

# **Financial Implications of the British Sign Language (Wales) Bill**

November 2025

# 1. Introduction

- 1.** On 24 April 2024, Mark Isherwood MS was successful in a ballot held under the Senedd's Standing Order 26.87 for the right to seek leave to introduce a Member Bill. He was given leave to proceed with the Bill on 19 June 2024.<sup>1</sup>
- 2.** The British Sign Language (Wales) Bill<sup>2</sup> (the Bill) and Explanatory Memorandum (EM), including the Regulatory Impact Assessment (RIA), was subsequently introduced by Mark Isherwood MS (the Member in charge) on 14 July 2025.<sup>3</sup>
- 3.** The Finance Committee (the Committee) took evidence on the financial implications of the Bill on 18 September 2025, from:
  - Jane Hutt MS, Cabinet Secretary for Social Justice, Trefnydd and Chief Whip;
  - Amira Evans, Head of Equalities, Welsh Government; and
  - Bethany Thomas, British Sign Language Policy Manager, Welsh Government.<sup>4</sup>
- 4.** Followed by a session on 24 September 2025 with the Member in charge:
  - Mark Isherwood MS, Member in Charge of the Bill;
  - Gareth Rogers, Bill Manager, Senedd Commission; and
  - Martin Jennings, Senedd Research, Senedd Commission.<sup>5</sup>
- 5.** Policy scrutiny of the Bill was undertaken by the Equality and Social Justice Committee.<sup>6</sup>
- 6.** The Legislation, Justice and Constitution Committee also considered the Bill in accordance with matters which fall within its remit.<sup>7</sup>

---

<sup>1</sup> Plenary, RoP, 19 June 2024

<sup>2</sup> British Sign Language (Wales) Bill, as introduced

<sup>3</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025

<sup>4</sup> Finance Committee, RoP, 18 September 2025

<sup>5</sup> Finance Committee, RoP, 24 September 2025

<sup>6</sup> Equality and Social Justice Committee

<sup>7</sup> Legislation, Justice and Constitution Committee

## 2. Financial implications of the Bill

**7.** The Bill intends to:

- place a duty on Welsh Ministers to promote and facilitate the use of British Sign Language (BSL) and prepare and publish a strategy which sets out how it will fulfil this duty and to report on its progress;
- place a duty on listed public bodies to prepare and publish a plan on how it intends to facilitate the use of BSL and report on its progress. Welsh Ministers must publish guidance which sets out how listed public bodies can promote and facilitate the use of BSL;
- act as a platform to ensure improved services and better outcomes for the Deaf community through greater access to public services such as health and education, improve BSL signers employment outcomes and enable them to live in a society where their language and culture are both recognised and promoted.<sup>8</sup>

### Cost Summary

**8.** The costs included in the RIA are appraised across a 10 year period between 2026-27 and 2035-36 inclusively. The RIA shows the total net cost of the Bill over the appraisal period is approximately £3.8 million to £4.1 million.<sup>9</sup>

**9.** Costs incurred by the Welsh Government are estimated to be £1.6 million across the appraisal period, with listed public bodies incurring costs between £2.2 million and £2.5 million.

**10.** A summary of the costs outlined in the RIA are included in the table below:<sup>10</sup>

---

<sup>8</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 3

<sup>9</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 68

<sup>10</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 68

Table 1. Costs associated with the British Sign Language (Wales) Bill from 2026 to 2036

Cost description	Cost (£)
<b>Welsh Government</b>	
Adviser	1,131,800
Assisting Panel	247,000
First National BSL Strategy and guidance	106,100
Report on strategy	60,100
Updated BSL strategy	64,600
Total costs	1,609,600
<b>Listed Public Bodies costs</b>	
BSL Plan	711,900 – 1,092,700
Reporting on BSL Plan	726,400
Review / updating of plan	711,900
Total costs	2,150,200 – 2,531,000
Total Bill costs	3,759,800 – 4,140,600

11. The RIA states that the:

*“Regulatory Impact Assessment has been informed by formal conversations and a variety of informal discussions with representative groups and organisations who will be impacted upon by the Bill.”<sup>11</sup>*

12. In terms of engagement with the Welsh Government on the costs associated with the Bill, the Member in charge confirmed that his team had “constructive working engagement” with Welsh Government officials, “including the financial costings attached to it”.<sup>12</sup>

13. The Cabinet Secretary described it as “a strong collaboration”, stating that:

<sup>11</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 73

<sup>12</sup> Finance Committee, RoP, 24 September 2025, paragraph 12

*"I'm really pleased to have been able to offer support and collaborate with Mark on this because it is about facilitating and promoting the use of BSL in Wales."*<sup>13</sup>

**14.** The Cabinet Secretary also stated that the costs in the RIA were "reasonable"<sup>14</sup> and that they are also "cost-effective and represent value for money",<sup>15</sup> adding that:

*"... I think we're confident that, the way the RIA has been developed, it is estimating costs on known experience ... I think we're learning from Welsh legislation, and the Bill team supporting Mark is also looking to that experience. So, it is consistent, we believe, in terms of that standardised approach to estimating costs."*<sup>16</sup>

## Unquantified Costs

**15.** The RIA says "the detail of what will be contained in the National BSL Strategy, associated guidance and the BSL plans is not included on the face of the Bill itself". It further states:

*"It will be for Welsh Ministers to determine the content of the National BSL Strategy and the guidance. It will be for each of the listed public bodies to determine the contents of its own BSL plan."*<sup>17</sup>

**16.** The RIA explains the National BSL strategy and the BSL plans will be the primary documents that will determine how BSL is promoted and its use facilitated in Wales. Consequently, it notes:

*"Without knowing the full detail of what those key documents will contain, the costs attributed to implementing them must be counted as unquantified."*<sup>18</sup>

**17.** In written evidence, the Cabinet Secretary also added that:

---

<sup>13</sup> Finance Committee, RoP, 18 September 2025, paragraph 150

<sup>14</sup> Finance Committee, RoP, 18 September 2025, paragraph 158

<sup>15</sup> Finance Committee, RoP, 18 September 2025, paragraph 162

<sup>16</sup> Finance Committee, RoP, 18 September 2025, paragraphs 189-190

<sup>17</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 72

<sup>18</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 72

*"Welsh Government agrees that it is not possible to estimate the implementation costs accurately at this stage as these costs are unquantified."*<sup>19</sup>

- 18.** The Member in charge explained why costs relating to these aspects of the Bill were not included in the RIA:

*"... the Bill itself, as you know, is a framework Bill. It doesn't itself specify the actions that the strategy might direct or that public bodies might include in their plans. There are expectations about what that should include, but it doesn't prescribe what those should be or the further costings associated with that. So, the costings are accurate for what the Bill proposes, but they don't seek to address anything beyond that."*<sup>20</sup>

- 19.** He added that the cost estimates in the RIA:

*"... cannot and do not seek to identify any additional costs that might incur in consequence of the strategies and plans that the Bill would require."*<sup>21</sup>

- 20.** The Member in charge also confirmed that no modelling of future costs had taken place "in any great detail", explaining that:

*"It's a private Member's Bill. Even with the Welsh Government working with us, that was only on what the Bill itself stated. We haven't got the resource to do that level of work."*<sup>22</sup>

- 21.** An official accompanying the Member in charge also stated that producing these cost estimates "would have been very, very difficult" and that "we couldn't really have put expectations for the Welsh Government either at that time".<sup>23</sup>

## Benefits

- 22.** The RIA notes that it is not possible to quantify benefits of the Bill as these will be dependent on the content of the national BSL strategy and the BSL plans,

---

<sup>19</sup> Welsh Government, Welsh Government position on costs for the BSL (Wales) Bill, September 2025, page 3

<sup>20</sup> Finance Committee, RoP, 24 September 2025, paragraph 14

<sup>21</sup> Finance Committee, RoP, 24 September 2025, paragraph 16

<sup>22</sup> Finance Committee, RoP, 24 September 2025, paragraph 18

<sup>23</sup> Finance Committee, RoP, 24 September 2025, paragraph 19

together with how they are implemented across Wales. However, it adds “the practical benefits of the Bill will be significant”.<sup>24</sup>

**23.** In giving evidence to the Committee, the Member in charge also indicated that the Bill places a “realistic expectation” that public bodies “will not only look at this as a cost, but as an investment”.<sup>25</sup>

**24.** The Cabinet Secretary stated that, due to the framework nature of the Bill, and because the details of the BSL strategy and plans are not yet known, the Welsh Government “can't fully assess the Bill's overall impact or its full cost-benefits”.<sup>26</sup>

**25.** Nonetheless, the Cabinet Secretary said:

*“... there could be savings in terms of the fact that this is going to be about prevention, engagement and good delivery of services.”<sup>27</sup>*

## Committee View

**26.** The Committee welcomes the Bill’s intentions and particularly the Member in charge’s commitment to ensuring that it leads to meaningful action to ensure improved services and better outcomes for the deaf community.

**27.** The Committee is encouraged that the Welsh Government has worked closely with the Member in charge to support the drafting of the Bill and the RIA, and that this has extended to technical and policy support, which has informed the cost estimates. We believe that this has resulted in clear and robust costs and shows what can be achieved when the Welsh Government works closely with non-government Members on developing legislation, and we applaud this collaborative approach which should be seen as a model of good practice.

**28.** The Committee has previously recommended<sup>28</sup> that the Welsh Government works with individual Members and/or the Committee proposing legislation by providing relevant financial information and expertise prior to a Bill’s

---

<sup>24</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 90

<sup>25</sup> Finance Committee, RoP, 24 September 2025, paragraph 20

<sup>26</sup> Finance Committee, RoP, 18 September 2025, paragraphs 155-156

<sup>27</sup> Finance Committee, RoP, 18 September 2025, paragraphs 169

<sup>28</sup> Finance Committee, Financial Implications of the Food (Wales) Bill, May 2023, Recommendation 1

introduction and we welcome that this approach has been followed on this occasion.

**29.** The Committee notes that this is a framework Bill which sets out specific areas of action and expectation, and that costs relating to implementing key provisions, such as the BSL strategy and BSL plans, have not been modelled or quantified (the consideration of specific costs relating to the strategy and plan is considered in further detail under chapter 3).

**30.** We also note that the Bill could lead to savings related to improving services and prevention and other benefits, and agree with the Member in charge that the costs associated with the Bill should be seen as an investment. However, we also acknowledge that these benefits have not been costed because the details of the strategy and plans are not yet known. The Committee understands why it has not been possible to quantify these costs given they go beyond the scope of the Bill and due to the significant resources required to produce such figures at this stage. The Committee also recognises that calculating such costs is difficult, due to the lack of information that is available as a basis for any calculations.

**31.** However, we believe that additional transparency regarding the work undertaken to calculate the benefits of the Bill would be helpful, to understand the savings that could be accrued, and we ask the Member in charge to work with the Welsh Government to assess these costs.

**Conclusion 1.** The Committee is broadly content with the financial implications of the Bill as set out in the Regulatory Impact Assessment, subject to the comments and recommendations in this report.

**Conclusion 2.** The Committee welcomes the collaborative approach between the Member in charge and the Welsh Government in developing the costs of the Bill, and considers this a model of good practice for future non-government Bills.

**Recommendation 1.** The Committee recommends that the Member in charge works with the Cabinet Secretary to analyse the cost benefits of the Bill and updates the Regulatory Impact Assessment to include further information on these benefits, including how they will be analysed and when they are anticipated to be delivered.



### 3. Specific costs arising from the Bill

#### Welsh Government Costs

**32.** Under the Bill it would be for the Welsh Government to develop a BSL strategy with input from a BSL Adviser and an assisting panel, which will set the direction for local BSL plans to be developed by the listed public bodies. The additional resource needed to administer the Bill will be determined by how much additional input is needed on top of the Welsh Government's policy work and planning to the point at which the Bill receives Royal Assent.

**33.** Welsh Government staff costs in the RIA have been based on the latest average gross costs for staff pay bands 2023-24, as set out in the Welsh Government's Pay Policy Statement 2024, published in December 2024, using a 52-week year and five-day working week.<sup>29</sup> These costs include additional employment costs, such as pension and National Insurance contributions.

**34.** The Cabinet Secretary's paper confirms that:

*"The Welsh Government considers generally reasonable assumptions have been made to develop estimates for annual administrative costs to Welsh Government."*<sup>30</sup>

**35.** The RIA states that it is not possible to estimate the current staffing resource that goes into administration of Welsh Government BSL policy in order to estimate current status quo costs, adding that:

*"... it is not possible to calculate how resource currently used could be reassigned or, therefore, any administrative savings for the Welsh Government that would arise from this Bill."*<sup>31</sup>

**36.** The RIA estimates that the Welsh Government would incur costs of £214,300 in the first year of the appraisal period (2026-27). During Plenary on 16 July 2025, the Cabinet Secretary confirmed that the "Welsh Government will provide the

---

<sup>29</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 78

<sup>30</sup> Welsh Government, Welsh Government position on costs for the BSL (Wales) Bill, September 2025, page 3

<sup>31</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 79

costs, as you have outlined, for the first year, in full, for 2026-27 of £214,300"<sup>32</sup>, a point she reiterated when giving evidence to the Committee.<sup>33</sup>

**37.** Further details about the funding provided by the Welsh Government during the first year of the Bill's implementation were provided in the Cabinet Secretary's written evidence:

*"The funding for 2026-27 will be allocated to the Social Justice MEG as part of the 2026-27 Draft Budget. The 2026-27 Draft Budget will be a single year budget. It will not contain planning assumptions in place in respect of future years baselines. Funding the costs for future years, beyond 2026-27, will be a decision for the new Government following the election in May 2026."*<sup>34</sup>

**38.** The Cabinet Secretary also told the Committee that funding the implementation of the Bill beyond 2026-27 would be for "future governments", adding that:

*"We're not binding future Governments and neither can the Member, obviously, identify what all those costs will be for the future, but it's important that in his RIA, he has given that range, in terms of the listed public bodies, of costs. BSL guidance will have an impact on that in terms of what administrative and implementation costs are likely to be."*<sup>35</sup>

**39.** In terms of the costs already allocated by the Welsh Government in relation to supporting BSL, the Cabinet Secretary explained that:

*"... we've allocated £270,000 annually on posts that support BSL policy work, and that's distinct from our disability rights policy team."*<sup>36</sup>

**40.** An official accompanying the Cabinet Secretary provided further details regarding the Welsh Government's current BSL activities, outlining that:

---

<sup>32</sup> Plenary, RoP, 16 July 2025, paragraph 306

<sup>33</sup> Finance Committee, RoP, 18 September 2025, paragraph 167

<sup>34</sup> Welsh Government, Welsh Government position on costs for the BSL (Wales) Bill, September 2025, page 3

<sup>35</sup> Finance Committee, RoP, 18 September 2025, paragraph 202

<sup>36</sup> Finance Committee, RoP, 18 September 2025, paragraphs 209-210

*“... in 2024-25, the Welsh Government established a BSL policy team within our equality and human rights division, and half the team are presented here today. The Cabinet Secretary announced in November 2024 that we would set up a BSL stakeholder group—it was a task and finish group—and that we would also develop a BSL route-map.”<sup>37</sup>*

**41.** The Cabinet Secretary confirmed that there are no conflicts between the Welsh Government’s policy commitments and the aims of the legislation, stating that the current work is “paving the way” for the Bill and that “[I]t is very hand in glove”.<sup>38</sup>

**42.** However, on this point, an official accompanying the Member in Charge stated that the Welsh Government’s current BSL activities:

*“... does suggest that some of the work they're planning to do over the next 18 months is going to tie in and that's going to be some of the background work. So, I'd agree, there's some netting off there, but we don't know what.”<sup>39</sup>*

## **BSL Adviser and Assisting Panel**

**43.** The Bill would require the Welsh Ministers to appoint a person to be the BSL Adviser, with the costs associated with the appointment of a BSL Adviser falling to the Welsh Government. The costs mainly relate to the BSL Adviser’s salary but there will also be transitional costs associated with recruitment to the post.<sup>40</sup>

**44.** The RIA notes<sup>41</sup> the Member in charge has based estimates on costs of a similar recruitment exercise in Welsh Government legislation, namely the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (the ‘VAWDASV Act’).<sup>42</sup>

**45.** The VAWDASV Act includes the requirement to appoint a Ministerial Adviser, the recruitment cost of which was estimated to be £11,000. This includes the cost of advertising the position in the local and national press, appointing an Independent Assessor to oversee the process, establishing a selection panel and

---

<sup>37</sup> Finance Committee, RoP, 18 September 2025, paragraph 164.

<sup>38</sup> Finance Committee, RoP, 18 September 2025, paragraph 174.

<sup>39</sup> Finance Committee, RoP, 24 September 2025, paragraph 35.

<sup>40</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 79.

<sup>41</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 79.

<sup>42</sup> Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, anaw.3

providing administrative support throughout the process and candidates' expenses.<sup>43</sup>

**46.** The Welsh Ministers must be satisfied that the person appointed as adviser is able to communicate effectively in and uses BSL. Given this requirement, the recruitment process will include a BSL translator, with the related costs including BSL services for two days. The day rates used are based on quotes, provided to the Member's Bill team, for providing BSL services (£315 for a whole day and £195 for a half day, plus VAT). Total recruitment costs, which are one-off or transitional costs, are estimated to be £15,800.<sup>44</sup>

**47.** The BSL Adviser would need to work with Ministers and senior officers across Welsh Government departments. A similar approach to the cost estimates for the VAWDASV Act was taken. As with this role, the Ministerial Adviser included in the VAWDASV Act was not a civil service post, but the salary for the post needs to take account of the demands of the role.<sup>45</sup>

**48.** The Member in charge has set the Ministerial Adviser's salary in the Executive Band 1 (Grade 6) of the Welsh Government pay scale, with on-costs (including National Insurance contributions, pension, IT costs and travel and subsistence costs associated with carrying out functions and duties).<sup>46</sup>

**49.** As the Member in charge anticipates that the BSL Adviser role will be located in a Welsh Government building, no additional office facilities will be required, and the administration support provided by Welsh Government staff is included in the cost estimates of the other requirements of the Bill. Therefore, no further resource will be required.<sup>47</sup>

**50.** The Bill also requires the Welsh Ministers to appoint persons to be members of a panel to assist the BSL Adviser.<sup>48</sup> In terms of the costs of supporting the BSL assisting panel, consideration was also given to the costs included in the VAWDASV Act.<sup>49</sup>

---

<sup>43</sup> Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: Explanatory Memorandum, February 2015, page 52

<sup>44</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 79

<sup>45</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 80

<sup>46</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 80

<sup>47</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 80

<sup>48</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 80

<sup>49</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 81

**51.** When asked how costs relating to the BSL Adviser was developed, the Member in charge explained that:

*"... originally, the proposal was for a further commissioner. We know, from the cost of other commissioners, that the cost could have been quite significant, and that was certainly something the Welsh Government were wary of, putting it politely. So this proposal for the adviser is at a far lower cost, but the function will be critical."*<sup>50</sup>

**52.** When asked whether the costs relating to the BSL Adviser provided value for money, the Cabinet Secretary stated that:

*"It does align with our expenditure. We have already got proof of the effectiveness of a national adviser role in VAWDASV, and we do believe that this publicly appointed BSL adviser—and assisting panel, which is crucial; it's not just vested in one person—will really empower deaf leadership and strengthen collaboration and engagement between Welsh Government and the deaf BSL signing community ... We'll get policy right if that's the case, and that has to be value for money and good government."*<sup>51</sup>

## Developing the National Strategy and Associated Guidance

**53.** The Bill intends to place a duty on the Welsh Ministers to prepare and publish a national BSL strategy, which must:

- describe how Welsh Ministers themselves intend to promote and facilitate the use of BSL in the exercise of their functions; and
- describe how Welsh Ministers intend to encourage certain public bodies to promote and facilitate the use of BSL in the exercise of their functions.<sup>52</sup>

**54.** The RIA notes that the first national BSL strategy must be published by the Welsh Ministers within 18 months beginning with the day after the date the Act

---

<sup>50</sup> Finance Committee, RoP, 24 September 2025, paragraph 38

<sup>51</sup> Finance Committee, RoP, 18 September 2025, paragraphs 186

<sup>52</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 82

comes into force. Before publishing the BSL strategy the Welsh Ministers must first consult the BSL Adviser, and any other persons they consider appropriate.<sup>53</sup>

**55.** The BSL strategy must be reviewed at least once in every six years from the date it was first published. If Welsh Ministers wish to revise the strategy they must then publish the revised version of it.<sup>54</sup> Alongside the BSL strategy prepared and published by Welsh Ministers, the Bill also requires the Welsh Ministers to issue guidance to the listed public bodies on how they may promote and facilitate the use of BSL in exercising their functions.<sup>55</sup>

**56.** It also says the strategy will build on work underway, such as the work announced in November 2024 to inform development of a Welsh Government BSL “route map”. The RIA explains:

*“While likely in practise to draw on the work of the BSL Stakeholder Group, the extent to which this will be the case is not known. Nor are the costs relating to the BSL Stakeholder Group known.”<sup>56</sup>*

**57.** The RIA says the Welsh Ministers will also have to publish a report to assess progress made in promoting and facilitating the use of BSL at least once every three years after the BSL strategy is first published.<sup>57</sup>

**58.** The RIA states “[t]o ensure the best possible estimate for the administrative costs, regard was paid to costs of preparing a national strategy as set out in Bills introduced in Wales and Scotland”<sup>58</sup>, including:

- The VAWDASV which included £11,100 of administrative costs to prepare a national strategy;<sup>59</sup>
- The Social Partnership and Public Procurement (Wales) Act 2023 which included £37,200 to produce statutory and supplementary guidance;<sup>60</sup>

---

<sup>53</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 83

<sup>54</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 83

<sup>55</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 83

<sup>56</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 83

<sup>57</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 86

<sup>58</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 83

<sup>59</sup> Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: Explanatory Memorandum, February 2015, page 52

<sup>60</sup> Social Partnership and Public Procurement (Wales) Bill: Explanatory Memorandum, June 2022

- The British Sign Language (Scotland) Act 2015 estimated administrative costs for the Scottish Government to prepare, consult and publish an initial National Plan to be in the range of £40,000 to £80,000;<sup>61</sup> and
- The Food (Wales) Bill estimated the cost of providing a national strategy to be £41,920.<sup>62</sup>

**59.** The Member in charge also confirmed that other legislation from Northern Ireland and New Zealand had been examined in developing the costs for the Bill.<sup>63</sup> The Cabinet Secretary felt that the approach of looking at previous legislation was “very valuable”.<sup>64</sup>

**60.** In addition, an official accompanying the Cabinet Secretary explained that the Welsh Government had worked with the Member in charge to develop costs relating to these provisions:

*“We provided Mark Isherwood's Bill team with the figures for what it takes currently to provide the leadership and the cross-Government work for the BSL stakeholder group that we have, and the development of the BSL route-map. Obviously, there are additional costs in this in relation to interpretation and translation, which won't be reflected in other legislation.”<sup>65</sup>*

**61.** An official accompanying the Member in charge provided further insight into the RIA's calculation of the staff costs associated with these provisions in the Bill:

*“... you are ... almost starting from scratch and assuming nothing has been done beforehand. That way, we set out the pay grades of people we thought would be involved, from director level downwards, and also the additional costs of providing and consulting in BSL. So, we're confident that they seem to be reasonable costs for the entirety of it.”<sup>66</sup>*

---

<sup>61</sup> British Sign Language (Scotland) Bill: Explanatory Memorandum, October 2014

<sup>62</sup> Food (Wales) Bill: Explanatory Memorandum, December 2022

<sup>63</sup> Finance Committee, RoP, 24 September 2025, paragraphs 53-54

<sup>64</sup> Finance Committee, RoP, 18 September 2025, paragraphs 169

<sup>65</sup> Finance Committee, RoP, 18 September 2025, paragraphs 193

<sup>66</sup> Finance Committee, RoP, 24 September 2025, paragraph 42



## Listed Public Bodies Costs

**62.** The Bill will require the listed public bodies to prepare and publish a BSL plan, which must:

- describe how the body intends to promote and facilitate the use of BSL in exercising their functions;
- describe how that body intends to follow the guidance issued by Welsh Ministers under Section 3 of the Bill; and
- contain any other information that the Welsh Ministers may set out in regulations.<sup>67</sup>

**63.** The 34 listed public bodies comprise the 22 local authorities, seven Local Health Boards, three NHS Trusts and two Special Health Authorities (Digital Health and Care Wales (DHCW) and Health Education and Improvement Wales (HEIW)).<sup>68</sup>

**64.** The Bill also requires listed bodies to prepare and publish a report describing what they have done to implement their plans and why they may not have actioned elements of their plan.<sup>69</sup>

**65.** The Cabinet Secretary's written evidence states that:

*"Welsh Government considers the administrative costs to listed public bodies for the second and subsequent years of the Bill provide a reasonable estimate of the resource and cost required, in line with existing RIA costs such as the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Bill."<sup>70</sup>*

**66.** The RIA mentions the cost of producing public authority plans will include staff time to develop and consult on a draft plan, as well as publication and distribution of the final plan. Publication costs will vary depending on the type of publication chosen. The costs associated with publication online are minimal. There is a requirement to publish plans in BSL format.<sup>71</sup>

---

<sup>67</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 87

<sup>68</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 85

<sup>69</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 87

<sup>70</sup> Welsh Government, Welsh Government position on costs for the BSL (Wales) Bill, September 2025, page 3

<sup>71</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 88



**67.** A cost range has been estimated for listed public authorities, assigning time resource to staff on the basis of the National Joint Council for Local Government Services pay-scales for 2024-25. It has been assumed that NHS organisations will have the same resource input and use staff on equivalent pay scales.<sup>72</sup>

**68.** Consultation costs include both the BSL translation of materials, added to this are BSL costs of half a day's cost of two BSL signers and one notetaker, calculated to be £3,259 per listed organisation. Publication costs are £500 per listed organisation, uprated by inflation.<sup>73</sup>

**69.** The high cost range assumes all organisations will require 20 days of a point 48 member of staff, 40 days of a point 40 member of staff and 40 days of a point 25 member of staff. A lower range of costs is included, where staff costs allow for more variance in terms of size of body.<sup>74</sup>

**70.** The RIA notes there is a requirement for listed bodies to review plans within 12 months of the publication of any revised national BSL strategy by Welsh Ministers. It is estimated that the costs of revising plans for listed bodies which decide to update their plans following the review will be the same as the lower range estimated.<sup>75</sup>

**71.** It also states:

*"The cost of implementing the plans is not included in this impact assessment. This will be dependent on the actions that are required in the national BSL strategy, which will be produced by Welsh Ministers."*<sup>76</sup>

**72.** The Member in charge confirmed that the average annual cost to each listed public body of preparing and publishing BSL plans would be £7,500, adding that:

*"Clearly, it'll be more front-end loaded at the beginning, where the higher admin costs in delivering what the Bill requires will be higher, and in some years lower. But that would be the average for the Bill itself. It doesn't, of course, as we've already*

---

<sup>72</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 89

<sup>73</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 89

<sup>74</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 89

<sup>75</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 90

<sup>76</sup> British Sign Language (Wales) Bill: Explanatory Memorandum, July 2025, page 90

*discussed, cover any costs resulting from actions following the plans.”<sup>77</sup>*

**73.** When asked if the costs could be lower than those outlined in the RIA, an official accompanying the Member in charge stated:

*“It's all around how much collaboration there is. I think we felt we'd do a higher estimate, which would be all organisations almost working on their own. But ... local authorities ... were also feeding back, 'We really would like to see this done at a regional partnership level.' So, we would expect the cost to be at the lower end.”<sup>78</sup>*

## Committee View

**74.** The Committee notes that the Bill is expected to deliver long-term value for money by improving access to services for deaf BSL users and reducing inefficiencies caused by communication barriers, and that the BSL Adviser and Assisting Panel are key to ensuring its effective implementation and stakeholder engagement.

**75.** The Committee welcomes that the Welsh Government intends to allocate funding for this Bill for 2026-27 and recognises that it will be for future governments to decide arrangements beyond this point. We also note the work already being undertaken by the Welsh Government relating to BSL policy and believe that it complements the aims and objectives of the Bill.

**76.** Nonetheless, we found it difficult to decouple the costs outlined in the RIA from the costs already committed by the Welsh Government in this policy area. The Committee believes that certain costs in the RIA could be overstated, particularly if arrangements to deliver BSL policy aims are already in place and appropriately funded. However, we were unable to assess this effectively given the lack of clarity around how the Welsh Government's planned BSL policies will interact with the Bill's aims, and we ask the Member in charge to work with the Welsh Government in this area to get a better idea of whether the anticipated costs in the RIA are accurate.

**77.** The Committee understands that the Member in charge based his cost estimates on similar provisions within existing legislation, namely, the Welsh

---

<sup>77</sup> Finance Committee, RoP, 24 September 2025, paragraph 60

<sup>78</sup> Finance Committee, RoP, 24 September 2025, paragraph 63

Language (Wales) Measure 2011, the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, and the the British Sign Language (Scotland) Act 2015. We recognise that the methodology used as a basis for the costs in the RIA was informed by these examples, and that some costs are higher due to the inclusion of BSL-specific needs like interpretation. We believe this is a sensible approach to producing cost estimates and makes the best use of available data to produce a clear overview of the cost of the Bill.

**78.** The Committee notes that substantial costs associated with the Bill are likely to fall on the listed public bodies as they implement their individual BSL plans. While we recognise that the framework nature of the Bill means that these implementation costs have not been included in the RIA, it remains difficult to fully understand the financial impact of the Bill in this area, including how public bodies will be expected to absorb these costs within existing budgets.

**79.** The Committee also believes there is a risk that the costs of implementation could escalate during the course of the appraisal period, given that the scale of the implementation costs, especially for public bodies, are uncertain and based on a range of costs. We believe that these uncertainties could be mitigated by a robust post-implementation review of the legislation that should include an assessment of the actual costs of implementing the Bill. The Committee has recently conducted post-legislative scrutiny<sup>79</sup> of the Public Services Ombudsman (Wales) Act 2019<sup>80</sup>, which included an assessment of costs. We believe that the statutory review provisions in that Act serves as a good practice model for all legislation brought forward in the Senedd.

**Conclusion 3.** The Committee believes that the approach of estimating the costs of the Bill by drawing on comparable legislation makes effective use of existing data and methodologies and that this has produced a clear and credible overview of the financial implications of the Bill.

**Recommendation 2.** The Committee recommends that the Member in charge works with the Welsh Government to clarify how its existing and planned BSL policies will interact with the provisions of the Bill, to determine whether the cost estimates set out in the Regulatory Impact Assessment accurately reflect

---

<sup>79</sup> Finance Committee, *Post-legislative review of the Public Services Ombudsman (Wales) Act 2019*

<sup>80</sup> *Public Services Ombudsman (Wales) Act 2019, anaw.3*

additional financial requirements, or whether some costs may already be covered through existing commitments.

**Recommendation 3.** The Committee recommends that the Member in charge works with the Welsh Government to provide further clarity on the costs arising from the Bill for listed public bodies, particularly in relation to the implementation of BSL plans.

**Recommendation 4.** The Committee recommends that the Welsh Government conducts a post-implementation review of the Bill and for it to include an assessment of the overall costs and benefits of the Bill and whether this meets the expected costs set out in the Regulatory Impact Assessment.