

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Cymdeithas Dehonglwyr Iaith Arwyddion

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Association of Sign Language
Interpreters



ASLI Response to the BSL (Wales) Bill Consultation

Introduction

The Association of Sign Language Interpreters/Translators (ASLI) is the professional membership association for British Sign Language interpreters and translators in the UK. Our members work across Wales in education, health, justice, employment, and community settings. We exist to represent and promote the profession, and we bring the unique perspective of practitioners who work daily with Deaf BSL users and see the barriers they face in accessing services and opportunities.

ASLI strongly welcomes the introduction of the British Sign Language (Wales) Bill. Wales has a proud record of supporting linguistic minorities, but unlike Welsh and English, BSL has until now lacked equivalent statutory protection. This Bill offers a long overdue opportunity to place BSL on an equal footing as a language of Wales.

However, our members are clear that legislation alone will not deliver equality. Without workforce investment, the duties in the Bill risk being aspirational rather than deliverable. Interpreter shortages are already a structural barrier across Wales, and unless the Bill is accompanied by ring-fenced funding and measurable workforce targets, Deaf people will continue to face exclusion in practice.

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

We support the general principles of the Bill. Recognition of BSL in law is an important step towards reducing entrenched inequalities faced by Deaf people in Wales.

The Bill responds to Wales' obligations under the UN Convention on the Rights of Persons with Disabilities, which requires state parties to provide professional interpreters, promote the learning and use of sign languages, and support the cultural and linguistic identity of Deaf communities. The Bill also supports the Well-being of Future Generations (Wales) Act, where Deaf people have so far been excluded from many public bodies' efforts.

However, we stress that interpreter shortages are a structural barrier to implementation. Public bodies cannot deliver equal access if there are not enough interpreters, translators, or BSL teachers. Unless this is addressed, legal recognition will not lead to real-world change.

What are your views on the Bill's key provisions, in particular are they workable and will they deliver the stated policy intention?

The Bill is more ambitious than its English counterpart and, in some respects, stronger than the Scottish Act. Its framework — ministerial duties, national strategy, public body BSL plans, a BSL Adviser, and reporting duties — is coherent and workable.

However, these duties risk being aspirational if not underpinned by measurable outcomes and sufficient resources. For example:

- The duty on Ministers to promote and facilitate BSL lacks specific outcomes.

- A national strategy without time-bound targets will not deliver systemic change.
- Public body BSL plans may become descriptive exercises unless tied to measurable progress and subject to independent scrutiny.

We welcome the creation of a BSL Adviser role and feel they must be a BSL signer. Their independence and resources must be guaranteed if the role is to have impact.

We also note that the Bill includes a duty on Welsh Ministers to publish guidance. This is a critical component of successful implementation. The guidance should include best practice standards for service provision, interpreter engagement, and community consultation. Without clear and practical guidance, public bodies may struggle to interpret their obligations, leading to inconsistent delivery across Wales.

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

The greatest barrier is the national shortage of qualified BSL interpreters, translators, and teachers. Even if listed public bodies commit to delivering their plans, the shortage will prevent meaningful change.

To overcome this:

- Ring-fenced funding must be allocated to interpreter training, mentoring, and CPD.
- Bursaries should be provided to widen access to the profession.
- Interpreter training programmes in Wales must be expanded and supported.

- The national strategy should include clear workforce development targets, such as increasing the number of qualified interpreters within a set timeframe and supporting retention through professional standards and fair conditions.

Without these measures, the Bill risks reinforcing the “Deaf Legal Illusion” — law that looks progressive on paper but fails to deliver in practice.

There is also a risk that without sufficient workforce investment, public bodies may resort to inadequate or tokenistic provision, which could undermine trust within the Deaf community. To avoid this unintended consequence, the Bill must be accompanied by robust workforce planning and accountability mechanisms that ensure duties translate into meaningful access.

What are your views on the assessment of the financial implications of the Bill?

The financial memorandum outlines administrative costs but does not fully address the investment required for workforce expansion. Without ring-fenced resources for interpreter training and development, the duties will be undeliverable.

Future financial planning should explicitly include:

- Interpreter and translator training and CPD.
- Training of BSL teachers to underpin interpreter education.
- Development of accessible BSL resources and materials.

This investment is not optional: it is a precondition for successful implementation.

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

We recommend that the national BSL strategy include measurable and time-bound workforce targets. Progress should be tracked, reported on, and independently scrutinised.

We also urge that the list of listed public bodies be expanded to include Estyn, Qualifications Wales, higher and further education institutions, Transport for Wales, and other key organisations.

Deaf BSL users should expect equal access across all areas of public life.

Finally, reporting duties must focus on outcomes rather than activities. Independent monitoring, including from the BSL Adviser, is essential to avoid the risk of “tick-box” compliance.

We also wish to comment on the powers granted to Welsh Ministers to make subordinate legislation. These powers appear appropriate, provided they are exercised transparently and with meaningful consultation. They should be clearly defined to prevent scope creep and ensure that any future regulations remain aligned with the Bill’s original intent to promote linguistic equality for Deaf BSL users.

Conclusion

ASLI strongly supports the BSL (Wales) Bill but emphasises that recognition alone is insufficient. Interpreter shortages are a structural barrier to equality, and unless addressed, the Bill’s duties will remain

aspirational.

We call for:

- Ring-fenced funding for interpreter and translator training.
- A national BSL strategy with clear, measurable workforce targets.
- Independent monitoring to ensure reporting focuses on real outcomes.

With these measures in place, the Bill can move beyond symbolism to deliver genuine transformation, ensuring that Deaf BSL users in Wales enjoy equal access to public services and full participation in Welsh society.