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Eich llais mewn iechyd | Your voice in health
a gofal cymdeithasol | and social care

31 October 2025

Jenny Rathbone MS
Chair
Equality and Social Justice Committee
Senedd Cymru

Sent via email only via: SeneddEquality@senedd.wales

Dear Chair

BRITISH SIGN LANGUAGE (WALES) BILL

Thank you for your letter of 16 October 2025, asking for information from Llais about the accessibility of complaints procedures, and in particular British Sign Language.

I attach our response to your questions. We hope you find this information helpful. Please let us know if we can provide any further assistance at this time.

Yours sincerely

J A Thomas

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Chief Executive

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British Sign Language (Wales) Bill

Llais response to the Equality and Social Justice Committee's request for information

Thank you for inviting Llais to contribute to the Committee's scrutiny of the British Sign Language (Wales) Bill.

As the independent body that reflects the views and represents the interests of people living in Wales in their National Health Service (NHS) and social care services, we welcome the opportunity to share our perspective and the experiences of those we support, and to answer the questions the committee has asked of us.

We work with people and communities across all parts of Wales, making sure that everyone's voice can be heard and used to inform the planning, design, development, and delivery of health and social care services for all. We achieve this through community engagement, our complaints advocacy service, and representations to decision-makers.

Our commitment to accessible services

We provide our services and deliver our functions on a needs-based, person-led basis. We are committed to making sure that people's voices are heard and acted upon, regardless of their communication needs.

When a BSL user approaches us, we work to understand and provide our services using their preferred method of communication, including arranging qualified BSL interpreters or using video relay services. This may be for an engagement event, supporting a person to raise their complaint about health and/or social services, or dealing with a concern about Llais itself.

We have established policies and commitments to make sure our activities and services are accessible to all people and communities in Wales, including d/Deaf people and BSL users. For example:

- Our accessibility statement¹ lets people know how we approach our activities in a way that enables everyone to get involved
- Our Complaints Advocacy Policy ensures free, independent, and confidential support to individuals who want support to raise concerns about health and/or social services. This includes access to BSL interpreters and alternative formats.
- Our Communication Strategy (2024–2027) outlines inclusive, trauma-informed communication practices, with a focus on amplifying the voices of all communities.
- We encourage feedback to improve accessibility.
- We have recently agreed to offer an introductory BSL course to all our people in public-facing roles, to be rolled out across Wales, as well as offering the opportunity to a selection of our people to achieve a recognised BSL qualification.

We provide information in a range of formats, offer video and remote interpreting where appropriate, and work closely with people to ensure their needs are met at every stage.

Where someone wishes to make a complaint about Llais, we offer and facilitate people to communicate their concerns in the way that works best for them, including BSL where appropriate.

We are committed to meeting the renewed Accessible Communication and Information Standards (ACIS) and the requirements of the new Listening to People regulations.

Considering the changes to the NHS complaints system in April 2026 we recently contacted Welsh Government colleagues specifically to seek advice on how we can improve our responsiveness for people with additional communication and information needs who have a formal complaint with an NHS body or Local Authority, and how we might better align our approach with the frameworks used by those services.

We believe that using the same standards and frameworks as health and social services is important as these complaints are about the services they provide.

¹ [Llais Accessibility Statement | Llais](#)

Our Customer Records Management (CRM) system helps us identify people's communication needs, such as BSL support. We have recorded over 150 instances where BSL or the word d/Deaf has been mentioned, though this may include multiple actions relating to our support for an individual raising a single complaint, or engagement about a particular matter.

We have received feedback from people who appreciate the inclusive approaches our staff take. For example, a recent email from a d/Deaf parent attending a play session at a Children's Centre in West Wales described how one of our Llais staff members confidently used British Sign Language (BSL) to greet and engage them. The parent wrote:

'I am Deaf and wear two hearing aids... the worker sat down and signed good morning, they knew it wasn't quite correct and tried again and got it right and then signed how are you? ... I was very happy to have that added into my day... I just couldn't believe that someone was confident and comfortable enough to try without asking if I used BSL first. You should be very proud to have them working for you. They made me feel comfortable to talk about some issues I've had with access to healthcare as a Deaf person. To have someone come and ask about experiences with health care in the area and for them to be so inclusive, I think is amazing to have.'

This feedback demonstrates the positive impact of our people having even basic BSL skills and d/Deaf awareness, and the importance of inclusive, proactive engagement. It also highlights the value of our commitment to rolling out introductory BSL training to our people in public-facing roles.

This video available at the link below summarises our complaints advocacy service and highlights some of the challenges faced by one BSL client, Gemma (2:40 onwards):

<https://youtu.be/K-6qwPMQEag?si=t6QyDh1Emjuv6l5w>.

What we hear about BSL in health and social services

We set out below details of the issues we have picked up about the use of BSL in health and social services, often through our complaints advocacy service.

Barriers and challenges

A major barrier we often hear about is the shortage of interpreters. We have also experienced this as an organisation.

The Wales Interpretation and Translation Service (WITS) is the main provider for interpretation and translation services offered by NHS and local authorities when dealing with health and social care complaints in Wales. Welsh Government colleagues have informed us that BSL is consistently among the top 5 requested languages each month. Llais does not currently have access to the WITS service.

The introduction of the new NHS complaints system 'Listening to People' from April 2026 will introduce mandatory listening meetings and a greater emphasis on early resolution.

This is positive for people, but it also means that BSL users will have at least 2 new points of contact with NHS bodies, each of which must be accessible and appropriately supported by qualified interpreters.

For Llais, this also means additional contact with the person making a complaint if they are using our complaints advocacy service, both to help them understand the process and to support them before and after listening meetings.

This may double the number of interactions where interpreter support is required, both with NHS bodies and with Llais as their complaints advocate.

We are concerned that without access to a responsive Deaf BSL interpretation service with more available interpreters, we and NHS bodies will struggle to meet the new 5 and 10-day deadlines within the new 'Listening to People' complaints system.

Complaints data and themes

Since we started our work in April 2023, we have supported some people to raise BSL related concerns through our complaints advocacy service. These concerns have often involved delays or difficulties in arranging interpreters for listening meetings or discussions about complaints.

These cases have been a small yet growing area (particularly in the Gwent region) spanning both health and social services, with the overarching theme being the difficulty in accessing and communicating within the service.

Communicating with GPs has been reported to us as particularly challenging. The reliance on a technologically based interpretation service, lack of knowledge of local variations in sign language (particularly by interpreters based outside Wales), and technical issues during the links have been identified as recurring challenges to accessing services.

Data and summary of complaints about health and social services regarding access to BSL

- We have provided support through our complaints advocacy service in 20 cases that mention BSL or Deaf-related communication barriers as central to the complaint. Some complaints may span more than one service.
- Complaints span GP practices (8 cases), hospitals (3 cases), social services (3 cases), and outpatient appointments such as physio (6 cases) and dentistry (1 case).
- Common issues include refusal to provide face-to-face interpreters, reliance on unsuitable video platforms, inaccessible booking systems, lack of d/Deaf awareness, and inappropriate reliance on family members for interpretation.

Our complaint advocates also report wider hearing related issues that may not be specifically relating to BSL, and these include people having trouble in accessing services such NHS 111 and making GP appointments when they cannot be made in person.

Case studies with complainant quotes

Case study 1: GP surgery refusal to provide a face-to-face BSL interpreter

“Please help me tell them all I need a face-to-face interpreter for all my appointments. The iPad is not suitable for me. I only see through one eye, and it keeps freezing and the interpreters use signs I don’t understand.”

Case study 2: Loss of accessible communication channel

“I feel that they are taking away my independence in being able to communicate with them... I cannot use the phone at all, and even the online app is pretty much useless and inaccessible as there is no way of requesting a BSL Interpreter at the time of booking an appointment.”

Case study 3: Inadequate BSL support in hospital

The BSL interpreter states that the patient lacks full capacity... and requires daily BSL services to support her communication with the whole team, not just for therapies.”

Case study 4: Social services failing to provide BSL interpreters

She wants to complain that the social workers are not using BSL interpreters for every visit... and when the BSL interpreter they usually use is not available... they do not use a substitute and instead make her wait.

Case study 5: Missed appointments and lack of communication

“Together with a booked BSL interpreter, we waited about an hour... before we got news... that she was not being brought to the Gwent.”

We hear that these challenges are sometimes compounded in the NHS because the existing Putting Things Right complaint process is primarily conducted in writing, which can exclude BSL users from fully participating in their own care and complaints.

Our wider engagement and communication functions

Recent feedback from our engagement with people and communities outside of our complaints advocacy service illustrates similar ongoing barriers for users of BSL as those have heard through our complaints advocacy service.

For example, several d/Deaf patients in Cwmbran have struggled to access GP appointments due to systems that rely on telephone or complex online forms, which are not always accessible or available in BSL. While some GPs have agreed to accept email queries, this is not a consistent or equitable solution, particularly for urgent appointments or for users of BSL who are not confident in written English.

Organisational learning and next steps

We use feedback, both positive and negative, to learn and to drive improvement. For example, the positive experiences shared with us has reinforced our commitment to BSL and d/Deaf awareness training for staff. We are also working to improve our data capture and are seeking advice

from Welsh Government colleagues on aligning our approach with health and social services.

Reflections and recommendations

We agree that easy, timely access to appropriate interpreters is now more important than ever, given the upcoming changes to the NHS complaints system and the increased number of required contacts.

We would welcome further discussion on developing a shared framework for access to, and monitoring of, interpreter provision, and making sure that people with hearing loss and users of BSL can participate fully and equally in the complaints process.

Thank you again for the opportunity to contribute. We are happy to provide further information or discuss these issues in more detail.