work. There is also geographic inequality faced by Deaf people who do not live in South Wales, or in the more populated areas of North Wales, where nearly all interpreters are based.
- h) Issues facing colleagues could also include (but are not limited to) vicarious trauma, burnout, lack of available support (nearly all of us are freelance and self-employed), lack of local training opportunities, fees not rising in line with inflation, and a general lack of awareness of the role of BSL communication professionals.
- i) There are very few colleagues who are qualified to provide professional supervision, a tool that supports longevity of career and safety in the profession.
- j) Public sector awareness of the methods to procure communication professionals continues to be sporadic – requests are often made last minute. There is often an assumption that because a *request* for an interpreter has been made that one has been *booked*, which is often not the case. Interpreting colleagues then often get blamed for ‘not turning up’ when, in fact, the booking has not been confirmed.

- k) There are ongoing, systemic issues within DWP around the administration and granting of Access to Work funding. New applications for interpreter support currently take 30 weeks to process, and renewal requests often result in cuts to existing grant funding, making it even more difficult for Deaf people to secure interpreting provision. Many interpreters turn down bookings that are funded by AtW as payments are often delayed, invoices lost, budgets administered incorrectly or inappropriately with, seemingly, a complete lack of understanding around the needs of Deaf people who use BSL.
- l) The availability of BSL communication professionals is not always compatible with primary and secondary health appointment booking systems. Quite often appointments are sent out, but an interpreter is not available, and therefore the onus is on the patient and the interpreter to mediate back and forth to arrange a mutually convenient date, often resulting in appointments being delayed. There is an assumption in health that because an appointment is made for a Deaf person an interpreter will always be available.
- m) There is no route to qualifying for individuals working between Welsh and BSL. Currently, colleagues will 'self certify' that they have the requisite language skill level, but as there is no method of assessment to ascertain the correct standard is being met, there is no recourse for clients to know that accuracy in interpretation is upheld. NRCPD (the regulatory body) has raised this as an issue with the BSL Stakeholder group and also the Welsh Government, but until there is an assessment and qualification pathway created, colleagues can only be certified to work between BSL and English, not Welsh.

4. What can be done to entice more BSL interpreters into the profession?

- a) Provide funding for training. Spoken language interpreting training at universities can be funded via Student Finance. This is not the case for sign language interpreting/translation courses, where learners have to pay privately.
- b) To reiterate, we do **not** believe a fast-track approach to flooding the market is appropriate.
- c) Promote the profession as a career of choice and one that is not a 'helping' profession. The BSL Route Map makes reference to working with organisations such as Careers Wales but there will need to be involvement from ASLI and the wider interpreting/translation profession.

- d) Work with NRCPD to investigate the option to also qualify as BSL/Welsh interpreters, as well as BSL/English.
- e) Continue to raise awareness of BSL as a language in its own right, with parity of esteem to that of spoken languages, specifically Welsh and English.
- f) Leverage political ties to improve non-devolved functions such as Access to Work, so that Deaf BSL users are more able to utilise their budgets to secure access to interpreting/translation and that colleagues are more likely to accept work funded by AtW, secure in the knowledge that they will be paid on time.

5. Whether there is sufficient training available and what are the pathways into the profession?

Training situation in Wales:

- a) Currently, training provision for those wishing to join the interpreting/translation profession is non-existent in Wales. There are currently no training centres running courses in Wales. There are no universities delivering degree level courses in sign language interpreting/translation.
- b) The nearest training centres are in Bristol or Warrington, both of which are run by privately owned and managed training centres. The nearest universities are UCLAN and Wolverhampton. We are aware of one student currently attending Heriot-Watt University in Scotland.
- c) Welsh colleagues qualified to teach and assess the diploma in interpreting/translation all do so in England.

Pathways into the profession can normally be identified as follows:

- a) Training pathways for individuals in Wales consist solely of attending a training centre or university in England or Scotland.
- b) Communication support workers (untrained, unregulated individuals working in education with deaf children, often with poor BSL language skills) may eventually decide to train as interpreters. Occasionally their training will be paid for by their employer, though most pay privately.

- c) Deaf people will, as a second or third career option, become intralingual interpreters or BSL translators.
- d) Individuals from various 'helping professions' will re-train as interpreters (nurses, social workers, support workers etc).
- e) A small number of hearing individuals born into Deaf families will undertake training, having lived in the community their entire lives.
- f) A very small number of learners who have progressed from Level 1 to Level 6 in BSL will then move into interpreter training as a natural progression.

6. Whether there is anything that the Bill should include to improve the Deaf community's access to BSL interpreters?

- a) We feel that the Bill and subsequent strategies and plans should **not** focus exclusively on access to interpreters/translators. We've seen mention many times in committee that 'access to interpreters will resolve many of the problems Deaf people face'. While that may be true in *some* situations (e.g. emergency access to health care) access to interpreters is one small piece of a very large jigsaw, starting with access to BSL from birth for deaf children and their families, in line with the spirit of the Well-being of Future Generations Act.
- b) There should be mention that the BSL Bill should not be seen as a workaround for failing to provide reasonable adjustments under the Equality Act. The BSL Bill should be seen to work alongside the Equality Act in a complementary fashion. However, given that language is not considered a protected characteristic in the Equality Act, perhaps there could be some provision included in the Bill for citizens of Wales to hold public bodies to account for failing to provide BSL when required.
- c) There should be an Active Offer of BSL as is currently provided for the Welsh Language.
- d) There should be explicit mention in the Bill about how deaf children and their families must be provided opportunities to learn BSL as a first and preferred language, which in turn will provide mechanisms for BSL users to work with and access interpreters in the future.
- e) We feel that the wording of what a listed body should do in relation to 'promoting and facilitating the use of BSL in the exercise of its functions' could

be made more explicit. Currently the wording might allow, for example, a local authority to simply say 'we have promoted the use of BSL through a line on our website and suggest that people request an interpreter if one is needed'. This would not be in the spirit of the Bill. There needs to be more concrete direction on what a public body must do, with examples provided.

- f) Timelines could be shortened between the Act coming into force and the publication of BSL plans. Currently, the Bill states that there will be 18 months from the enforcement of the Act to publish a strategy and then a further 12 months after that for public bodies to publish their BSL plans, totalling 30 months before work can actively start on improving the lives of BSL using citizens.
- g) We are disappointed to see that the role of the BSL advisor could not be strengthened to that of BSL Commissioner, in line with the Welsh Language Commissioner who has powers to investigate breaches of standards and take legal action.
We do acknowledge that part of the advisor's role could be investigating how to increase the number of people entering the interpreting/translation profession, in line with the BSL Route Map.
- h) We argue that, while we agree that the BSL advisor should be "...able to communicate effectively in and uses BSL...", they should also be a Deaf person, as they have that lived experience, would provide credibility and have the full support of the community. This post should not be held by a hearing person, in the same way that the Welsh Language commissioner's post would not be held by someone who cannot speak Welsh. To suggest a Deaf person should hold the role is not discriminatory. Appointing a non-Deaf person to the role would disenfranchise the entire community, as well as the language professionals working with them.
- i) In appointing the BSL advisor, we recommend that the panel consists majorly of Deaf BSL users who can *legitimately* advise on whether someone is appropriate for the role. The advisor should not be appointed by a panel consisting solely of hearing, non-BSL using individuals. Appropriately qualified and skilled BSL/English interpreters must be made available for the interview/appointment process, and perhaps could even contribute to the make-up of the panel and/or subsequent team (subject to consultation with the BSL community).
- j) In relation to the section on the BSL advisor and the point: "If a listed public body decides not to comply with a request under subsection (7), it must

explain why to the BSL adviser in writing.” This appears to be a loophole that could be tightened.

- k) The Bill could make it clear that it recognises BSL as having parity of esteem with that of spoken languages and is recognised as one of Wales’ indigenous languages.
- l) The list of public bodies as currently stated needs to be increased dramatically to incorporate a wider range of organisations, including all Wales Government-sponsored bodies.
- m) In relation to pay and remuneration for the BSL advisor, the current wording is ‘may pay’. We feel this should be paid employment for a highly skilled and knowledgeable Deaf BSL user and, therefore, the wording should be strengthened to ‘will pay’.
- n) In relation to how a public body “...describes how it intends to follow guidance issued under section 3, or *explains why it does not intend to do so...*” the latter half of this sentence suggests an automatic ‘get out of jail free’ card. We feel the statement should remove the words “or explains why it does not intend to do so” thereby instructing public bodies that they will publish a plan that describes how it intends to follow guidance issued under section 3.
- o) We would also ask what recourse is available to individuals to hold public bodies to account, should they fail to comply with the requirements as laid out by the Act?

We hope you find these answers useful to the questions you have posed. Please do not hesitate to reach out should you require more information.

Yours truly,



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