

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Bil Iaith Arwyddion Prydain (Cymru)

Ymateb gan: Iechyd Cyhoeddus Cymru

Welsh Parliament

Equality and Social Justice Committee

Inquiry: British Sign Language (Wales) Bill

Evidence from: Public Health Wales



Public Health Wales is the national public health agency in Wales and exists to protect and improve health and well-being and reduce health inequalities for people in Wales.

Public Health Wales is pleased to provide this written submission to the British Sign Language (Wales) Bill consultation on 12 September 2025. Public Health Wales is the national public health agency in Wales and exists to protect and improve health and well-being and reduce health inequalities for people in Wales. We are one of the 11 organisations that make up NHS Wales.

This submission reflects considerations that focus on the delivery of our strategic priority to deliver excellent public services within the Health Protection and Screening Services directorate.

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

Public Health Wales welcomes the British Sign Language (Wales) Bill and are committed to the promotion and use of British Sign Language within the delivery of excellent public health services. The current provision and facilitation of BSL within public health services considers the requirements placed upon public bodies under the Equality Act 2010. The proposed British Sign Language (Wales) Bill will strengthen this provision and reflects the formal recognition of BSL.

Public Health Wales HPSS Directorate recognises the importance of providing equitable communication support for people who are D/deaf and use BSL. While significant strides are being made in terms of information provision and stakeholder engagement, challenges remain. These include workforce limitations; interpreter/translator capacity; funding; procurement infrastructure and mechanisms for quality assurance. Effective implementation of the Bill has the potential to address these challenges and ensure that high quality accessible health communication becomes standard practice across all services.

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

A duty on specified public bodies to publish BSL plans

It is noted that Public Health Wales will be required to prepare and publish a BSL plan within 12 months of publication of the National BSL Strategy. This will require identification of dedicated staff resource to develop, engage with the D/deaf community and publish the strategy including in BSL format. This has additional costs, as identified within the financial implications of the Bill Explanatory Memorandum. To effectively implement this additional funding allocation to PHW is required.

Collaborative approaches will be required across health services to develop plans with the D/deaf community and supporting organisations and ensure people are aware of the support and the resources available to them.

Additional questions

What provision is there currently within health services to meet the communication needs of Deaf BSL users?

Scheduled Health Appointments: Public Health Wales Screening Division facilitate the use of BSL interpreter services for scheduled health appointments which are pre-arranged using the services of the Wales Interpretation and Translation Services (WITS). Face to face interpreters must be pre-booked and Public Health Wales are committed to provision of BSL interpreters through WITS though acknowledges the known capacity limitations in this provision.

Emergency or urgent care: Emergency or urgent care provision of services such as within a health protection response would look to provide services to Deaf BSL users on a case by case basis.

Digital channels: Public Health Wales Screening Division provides a range of screening information in multiple formats, including BSL, aligned to the patient journey. A systematic programme of work is underway to address any gaps in provision of available materials to ensure equitable access to information. This work is ongoing.

Public Health Wales Vaccine Preventable Disease Programme have the following resources available or in train in BSL:

- RSV Older Adults in BSL Video
- Get vaccinated against Shingles BSL Video
- Protection against Meningitis and Septicaemia (MenACWY) BSL Video
- Protect your baby against rotavirus infection BSL Video
- BCG vaccine for babies and Children BSL video

Under development:

- New BSL resource being produced in line with changes to children's schedule and CYP programmes.
- Further BSL resource will be produced for Covid Booster , Flu, RSV and Shingles once complete.

Are there any current plans or projects within your organisation aimed at improving communication support for Deaf BSL users accessing health services?

Public Health Wales Screening Division and Vaccine Preventable Disease Programme are committed to ensuring public information is consistently available in Welsh, English, and BSL. This is vital to ensure accessible, alternate formats can support informed decision-making on take up of public health services including screening and vaccination.

To improve communication support for deaf BSL users Public Health Wales work in close collaboration with organisations such as RNID and the British Deaf Association (BDA). These partnerships are integral to the co-production and dissemination of high quality BSL resources. Stakeholder communications, including outreach to third-sector partners and health professionals, are being used to raise awareness of the newly available materials.

To improved access to accessible resources QR codes are being incorporated into printed screening materials as standard practice. These link directly to BSL video content, allowing service users to access information in their preferred format at key points in the screening pathway, for example, about invitations or result notifications.

What are the main barriers that health services face in improving communication support for Deaf BSL users?

BSL Translation of Information

Translation and production of BSL resources are cost-intensive and must be funded from existing budgets. Updating BSL materials requires re-filming and re-editing, which incurs additional costs not faced with written translations.

Unlike Welsh language services, there is currently no national BSL procurement framework. Services must independently source and commission translators, resulting in inconsistent costs and administrative inefficiencies.

Public Health Wales would support the development of a centralised system for development of BSL translation of information provision and would commit to utilising such a central function.

BSL interpretation provision

There is limited workforce capacity within BSL interpreters with a small pool of NRCPD-registered BSL translators in Wales, particularly those with knowledge of Welsh dialects. This creates bottlenecks and risks around capacity, delays, and cost escalation when developing this type of information.

Services, unless they have a BSL QA advisor, have no way of quality assuring BSL information and rely on accredited translators to guide us. However, our experience has led us to work closely with translators to ensure they understand the technical accuracy of the health information to be conveyed and not deviate from this. This can often be labour intensive and can lead to delays.

While face-to-face interpretation is considered best practice, availability can be inconsistent. Expansion of on-demand services (e.g., Insights App, VRI, VRS) could help mitigate this issue but requires central investment. A "Once for Wales" approach to

deploying VRS and VRI systems would provide a more inclusive and standardised communication pathway.