

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cyngor Bwrdeistref Sirol Caerffili

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Caerphilly County Borough Council



What are your views on the general principles of the Bill?

(We would be grateful if you could keep your answer to around 500 words).

We support the general principles of the British Sign Language (BSL) (Wales) Bill, particularly its aim to promote and facilitate the use of BSL across public services in Wales. While the Equality Act provides a legal framework for accessibility, it lacks the specificity and clarity needed to ensure equitable access for BSL users. The Bill offers an opportunity to address this gap by placing explicit duties on Welsh Ministers and public bodies.

However, we believe that the successful implementation of these principles will require significant investment in resources, training, and infrastructure. Without this, the Bill risks creating expectations that cannot be met, potentially undermining trust among Deaf communities. The Bill must also recognise the diversity within the Deaf community, including regional dialects and tactile forms of BSL, and ensure that any measures taken are inclusive and representative.

We also note the importance of ensuring that Deaf individuals have a meaningful input/contribution in the design and delivery of services. While public bodies are keen to engage, there is often a lack of effective links with Deaf communities, resulting in inaccessible consultation processes. The Bill should therefore support mechanisms that enable genuine participation and co-production.

In principle, the Bill is a positive step forward, but its success will depend on how well its provisions are resourced, implemented, and monitored.

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?

(We would be grateful if you could keep your answer to around 500 words).

The Bill's key provisions are broadly workable and align with its stated policy intentions. However, their effectiveness will depend on how they are operationalised and supported.

The proposed duties on Welsh Ministers to promote BSL, publish strategies and guidance, and appoint a BSL adviser are welcome. These measures can help embed BSL into the fabric of public service delivery. Similarly, requiring public

bodies to publish BSL plans and report on progress introduces accountability and transparency.

Nonetheless, we are concerned about the potential strain on already stretched services. Many public bodies lack the internal capacity and expertise to meet these new duties without substantial support. The Bill must therefore be accompanied by clear guidance, funding, training opportunities and ongoing support.

The appointment of a BSL adviser and the establishment of reporting duties are positive steps, but expectations must be managed carefully. The experience of implementing the Welsh Language (Wales) Measure 2011 shows that such roles can generate high expectations that are difficult to meet without adequate resources.

Overall, the provisions are sound, but their success hinges on practical support and realistic timelines.

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?

(We would be grateful if you could keep your answer to each section to around 500 words).

1 - A duty on Welsh Ministers to promote and facilitate the use of BSL

We support the principle of placing a duty on Welsh Ministers to promote and facilitate the use of BSL. This aligns with the broader goals of equality and inclusion and mirrors the approach taken with the Welsh Language. However, we caution that such a duty must be supported by clear guidance, funding, and infrastructure to avoid creating unrealistic expectations. When the Welsh Language Standards came in, public bodies were already in a position to put these in place due to previous Welsh Language Schemes and Acts, which meant the Welsh language already had a solid foundation to build upon and progress from. However, there is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill, such as a programme similar to Welsh Assembly Government's BSL Futures Project from 2004. Caerphilly County Borough Council was one of the host organisations.

Promotion alone is insufficient without practical measures to ensure accessibility. Ministers must lead by example, embedding BSL into government communications and services. This includes ensuring that information is available in BSL and that BSL users are actively involved in shaping policy.

The duty should also recognise the diversity of BSL users, including regional dialects and tactile forms, and ensure that promotion efforts are inclusive. Without this, the policy risks marginalising parts of the Deaf community.

2 - A duty on Welsh Ministers to publish national strategy and guidance

Publishing a national strategy is a vital step in ensuring consistency and accountability. We support this provision, provided the strategy is developed in consultation with Deaf communities and public bodies.

The strategy must be realistic, resourced, and include clear timelines and outcomes. It should also address the barriers identified in education, health, social care, and other public services. Guidance should be practical and tailored to the varying capacities of public bodies.

There is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill, such as a programme similar to Welsh Assembly Government's BSL Futures Project from 2004. Caerphilly County Borough Council was one of the host organisations.

There is a significant lack of capacity within the British Sign Language (BSL) interpreter market to meet current and growing demand. Despite increasing awareness and legal obligations around accessibility, the supply of qualified BSL interpreters remains insufficient. This shortage is impacting service delivery across sectors, with organisations frequently unable to secure interpreters when needed. The limited availability is compounded by regional disparities, high demand for specialist skills, and retention challenges within the profession. Urgent action is needed to address this capacity gap and ensure equitable access for BSL users.

We recommend that the strategy include mechanisms for monitoring progress and sharing best practice. It should also be reviewed regularly to reflect evolving needs and feedback from BSL users.

3 - A duty on Welsh Ministers to publish BSL guidance

We agree that Welsh Ministers should publish BSL guidance to support public bodies in meeting their duties. This guidance must be accessible, co-produced with Deaf communities, and reflect the lived experiences of BSL users.

Guidance should cover areas such as communication standards, interpreter access, staff training, and inclusive consultation methods. It should also provide clarity on terminology, recognising that not all BSL users are signers and that identity preferences vary.

To be effective, the guidance must be supported by training and resources. Without this, public bodies may struggle to implement it meaningfully.

4 - A duty on specified public bodies to publish BSL plans

We support the requirement for public bodies to publish BSL plans, as this introduces transparency and accountability. However, we are concerned about the capacity of public bodies to meet this duty without additional support and where this responsibility will lie within organisations.

Many services are already stretched, and developing meaningful BSL plans will require investment in staff training, interpreter services, accessible communication tools and recruitment. This could possibly be seen to sit with existing equalities teams, many of which are already responsible for ensuring compliance with Welsh language legislation.

Plans must be co-produced with Deaf communities and reflect local needs, including regional dialects and tactile forms.

We recommend that the Bill include provisions for support and oversight to ensure that plans are not tokenistic but lead to real improvements.

5 - The appointment of a BSL adviser

The appointment of a BSL adviser is a positive step, but expectations must be managed. The adviser should be a fluent BSL user and have a deep understanding of the challenges faced by Deaf communities.

We recommend that the adviser work closely with public bodies, providing practical support and facilitating engagement with Deaf communities. The role should be clearly defined, with realistic responsibilities and sufficient resources.

The adviser should also help coordinate the development of national strategy and guidance, ensuring consistency and alignment with the needs of BSL users.

6 - Reporting duties to be imposed on the public bodies and Welsh Ministers in relation to these duties.

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate Legislation?

(We would be grateful if you could keep your answer to around 500 words).

The powers granted to Welsh Ministers to make subordinate legislation under the Bill appear appropriate, provided they are exercised transparently and with meaningful consultation. These powers will be necessary to adapt and refine the implementation of the Bill over time, especially as the needs of BSL users evolve and as public bodies develop their capacity.

However, we recommend that any subordinate legislation be subject to robust scrutiny and co-production with Deaf communities and relevant stakeholders. This will help ensure that regulations are practical, inclusive, and aligned with the lived experiences of BSL users.

Clear parameters should be set to prevent overreach and ensure that subordinate legislation supports, rather than complicates, the delivery of services. It should also be accompanied by guidance and impact assessments to help public bodies understand and implement changes effectively.

Are there any barriers to the implementation of the Bill's provisions and does the Bill take account of them?

There are several barriers to implementation that must be acknowledged:

- **Resource constraints:** Many public bodies are already stretched and may struggle to meet new duties without additional funding and staffing.
 - **Lack of awareness and training:** Staff may not have the knowledge or confidence to engage effectively with BSL users.
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- **Accessibility of information:** Current systems and processes often fail to provide information in accessible formats for Deaf people. This will take significant resources in way of time and financial investment.
- **Limited engagement mechanisms:** Public bodies may lack established links with Deaf communities, making co-production difficult. This is already a barrier when running consultations and engagement exercises.
- **Insufficient capacity in the BSL interpreter market:** There is a well-documented shortage of qualified BSL interpreters, which poses a major challenge to implementing the Bill's provisions. Public bodies may struggle to secure interpreters when needed, particularly in rural areas or for specialist services. Without investment in interpreter training, recruitment, and retention, this gap will continue to hinder effective service delivery and equitable access.

The Bill partially addresses these barriers through its provisions for guidance, strategy, and reporting, but more explicit commitments to funding, training, and support are needed.

What are your views on the assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

(We would be grateful if you could keep your answer to around 500 words).

We have serious concerns about the financial implications of the Bill. While the goals are commendable, achieving them will require substantial investment in interpreter services, staff training, accessible communication tools, and engagement mechanisms.

Current systems and processes often fail to provide information in accessible formats for Deaf people. This will take significant resources in way of time and financial investment. It could also result in investment into software systems to enable Deaf people and users of BSL to receive information in their preferred format.

A major and often overlooked financial consideration is the lack of capacity within the BSL interpreter market. There is a well-documented shortage of qualified interpreters, and demand is already outstripping supply across many sectors. This shortage is particularly acute in rural areas and for specialist services. Without

targeted investment in interpreter training, recruitment, and retention, public bodies may struggle to meet the Bill's requirements. This could result in delays, reduced service quality, and increased costs as organisations compete for limited resources.

The proposed establishment of a BSL adviser and Advisory Panel, while valuable, will also incur significant costs. These must be carefully managed to avoid diverting resources from frontline services.

The Explanatory Memorandum should provide a more detailed and realistic assessment of these costs, including long-term funding commitments. Without this, public bodies may be unable to meet their obligations, leading to frustration among BSL users and reputational risks for the relevant public bodies, and ultimately Welsh Government.

Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum?

We would like to raise the following additional points:

- **Terminology:** The Bill should be sensitive to how individuals identify, avoiding rigid labels like “deaf BSL signers” which may not reflect personal preferences. It's important to recognise that a Deaf person is not necessarily the same as a BSL user. While many Deaf people use BSL, not all BSL users are Deaf. For example, some hearing individuals may have grown up in Deaf families and learned BSL as their first language. In such cases, BSL may be their preferred or primary language.
- **System/process changes:** Implementing the Bill will require significant changes to internal systems, which may be complex and resource intensive.
- **Expectation management:** The Bill must be clear about what is achievable and ensure that expectations are aligned with available resources.

Anything else?
