
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 Coleg Brenhinol y Seiciatryddion Cymru | Evidence from Royal College of Psychiatrists Wales

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

RCPsych Wales is pleased to support this Bill.

We agree with the aim of the Bill to institutionalise the promotion and facilitation of BSL, thereby ensuring that BSL is integral to public services and removing barriers to access. The barriers faced by Deaf people using mental health services are manifold, persistent and well documented (Terry, 2024; Shank & Foltz, 2019). Although well-intentioned, existing measures, such as the All Wales Standards for Accessible Communication and Information for People with Sensory Loss first introduced in 2013, have fallen short in delivering much-needed improvements for their intended population.

More needs to be done to ensure that Deaf people can access mental health information in an accessible format and communicate with services through inclusive systems. Greater Deaf awareness training is also required among health professionals, alongside an increase in the capacity of, and training provision for, interpreters. We hope this Bill will serve as a vital catalyst for addressing the long-standing inequities faced by Deaf mental health patients in Wales.

RCPsych Wales is pleased to be working with the All Wales Deaf Mental Health and Well-being Group, through our Dyfodol Programme and in collaboration with the NHS Wales Joint Commissioning Committee, to review mental health services for Deaf people. We endorse the group's aim of achieving effective and high-quality mental health and wellbeing services for Deaf individuals in Wales. The Bill should complement the commitment in the Welsh Government's new Mental Health and Wellbeing Strategy Delivery Plan to develop an implementation plan to improve support for people with sensory loss across all health services.

References

Shank, C. & Foltz, A. 2019. Health and wellbeing for deaf communities in Wales. Scoping for a Wales-wide survey. Bangor University. Available at: <http://deaf-communities-wales.bangor.ac.uk/index.php.en>

Terry, J., Meara, Rh. & England, R. 2024. "They still phone even though they know I'm deaf": exploring experiences of deaf people in health services in Wales, UK. *Journal of Public Health*. Vol. 46, No. 3, pp. e520-e527. Available at: <https://doi.org/10.1093/pubmed/fdae112>

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 believe that legislation is needed to deliver the stated policy intention of the Bill. If it isn't progressed, Wales risks becoming the only UK nation without equivalent legislation.

Currently, deaf patients in Wales often have to travel to England for mental health treatment, as specialist services are not available locally. This is particularly unacceptable given that deaf people are twice as likely to experience mental health problems compared with the general population (Terry et al, 2021). The proposed Bill offers a right-based approach to addressing this.

References

Terry, J, Redfern P, Bond J, Fowler-Powe M, Booth C. 2021. Deaf people Wales: Hidden inequality. Available at: www.swansea.ac.uk/media/Deaf-People-Wales_Hidden-Inequality-2021.pdf

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

We agree with these provisions.

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

We agree with these provisions. It will be important that the National BSL Strategy and associated guidance align with other existing and future frameworks e.g., the new Mental Health and Wellbeing Strategy and the forthcoming Disabled People's Rights Plan.

3 - A duty on Welsh Ministers to publish BSL guidance

We agree with these provisions.

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

We agree with these provisions.

5 - The appointment of a BSL adviser

We agree with these provisions, and particularly welcome that the person appointed as adviser must be able to communicate effectively in, and use, BSL. Both the adviser and the supporting panel should be able to draw on external expertise (e.g., RCPsych Wales in relation to mental health) to ensure decisions and approaches are fully informed and effective. It is

equally important that the supporting panel brings lived experience, ensuring services are shaped by the perspectives of those directly affected.

The lack of progress made over recent years in improving Deaf people's access to, and experiences of, mental health services indicates that the voice of lived experience has not been sufficiently reflected thus far in the design and delivery of said services. Welcome efforts are being made to address this, such as through Bangor University's Deaf Health and Well-being Wales project, launched last year, which aims to co-design, co-construct, implement, and evaluate community-led solutions for the Deaf community in Wales. The College's National Collaborating Centre for Mental Health has also produced guidance on co-production in mental health commissioning, which may offer further useful information on which to draw (NCCMH, 2019).

References

National Collaborating Centre for Mental Health. 2019. Working Well Together: Evidence and Tools to Enable Co-production in Mental Health Commissioning. Available at: <https://www.rcpsych.ac.uk/docs/default-source/improving-care/nccmh/working-well-together/working-well-together---evidence-and-tools-to-enable-co-production-in-mental-health-commissioning.pdf>

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

We agree with these provisions.

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

We are content that the powers in the Bill for Welsh Ministers to make subordinate Legislation are appropriate.

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

We share concerns previously expressed about the shortage of qualified BSL interpreters in Wales, which the Bill itself is silent on. Every effort should be made to rectify this as a matter of priority through the Welsh Government's National BSL Strategy and BSL Guidance and Listed Public Bodies' BSL Plans.

We are mindful of the need to support the development of accessible, culturally sensitive health services and enhance the Deaf cultural competence of health professionals and administrative staff. Involving Deaf people in the co-design and co-development of mental health services will be key in this regard.

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

Against a backdrop of financial pressures, listed public bodies must be adequately resourced to implement and fulfil the requirements of the Bill.

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

Anything else?