
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 Cyngor Dinas Casnewydd | Evidence from Newport City Council

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

Newport City Council welcomes the general principles of the British Sign Language (Wales) Bill and supports its aim to promote and facilitate the use of BSL across Wales. Building on its recognition as an official language in 2022, the Bill marks a significant step toward improving accessibility, inclusion, and equity for Deaf communities.

We support the Bill's emphasis on national leadership, accountability, and visibility. However, successful implementation will depend on addressing key barriers, including interpreter shortages and financial pressures on public bodies.

A national strategy with measurable outcomes, timelines, and support mechanisms will be essential. We also recommend alignment with other national strategies, such as the forthcoming Disabled People's Rights Plan for Wales, to ensure coherence and avoid duplication.

Overall, the Council supports the Bill's principles and welcomes the opportunity to contribute to its development.

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?

The Bill's key provisions are broadly workable and well-intentioned, but their success will depend on how they are implemented and supported.

1. **Duty on Welsh Ministers to promote and facilitate BSL:** This is essential and should be backed by investment in interpreter training, public engagement, and awareness-raising. National leadership will help drive consistency across sectors.
2. **National strategy and guidance:** A coherent strategy is vital. It should align with other national plans, be co-produced with Deaf communities, and include support mechanisms for public bodies
3. **BSL guidance:** Clear, practical guidance is needed to help public bodies understand their responsibilities. It should be supportive rather than overly prescriptive, allowing flexibility for different organisational contexts.

4. BSL plans by public bodies: Plans should be proportionate to organisational size and embedded within existing frameworks, such as Strategic Equality Plans, to avoid duplication and promote coherence.

5. Appointment of a BSL adviser: This is a positive step. The adviser should be a BSL user with strong links to Deaf communities, and their role should include monitoring, advocacy, and capacity-building.

6. Reporting duties: These should align with existing reporting mechanisms under the Equality Act 2010 and Welsh Specific Duties. Welsh Government should lead by example by publishing its own internal progress report annually.

In summary, the provisions are workable but require sustained investment, co-production, and alignment with existing frameworks to deliver the stated policy intention effectively.

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

This duty is essential and should be supported by sustained investment in BSL awareness, interpreter training, and public engagement. National leadership will help drive consistency and visibility across sectors

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

While a national strategy will provide clarity and direction, we recommend that it be coherent with other relevant national strategies, such as the forthcoming Disabled People's Rights Plan for Wales, to ensure alignment and avoid duplication.

We also recommend that the strategy be co-produced with Deaf communities and include measurable outcomes, clear timelines, and mechanisms for supporting local authorities in implementation.

3 - A duty on Welsh Ministers to publish BSL guidance

Clear guidance is vital to ensure public bodies understand their responsibilities under the Bill. However, the guidance should be practical and supportive rather than overly prescriptive, allowing flexibility for different organisational contexts and capacities.

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

To avoid duplication, streamline reporting, and ensure alignment with equality objectives, we recommend that BSL plans be proportionate to organisational size and capacity, and that they be embedded within existing equality and accessibility frameworks, such as Strategic Equality Plans under the Equality Act 2010 and Welsh Specific Duties.

5 - The appointment of a BSL adviser

The appointment of a BSL adviser is a positive and welcome step. However, to ensure credibility and meaningful impact, the adviser should be a BSL user with strong links to Deaf communities.

Their role should encompass monitoring, advocacy, and capacity-building across sectors to support effective implementation of the Bill.

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

We recommend that the reporting duties for public bodies be aligned with existing mechanisms under the Equality Act 2010 and the Welsh Specific Duties. This would help reduce administrative burden and promote coherence across statutory reporting frameworks.

In addition, Welsh Ministers and Welsh Government should be seen to lead by example. We suggest that Welsh Government publish its own internal assessment of progress in implementing the Bill annually. This would demonstrate accountability and reinforce its leadership role in advancing BSL inclusion.

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

The powers proposed for Welsh Ministers to make subordinate legislation appear appropriate, provided they are exercised transparently and in consultation with Deaf communities and relevant stakeholders. Subordinate legislation will be essential to ensure the Bill remains responsive to emerging needs, technological developments, and evolving best practice in inclusive communication.

We recommend that any regulations or guidance developed under these powers be co-produced with BSL users and subject to regular review. This will help ensure that subordinate legislation supports meaningful implementation and avoids unintended barriers.

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

While the Bill is well-intentioned, several practical barriers may affect implementation:

- **Interpreter availability:** A shortage of qualified BSL interpreters in Wales will limit public bodies' ability to meet demand.
- **Funding and resources:** Local authorities, including Newport City Council, face significant budget constraints and rising demand for statutory services. Implementation will require sustained investment in training, technology, and service adaptation.
- **BSL in education:** Unlike the Welsh language, BSL is not embedded in the education system, including early years provision. Inconsistent teaching outcomes affect early language development and future interpreter availability.

· Awareness and cultural change: Embedding BSL in public services will require ongoing staff training and cultural change, especially in organisations with limited prior engagement with Deaf communities.

The Bill acknowledges some of these challenges but could go further in outlining how Welsh Government will support public bodies. We recommend that the national strategy include a workforce development plan, funding commitments, and a communications campaign to raise awareness and promote BSL inclusion.

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

While the financial assessment in Part 2 of the Explanatory Memorandum provides a useful starting point, it may underestimate the long-term costs associated with meaningful implementation, particularly given the budget pressures currently faced by local authorities.

We recommend that the financial assessment be revisited in close consultation with local authorities and service providers to ensure it accurately reflects the scale of investment required to deliver the Bill's aims effectively and sustainably.

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

While the Bill should promote consistency and accountability, we recommend a flexible framework that allows for proportional implementation, co-produced solutions, and ongoing dialogue with Deaf communities.

A rigid approach may not reflect the diverse needs of BSL users and capacities of public bodies.

Anything else?

Newport City Council is committed to supporting the principles of the British Sign Language (Wales) Bill and improving outcomes for BSL users.

We welcome the opportunity to contribute to the development of the Bill and recommend ongoing engagement with local authorities.