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 Bwrdeistref Sirol Merthyr Tudful| Evidence from Merthyr Tydfil County Borough Council

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

The general principles of the British Sign Language (BSL) (Wales) Bill are supported, particularly its aim to promote and facilitate the use of BSL across public services in Wales. The Bill offers an opportunity to address any current gaps in legislation by placing explicit duties on Welsh Ministers and public bodies. 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. The Bill must also recognise the diversity within the Deaf community, and ensure that any measures taken are inclusive and representative. Ensuring that Deaf individuals have a meaningful input/contribution in the design and delivery of services is important. The Bill should 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?

The Bill's key provisions are broadly workable and align with its stated policy intentions. The effectiveness of the key provisions 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 welcomed. 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.

There are concerns about the potential strain on already stretched services. Many public bodies may lack the internal capacity and expertise to meet these new duties without substantial support. The Bill must therefore be accompanied by clear guidance to ensure consistency in implementation across Wales, funding, training opportunities and ongoing support. The appointment of a BSL adviser and the establishment of reporting duties are positive steps, and expectations must be managed carefully. Adequate resources are required to ensure implementation is effective. Overall, the provisions are sound, and 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?

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

The principle of placing a duty on Welsh Ministers to promote and facilitate the use of BSL is supported. This aligns with the broader goals of equality and inclusion. The duty must be supported by clear guidance, funding, and infrastructure to avoid creating unrealistic expectations. There is a need for investment in the basic infrastructure that will be needed to support the implementation of this bill. 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 and ensure that promotion efforts are inclusive.

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. This provision is supported, 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. There is a lack of capacity within the BSL interpreter market to meet current and growing demand which will have an impact on implementing the bill. Specialist skills are required and the capacity gap should be addressed. The strategy should 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

Welsh Ministers publishing BSL guidance to support public bodies in meeting their duties is supported. 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. It is also vital that guidance is produced to ensure there is a consistent approach to implementation across all public bodies.

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

The requirement for public bodies to publish BSL plans, as this introduces transparency and accountability is supported. There are concerns 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 who are already stretched, with growing demands and an increase in duties places upon us, the allocation of funding and resources is something which is essential to ensure effective delivery of any new pieces of legislation or plans.

Plans must be co-produced and reflect local needs. The Bill should include provisions for support and oversight to ensure that plans are not tokenistic and lead to real improvements.

5 - The appointment of a BSL adviser

The appointment of a BSL adviser is a positive step, and expectations must be managed. The adviser should be a fluent BSL user and have a deep understanding of the challenges faced by Deaf communities. The adviser should 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 public bodies and Welsh Ministers need to report should be identified, with expectations being realistic. Also guidance and templates developed to assist in reporting to ensure consistency. Alignment of reporting duties would be helpful with an important consideration given to resources and capacity within teams to be able to deliver the increasing duties.

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

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. Any subordinate legislation should be subject to robust scrutiny and co-production with Deaf

communities and relevant stakeholders to ensure that regulations are practical, inclusive, and aligned with the lived experiences of BSL users. Clear parameters should be set and 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?

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. Training should be provided to public bodies to ensure effective implementation. Accessibility of information - Current systems and processes often fail to provide information in accessible formats. This will take significant resources in way of time and financial investment. Limited engagement mechanisms - Public bodies may lack established links with Deaf communities which is a barrier and can make co-production difficult. Insufficient capacity in BSL interpreters: Shortages of BSL interpreters can impact the delivery of any action plans. 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?

There are concerns about the financial implications of implementing the Bill. While the goals are commendable, achieving them will require substantial investment in interpreter services, staff training, accessible communication tools, and engagement mechanisms. As above, shortages in qualified interpreters and systems and processes not always able to provide information in accessible formats for deaf people will impact delivery and incur costs. There will be financial investment required in implementation.

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?

Consistency in approaches – guidance is essential to ensure that a consistent approach is delivered across Wales. Training would be welcomed and a support infrastructure set up. Managing expectations - The Bill must be clear about what is achievable and ensure that expectations are aligned with available resources. System/process changes - Implementing the Bill will require significant changes to internal systems, which may be complex and resource intensive. 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.

Anything else?