

# **The British Sign Language (Wales) Bill**

## Stage 1 report on the general principles

December 2025



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## Stage 1 report on the general principles

December 2025



# About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:  
**[www.senedd.wales/SeneddEquality](http://www.senedd.wales/SeneddEquality)**

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Current Committee membership:



**Committee Chair:  
Jenny Rathbone MS**  
Welsh Labour



**Mick Antoniw MS**  
Welsh Labour



**Jane Dodds MS**  
Welsh Liberal Democrats



**Altaf Hussain MS**  
Welsh Conservatives



**Julie Morgan MS**  
Welsh Labour



**Sioned Williams MS**  
Plaid Cymru

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## Chair's foreword

Most politicians have ideas for using legislation to deliver change. Few ever get that opportunity, so making it count is vital. The British Sign Language (Wales) Bill, if delivered rigorously, could bring real and lasting change. It represents an important milestone in efforts to recognise BSL as a distinct language and culture in its own right.

The Committee's scrutiny of the Bill has been shaped by the voices of those who use BSL every day. We heard compelling evidence from deaf BSL signers about the barriers they face in accessing a range of public services. Their experiences underline why this legislation matters. It matters not only as a symbolic gesture, but as a foundation for greater transparency and accountability that will improve lives.

The Bill places duties on public bodies and Ministers to promote and facilitate the use of BSL. While we support these commitments; for the Bill to achieve its purpose, implementation must be robust, supported by clear guidance, adequate resources, and considered engagement with deaf BSL signers themselves.

Our report considers both suggested changes to the Bill and barriers to implementation. The greatest threat to the latter is the shortage of interpreters and translators in Wales. Urgent and sustained action is needed to address this and build firmer foundations for the profession in the future.

Our heartfelt thanks goes to everyone involved in our work, not only those who gave evidence, but also the countless individuals who helped us to break new ground in the way we approached our scrutiny.

A handwritten signature in black ink, reading 'Jenny Rathbone'.

**Jenny Rathbone MS**

Chair of the Equality and Social Justice Committee

## Recommendations and conclusions

**Recommendation 1.** We recommend that the Senedd agrees the general principles of the British Sign Language (Wales) Bill at Stage 1. .... Page 25

**Recommendation 2.** We recommend that the Member in Charge reviews the description of BSL used in the Explanatory Memorandum to address the concerns raised by stakeholders and considers the merits of including a clear definition of BSL on the face of the Bill and whether amendments are needed to achieve this. The Member in Charge should aim to set out his response to this recommendation by 7 January 2026 so that if the Bill progresses, Members can consider the response ahead of Stage 2 proceedings. .... Page 26

**Recommendation 3.** We recommend that the Member in Charge of the Bill brings forward amendments at Stage 2 which would require Welsh Ministers to publish the BSL guidance within the same or similar timescales as those specified in relation to the national BSL strategy. We think that unless a compelling argument is made for a different timescale, 18 months after the Bill is enacted should be sufficient and appropriate. .... Page 33

**Recommendation 4.** We recommend that the Member in Charge brings forward amendments at Stage 2 which would require Welsh Ministers to consult on the content of the BSL guidance prior to its publication. .... Page 34

**Recommendation 5.** The Welsh Government should set out in response to this report:

- how it expects listed public bodies to collaborate across administrative boundaries in the preparation of local plans;Page
- how it will build the capacity of listed public bodies so that they are equipped with the right support and expertise to prepare and execute local plans effectively; and
- provide confirmation that the Implementation Team for the Bill has dedicated resources to fulfil this recommendation.

The Welsh Government should confirm that this will be in place ahead of the Stage 1 debate scheduled for 17 December 2025. .... Page 40

**Recommendation 6.** We note that under section 7(2) it is envisaged that Welsh Ministers must produce progress reports in every period of 3 years after



publication of the national strategy. We recommend that the early progress reports required by the Bill, should it become law, involve consideration of whether other public bodies should be added. .... Page 41

**Recommendation 7.** We recommend that the Welsh Government and the Member in Charge consider how the appointments process can ensure that the needs of the Deaf community are reflected appropriately in the appointments process for the BSL Adviser. We would welcome more detail on this matter in response to this report, which we expect in time for the Stage 1 debate on 17 December 2025. .... Page 47

**Recommendation 8.** We recommend that the role of BSL Adviser is recognised as a public appointment that is eligible for pre-appointment scrutiny and that the appropriate committee in the next Senedd is offered the opportunity to conduct a pre-appointment hearing with the preferred candidate. We agree that this change can be achieved informally through agreement between the Welsh Government and the Senedd and should be made now in order to provide a firm signal of intent for the next Welsh Government and Senedd. .... Page 48

**Recommendation 9.** We recommend that the Member in Charge clarifies the options available to complainants requiring recourse in instances where public services are failing to meet their duties under the Bill (if enacted by the Senedd) and considers whether any changes to the Explanatory Memorandum are required that could help in that regard. .... Page 55

**Recommendation 10.** We recommend that the Member in Charge brings forward amendments at Stage 2 which would place duties on Welsh Ministers to prepare and issue guidance on the appropriate route for BSL signers to make complaints about access to services. This should be accompanied by a duty to consult on that guidance with the Office of the Public Services Ombudsman for Wales specified as a mandatory consultee. .... Page 55

**Recommendation 11.** We recommend that the Member in Charge brings forward amendments at Stage 2 to ensure engagement and co-production by placing a formal requirement on Welsh Ministers to consult Deaf BSL signers on the national BSL strategy and guidance. .... Page 58

**Recommendation 12.** We recommend that the Welsh Government ramps up efforts to expand the BSL interpreter workforce and commits to:

- reviewing the timescales for actions that are to be taken forward in the BSL Stakeholder Route Map to ensure they are aligned with the Bill;

- Setting annual targets for the training and recruitment of BSL interpreters and translators;
- Setting clearer and more ambitious target deadlines to prevent slippage. ....Page 67

**Conclusion 1.** It is vital that this Bill, if it becomes law, leads to real and tangible, rather than tokenistic, change.....Page 25

**Conclusion 2.** To ensure meaningful change, the national BSL strategy should contain clear, measurable and time-bound targets. It is vital that the next Welsh Government ensures that this is reflected in the draft BSL strategy that is issued for consultation if the Bill becomes law.....Page 33

**Conclusion 3.** A majority of the Committee have concluded that making it a legal requirement that the BSL Adviser is deaf cannot be achieved without risk of legal challenge that could derail the Bill in its entirety. A majority of the Committee consider this is an unacceptable level of risk. Two Members disagreed with this conclusion. They considered that these risks were outweighed by the strong support expressed by most individuals who gave evidence in favour of making it a legal requirement that the BSL Adviser is deaf.....Page 47

**Conclusion 4.** We welcome the report of the BSL stakeholder group and hope that it will provide a firm basis for progressing issues irrespective of whether this Bill is passed.....Page 59

**Conclusion 5.** The single biggest threat to effective implementation of this Bill, if it becomes law is the shortage of BSL translators and interpreters in Wales. This demands immediate and sustained action.....Page 66

**Conclusion 6.** We note these concerns and think the Member in Charge should look at revising the costs in the Explanatory Memorandum to take account of inflation.....Page 67

# 1. Introduction

- 1.** The British Sign Language (Wales) Bill is a Member proposed Bill that was introduced on 14 July 2025 by Mark Isherwood MS.
- 2.** The Bill was remitted to our Committee by the Business Committee for scrutiny with a reporting deadline of 5 December 2025.
- 3.** The terms of reference were to consider the general principles of the British Sign Language (Wales) Bill and the need for legislation to deliver the stated policy intention. The Committee also considered the Bill's key provisions which consist of:
  - A duty on Welsh Ministers to promote and facilitate the use of BSL.
  - A duty on Welsh Ministers to publish a National BSL Strategy.
  - A duty on Welsh Ministers to publish guidance.
  - A duty on specified public bodies to publish BSL plans.
  - The appointment of a BSL adviser.
  - Reporting duties to be imposed on the public bodies and Welsh Ministers in relation to these duties.
  - The appropriateness of powers in the Bill for Welsh Ministers to make subordinate legislation.

The Committee also considered:

- Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them.
- The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation.
- Whether there are any unintended consequences arising from the Bill; and
- The financial implications of the Bill.

## **The Committee's approach**

**4.** We considered our approach at a special meeting called by the Chair on 21 July 2025.

**5.** We agreed to launch a consultation which ran from 30 July to 12 September 2025. Respondents were invited to take part online, by post and via email. In a first for a Senedd Committee, in addition to the Senedd's two official languages, we were able to accept responses to the consultation in British Sign Language (BSL) if preferred.

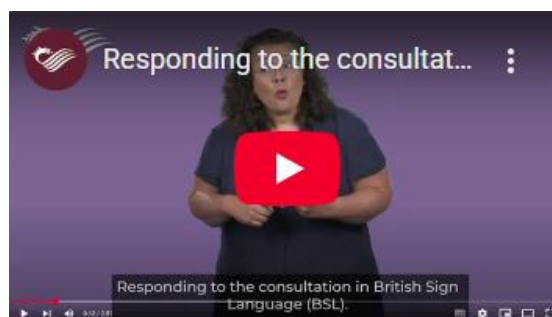
### **Responding to the consultation in British Sign Language (BSL)**

Responses in BSL can only be uploaded using the online response form.

Before completing the Form please prepare a video of you signing your response to the consultation questions.

When you have a video prepared complete the form to access our video upload platform.

<https://youtu.be/GxTJwpUQN8w>



### **Understanding the Legislative Process of the Welsh Parliament**

The Senedd is responsible for making laws in devolved areas in Wales. Before becoming law, Bills go through a process aimed at ensuring that Senedd Members have properly considered the Bill and its consequences. As part of the process, Members can ask a smaller group of members (known as committees) from different political parties to carry out detailed work on the proposals. Committee will usually gather evidence from interested parties and experts before reporting back to the Senedd with their findings.

This process helps to ensure that laws are decided on a transparent and democratic basis.

<https://youtu.be/ZESYUsd5oN8>



**6.** We were keen to ensure that our proceedings reflected the spirit of the Bill. We were delighted that live BSL interpretation was available for all six of our meetings when the Bill was being considered.<sup>1</sup>

**7.** Witnesses gave testimony during sessions in September through to October 2025. For transparency, we asked anyone who appeared during these sessions to state on the record any involvement or role in the development of the Bill. Our Citizen Engagement Team conducted focus groups with Deaf people directly to inform our scrutiny. Full details including links to transcripts are provided in the Annexes.

**8.** As always, we are enormously grateful to everyone who contributed to our work.

**Figure 1 key estimated figures relating to British Sign Language (BSL) in Wales<sup>2</sup>**

**900**

According to the 2021 Census this is the number of residents aged 3 years and over in Wales who reported using BSL as their main language.

**7,200**

The number of individuals who use BSL in Wales estimated by the British Deaf Association of whom 4,000 are deaf.

**Between  
5,600 -  
7,300**

The estimated Welsh BSL population according to a Welsh Government-commissioned report from 2020.

**54**

Current number of BSL interpreters registered in Wales.

<sup>1</sup> Apart from 13<sup>th</sup> October when live interpretation was provided for the first session and had to be added retrospectively to the second session.

<sup>2</sup> Figures taken from the following sources: Office for National Statistics, [Language, England and Wales: Census 2021](#), November 2022; British Deaf Association, [BSL statistics](#), Bowen, R and Holtom, D (2020) [Independent Review of BSL Provision for Adults in Wales: BSL 32 NRCDP](#).

## **Terminology in this report**

**9.** We acknowledge the importance of language, that preferences and views will differ, and that every individual is unique. We want our language to be inclusive and reflect the diversity and vitality of the communities we represent. In this report, we will use the term “BSL signers” rather than “BSL users” and “Deaf BSL signers” when referring to BSL signers who are medically or audiotogically deaf.



## 2. General principles

The Bill's overall aim is to promote the use of British Sign Language (BSL). There is broad support for this aim and the general principles of the Bill. While existing policy and legal frameworks provide some rights, this Bill focuses exclusively on BSL as a language.

**10.** Most of the evidence we received was in support of the general principles of the Bill.<sup>3</sup>

**11.** Those who did not support the Bill did so on the grounds that the Bill did not go far enough, or because they felt that the Equality Act 2010 already provided sufficient protection for BSL signers.<sup>4</sup>

### The need for legislation

**12.** The Bill's Explanatory Memorandum states that there are three primary reasons why legislation is needed:

- To bring Wales into line with precedents set elsewhere in the UK by placing duties on the government and listed bodies to promote and facilitate the use of BSL and achieve legislative parity with other jurisdictions in the UK.
- To recognise the language needs of the BSL signers and their cultural identity and heritage; and
- To break down barriers that Deaf BSL signers currently face in accessing public services.

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<sup>3</sup> 30 out of 32 written responses received supported the general principles.

<sup>4</sup> BSL 30 National Union of British Sign Language Interpreters; BSL 19 Monmouthshire County Council

**13.** Several supporters of the Bill highlighted the lack of progress within the current legal and policy framework as one of the main reasons for supporting the Bill.

**14.** The British Deaf Association (BDA), Caerphilly County Borough Council (Caerphilly CBC), Wrexham County Borough Council (Wrexham CBC), the Royal National Institute for the Deaf (RNID Cymru), Disability Wales and others said that existing equality legislation and accessibility standards have not addressed the barriers faced by Deaf BSL signers sufficiently, and indicated that the Bill would incentivise good practice by public bodies.<sup>5</sup>

**15.** Caerphilly CBC for example said although the Equality Act 2010 provides a framework for accessibility, it “lacks the specificity and clarity” to ensure equitable access for BSL signers.<sup>6</sup>

**16.** Deaf BSL signers who contributed to our focus groups described how:

*“the Equality Act isn’t working for us, the accessible standards in health are not working - so pretty much every sector in Wales isn’t working. So, we want improvements everywhere...”<sup>7</sup>*

**17.** RNID Cymru and the BDA told us that the Bill was required to achieve parity with legislation in other parts of the UK, and to ensure Deaf BSL signers in Wales are not left disadvantaged.<sup>8</sup>

**18.** Professor Jemina Napier of Herriot-Watt University said that the BSL Acts in Scotland and Westminster have helped to generate more visibility and accountability.<sup>9</sup>

## **Recognition of BSL as a language and culture**

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**19.** Several organisations, including the BDA, National Deaf Children’s Society Cymru, and the Wales Council for Deaf People (WCDP) welcomed the Bill’s focus on BSL as a language and culture.<sup>10</sup>

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<sup>5</sup> Written evidence, [BSL 23 British Deaf Association](#), [BSL 07 Caerphilly County Borough Council](#), [BSL 17 Wrexham County Borough Council](#), [BSL 02 Disability Wales](#)

<sup>6</sup> Written evidence, [BSL 07 Caerphilly CBC](#)

<sup>7</sup> British Sign Language Bill: engagement findings

<sup>8</sup> [BSL 23 British Deaf Association](#)

<sup>9</sup> See [British Sign Language \(Scotland\) Act 2015](#) and the [British Sign Language Act 2022](#)

<sup>10</sup> [BSL 23 British Deaf Association](#); [BSL 26 National Deaf Children’s Society Cymru](#); [Record of Proceedings](#), paragraph 143, 22 September 2025

**20.** Charles Hampton of WCDP described the potential impact of the Bill:

*"It will impact deaf people in all walks of life, especially for those that are part of the Welsh signing community. It enables them to be aware of their rights and to have a right to eliminate barriers that they're currently facing and know that they can have provisions in their own language, going forward. It's a fantastic start, and I feel that will grow and it will be a bonus for those in future generations."*<sup>11</sup>

**21.** Tom Lichy of the BDA described the legislation as "a really valuable step forward" in recognising Deaf culture and heritage, and in acknowledging their "multilevel identity as deaf and disabled."<sup>12</sup>

**22.** Dr Christopher Shank, a linguist from Bangor University stated that it was "an important step in recognizing, validating, and protecting" the "linguistic presence, rights and identities" of "an under-recognized, often overlooked, Indigenous minority language and cultural group within Wales."<sup>13</sup>

**23.** Similarly, Professor Jemina Napier said that the Bill was not only needed to improve access to public services but also because of the opportunities it provides to "promote BSL as a language of the nation and promote BSL as a language of a minority group, and so in Wales you're talking about a minority within a minority, in some respects."<sup>14</sup>

**24.** The Cabinet Secretary, Jane Hutt MS, said that the Welsh Government had initially questioned the need for legislation and explored whether the same goals could be achieved through policy development. The Cabinet Secretary confirmed that she had had extensive engagement with the Member in Charge of the Bill, Mark Isherwood MS and that the Welsh Government would be supporting the legislation.<sup>15</sup>

**25.** Mark Isherwood MS (the Member in Charge) said the Bill was designed to ensure Wales was not the only UK nation without BSL legislation. He said they had explored models used in other nations and the emerging evidence of their impact as part of the development of the Bill.<sup>16</sup>

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<sup>11</sup> Record of Proceedings, paragraph 143, 22 September 2025

<sup>12</sup> Record of Proceedings, paragraph 146, 22 September 2025

<sup>13</sup> BSL 20 Dr Christopher Shank

<sup>14</sup> Record of Proceedings, paragraph 293, 22 September 2025

<sup>15</sup> Record of Proceedings, paragraph 186, 13 October 2025

<sup>16</sup> Record of Proceedings, paragraph 128, 15 September 2025

## Framework legislation

**26.** The Bill itself sets out a planning and reporting framework for Welsh Ministers and public bodies but does not detail the specific actions that will be needed to promote and facilitate the use of BSL. Instead, the Bill requires Welsh Ministers and listed public bodies to set out their priorities and planned actions in the national BSL strategy and local BSL plans.

**27.** Although stakeholders identified a number of actions they wanted to see to promote and facilitate the use of BSL and were keen to see progress, the Committee did not hear strong evidence that specific actions or targets should be prescribed on the face of the Bill.

**28.** The BDA disagreed with setting specific targets within the Bill and said the legislation should instead empower the Deaf community to lead on deciding priority areas for action.<sup>17</sup>

**29.** Similarly, Dr Rob Wilks said the difficulty was that there were “so many and, if anything, too many problems to be resolved” and advocated for the Bill to have a more general focus. Dr Wilks emphasised the importance of ensuring deaf people’s views and experiences feed into strategy and planning.<sup>18</sup>

**30.** Professor Jemina Napier said that a broader legislative framework as provided by the Bill could allow further exploration of what needs and demands may emerge. However, she said there was a risk actions might be deprioritised without specific targets.<sup>19</sup>

**31.** One of the concerns of stakeholders was that the Bill will not deliver tangible improvements for Deaf BSL signers. Dr Rob Wilks argued that the Bill “...risks reinforcing the Deaf Legal Illusion, which refers to law that appears progressive but in practice delivers little meaningful change.”<sup>20</sup>

**32.** Kieran Sawdon of NDCS said there was a risk the duties would become “performative in nature” but argued this could be mitigated through the BSL Adviser role and the democratic checks and balances in the Bill.<sup>21</sup>

**33.** The Member in Charge, Mark Isherwood MS, referred to the Bill as a framework Bill on several occasions and conceded that “in an ideal world” he

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<sup>17</sup> [Record of Proceedings](#), paragraph 186, 22 September 2025

<sup>18</sup> [Record of Proceedings](#), paragraph 267-268, 22 September 2025

<sup>19</sup> [Record of Proceedings](#), paragraph 352, 22 September 2025

<sup>20</sup> [BSL 09 Dr Rob Wilks, University of the West of England](#)

<sup>21</sup> [Record of Proceedings](#), paragraph 23, 29 September 2025

would have preferred including more specific actions on the face of the Bill.<sup>22</sup> He argued, however, that processes included in the Bill such as the requirement to report on progress would mitigate these risks. More importantly, he said there was a need to hear from Deaf communities, the BSL Adviser and the assisting panel before deciding what the priorities should be. He also argued that Welsh Ministers should have discretion to implement the legislation, and public bodies should be able to respond to local priorities.<sup>23</sup>

**34.** The Member in Charge added that the priority was to “achieve the consensus necessary to get this Bill onto the statute book.”<sup>24</sup>

**35.** When questioned, the Cabinet Secretary argued that the Bill was not “strictly speaking” a framework Bill as it did not rely on secondary legislation to fill in its detail. However, regarding the practicalities she confirmed that “a future incoming Government will have the responsibility to develop the detail of the national strategy and BSL guidance”.<sup>25</sup>

## Definition of BSL

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**36.** The Bill as introduced does not include a definition of BSL and refers exclusively to BSL and not to other forms of communication used by deaf people.

**37.** In response to the Committee’s questioning on why other forms of communication were omitted, the RNID, BDA and WCDP said whilst other forms of communication tend to be communication tools which use aspects of BSL or English and Welsh, BSL is a language in its own right.<sup>26</sup> They therefore argued it is right that the Bill focuses on BSL, and suggested that empowering Deaf BSL signers to design and deliver solutions would help to drive improvements across the board.<sup>27</sup>

**38.** Some local authorities such as Caerphilly CBC highlighted the diversity of communication needs that exists within deaf communities and argued this should be reflected in the Bill and its implementation. The BDA suggested extra support may be needed for deafblind people who use tactile signing.<sup>28</sup>

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<sup>22</sup> ~~Record of Proceedings~~ paragraph 51, 15 September 2025

<sup>23</sup> ~~Record of Proceedings~~ paragraph 42, 15 September 2025

<sup>24</sup> ~~Record of Proceedings~~ paragraph 51, 15 September 2025

<sup>25</sup> ~~Record of Proceedings~~ paragraphs 192 and 193, 13 October 2025

<sup>26</sup> ~~Record of Proceedings~~ paragraphs 20 – 22, 152, 22 September 2025

<sup>27</sup> ~~Record of Proceedings~~ paragraph 152, 22 September 2025

<sup>28</sup> ~~Record of Proceedings~~ paragraph 152, 22 September 2025

**39.** Dr Kate Attfield described the definition of BSL used in the Explanatory Memorandum (EM) on paragraph 162 as “inaccurate and condescending”. Dr Attfield argued that her definition of BSL – one which makes it clear that BSL has its own syntax and grammar – was preferable and should be included in the EM. She suggested the description should make it clear that other forms of communication, such as Makaton or Sign Supported English are not included within the definition.<sup>29</sup>

**40.** Dr Christopher Shanks of Bangor University and Dr Rob Wilks of the University of the West of England said regional variations of BSL should be recognised within the definition.<sup>30</sup>

**41.** The Member in Charge told us that this was “unashamedly a language Bill.” However, he said he hoped and expected that the Bill would further drive awareness and understanding of wider deaf and hearing loss issues and improve the provision necessary to support those groups.<sup>31</sup>

## **The Committee’s view**

### **On the general principles of the Bill**

**42.** We note that the vast majority of the evidence we received supported the general principles of the Bill.

**43.** In considering the need for legislation, we heard compelling arguments to support the case for this Bill. Some of the evidence argued that the Bill is unnecessary and that sufficient protections already exist for BSL signers under existing policies and legislation, not least the Equality Act 2010. There was, however, only limited evidence to support this. The majority of stakeholders and BSL signers themselves told us that more often than not, the needs of signers are overlooked and that accessing public services can be a challenge for far too many deaf people.

**44.** It is a concern that as things stand, unless the Senedd acts through passing legislation, BSL signers in Wales will continue to have significantly weaker statutory protections than elsewhere in the United Kingdom. To avoid this outcome, there is a clear need to legislate to achieve parity with legislation passed

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<sup>29</sup> [BSL 10 Dr Kate Attfield](#)

<sup>30</sup> [Record of Proceedings](#), paragraph 180, 22 September 2025

<sup>31</sup> [Record of Proceedings](#), paragraph 17, 15 September 2025



by the UK Parliament, Scottish Parliament and which is expected to be enacted by the Northern Ireland Assembly.

**45.** We also note the positive potential impact that this Bill could have on enhancing the status and recognition of BSL as a distinct minority language and culture. It is clear from our work that for BSL signers in Wales this is of huge symbolic, as well as practical, importance. As a nation with a history of struggle to promote another minority language, we are pleased to lend our support to this legislation.

**Recommendation 1.** We recommend that the Senedd agrees the general principles of the British Sign Language (Wales) Bill at Stage 1.

### **On the framework nature of the legislation**

**46.** This Bill would institute a planning and reporting framework which would aim to facilitate and promote the use of BSL by the Welsh Government and key public services. As there is considerable evidence to suggest that current arrangements are not working effectively in the context of BSL, this aim is both laudable and necessary.

**47.** Although the Cabinet Secretary may dispute the extent to which the Bill can be considered a “framework Bill” in the purest sense of the term it is notable that a significant amount of the practical detail will be set out in future strategies, plans and guidance, rather than on the face of the legislation. This contrasts noticeably with the Sign Language Bill being considered by the Northern Ireland Assembly.<sup>32</sup> We understand the rationale for this lack of detail and accept the need for flexibility and further engagement and consultation with stakeholders. The views of Deaf BSL signers will be key in shaping these documents and we welcome the reassurances received in that regard, as part of this process.

**48.** Nevertheless, relying too heavily on a framework approach can have limitations in terms of scrutiny, accountability and legal clarity. Above all, we are mindful of the concerns expressed to us by stakeholders that the Bill risks being “performative” or could reinforce a legal “illusion” of safeguards for Deaf BSL signers if there is a failure to follow-up words with concrete actions.

**Conclusion 1.** It is vital that this Bill, if it becomes law, leads to real and tangible, rather than tokenistic, change.

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<sup>32</sup> See Northern Ireland Assembly, [Sign Language Bill](#), as introduced

## On the definition of BSL

**49.** We note that there is no definition of BSL in the Bill. Furthermore, we note the concerns that the description of BSL used in the Explanatory Memorandum may require further clarification and finessing.<sup>33</sup> We did not receive sufficient evidence to reach a conclusive view on whether there should be a definition added to the Bill itself, however, we think the pros and cons need further consideration.

**Recommendation 2.** We recommend that the Member in Charge reviews the description of BSL used in the Explanatory Memorandum to address the concerns raised by stakeholders and considers the merits of including a clear definition of BSL on the face of the Bill and whether amendments are needed to achieve this. The Member in Charge should aim to set out his response to this recommendation by 7 January 2026 so that if the Bill progresses, Members can consider the response ahead of Stage 2 proceedings.

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<sup>33</sup> Specifically, paragraph 162 of the Explanatory Memorandum

### 3. Duty to promote, BSL strategy and guidance

This chapter looks at sections 1 to 3 of the Bill. These relate to some of the duties placed on Welsh Ministers to promote and facilitate BSL.

#### The duty to promote and facilitate BSL

**51.** Section 1 imposes a duty on Welsh Ministers to promote and facilitate the use of BSL.<sup>34</sup> A clear majority of stakeholders expressed support for this duty including NDCS, Dr Rob Wilks, Newport City Council, Merthyr Tydfil CBC, Caerphilly CBC, the Association of School and College Leaders (ASCL), and Qualifications Wales.

**52.** Several organisations, local authorities in particular, Dr Kate Attfield, and others emphasised the need for additional funding, investment and national leadership to accompany this duty.<sup>35</sup>

**53.** The WLGA said that they remained concerned about the “deliverability of duties in the Bill” and highlighted funding and availability of interpreters as particularly challenging.<sup>36</sup>

**54.** The National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD) cautioned that:

*“The success of this provision will, however, depend on how it is operationalised. Simply imposing a duty without specifying the mechanisms for delivery risks creating an obligation that is symbolic but lacks substance.”<sup>37</sup>*

<sup>34</sup> British Sign Language (Wales) Bill (As introduced)

<sup>35</sup> BSL 25 National Deaf Children’s Society, BSL 27 Newport City Council, BSL 29 Merthyr Tydfil CBC, BSL 05 Association of School and College Leaders (ASCL), BSL 07 CCBC, BSL 01 Qualifications Wales

<sup>36</sup> BSL 23 WLGA

<sup>37</sup> BSL 32 - National Registers of Communication Professionals working with Deaf and Deafblind People)

**55.** Similarly, the Association of Sign Language Interpreters (ASLI) told us that duties to promote and facilitate BSL “lack specific outcomes” and “risk being aspirational if not underpinned by [...] sufficient resources.”<sup>38</sup>

**56.** The ASLI view was shared by Dr Rob Wilks who compared the duty in section 1 with comparable legislation in other UK jurisdictions and concluded that it “is most similar” to the Scottish Act:

*“It is stronger than the English Act, which only imposes a duty to report on the promotion and facilitation of BSL, rather than a duty to promote and facilitate BSL. The Northern Ireland Bill will only impose a duty to promote on one government department, but gives deaf individuals the right to use BSL or ISL in everyday activities, and also includes a duty to promote deaf culture, not just BSL and ISL.”<sup>39</sup>*

**57.** The Member in Charge told us that the words “promote” and “facilitate” are used in both the British Sign Language (Scotland) Act 2015 and the British Sign Language Act 2022 which would ensure a “consistent approach [is] taken across other UK legislatures.”<sup>40</sup>

## **National BSL strategy**

**58.** Section 2 will require Welsh Ministers to prepare and publish a national BSL strategy which sets out both how they will promote and facilitate the use of BSL in the exercise of their functions and how they will encourage listed public bodies to do the same.

**59.** Stakeholders, including the BDA, and some local authorities said the national BSL strategy should include specific, time-bound actions or targets, to ensure that progress is made.<sup>41</sup> Local authorities and Health Education and Improvement Wales (HEIW) emphasised that these needed to be realistic and deliverable and that the strategy should be developed with input from listed public bodies.<sup>42</sup>

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<sup>38</sup> Written evidence, [BSL 08 Association of Sign Language Interpreters](#)

<sup>39</sup> Written evidence, [BSL 08 Dr Rob Wilks, University of the West of England](#)

<sup>40</sup> PTN 3.1 Correspondence to the Chair from Mark Isherwood MS regarding the British Sign Language (Wales) Bil, 8 October 2025

<sup>41</sup> [Record of Proceedings](#), paragraph 204, 22 September 2025; [BSL 07 Caerphilly CBC](#); [BSL 29 Merthyr Tydfil CBC](#)

<sup>42</sup> [BSL 17 Wrexham CBC](#); [BSL 21 WLGA](#)

**60.** The WLGA said they remained concerned: “There is no detail on what will be included in the National Strategy and therefore what the Local Plans that will be developed will need to look like.”<sup>43</sup>

**61.** Most of the evidence did not offer specific measures that they would like to include in the strategy in the form of targets. However, the ASLI called for “clear workforce development targets” aimed at increasing and supporting retention of qualified interpreters within a set timeframe.<sup>44</sup>

**62.** Dr Rob Wilks said Scotland’s national BSL plan has previously set out vague objectives, and this has made it difficult to measure impact.<sup>45</sup>

### Reviewing the strategy

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**63.** Sub-section 2 provides that Welsh Ministers must publish a strategy within 18 months of the Act coming into force and review the strategy at least every six years and after any updates.

**64.** Stakeholders broadly agreed with proposals that the strategy be reviewed at least every six years. Some, including RNID Cymru, NDCS, Dr Rob Wilks and Professor Jemina Napier suggested that this time period could be too long and emphasised the need to retain some agility to respond to emerging trends.<sup>46</sup>

**65.** The Member in Charge confirmed that the six-yearly period was drawn from similar legislation elsewhere in the UK and had been agreed with Welsh Government Ministers. He added the requirement for a three-year progress report meant the Bill was more thorough than other legislative models.<sup>47</sup>

**66.** On the issue of targets, the Member in Charge set out his views that “for this to be effective and to meet its statutory requirements, there would need to be appropriate targets and timelines applied to the key issues, and that should follow through to the plans also.” Mark Isherwood MS added:

*“But there will be variability, because some public bodies will be further ahead than others, some will have more resource available than others, some [...] will agree to co-operate on a regionalised basis*

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<sup>43</sup> BSL 21 WLGA

<sup>44</sup> Written evidence, [BSL 08 ASLI](#)

<sup>45</sup> [Record of Proceedings](#), paragraph 157, 29 September 2025

<sup>46</sup> [Record of Proceedings](#), paragraph 44, 22 September 2025, [BSL 09 Dr Rob Wilks, University of the West of England](#); [BSL 26 NDCS](#)

<sup>47</sup> [Record of Proceedings](#), paragraph 29, 15 September 2025

*and make better use of the resource they already have. Some may be more possessive of their independence. But the hope and intention is that they will seek to comply with the legislation and make sure that they do what it says on the tin.”<sup>48</sup>*

**67.** The Cabinet Secretary stated that the national strategy will “lay out the steps for Wales to become a nation that respects, promotes and facilitates BSL” and that it was her view that it “should include measurable, time-bound actions to deliver meaningful change.”<sup>49</sup>

## **BSL guidance**

**68.** Section 3 would require Welsh Ministers to issue guidance to listed public bodies on how to promote and facilitate the use of BSL in the exercise of their functions and that this guidance must be available in BSL.

**69.** Most stakeholders welcomed these provisions; however, several specific issues were raised in evidence.

**70.** RNID Cymru, Merthyr CBC, NRCPD all emphasised the important role guidance will play in supporting consistency and effective implementation.<sup>50</sup>

**71.** Several organisations such as Cwm Taf Morgannwg University Health Board (UHB) called for timely publication of the guidance.<sup>51</sup> The WLGA went further and suggested the Bill should be amended to require the Welsh Government to publish guidance alongside the national BSL strategy, or within one calendar month. They argued any delay would place further strain on public bodies and restrict the time available for local authorities to develop and consult on their BSL plans.<sup>52</sup>

**72.** Hywel Dda UHB said that language in the Bill was “not definitive enough” and that this could lead to inconsistency. They emphasised that clarity on resourcing, assessment of the circumstances in which translation is needed, and implementation support would be beneficial.<sup>53</sup>

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<sup>48</sup> [Record of Proceedings](#), paragraph 40, 20 October 2025

<sup>49</sup> [Record of Proceedings](#), paragraph 199, 13 October 2025

<sup>50</sup> [BSL 29 Merthyr Tydfil CBC](#)

<sup>51</sup> [BSL 25 Cwm Taf Morgannwg UHB](#)

<sup>52</sup> [BSL 21 WLGA](#)

<sup>53</sup> [BSL 03 Hywel Dda University Health Board](#)



**73.** NRCDP and RNID Cymru emphasised the need for the guidance to be co-developed in collaboration with Deaf BSL signers, and professionals and for this to be used as the basis of local BSL plans.<sup>54</sup>

**74.** RNID Cymru also highlighted the UK Government's failure to ensure that guidance was available to government departments under section 3 of the British Sign Language Act 2022. They told us that guidance to inform departments on how to improve their provision of BSL "had not been enacted" and cautioned that:

*"each department has published their own plan without the guidance, which has resulted in inconsistent actions across departments. Wales should learn from this process and ensure that the guidance is in place before the plans are developed to ensure that they meet the needs of deaf BSL users."*<sup>55</sup>

**75.** The Committee wrote to the Minister now responsible for these matters on this point. Minister of State for Social Security and Disability, Sir Stephen Timms MP told us that "work to prepare guidance had started" and would be "published in due course". He explained:

*"The BSL Advisory Board, having come to the end of its initial three year term, is in the process of being reappointed, and I envisage that its new membership should be in place by the end of the year. I think its likely that, once it starts meeting, it will set up a sub-group to support this piece of work."*<sup>56</sup>

**76.** With regards to the national BSL strategy, section 2(4) states that the Welsh Ministers must consult the BSL Adviser (created by provisions in section 5) and "any other persons they consider appropriate". However, the Bill as drafted does not impose consultation requirements in respect of the BSL guidance.

**77.** Several organisations emphasised the need for consultation with public bodies when formulating and implementing the national strategy and the

<sup>54</sup> BSL 24 RNID Cymru

<sup>55</sup> BSL 24 RNID Cymru

<sup>56</sup> Correspondence from Sir Stephen Timms, Department for Work and Pensions to the Chair regarding guidance under the British Sign Language Act 2022

guidance, including Caerphilly CBC, Wrexham CBC, Cwm Taf Morgannwg UHB, and Newport City Council.<sup>57</sup>

**78.** The Cabinet Secretary said the guidance would be delivered by an incoming government and would cover “ways of working to support cost-effective planning, reporting and delivery, and also look at ways in which public bodies can effectively publish their own reports as part of existing reporting cycles.” Jane Hutt MS also said the guidance should be delivered alongside the national BSL strategy.<sup>58</sup>

**79.** The Member in Charge confirmed that “the expectation is that the guidance will be published alongside or shortly after publication of the strategy” and that this would be developed with input from the Adviser, advisory panel, and broader community. On the timescales for publishing the guidance however, the Member in Charge and an official acknowledged that this was only an expectation as it is not included as a requirement on the face of the Bill.<sup>59</sup>

## **The Committee’s view**

### **On the duties in sections 1 to 3**

**80.** The duties in sections 1, 2 and 3 of the Bill are key to the overarching aims of the Bill. Most of the evidence we received was supportive of these duties, however, there were also concerns about how they might be delivered in practice. In particular we note that several public bodies were concerned that they would struggle to deliver new duties without dedicated resource.

### **On the BSL national strategy**

**81.** We are content that the provisions of Section 2 setting out how Welsh Ministers will be required to prepare the strategy are broadly adequate. It is clear that the national strategy will play a pivotal role in setting out a more detailed framework for the delivery of the Bill. Some stakeholders called for more detail on what the strategy is likely to contain and therefore what it will mean for them. There is a tension however between calls for more detail on what the strategy is likely to contain (and therefore mean for stakeholders) and the need to allow time for engagement with Deaf BSL signers and other interested parties. It is not clear to us that this tension can be easily reconciled.

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<sup>57</sup> [BSL 07 Caerphilly CBC, BSL 17 Wrexham CBC, BSL 25 Cwm Taf Morgannwg UHB, BSL 27 Newport City Council](#)

<sup>58</sup> [Record of Proceedings](#), paragraph 209, 13 October 2025

<sup>59</sup> [Record of Proceedings](#), paragraph 67 to 69, 20 October 2025

**82.** Nevertheless, it is vital that the strategy provides public bodies, BSL signers and the wider public with clarity on what it is seeking to achieve. This should come in form of clear, measurable and time-bound targets and we welcome the fact that the Cabinet Secretary has acknowledged the need for these in her evidence.

**Conclusion 2.** To ensure meaningful change, the national BSL strategy should contain clear, measurable and time-bound targets. It is vital that the next Welsh Government ensures that this is reflected in the draft BSL strategy that is issued for consultation if the Bill becomes law.

### **On the BSL guidance**

**83.** The requirement for the Welsh Ministers to publish guidance in section 3 is crucial to ensuring consistent application of the legislation by public bodies. Public bodies made it clear that without comprehensive guidance they will struggle to deliver the aims of the Bill.

**84.** Given the crucial relationship between the BSL strategy and the guidance, there were calls for the latter to be issued in a timely fashion. This is especially important given the negative impact that a delay in issuing guidance under the British Sign Language Act 2022 has reportedly had on the quality of plans for UK Government departments. The response from Sir Stephen Timms on behalf of the UK Government which indicates the potential for even further delays to the guidance has only reinforced our belief that specific timescales are needed to ensure timeliness.

**85.** The Bill requires listed public bodies to publish a BSL plan which describes how they will follow the guidance (or why they do not intend to do so) within 12 months of the publication of the national strategy. We therefore think it is fair that Welsh Ministers are required to publish guidance within a timescale which will give public bodies sufficient time to fulfil these requirements.

**Recommendation 3.** We recommend that the Member in Charge of the Bill brings forward amendments at Stage 2 which would require Welsh Ministers to publish the BSL guidance within the same or similar timescales as those specified in relation to the national BSL strategy. We think that unless a compelling argument is made for a different timescale, 18 months after the Bill is enacted should be sufficient and appropriate.

### **On consultation requirements**

**86.** The legislation currently places a requirement on Welsh Ministers to consult on the BSL strategy but is silent with regards to consulting on the guidance. This appears to us to be anomaly which needs addressing.

**Recommendation 4.** We recommend that the Member in Charge brings forward amendments at Stage 2 which would require Welsh Ministers to consult on the content of the BSL guidance prior to its publication.

## 4. BSL plans and listed public bodies

This chapter looks at the requirements placed on listed public bodies in sections 4, 6 and 8 of the Bill as introduced.

### BSL plans

**87.** The Bill would require listed public bodies to prepare and publish a BSL plan within 12 months of the publication of a national BSL strategy, and to report on implementation after a further 12 months. These provisions are set out in section 4 and 6.

**88.** In determining the contents of these plans, the Explanatory Memorandum states that “it will be for each of the listed public bodies to determine the contents of its own BSL plan” as each public body “will have the greatest understanding of their own needs”.<sup>60</sup>

**89.** Most of the submissions we received including from individuals like Dr Julia Terry and Aled Thomas, and organisations such as the Royal College of Psychiatrists Wales, local authorities, and local health boards were supportive of the requirements to produce BSL plans.<sup>61</sup>

**90.** While welcoming the requirements, many local authorities including Caerphilly CBC, Carmarthenshire County Council, Monmouthshire County Council and Wrexham CBC, were concerned about the potential strain on “already stretched services”, highlighting that many public bodies lack the capacity and expertise to meet these duties without substantial support.<sup>62</sup>

**91.** Councillor Ash Lister of the WLGA argued that Welsh Ministers should provide direction on what regional working should look like, and said collaboration could pose real challenges without clarity from the centre.<sup>63</sup>

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<sup>60</sup> Explanatory Memorandum, paragraph 253

<sup>61</sup> [BSL 11 Aled Thomas](#), [BSL 15 Dr Julia Terry](#), [BSL 17 Wrexham CBC](#), [BSL 13 Royal College of Psychiatrists](#), [BSL 03 Hywel Dda UHB](#), [BSL 25 Cwm Taf Morgannwg UHB](#)

<sup>62</sup> [BSL 07 Caerphilly County Borough Council](#), [BSL 04 Carmarthenshire CC](#), [BSL 19 Monmouthshire CC](#), [BSL 17 Wrexham CBC](#)

<sup>63</sup> [Record of Proceedings](#), paragraph 105, 13 October 2025

**92.** The Member in Charge told us that regional working could bring benefits through sharing resources in preparing plans and co-delivering some actions. However he recognised some public bodies may have good reason to maintain elements at a local level, “because the population of need already exists and because the critical mass of services is already there.”

## Reporting on implementation of BSL plans

**93.** Section 6 provides that listed public bodies must submit progress reports to the Welsh Ministers on implementation of their plans 12 months after publication or after any revisions to their plans are made.

**94.** There was a firm view from representatives of public bodies that new administrative burdens should be minimised and many suggested that new reporting duties should be aligned with existing reporting requirements such as those required by the Equality Act 2010 and/or the Well-being of Future Generations (Wales) Act 2015.<sup>64</sup>

**95.** Some public bodies expressed concern regarding “duplicative reporting” and new bureaucratic burdens.<sup>65</sup> Kathryn Cobley of the Welsh Ambulance Service said there was a risk that a separate, bureaucratic reporting process “*overtakes the principles*” of an action plan and that having multiple approaches for different protected characteristics risked undermining the joined-up approach to improving equality and fairness across the board.<sup>66</sup>

**96.** ASCL Cymru argued that reporting requirements “should not increase workload or add unnecessary administrative burden on schools and colleges” adding that data collection should be “streamlined with existing systems wherever possible”.<sup>67</sup>

**97.** The WLGA recommended utilising existing annual equality reporting requirements under the Public Sector Equality Duty to report on progress. They suggested that infrequent reporting requirements would lead to local authorities getting ad-hoc requests for data and information.<sup>68</sup>

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<sup>64</sup> BSL 25 Cwm Taf Morgannwg UHB, BSL 27 Newport City Council, BSL 21 WLGA

<sup>65</sup> BSL 25 Cwm Taf Morgannwg UHB

<sup>66</sup> Record of Proceedings, paragraph 267, 6 October 2025

<sup>67</sup> BSL 05 ASCL Cymru

<sup>68</sup> BSL 21 WLGA



**98.** RNID Cymru supported aligning “streamlined” reporting arrangements so that funding and resources can be “allocated in a way that has the biggest direct impact on BSL users”.<sup>69</sup>

**99.** Dr Rob Wilks did not oppose aligning reporting cycles but said it was important that the duties were not watered down.<sup>70</sup>

**100.** On the question of alignment with other reporting duties, the Member in Charge was clear that alignment with other reporting duties would undermine the Bill’s focus at fundamental level:

*“If this was subsumed, then the focus would be at risk of being lost. The Equalities Act 2010 and the Well-being of Future Generations (Wales) Act 2015 and otherwise have varying reporting duties, but they’re general; they don’t apply to BSL. This is a BSL language Act. It’s not an equalities Act, it’s not a rights Act—it’s a language Act, with a very specific focus.”<sup>71</sup>*

**101.** The Cabinet Secretary told us that the reporting arrangements would play an important role in enabling scrutiny and avoiding a postcode lottery.<sup>72</sup> She also confirmed that the guidance issued by Welsh Ministers will “cover ways of working to support cost-effective planning, reporting and delivery, and also look at ways in which public bodies can effectively publish their own reports as part of existing reporting cycles.”<sup>73</sup>

## Adding to the number of listed public bodies

**102.** What is meant by listed public bodies for the purposes of the Act is set out in section 8. The definition in the Bill as introduced includes all county and county borough councils, all local health boards, three NHS trusts and two special health authorities. Section 8(2) includes a power for Welsh Ministers to make regulations to add or remove devolved authorities from the list of listed public bodies.

**103.** NDCS, ASLI, RNID Cymru, the BDA and others all called for an expansion in the number of listed public bodies. Estyn and Qualifications Wales were the most

<sup>69</sup> BSL 24, RNID Cymru

<sup>70</sup> Record of Proceedings, paragraph 214, 29 September 2025

<sup>71</sup> Record of Proceedings, paragraph 98, 20 October 2025

<sup>72</sup> Record of Proceedings, paragraph 224, 13 October 2025

<sup>73</sup> Record of Proceedings, paragraph 209, 13 October 2025

often identified for inclusion, however, Tertiary Education Commission, Medr, universities and Transport for Wales were also highlighted.<sup>74</sup>

**104.** Although the BDA were keen to see provision within the education sector prioritised, Tom Lichy acknowledged that it may be preferable to “start with a smaller number of higher quality plans” and to learn and grow from there.<sup>75</sup>

**105.** The Children’s Commissioner said the existing listed public bodies were “a pragmatic starting point” given their responsibility for providing health and education services.

**106.** WCDP said there was a lack of care and support provision accessible to deaf people and suggested that Care Inspectorate Wales should be listed.

**107.** Dr Rob Wilks argued for adding a substantial number of devolved public bodies to be added including fire and rescue, services, higher education institutions, Wales’ statutory commissioners; the Senedd Commission, and Natural Resources Wales.<sup>76</sup>

**108.** None of the contributors to our focus groups were satisfied with the current list of public bodies in the Bill. According to the summary:

*“There were strong views that the list is too limited and should be expanded to explicitly include other key organisations [...] Some acknowledged that expanding the list might not be possible immediately, but felt it should remain a clear ambition for the future.”<sup>77</sup>*

**109.** Disability Wales, ASLI, BDA and others highlighted difficulties accessing transport as another area where Deaf BSL signers face barriers and called for priority to be given to adding Transport for Wales to the list.<sup>78</sup>

**110.** Mark Isherwood MS said the Bill focuses on bodies with responsibility for health and education as a starting point, because the “overwhelming weight of

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<sup>74</sup> BSL 26 NDCSC, BSL 08 ASLI, BSL 09 Dr Rob Wilks, University of the West of England (UWE), BSL 23 BDA

<sup>75</sup> Record of Proceedings, paragraph 160 – 161, 22 October 2025

<sup>76</sup> BSL 09 Rob Wilks, University of the West of England

<sup>77</sup> BSL Bill: Engagement findings

<sup>78</sup> BSL 02 Disability Wales, BSL 08 ASLI, BSL 23 BDA

evidence” related to these areas. He noted that Transport for Wales and Estyn might be other public bodies to consider including.<sup>79</sup>

**111.** The Member in Charge added that although exercising the power to amend the list of listed public bodies will be a matter for Welsh Ministers, the regulations will need to be approved by the Senedd and that the Senedd could “proactively work with Welsh Ministers in seeking appropriate changes to the list” for example via committee recommendations and other forms of Senedd business.<sup>80</sup>

## The Committee’s view

### On BSL plans

**112.** Throughout this process, the Member in Charge and the Cabinet Secretary have emphasised the importance of engagement with Deaf BSL signers on the contents of the strategy, guidance and local BSL plans. We note that several public bodies, particularly local authorities, expressed concerns at their capacity to undertake this work due to lack of expertise and on top of other demands on services.

**113.** There is clearly scope for some public bodies to work across boundaries and adopt a more collaborative or regional approach to developing local plans. It is likely that this would be more efficient and effective than a myriad of different approaches. However, given the complexity of the administrative landscape it is not entirely clear whether collaboration on local plans would align naturally to any of the existing structures or footprints. We therefore echo the calls from stakeholders for greater clarity from the Cabinet Secretary on how the Welsh Government would envisage this working in practice.

**Recommendation 5.** The Welsh Government should set out in response to this report:

- how it expects listed public bodies to collaborate across administrative boundaries in the preparation of local plans;
- how it will build the capacity of listed public bodies so that they are equipped with the right support and expertise to prepare and execute local plans effectively; and

<sup>79</sup> Record of Proceedings, paragraph 49, 15 September 2025

<sup>80</sup> PTN 3.1 Correspondence from Mark Isherwood MS to the Equality and Social Justice Committee, 8 October 2025

- provide confirmation that the Implementation Team for the Bill has dedicated resources to fulfil this recommendation.

The Welsh Government should confirm that this will be in place ahead of the Stage 1 debate scheduled for 17 December 2025.

### **On reporting requirements**

**114.** The Bill envisages placing new reporting requirements on listed public bodies in relation to the implementation of their BSL plans. It was suggested by some that aligning these with existing equalities-related reporting requirements could have benefits from both a practical and administrative standpoint. While this argument may appear sensible, superficially at least, we have concluded that doing so could be detrimental to the aims of the Bill at a fundamental level. Merging the reporting requirements with existing reporting duties under, for example, the Equality Act 2010 or Well-being of Future Generations (Wales) Act 2015 would detract from the key focus of the Bill and potentially undermine a key mechanism for holding public bodies to account.

**115.** While we appreciate the significant workload pressures that public bodies are facing and generally approve of measures which improve administrative efficiency, we do not think that it is worth putting one of the Bill's key aims at risk in pursuit of this aim. Instead, public bodies should explore better ways of ensuring efficient implementation and which are likely to yield better returns: for example through cooperation and collaboration at a regional level.

### **On adding public bodies**

**116.** As set out in the Explanatory Memorandum, health and education (in the form of local authorities and health bodies) have been prioritised in the Bill initially as this is where, according to respondents to the consultation, there is most pressing need. We accept this argument and agree that depth and quality is likely to be more important than breadth at least until the Act has time to embed itself properly. At the same time, we acknowledge that some have called for additional public bodies to be included in the list including, most notably, those working within the education sector such as Estyn, Qualifications Wales, and Medr. Given that responsibility for school improvement and day-to-day management lies with local authorities, however, we agree with the Bill's proposed focus on local authorities in the first instance. Deaf BSL signers similarly highlighted difficulties in navigating public transport networks. We would therefore wish to see the transport sector prioritised, where possible, for future

inclusion and for the Welsh Government to explore the feasibility of bringing public transport providers under the scope of the Bill.

**Recommendation 6.** We note that under section 7(2) it is envisaged that Welsh Ministers must produce progress reports in every period of 3 years after publication of the national strategy. We recommend that the early progress reports required by the Bill, should it become law, involve consideration of whether other public bodies should be added.

## 5. BSL Adviser and Assisting Panel

If passed, Welsh Ministers and listed public bodies will benefit from advice and guidance from the new BSL Adviser and their Assisting Panel.

**117.** Section 5 places a duty on Welsh Ministers to appoint a BSL Adviser to provide advice and information to Welsh Ministers in relation to their functions under the Act and, with the agreement of Welsh Ministers, provide advice more generally to listed public bodies on the promotion and facilitation of BSL.

**118.** Further provisions about the appointment are made in Schedule 1 to the Bill. The Explanatory Memorandum confirms that “the Adviser and the panel members will be appointed by the Welsh Ministers via the formal public appointments process” and “that they will then hold office in accordance with terms specified by the Ministers through that appointment process.”<sup>81</sup>

**119.** Despite overwhelming support for the creation of a BSL Adviser from stakeholders, including RNID Cymru, the BDA, local authorities, participants in our focus groups and others, there were differing opinions on some aspects of the role and wider appointment process.<sup>82</sup>

### Appointment of a BSL adviser

**120.** Section 5(2) of the Bill specifies that in appointing a BSL Adviser, the Welsh Ministers must be satisfied that the person appointed is able to communicate effectively in and uses BSL.

**121.** Tom Lichy of the BDA explained that in his view this meant that the Adviser would “need to be fluent, and fluent means they can attend a professional high-level meeting and conduct that in BSL.” He added:

*“Many deaf people aren't actually given the opportunity to learn BSL at home or school. A lot of deaf people learn BSL later in life, so I don't*

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<sup>81</sup> Explanatory Memorandum, paragraph 186

<sup>82</sup> BSL Bill: Engagement findings

*want to block or exclude them from being involved. We want to be as inclusive as possible.”*

**122.** RNID Cymru, the NDCS, the BDA, Newport City Council, University of Edinburgh and others were broadly happy with this requirement.<sup>83</sup> However, some witnesses felt that the BSL Adviser should ideally be a Deaf BSL signer.

**123.** Michelle Fowler of Velindre UHB said she would “advocate strongly” that it is a deaf BSL signer:

*“If you have a hearing person who's learnt British Sign Language, their experience and lived experience of living in a hearing world is going to be completely different.”<sup>84</sup>*

**124.** Sarah Thomas of the Centre for Sign Sight Sound argued “you cannot have a non-deaf BSL user representing the deaf BSL community of Wales”.<sup>85</sup>

**125.** Dr Kate Attfield suggested it might be damaging to have a hearing person in the role as “it would potentially feel like a recurrence of the old missionaries for deaf people”.<sup>86</sup>

**126.** A majority of contributors to our engagement focus groups agreed that the Adviser should be fluent in BSL, with many stating that they should ideally be a deaf person, or at the very least, have a strong connections to and lived experience of Deaf culture, like a CODA (Child of Deaf Adults).<sup>87</sup>

**127.** The Member in Charge reiterated that the BSL Adviser must be a BSL signer. He added that he hoped and anticipated that the person appointed would be in regular contact with the Deaf community, and that “hopefully and intentionally” they would be part of the Deaf community themselves.<sup>88</sup>

**128.** When questioned about the legal implications of making it a requirement that the Adviser is a Deaf BSL signer, the Cabinet Secretary committed to writing

<sup>83</sup> BSL 24 RNID Cymru, [Record of Proceedings](#), paragraph 91, 29 September 2025, [BSL 27 Newport City Council](#), [BSL 24 British Deaf Association](#), [BSL 28 University of Edinburgh](#)

<sup>84</sup> [Record of Proceedings](#), paragraph 135, 6 October 2025

<sup>85</sup> [Record of Proceedings](#), paragraph 90, 22 September 2025

<sup>86</sup> [Record of Proceedings](#), paragraph 221, 29 September 2025

<sup>87</sup> BSL Bill: Engagement findings

<sup>88</sup> [Record of Proceedings](#), paragraph 60, 15 September 2025



to us with a more detailed view. However, very little detail was ultimately provided in the correspondence received which stated:

*"[...] the Welsh Government is unable to disclose legal advice. Nevertheless, to assist the committee, there appears to be no legal bar to the Bill requiring that the BSL adviser be deaf. The attention of the committee is drawn, in particular, to section 13(3) of and paragraph 2 of Schedule 3 to the Equality Act 2010. Regarding legislative competence, the Welsh Government considers that a requirement that the BSL adviser be deaf would be within the legislative competence of the Senedd for the same reasons that the other provisions of the Bill would be."*<sup>89</sup>

**129.** The Cabinet Secretary set out her view after the Committee had concluded evidence gathering for the Bill and as a result the Committee was not able to explore it in more detail with stakeholders.

**130.** The Committee did, however, consider the interaction with the Equality Act 2010 and the implications for legislative competence. The Committee has reached a different view which is set out at the end of this chapter.

## **The role of the BSL Adviser**

**131.** Many stakeholders wanted reassurance about the parameters of the role and its ability to act independently and bring about change. There is very little detail in the Bill on the exact nature of the role beyond those set out in section 5(2) to 5(7) and in paragraphs 179 to 187 of the EM. According to the provisions in Schedule 1 to the Bill, the Adviser will hold office in accordance with the terms specified by the Ministers through a formal appointments process.

**132.** The NDCS were clear that they would like to see the BSL Adviser acting as "a critical friend" to the Welsh Government and suggested that pre-appointment scrutiny by the Senedd would help to enhance this.<sup>90</sup>

**133.** Denbighshire County Council said that the effectiveness of the BSL Adviser will depend on their resources and level of authority:

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<sup>89</sup> PTN. 3.4 Correspondence from the Cabinet Secretary to the Committee: follow-up information on the BSL (Wales) Bill, 23 October 2025

<sup>90</sup> BSL 26 NDCS

*"If the role is too limited or advisory-only, it may lack the power to drive real change".<sup>91</sup>*

**134.** RNID Cymru, Merthyr CBC, the National Union of British Sign Language Interpreters, NRCDP and others wanted to see more clarity on the exact nature of the role and what the level of resource available to whoever is appointed will be.<sup>92</sup>

**135.** Dr Rob Wilks agreed and said it was important the BSL Adviser sufficient resources rather than "a tokenistic amount of money". He, David Reader and NDCS also compared the BSL Adviser's role with that of the Welsh Language Commissioner and argued they should have the same status.<sup>93</sup>

**136.** The BDA expressed their hopes that "the Adviser will bring direct personal experience of the Welsh deaf signing community and its culture."<sup>94</sup>

**137.** The Cabinet Secretary told us that the role ought to be considered for pre-appointment scrutiny and she felt this was "important in terms of the independence of the role and scrutiny of that appointment."<sup>95</sup>

## Assisting Panel

**138.** The Bill makes provisions for the appointment of an Assisting Panel and gives Welsh Ministers the power to appoint members in consultation with the BSL Adviser. According to the EM the purpose of the panel will be to provide policy advice and guidance to the Adviser and Welsh public services on how to engage with Welsh BSL signers and ensure they are involved in the design and delivery of services.<sup>96</sup>

**139.** The BDA, the Royal College of Psychiatrists, Dr Rob Wilks, the Children's Commissioner, all emphasised the need for members of the panel to bring lived experience to the role and advocated co-production.<sup>97</sup>

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<sup>91</sup> [BSL 18 Denbighshire County Council](#)

<sup>92</sup> [BSL 24 RNID Cymru, BSL Merthyr CBC](#)

<sup>93</sup> [Record of Proceedings](#), paragraph 233, 29 September 2025

<sup>94</sup> [BSL 23 BDA](#)

<sup>95</sup> [Record of Proceedings](#), paragraph 242, 13 October 2025

<sup>96</sup> Explanatory Memorandum, paragraph 236

<sup>97</sup> [BSL 23 British Deaf Association, BSL 13 Royal College of Psychiatrists](#)

**140.** The BDA told us that to operate effectively, it was important the panel are all BSL signers. Charles Hampton of WCDP suggested it should include members with regular connection to grass-roots community groups.<sup>98</sup>

**141.** RNID Cymru said the panel could include sub-groups with specialist knowledge to investigate certain areas and collaborate with particular public bodies. Dr Kate Attfield said the panel should include people with expertise relating to listed public bodies.<sup>99</sup> Jamie Martin of NDCS suggested interpreters should also be represented.<sup>100</sup>

**142.** The Children's Commissioner wanted to see stronger mechanisms for hearing from deaf children and young people. Rocio Cifuentes suggested a specific children and young people's panel should be considered.<sup>101</sup> Similarly the NDCS called for parents of deaf children to be represented on the assisting panel.<sup>102</sup>

**143.** Mark Isherwood MS said that the statutory nature of the panel was not found anywhere else in the UK and confirmed that the panel would "comprise people who themselves are members of the deaf community and/or in direct contact with members of the deaf community".<sup>103</sup>

**144.** The Cabinet Secretary told us that the assisting panel would help to represent the intersectional nature of the deaf community.<sup>104</sup>

## **The Committee's view**

### **On the appointment of a BSL Adviser**

**145.** The proposal to create a BSL Adviser and Assisting Panel sets this Bill apart from similar legislation elsewhere in the UK.

**146.** In terms of appointing a BSL Adviser, as drafted, it would be a legal requirement for whoever is appointed to be "able to communicate effectively" in, and use, BSL. In addition to this requirement, many felt strongly that whoever is appointed to the role, should also be a deaf person themselves with lived experience of being deaf. The Committee recognises the strength of feeling on

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<sup>98</sup> [Record of Proceedings](#), paragraph 250, 22 September 2025

<sup>99</sup> [Record of Proceedings](#), paragraph 237, 29 September 2025

<sup>100</sup> [Record of Proceedings](#), paragraph 117, 29 September 2025

<sup>101</sup> [Record of Proceedings](#), paragraphs 30 – 33, 29 September 2025

<sup>102</sup> [Record of Proceedings](#), paragraph 43, 29 September 2025

<sup>103</sup> [Record of Proceedings](#), paragraphs 60 – 61, 15 September 2025

<sup>104</sup> [Record of Proceedings](#), paragraph 142, 13 October 2025

this and wishes to state unequivocally that it is our hope and expectation that the legislation will be led by deaf BSL signers themselves. The person appointed will need, ultimately, to inspire the trust and confidence of BSL signers across Wales. Every effort should be made by the Welsh Government to promote the role to potential candidates with lived experience as a deaf person.

**147.** Nevertheless, we have considerable concerns about the potential risks and implications of including a formal legal requirement that the BSL Adviser is deaf on the face of the Bill. Such an approach would have the effect of excluding candidates who are not deaf but who may be capable of performing the role to the necessary standard. We therefore think it is difficult to safely conclude that such a requirement would be compatible with discrimination law and could be open to legal challenge. Such a provision could also be outside the competence of the Senedd which could delay or derail the Bill in its entirety. It is not uncommon for there to be differences in legal opinion on these matters and we note that the Cabinet Secretary has set out an alternative viewpoint. We further note that the Member in Charge is satisfied with the current wording of the Bill. Ultimately, only the courts have the power to give a definitive answer on these matters.

**148.** It is our job to make a judgement call based on advice and the evidence we have heard. At present, we are satisfied that the Bill is within competence. We would not wish to see this jeopardised, especially when it should be possible to encourage applications from deaf candidates as part of the appointments process.

**Conclusion 3.** A majority of the Committee have concluded that making it a legal requirement that the BSL Adviser is deaf cannot be achieved without risk of legal challenge that could derail the Bill in its entirety. A majority of the Committee consider this is an unacceptable level of risk. Two Members disagreed with this conclusion. They considered that these risks were outweighed by the strong support expressed by most individuals who gave evidence in favour of making it a legal requirement that the BSL Adviser is deaf.

**Recommendation 7.** We recommend that the Welsh Government and the Member in Charge consider how the appointments process can ensure that the needs of the Deaf community are reflected appropriately in the appointments process for the BSL Adviser. We would welcome more detail on this matter in response to this report, which we expect in time for the Stage 1 debate on 17 December 2025.

### On the role of the BSL Adviser

**149.** We support proposals for a BSL Adviser who we expect to see at the heart of government providing Welsh Ministers with valuable knowledge, insight and expertise on issues relating to the promotion and facilitation of BSL.

**150.** Evidently the role is more limited than the Commissioner that was originally envisaged: so it is vital there are robust arrangements in place to enable the Adviser to give advice without fear or favour. Their office will also need to be properly resourced.

**151.** We welcome the fact that the Cabinet Secretary has indicated her view that the role would be subject to pre-appointment scrutiny and believe that this would strengthen the independence of the role. However, we note that this would be a matter for the next Senedd and Welsh Government to agree. We urge them to continue to honour the custom of pre-appointment scrutiny that has been consolidated during this Senedd term.

**Recommendation 8.** We recommend that the role of BSL Adviser is recognised as a public appointment that is eligible for pre-appointment scrutiny and that the appropriate committee in the next Senedd is offered the opportunity to conduct a pre-appointment hearing with the preferred candidate. We agree that this change can be achieved informally through agreement between the Welsh Government and the Senedd and should be made now in order to provide a firm signal of intent for the next Welsh Government and Senedd.

### On the Assisting Panel

**152.** We welcome the proposed creation of an Assisting Panel and emphasise that this must be representative of the BSL signing community across Wales.

**153.** Given the importance of education within the context of this Bill, we agree with the Children's Commissioner's suggestion to explore the potential establishment of a children and young people's panel and urge the Member in Charge and the Welsh Government to give further consideration to how their voices can be represented.

## 6. Monitoring, accountability and enforcement

This chapter looks at the Bill's approach to ensuring accountability and monitoring progress.

### Monitoring and reporting requirements

**154.** Sections 6 and 7 set out the reporting arrangements under the Bill which include requiring public bodies to report on the implementation of local BSL plans within 12 months of their publication. It would require Welsh Ministers to publish a three-year progress report. Both are required to be published in BSL.

**155.** Sarah Thomas of the Centre for Sign Sight Sound and Polly Winn of RNID Cymru agreed said there would be significant interest and scrutiny from the Deaf community once the Bill is passed, and suggested expectations would need to be managed. Polly Winn suggested that transparency and accessible information would be crucial to ensure deaf people do not become frustrated with progress after the Bill is passed.<sup>105</sup>

**156.** Caerphilly CBC, Wrexham CBC, the NRCDP and others advocated clear mechanisms for monitoring and reporting on progress and evaluating the effectiveness of the Bill.<sup>106</sup> Newport City Council argued the Welsh Government must report on its own progress in delivering the BSL strategy.<sup>107</sup>

**157.** The NRCDP said that the effectiveness of reporting mechanisms “will depend on the clarity, frequency, and accessibility of reporting, as well as the capacity of Deaf users and representative organisations to scrutinise outcomes.”<sup>108</sup>

**158.** The Children's Commissioner suggested the Bill could be clearer on what will happen as a result of the three-year progress report required of Welsh Ministers, and what mechanisms would enable the BSL signers to respond and shape future strategies. She suggested a formal requirement for Welsh Ministers to respond to recommendations from the BSL Adviser or advisory panel would strengthen accountability.<sup>109</sup>

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<sup>105</sup> [Record of Proceedings](#), paragraph 46, 116, 22 September 2025

<sup>106</sup> [BSL 07 Caerphilly CBC](#), [BSL 17 Wrexham CBC](#), [BSL 32 NRCDP](#)

<sup>107</sup> [BSL 27 Newport City Council](#)

<sup>108</sup> [BSL 32 NRCDP](#)

<sup>109</sup> [Record of Proceedings](#), paragraph 108, 29 September 2025

**159.** The Cabinet Secretary emphasised that the Bill would rely on the “openness and transparency” of the reporting mechanisms and that these requirements were a “proportionate means of monitoring”. She said public scrutiny of those reports would be important, adding that “Welsh Ministers do have the powers to require a public body to review their plan if it's inadequate.”<sup>110</sup>

## **Accountability**

**160.** Section 5 (7) sets out that a listed public body is required to comply with a request for information from the BSL Adviser, unless it considers that doing so would conflict with its duties or have an adverse effect on the exercise of its functions.

**161.** Some stakeholders were concerned that the Bill lacks sufficient mechanisms for holding listed public bodies accountable for adhering to their BSL plans. Several argued that the BSL Adviser should play a role in monitoring and scrutinising the performance of listed public bodies. The BDA said it was important the BSL Adviser could “highlight important and critical issues and that that will be taken note of”, though they suggested this could be achieved by ensuring they have sufficient resources and support to “speak truth to power”.<sup>111</sup>

**162.** RNID Cymru argued the BSL Adviser should have powers to investigate and intervene in order to “compel public bodies to adhere to their plans”. They noted this would only be possible if they set clear, time-bound measures in local BSL plans.<sup>112</sup>

**163.** The WLGA explained that local authorities already have mechanisms for oversight and accountability, but the BSL Adviser should highlight where there are problems and advise Welsh Ministers and public bodies on how to avoid them in future.

**164.** Some public bodies wanted more clarity on the role of the BSL Adviser and their relationship with listed public bodies. Sarah Morley of Velindre said the terms of reference for the BSL Adviser should clearly state what the relationship will be.<sup>113</sup>

**165.** Some of the evidence including from the National Union of British Sign Language Interpreters, and Dr Rob Wilks questioned the lack of mechanisms in

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<sup>110</sup> [Record of Proceedings](#), paragraph 251, 13 October 2025

<sup>111</sup> [Record of Proceedings](#), paragraph 226, 22 September 2025

<sup>112</sup> [BSL 24 RNID Cymru, Record of Proceedings](#), paragraph 75, 29 September 2025

<sup>113</sup> [Record of Proceedings](#), paragraph 134, 6 October 2025



the Bill to allow deaf people to raise concerns in cases where listed public bodies are not compliant.<sup>114</sup>

**166.** Dr Kate Attfield argued that listed public bodies who do not comply with their duties or fail to provide information in BSL, where required, should face penalties.

**167.** The Member in Charge said the Welsh Government and the relevant regulatory bodies could play a role in scrutinising the performance of listed public bodies.<sup>115</sup> Mark Isherwood acknowledged that the BSL Adviser would not have powers to intervene directly. However, he envisaged the BSL Adviser and panel would raise concerns with Welsh Ministers and with listed public bodies and that “there should be no doubt, when they highlight deficiencies or praise good practice models, that that should then be taken forward”.<sup>116</sup>

**168.** With regards to the provisions in section 5(7) which states that a public body “must comply” with a request for information from the BSL Adviser, unless it “considers that doing so would conflict with its duties or have an adverse effect on the exercise of its functions”, the Member in Charge clarified that:

*“It is not my intention that this provision could or should be used as a general get out for public bodies. It should only be used when there is a genuine reason that would prevent that public body from providing the information requested. That could include, for example, information that, if released, could breach a duty of confidentiality held by that body.”*

**169.** Mark Isherwood noted that the wording mirrors provisions in other Senedd Acts, including in particular, the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.<sup>117</sup>

**170.** The Cabinet Secretary said that in her view the Bill “has a sufficient framework for monitoring” and that Welsh Ministers will have the power to direct and intervene if necessary. The Cabinet Secretary stated clearly the government’s

<sup>114</sup> [Record of Proceedings](#), paragraph 90, 29 September 2025

<sup>115</sup> [Record of Proceedings](#), paragraph 88 and 89, 15 September 2025

<sup>116</sup> [Record of Proceedings](#), paragraph 62 and 80, 15 September 2025

<sup>117</sup> Paper to note 5.3 [Correspondence from Mark Isherwood to the Chair regarding the British Sign Language \(Wales\) Bill - 17 September 2025](#)

view that the BSL Adviser should not have enforcement powers, instead their role would be to scrutinise, help and support public bodies and Welsh Ministers.<sup>118</sup>

## Complaints and enforcement

**171.** The initial proposals for a BSL Bill included provision for a BSL Commissioner, who it was proposed would establish a system for the investigation of complaints. These proposals were eventually discounted in favour of an Adviser and advisory panel; however, some still called for clarity around the role vis-à-vis complaints.

**172.** Sarah Thomas of the Centre for Sign, Sight, Sound and Dr Rob Wilks said the BSL Adviser should have some involvement with complaints, on the basis that existing complaints systems are often inaccessible to BSL signers.<sup>119</sup>

**173.** Polly Winn of RNID Cymru said there needed to be a clear framework for feedback and complaints but suggested this could form part of broader Welsh Government work to address barriers faced by BSL signers, or that the BSL Adviser could work with public services to make existing processes more accessible.<sup>120</sup>

**174.** Rocio Cifuentes, the Children's Commissioner said there was "huge potential for duplication" and noted the BSL Adviser role had not been designed with mechanisms to investigate or deal with complaints. She suggested the BSL Adviser could provide information about how to access existing complaints mechanisms.<sup>121</sup>

**175.** Cardiff and Vale UHB said they had worked to make their complaints process accessible to BSL signers. However, they suggested there was also a need for health services needed to rebuild trust amongst deaf people, stating that "communities that don't feel listened to or engaged won't necessarily raise concerns".<sup>122</sup>

## Relationship with the Public Services Ombudsman

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**176.** On the issue of complaints, we wrote to the Public Services Ombudsman to get a sense from them of the caseload involving BSL. They were keen to stress that they handle complaints from "individuals experiencing injustice or hardship due

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<sup>118</sup> Record of Proceedings, paragraphs 248, and 251 – 253, 13 October 2025

<sup>119</sup> Record of Proceedings, paragraph 86, 29 September 2025

<sup>120</sup> Record of Proceedings, paragraph 38, 22 September 2025

<sup>121</sup> Record of Proceedings, paragraph 136, 29 September 2025

<sup>122</sup> Record of Proceedings, paragraph 129, 6 October 2025

to issues with accessibility of public services in Wales” but that it was not their role “to conclude that someone has been discriminated against”.<sup>123</sup>

**177.** The Ombudsman confirmed that while they are able to accept complaints in formats other than writing, including in BSL, public awareness of this was probably lower than they would want. The Ombudsman provided figures which suggest “that access to BSL interpretation features very rarely” in their complaints. Since 2020 the Ombudsman has received 12 complaints involving access to BSL interpretation and only three complainants have asked them for BSL interpretation since 2020. The Ombudsman receives around 3,000 complaints a year.

**178.** The Ombudsman noted that the “position of a BSL Adviser does not currently include any responsibility for the handling of complaints about non-compliance” and expressed the view that more clarity was needed on “the options available to the BSL users who find that public services are not meeting their duties under the proposed legislation.”<sup>124</sup>

**179.** The Ombudsman confirmed their view that they would be the appropriate body for individuals experiencing injustice or hardship due to issues with accessibility of public services in Wales and called for:

*“a duty on the BSL Adviser to prepare and issue guidance on the appropriate route for complaints about access to services by BSL users. The BSL Adviser should be under a duty to consult on that guidance with our office, to ensure that our role is accurately reflected and that the guidance is aligned with our Model Complaints Policy and Guidance.”*<sup>125</sup>

**180.** Jane Hutt MS was clear that the BSL Adviser would not hear individual complaints or take on a “casework kind of role” and highlighted a concern that this would duplicate processes that exist elsewhere.<sup>126</sup>

**181.** The Member in Charge told us that although he envisaged the BSL adviser might hear complaints, “even if unsolicited and not on a formal basis”, he later

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<sup>123</sup> Consultation response from Ombudsman Wales regarding the scrutiny of the British Sign Language (Wales) Bill

<sup>124</sup> Consultation response from Ombudsman Wales regarding the scrutiny of the British Sign Language (Wales) Bill

<sup>125</sup> Consultation response from Ombudsman Wales regarding the scrutiny of the British Sign Language (Wales) Bill

<sup>126</sup> Record of Proceedings, paragraph 253, 13 October 2025

clarified that the Adviser would “have to work with the processes that there are and hope that they might be improved in the future.” Mark Isherwood MS said that that the Adviser “would not be a formal complaint recipient and invigilator” but that the person and team around them could highlight any concerns raised through the course of their interactions with public bodies.<sup>127</sup>

## **The Committee’s view**

### **On monitoring and accountability**

**182.** We support the monitoring arrangements proposed by the Bill and think it is important to emphasise the role public transparency and scrutiny plays in holding public bodies to account.

**183.** With regards to the provisions in section 5(7) which states that a public body “must comply” with a request for information from the BSL Adviser unless it “considers that doing so would conflict with its duties or have an adverse effect on the exercise of its functions”, we think the Welsh Government will need to closely monitor the use of this provision to ensure that it is not inappropriately or routinely used by public bodies to shy away from their new obligations.

### **On complaints**

**184.** One of the key ways in which the Bill differs from the Member in Charge’s original proposals is in respect of complaints. Original proposals establishing a BSL Commissioner and new complaints procedure were removed in favour of the proposed BSL Adviser in the Bill as introduced.

**185.** We firmly agree that it would not be appropriate for the BSL Adviser now envisaged to have a direct role in complaints. However, it is vital that service users have recourse in instances where public bodies are failing to meet the requirements of the Bill. The appropriate mechanism for this in the first instance is public bodies’ relevant complaints procedure within existing accountability structures. There is, however, potentially a lack of clarity about the complaints options available to BSL signers and members of the public particularly after they have exhausted internal complaints procedures. We agree with the suggestion from stakeholders and the Public Services Ombudsman that greater clarity would be beneficial.

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<sup>127</sup> Record of Proceedings, paragraph 94, 20 October 2025

**Recommendation 9.** We recommend that the Member in Charge clarifies the options available to complainants requiring recourse in instances where public services are failing to meet their duties under the Bill (if enacted by the Senedd) and considers whether any changes to the Explanatory Memorandum are required that could help in that regard.

**Recommendation 10.** We recommend that the Member in Charge brings forward amendments at Stage 2 which would place duties on Welsh Ministers to prepare and issue guidance on the appropriate route for BSL signers to make complaints about access to services. This should be accompanied by a duty to consult on that guidance with the Office of the Public Services Ombudsman for Wales specified as a mandatory consultee.

## 7. Engagement and co-production

Engagement with the Deaf community will be crucial to the success of the Act if it becomes law. However, the Bill itself says nothing about how this might happen in practice.

### Consultation and co-production

**186.** The Bill requires Welsh Ministers to consult with the BSL Adviser, and “any other persons they consider appropriate” before publishing a national BSL strategy, and before publishing a three-year progress report.

**187.** The importance of engagement with Deaf communities to determine priorities and co-produce solutions and guidance if the Bill becomes law was emphasised repeatedly by both stakeholders and the Member in Charge. At the same time, some stakeholders including the NRCPD noted that the Bill “does not mandate structured frameworks for co-production, nor does it specify that public bodies must work with representative Deaf organisations”.<sup>128</sup>

**188.** Polly Winn of RNID Cymru wanted more clarity on where engagement with deaf people would take place throughout the Bill’s provisions and expressed concerns that the Deaf community could potentially be over-burdened. She argued that Welsh Government guidance should be co-produced with deaf people, that engagement should be a stated aim within the national BSL strategy.

**189.** The BDA argued that delivering the Bill will create challenges for the Welsh Government including balancing the need to develop BSL plans speedily, with the capacity to do them well:

*“The fundamental tension is around the capacity of the Welsh deaf signing community to lead the development of the plans and thereby to have authority over our lives and the delivery of our aspirations. Too many plans will overwhelm the capacity of Welsh deaf signers to play a leadership role; too few will cause a failure in the delivery of vital*

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<sup>128</sup> BSL 06 NRCPD

*and urgent improvement. We believe that it is critical that the Welsh Government acknowledges and responds to this tension.”*

**190.** In response the BDA called for “genuinely Deaf-led planning” and for the Welsh Government to consider “what steps they could take to develop a deaf leadership cohort.”<sup>129</sup>

**191.** RNID, Centre for Sign Sight Sound, and NDCS emphasised the need to work with existing community organisations, and to look at existing best practice.<sup>130</sup>

**192.** Some local authorities said that public bodies may lack the connections and capacity to conduct meaningful engagement with Deaf communities. Caerphilly CBC said that whilst public bodies are keen to engage “there is often a lack of effective links with Deaf communities, resulting in inaccessible consultation processes”.<sup>131</sup>

**193.** Merthyr Tydfil CBC suggested the BSL Adviser could play a role in facilitating engagement with Deaf communities and providing practical support.<sup>132</sup>

**194.** Mark Isherwood MS said the appointment of the BSL Adviser should enable “the voice of deaf people to be heard at the centre of Government and in those public bodies”. He envisaged that the Bill would enable Deaf communities, the BSL Adviser and the assisting panel to help determine the priority areas for action.

**195.** In relation to local BSL plans, he said he hoped that Deaf communities would be “given the opportunity to explain what their real experience is at a local level to the public bodies, and hopefully to co-design and co-deliver the solutions necessary”.

## The BSL Stakeholder Task and Finish Group

*The Welsh Government established the BSL Stakeholder Task and Finish Group in January 2025 with the purpose of developing recommendations to inform its BSL policy ‘route map’. The group was co-chaired by two BSL signers and brought together a representative mix of stakeholders including charities and representative bodies.*

<sup>129</sup> [BSL 23 British Deaf Association](#)

<sup>130</sup> [Record of Proceedings](#), paragraphs 95 and 98, 29 September 2025

<sup>131</sup> [BSL 07 Caerphilly CBC](#)

<sup>132</sup> [BSL 29 Merthyr CBC](#)



*On 30 September 2025 the Group published 27 recommendations covering a range of relevant issues, split into 10 short-term and 17 longer-term timeframes.*

*Short term recommendations were to begin immediately and be completed within 18 months. They covered issues such as BSL data collection, clarifying definitions of BSL and mapping existing BSL provision and best practice.*

*Long-term recommendations should begin within 2 years and be completed within 5 years. These recommendations included measures to boost the BSL interpretation workforce, to review early years provision, and improve mental health services for deaf people.<sup>133</sup>*

**196.** The Cabinet Secretary emphasised the importance of working with the BSL signing community to ensure that their priorities and lived experience is reflected in the plans and guidance that the Bill will require. Jane Hutt MS referred to the Welsh Government’s BSL stakeholder group several times stating that they had already been “a model of good practice in terms of deaf leadership and that BSL is the primary language of all meetings.” She added that listening to the views of the deaf BSL signing community would be key and “if you actually follow their guidance, then you’re likely to get it right”.<sup>134</sup>

## The Committee’s view

**197.** The need to engage with the BSL signing community in the development, and co-production of plans and guidance was one of the clearest themes of all from our scrutiny of the Bill. It is reassuring that both the Member in Charge and the Welsh Government recognise this and expressed their expectation that this would happen clearly in evidence. However, we note that the Bill as drafted does not guarantee that this will take place.

**Recommendation 11.** We recommend that the Member in Charge brings forward amendments at Stage 2 to ensure engagement and co-production by placing a formal requirement on Welsh Ministers to consult Deaf BSL signers on the national BSL strategy and guidance.

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<sup>133</sup> More information is available on the Welsh Government’s website: [British Sign Language \(BSL\) Stakeholder Group: recommendations](#)

<sup>134</sup> [Record of Proceedings](#), paragraph 244, 13 October 2025

**198.** As the Deaf BSL signing community in Wales is relatively small, there were concerns that the level of engagement envisaged by the Bill could overburden this small cohort of individuals. The risk of consultation fatigue is something that needs to be considered. We think that the Welsh Government should consider how it can empower a leadership cohort made up of Deaf BSL signers and equip them with the skills and experiences necessary to lead on planning and delivery of the Bill if it becomes law.

**Conclusion 4.** We welcome the report of the BSL stakeholder group and hope that it will provide a firm basis for progressing issues irrespective of whether this Bill is passed.

## 8. Potential barriers and implementation

Public bodies will need to work together to prepare plans and to deliver them successfully. Dedicated support and guidance will need to be provided by the Welsh Government.

### Availability of interpreters and translators

**199.** According to the ASLI, as of July 2025 there were 54 registered sign language interpreters based in Wales.<sup>135</sup>

**200.** A shortage of BSL interpreters and translators was raised repeatedly including by local authorities, health boards, and by professionals themselves working within the sector.<sup>136</sup> The NRCDP, ASLI and the WLGA were among the organisations calling for action to address this shortage and suggested this could be achieved as part of the national BSL strategy.

**201.** Several public bodies particularly local authorities expressed concern that the Bill would increase demand for already stretched interpretation and translation services. They warned that this could result in delays, reduced service quality, and increased costs as organisations compete for the same resources.<sup>137</sup>

**202.** HEIW and Public Health Wales raised concerns about the reliability and quality of existing translation services, and difficulties they faced in quality assuring BSL information.<sup>138</sup>

**203.** The WLGA suggested that increased demand as a result of the Bill could mean that existing BSL interpreters would be less able to support short notice or emergency appointments.<sup>139</sup>

**204.** The need to invest in training of BSL interpreters and translators was raised repeatedly including by the WCDP, the CSSS, the WLGA, Dr Julia Terry, the Royal

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<sup>135</sup> Correspondence from Stephen Brattan-Wilson of the Association of Sign Language Interpreters regarding the British Sign Language (Wales) Bill

<sup>136</sup> Written evidence BSL 27 Newport City Council, BSL 21 WLGA, BSL 03 Hywel Dda, BSL 13 Royal College of Psychiatrists, BSL 32 NRCDP, BSL 05 ASLI, BSL 09 Dr Rob Wilks

<sup>137</sup> BSL 27 Newport City Council, BSL 21 WLGA, BSL 03 Hywel Dda, BSL 25 Cwm Taf Morgannwg

<sup>138</sup> BSL 22 HEIW, BSL 31 Public Health Wales

<sup>139</sup> BSL 21 WLGA

College of Psychiatrists and others. The NRCPD echoed these calls alongside investment in bursaries and continuing professional development to ensure an adequate supply of practitioners. They said quality assurance should be a key consideration, and recommended guidance should encourage or require the use of NRCPD-registered professionals.<sup>140</sup>

**205.** The CSSS, the WLGA and others highlighted there were no clear routes to train and qualify as an interpreter in Wales. Jodie Gallagher-Smith and the WCDP noted the expense associated with gaining accredited BSL training, especially at higher levels.<sup>141</sup>

**206.** Sarah Thomas of CSSS noted that many of the interpreters trained through the BSL Futures programme are coming to the end of their working lives.<sup>142</sup>

*The BSL Futures programme, established by the then Assembly Government aimed at improving social inclusion and access to services for BSL Signers in Wales by increasing the number of professional interpreters from 12 to 64.<sup>143</sup> It ran from 2006 to 2008, and according to the Welsh Government, 30 BSL English interpreters were recruited and trained.*

**207.** Professor Jemina Napier highlighted the need for advanced training. She said interpreters can be reluctant to work in court, police or healthcare situations, where people may be particularly vulnerable and interpreters may not feel they have the speciality knowledge they need.<sup>144</sup>

**208.** We approached BSL professionals directly some of whom responded individually, or contributed to the response from Stephen Brattan-Wilson, Wales representative for ASLI. His submission set out in detail many of the challenges that are evident in Wales including the lack of investment in BSL education for deaf children and in early years, the absence of training and career pathways, with most having to venture to England or Scotland to access opportunities. The ASLI's additional information was clear they did not support a "fast tracked approach to

<sup>140</sup> [BSL 32 NRCPD](#).

<sup>141</sup> [Record of Proceedings](#), paragraph 134, 22 September 2025

<sup>142</sup> [Record of Proceedings](#), paragraph 111, 22 September

<sup>143</sup> Welsh Government, [BSL Futures Programme](#), wales.gov

<sup>144</sup> [Record of Proceedings](#), paragraphs 308-310, 29 September 2025

increasing the numbers of BSL professionals” arguing instead in favour of a structured training programme to increase numbers gradually.<sup>145</sup>

**209.** Additional information provided by Julie Doyle, a professional working as an accredited BSL interpreter stated that:

*“Addressing interpreter shortages in Wales requires more than recruitment. A strategic, long-term investment in Deaf education, interpreter training, BSL teaching workforce planning and public service interpreter booking system reform is essential.”*<sup>146</sup>

**210.** Wrexham CBC and Public Health Wales argued for centralised coordination and support to improve efficiency. PHW and Angela Hughes of Cardiff and Vale UHB called for consideration of a “once for Wales” approach and a centralised system for accessing translation and interpretation services.<sup>147</sup>

**211.** The Cabinet Secretary acknowledged the shortage as a “challenge that needs to be addressed” adding, however, that:

*“Members of the BSL Stakeholder Group have been clear that any plan to address the shortage should be done in a pragmatic and staged approach. The recommendations from the Group were published on the Welsh Government website on the 30 September and include a short-term recommendation on the BSL interpreting and translation workforce to map out BSL within the existing teaching workforce to understand levels of BSL provision.”*<sup>148</sup>

**212.** The Member in Charge told us that if the Bill was to fulfil its statutory purpose a proper workforce plan was required.<sup>149</sup>

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<sup>145</sup> PTN 2.3 Correspondence from Stephen Brattan-Wilson of the Association of Sign Language Interpreters regarding the British Sign Language (Wales) Bill - 20 October 2025

<sup>146</sup> PTN 2.2 Correspondence to the Chair from Julie Doyle regarding the British Sign Language (Wales) Bill - 22 October 2025

<sup>147</sup> Written evidence, BSL 31 Public Health Wales, Record of Proceedings, paragraph 173, 6 October 2025

<sup>148</sup> PTN 3.4 Correspondence from the Cabinet Secretary to the Committee: follow-up information on the BSL (Wales) Bill, 23 October 2025

<sup>149</sup> Record of Proceedings, paragraph 31, 20 October 2025

## Funding and costs

**213.** The Regulatory Impact Assessment (RIA) in the EM estimates the overall costs of the Bill as being between £3.76 million and £4.14 million over a 10-year period. However, the EM states:

*“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. Without knowing the full detail of what those key documents will contain, the costs attributed to implementing them must be counted as unquantified.”<sup>150</sup>*

**214.** Local authorities advocated strongly for additional funding to meet the costs of fulfilling duties under the Bill. Merthyr Tydfil described many public bodies as “already stretched” and “may struggle to meet new duties without additional funding and staffing”.<sup>151</sup>

**215.** The WLGA expressed concerns that there are several unknown factors which may influence future costs and flagged that cost estimates do not currently take into account the uprating of the National Joint Council Services pay scales for 2025/26. They said that it was essential that the implementation of local BSL plans be costed and fully resourced. Representing local authorities, Sarah Capstick said without additional funding the Bill would “become the tick box exercise we don’t want it to be” and added that they were concerned that the costs in the RIA were too low and did not factor in delivery.<sup>152</sup>

**216.** Ceredigion Council told us that the quality of their plan would depend on the resources available.

**217.** Lee Wenham of Swansea Council summed up the local authority view on implementation: “with the right resourcing, we could implement it in time; without that, [...] our confidence isn’t so high.”<sup>153</sup>

**218.** Academics from the University of Edinburgh said a lack of funding for implementation of the BSL Act in Scotland has led to the development of

<sup>150</sup> Explanatory Memorandum, paragraph 254

<sup>151</sup> [BSL 30 Merthyr Tydfil CBC](#)

<sup>152</sup> [BSL 21 WLGA; Record of Proceedings](#), paragraph 168 – 169, 13 October 2025

<sup>153</sup> [Record of Proceedings](#), paragraph 48, 13 October 2025

“extremely cautious” local BSL plans, with public bodies waiting for the national government to act or provide funding.<sup>154</sup>

**219.** Some health bodies and local authorities, including Hywel Dda UHB and Wrexham CBC warned they may have to divert funding from other services in order to meet the requirements of the Bill.

**220.** Local Health Boards and Public Health Wales were concerned about the costs of BSL interpretation and translation, and the risks these costs could escalate as a result of the Bill.<sup>155</sup>

**221.** On the matter of costs, the Member in charge conceded that it was not possible as “future Welsh Governments will need to address that in their budgets. We can't do that in a Bill that isn't specifying what will be in the strategy or the plans once the Bill has become an Act.”

**222.** The Cabinet Secretary acknowledged that some public bodies may be “nervous and worried” about the cost implications of the Bill but that she hoped that the way the Welsh Government intended to deliver the guidance, in conjunction with the advice from the Adviser and Assisting Panel would result in a “positive development in the delivery of public services”.<sup>156</sup>

**223.** The Cabinet Secretary also highlighted that the Welsh Government had committed to meeting the cost of the first year of implementation.

## **Issues in education**

**224.** Several stakeholders advocated for improvements in the education and support for deaf babies, children and young people. Dr Rob Wilks and the WCDP contrasted the provision of education for deaf children in Wales with that in England.<sup>157</sup>

**225.** Several organisations including the BDA, NDCS and WCDP highlighted the barriers for people who want to learn BSL in Wales face including a lack of awareness in the education system alongside a lack of qualified teachers and professionals. The BDA called for the deaf education workforce to be expanded.

**226.** Cwlwm told us that despite best efforts of practitioners, levels of funding and training provisions were inadequate for all childcare and play settings who are

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<sup>154</sup> [BSL 28 Edinburgh University](#)

<sup>155</sup> [BSL 03 Hywel Dda UHB](#); [BSL 25 Cwm Taf Morgannwg UHB](#)

<sup>156</sup> [Record of Proceedings](#), paragraph 270, 13 October 2025

<sup>157</sup> [Record of Proceedings](#), paragraph 199, 22 September 2025



seeking to support young children who are D/deaf, or who have hearing impairments. They called for long-term funding and more support for practitioners to embed BSL in all settings.<sup>158</sup>

## Technology and systems

**227.** Health boards told us that arrangements in place to record BSL use, and preference are inconsistent across health systems.<sup>159</sup> Sarah Morley of Velindre said that information about BSL use, and communication needs does not always flow through to them when patients are referred.<sup>160</sup>

**228.** This was confirmed during engagement with Deaf communities:

*“On my health record it should state I’m Deaf. So, when they’re sending an appointment letter to me, it should flag up I’m Deaf. So, they should be booking interpreters at that stage.”*

*- focus group participant*

*“The NHS app – they must include BSL in that. Even if it was a link in BSL – what does it does and doesn’t do. Then the app comes out and guess what, nothing in BSL. It’s really frustrating because it feels like every five years you get a consultation on education, or health or something else and then nothing happens.”*

*- focus group participant*

**229.** Dr Biao Zeng highlighted the growth of online communication as a potential barrier for deaf people. He said there were technological solutions, but that these had major implications for BSL language and culture. He stressed the need to work with BSL signers from the beginning, to ensure any technology is meeting their needs.<sup>161</sup>

<sup>158</sup> BSL 06 Cwllwm

<sup>159</sup> BSL 03 Hywel Dda UHB, and BSL 25 Cwm Taf Morgannwg UHB

<sup>160</sup> Record of Proceedings, paragraph 14 and 15, 6 October 2025

<sup>161</sup> Record of Proceedings, paragraph 298, 22 September 2025

## The Committee's view

### On interpreters and translators

**230.** The availability of interpreters was, by quite some margin, the most frequently highlighted potential barrier to implementation that was raised during scrutiny. During this process, we ourselves experienced some of these difficulties. At the same time, we were awed by the efforts of the community of interpreter and translator professionals in Wales and beyond who pulled out all the stops to ensure that our proceedings were available in BSL.

**231.** In future we should not have to rely on the willingness of professionals working in the sector to go the extra mile to ensure needs are met. The number of interpreters and translators in Wales is too low and potentially shrinking. Meanwhile if it becomes law, the Bill is expected to result in a significant increase in demand for these services. We are concerned by what this may mean for implementation of the Bill and agree that resolving this issue requires urgent action now.

**232.** We urge the Welsh Government to consider the evidence we received from interpreters, translators and the ASLI as part of this process specifically and thoroughly. They highlight the complex and multifaceted nature of the issues and challenges unique to Wales, that Welsh Ministers will need to consider to change the situation. Work to train and retain more BSL interpreters and translators and to secure the long-term success of the profession in Wales must begin immediately. The 2004 BSL Futures Programme may provide one model to emulate in that respect, however, this can be no substitute for sustained investment in training and clear, homegrown solutions that reverse the current geographical disparities and loss of talent to the rest of the UK.

**233.** We note that planning is underway to develop solutions to the current shortage of BSL translators and interpreters. However, we think that there is a need to inject pace into this work and ensure that the timescales align with those envisaged by the Bill if it becomes law. Without immediate action, then effective implementation of the Bill looks highly unlikely.

**Conclusion 5.** The single biggest threat to effective implementation of this Bill, if it becomes law is the shortage of BSL translators and interpreters in Wales. This demands immediate and sustained action.

**Recommendation 12.** We recommend that the Welsh Government ramps up efforts to expand the BSL interpreter workforce and commits to:

- reviewing the timescales for actions that are to be taken forward in the BSL Stakeholder Route Map to ensure they are aligned with the Bill;
- Setting annual targets for the training and recruitment of BSL interpreters and translators;
- Setting clearer and more ambitious target deadlines to prevent slippage.

### **On costs and the RIA**

**234.** Stakeholders, public bodies especially, cast significant doubt over the feasibility of implementing this Bill without adequate resources. We acknowledge that the Senedd cannot expect to place new demands on services without ensuring that they have the resources to match. Whether public bodies receive additional resources or are able to re-deploy existing resources by working more productively and efficiently is an open question. However, we reiterate our concern that the Bill risks being tokenistic and will fail to lead to meaningful change without adequate resourcing.

**235.** Whilst the costs of delivery cannot be known until the strategy and local plans are agreed, we heard concerns from public bodies that the costs that are detailed may be unrealistic and do not take inflation into account.

**Conclusion 6.** We note these concerns and think the Member in Charge should look at revising the costs in the Explanatory Memorandum to take account of inflation.

### **On other matters**

**236.** Several additional issues were raised with us relating to education, technology and systems. Given that it is for Welsh Ministers, in conjunction with Deaf BSL signers to determine priorities we have decided against making any specific commentary or recommendations on these other matters that were raised. Instead, we simply wish to highlight them as issues so that the Welsh Government may give them further consideration and note that the BSL Stakeholder Group has made some relevant recommendations that could provide a starting point for future action.

## Annex 1: List of evidence sessions.

The following witnesses provided evidence to the Committee on the dates noted below. Transcripts for all these evidence sessions can be viewed on the [Committee's website](#) and BSL interpretation was provided for all evidence proceedings on the Bill and can be viewed via [Senedd.tv](#).

Date	Name and Organisation
<b>15 September 2025</b>	<b>Mark Isherwood</b> MS, Member in Charge of the Bill <b>Gareth Rogers</b> Bill Manager, Senedd Commission <b>Claire Thomas</b> Research Service, Senedd Commission <b>Gareth Howells</b> Legal Services, Senedd Commission
<b>22 September 2025</b>	<b>Polly Winn</b> RNID <b>Sarah Thomas</b> Centre of Sign Sight Sound <b>Tom Lichy</b> British Deaf Association <b>Martin Griffiths</b> British Deaf Association <b>Cath Booth</b> Wales Council for Deaf People <b>Charles Hampton</b> Wales Council for Deaf People <b>Professor Jemina Napier</b> Herriot-Watt University <b>Dr Biao Zeng</b> University of South Wales
<b>29 September 2025</b>	<b>Kieran Sawdon</b> National Deaf Children's Society

Date	Name and Organisation
	<p><b>Jamie Martin</b> National Deaf Children's Society</p> <p><b>Rocio Cifuentes</b> Children's Commissioner</p> <p><b>Dr Kate Attfield</b> Cardiff Metropolitan University</p> <p><b>Dr Rob Wilks</b> University of the West of England</p>
<b>6 October 2025</b>	<p><b>Angela Hughes</b> Cardiff and Vale University Health Board</p> <p><b>Sarah Morley</b> Velindre University NHS Trust</p> <p><b>Michelle Fowler</b> Velindre University NHS Trust</p> <p><b>Rhidian Hurle</b> Digital Health Care Wales</p> <p><b>Liam Williams</b> Welsh Ambulance Service NHS Trust</p> <p><b>Kathryn Cobley</b> Welsh Ambulance Service NHS Trust</p>
<b>13 October 2025</b>	<p><b>Councillor Ash Lister</b> Welsh Local Government Association</p> <p><b>Sarah Capstick</b> Welsh Local Government Association</p> <p><b>Lee Wenham</b> Swansea Council</p> <p><b>Cathryn Morgan</b> Ceredigion County Council</p> <p><b>Jane Hutt</b> MS, Cabinet Secretary for Social Justice, Trefnydd and Chief Whip</p> <p><b>Amira Evans</b> Head of Equalities, Welsh Government</p> <p><b>Jane Peffers</b> Head of British Sign Language Policy, Welsh Government</p>
<b>20 October 2025</b>	<p><b>Mark Isherwood</b> MS, Member in Charge of the Bill</p> <p><b>Gareth Rogers</b> Bill Manager, Senedd Commission</p>

Date	Name and Organisation
	<b>Claire Thomas</b> Research Service, Senedd Commission
	<b>Aled Evans</b> Legal Services, Senedd Commission

## Annex 2: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the [Committee's website](#).

Reference	Organisation
<b>BSL 01</b>	Qualifications Wales
<b>BSL 02</b>	Disability Wales
<b>BSL 03</b>	Hywel Dda University Health Board
<b>BSL 04</b>	Carmarthenshire County Council Organisation name
<b>BSL 05</b>	The Association of School and College Leaders
<b>BSL 06</b>	CWLWM
<b>BSL 07</b>	Caerphilly Borough Council
<b>BSL 08</b>	Association of Sign Language Interpreters
<b>BSL 09</b>	Dr Rob Wilks, University of the West of England
<b>BSL 10</b>	Dr Kate Attfield
<b>BSL 11</b>	Aled Thomas
<b>BSL 12</b>	Jodie Gallagher-Smith
<b>BSL 13</b>	Royal College of Psychiatrists Wales
<b>BSL 14</b>	David Reader
<b>BSL 15</b>	Dr Julia Terry, Swansea University
<b>BSL 16</b>	The Centre of Sign Sight Sound
<b>BSL 17</b>	Wrexham County Borough Council
<b>BSL 18</b>	Denbighshire County Council
<b>BSL 19</b>	Monmouthshire County Council
<b>BSL 20</b>	Dr Christopher Shank
<b>BSL 21</b>	Welsh Local Government Association



<b>Reference</b>	<b>Organisation</b>
<b>BSL 22</b>	Health Education and Improvement Wales
<b>BSL 23</b>	British Deaf Association
<b>BSL 24</b>	RNID Wales
<b>BSL 25</b>	Cwm Taf Morgannwg University Health Board
<b>BSL 26</b>	National Deaf Children's Society Cymru
<b>BSL 27</b>	Newport City Council
<b>BSL 28</b>	University of Edinburgh
<b>BSL 29</b>	Merthyr Tydfil County Borough Council
<b>BSL 30</b>	National Union of British Sign Language Interpreters
<b>BSL 31</b>	Public Health Wales
<b>BSL 32</b>	National Registers of Communication Professionals working with Deaf and Deafblind people

## Annex 3: Additional Information and engagement findings

The Committee wrote to several organisations with requests for additional information to inform its scrutiny. These are detailed below

Title	Date
PTN 2.3 Correspondence from Sir Stephen Timms, Department for Work and Pensions regarding guidance under the British Sign Language Act 2022	17 November 2025
PTN 3.3 Correspondence to the Chair from Stephen Brattan-Wilson of the Association of Sign Language Interpreters regarding the British Sign Language (Wales)	20 October 2025
PTN 3.2 Correspondence from Julie Doyle regarding the British Sign Language (Wales) Bill	20 October 2025
PTN 3.5 Correspondence from Rhidian Hurlle of Digital Health Care Wales regarding further information relating to the British Sign Language (Wales) Bill	22 October 2025
PTN 3.4 Correspondence from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip regarding follow-up information relating to the British Sign Language (Wales) Bill	23 October 2022
PTN 3.4 Correspondence from Llais regarding the British Sign Language (Wales) Bill	31 October 2025
PTN 3.3 Correspondence from the Public Services Ombudsman for Wales regarding the scrutiny of the British Sign Language (Wales) Bill	10 November 2025

The Citizen's engagement team led on direct engagement with Deaf communities in the form of focus groups on the Bill. A summary of findings is available online.

### Engagement findings

Title	Date
British Sign Language (Wales) Bill: engagement findings	20 October 2025