

**Senedd Cymru**

**Y Pwyllgor Cydraddoldeb a Chyflawnder Cymdeithasol**

**Ymchwiliad:** Bil iaith Arwyddion Prydain (Cymru)

**Ymateb gan:** Anabledd Cymru

**Welsh Parliament**

**Equality and Social Justice Committee**

**Inquiry:** British Sign Language (Wales) Bill

**Evidence from:** Disability Wales



# Proposed British Sign Language (BSL) (Wales) Bill

## Consultation: Response form

Name: [REDACTED]

E-mail: [REDACTED]

Are you submitting this response in a professional or personal capacity?:

**Professional capacity (including on behalf of an organisation)**

Are you responding on behalf of an organisation?

Yes

If responding on behalf of an organisation please give the organisation's full name

Disability Wales

Are you (your organisation) currently a provider of support/services for the Deaf community?

Yes

Please state your professional role with regard to support/services for the Deaf community:

Disability Wales (DW) is the national association of Disabled People's Organisations (DPOs) striving to achieve rights, equality and independent living of disabled people in Wales. Our DPO's and members include many from the deaf community that are BSL signers.

### British Sign Language (BSL) (Wales) Bill: Consultation Questions

#### The need for legislation

The [British Sign Language Act 2022](#) requires the UK Government to issue guidance about the promotion and facilitation of the use of British Sign Language (BSL). This however only applies in England and not to the Welsh Government or public bodies in Wales such as councils or the NHS. The British Sign Language (BSL) (Wales) Bill aims to place equivalent specific duties on the Welsh Government and public bodies in Wales.

**Question 1: Do you think there is a need for this legislation? Please provide reasons for your answer.**

Yes, at Disability Wales, we wholeheartedly support this legislation in all its forms, as there is a clear and pressing need for it.

While the UK Government's enforcement mechanisms monitor progress toward implementing BSL at a national level, the devolution of responsibilities to Wales means that equivalent oversight is not currently in place. This legislative gap leaves Welsh signers without the same protections.

We believe that introducing mandatory reporting and measurable targets will reveal existing barriers and help drive meaningful change. This will ensure that BSL signers have equal access to transport, education, housing, employment, and all areas of public life in Wales, opportunities from which they are often currently excluded.

This legislation represents not a quick fix but a critical first step in building a framework to gather data, identify gaps, and foster the bilingual implementation of BSL throughout

Wales. It is a pathway toward greater inclusion, equity, and recognition for the BSL community.

**Question 2: Do you agree or disagree with the goals that the Bill seeks to achieve? Please provide reasons for your answer.**

We agree with the goals outlined in the Bill and firmly believe that this marks the first crucial step toward meaningful change in Wales.

The Bill's goals reflect a necessary commitment to ensuring that BSL users have equitable access to services, resources, and opportunities. By introducing specific duties for the Welsh Government and public bodies, the Bill acknowledges the importance of BSL as a language and the rights of those who use it.

This legislation lays the groundwork for addressing systemic barriers faced by BSL signers in Wales. Importantly, the Bill will create a shift toward creating a Wales that values linguistic diversity and access for all.

We believe this is an important Bill to begin dismantling the inequalities that BSL signers experience, ensuring that their needs are met in both policy and practice.

### British Sign Language

**Question 3: Do you agree that the Bill should include proposals to promote and facilitate the use of BSL and its tactile forms?**

Yes

**Question 4: Do you agree that the Bill should support the various Welsh regional dialects of BSL?**

Yes

**Question 5: Do you think that the term 'BSL users' should be replaced with 'BSL signers', recognising that BSL is a language which includes both deaf and hearing signers? Please provide reasons for your answer.**

Yes, we call for the change of the linguistic term and stand in solidarity with the British Deaf Association for this request.

**Question 6: Do you think that the term 'deaf BSL signers' can be used when referring to BSL users/signers who are medically or audiology deaf? Please provide reasons for your answer.**

Don't know

Please see above response.

### Deaf Communities

**Question 7: Do you agree or disagree that deaf communities:**

**a) currently have a voice in the design and delivery of the public services that they use?**  
Please tick the answer that most applies and provide any comments.

Strongly disagree

From our discussions with Deaf and Disabled People's Organizations (DDPOs), far more work is needed to ensure meaningful involvement in the design and delivery of public services.

Too often, services are inaccessible to BSL signers/users, highlighting a lack of co-production during the planning stages. If BSL users/signers had been included from the outset, many of these barriers could have been avoided.

To drive meaningful and sustainable change, it is essential that BSL users/signers are actively involved not only in planning but also in the implementation of the actions stemming from this Bill. Their lived experience and insight are invaluable for creating truly inclusive services that meet their needs

**b) should have a formalised voice in the design and delivery of the public services that they use, especially ones targeted at deaf people. Please tick the answer that most applies and provide any comments.**

Strongly agree

Please see above responses

**Question 8: Are there any specific communication methods used by deaf people that you would like the Bill to reference/include?**

Please consult the Welsh Council for Deaf People for specific user's methods.

#### Barriers that exist for deaf people

**Question 9: What do you believe are the main barriers that currently exist for deaf people and/or their families in the following areas. Please tick all that apply and provide information/examples on each area:**

Education

Unlike other parts of the U.K there are no schools specifically for deaf children. This means often they are in mainstream schools that do not have the specialist support they need to excel in comparison to their hearing peers.

Health

**Access to healthcare is often problematic for individuals who communicate via BSL due to a lack of interpreters and staff trained in BSL.**

When vital health information is inaccessible, it creates anxiety and barriers to informed decision-making. Ensuring that all patients can understand and engage with their healthcare is critical.

To address this, Wales urgently needs increased funding to provide accessible health services, including the provision of BSL interpreters and bilingual communication support for those who need it.

Social Care

Similarly to healthcare the social care sector also has a lack of interpreters and staff trained in BSL.

This creates significant barriers to accessing vital support, leading to misunderstandings, delays in service provision, and unmet needs. Effective social care relies on clear and accessible communication. While gathering evidence for our response to Welsh Government's consultation on raising the maximum weekly social care charge, we were concerned to hear that a local authority had communicated with a Deaf BSL User in written format. This led to a serious misunderstanding about payment of care charges which caused considerable stress for the individual and their support worker.

Transport

The issue of inaccessible public transport for the Deaf community, particularly BSL signers, is a significant barrier in Wales, especially in rural areas. This lack of accessibility is compounded by the absence of clear communication regarding routes, stops, and instructions. The lack of accessible features in public transport systems affects not only BSL users but the broader Deaf community as well, highlighting a systemic issue that needs urgent attention.

Advocating for improved accessibility, such as BSL-interpreted announcements, visual cues, and accessible information systems on buses and other forms of transport, could make a meaningful difference. Addressing these gaps would not only ease the daily travel challenges faced by Deaf people but also align with a broader commitment to inclusivity and accessibility in public services.

Workplace

The inaccessibility of workplaces in Wales for BSL signers is a major barrier to employment for the Deaf community. Currently, many opportunities are provided by Disabled People's Organisations (DPOs), but the responsibility for creating accessible workplaces should not fall on charities and DPOs alone. There needs to be a proactive commitment from government and businesses to make workplaces accessible to the Deaf community, allowing greater access to employment.

Most disabled people, including those in the Deaf community, want to work, but systemic barriers, rather than their conditions prevent them from integrating into the workforce. This calls for improved employer education, stronger policies, public sector leadership, and collaborative efforts to remove these barriers.

#### Establishing a BSL Commissioner for Wales

The Bill proposes to establish a BSL Commissioner who would promote and facilitate the use of BSL, and would have the same powers as other minority language Commissioners such as in the [Welsh Language \(Wales\) Measure 2011](#).

**Question 10: Do you agree or disagree with the proposal to establish a BSL Commissioner for Wales, and, do you have any different suggestions or alternatives? Please provide reasons for your answer.**

Don't know

Many DPOs and disabled individuals in Wales are advocating for a broader Disabled People's Commissioner role. At Disability Wales, we focus on all disabled people, which means we cannot fully support this call without considering the needs and equity of all disabled people in Wales.

While we believe our organisation is well-equipped to provide advice and services, funding restrictions limit our capacity. We propose that increasing the capacity of DPOs and delegating more work and initiatives to include disabled people, while expanding opportunities for them, offers a viable alternative solution.

We also stress that these plans, decisions, and implementations must be coproduced with disabled people. Our concern is that a non-disabled Disability Commissioner and office, potentially led by non-disabled individuals, would undermine the very purpose of such an office. This issue is one we are working to address within our cross-party group on disability.

At our AGM on 11<sup>th</sup> December the Cabinet Secretary for Social Justice announced her intention to establish a Disability Rights Advisory Board to provide scrutiny and monitoring regarding progress with delivery of the Taskforce Action Plan. It is proposed that members of the Board will be selected via a Public Appointments process and it is vital that Deaf and Disabled people are represented on this Board.

#### **Question 11: The proposed remit of the Commissioner would be to:**

- **formulate BSL standards;**
- **establish a BSL Advisory Panel;**
- produce reports every 5 years in BSL, Welsh and English on the position of BSL in that period;
- provide guidance and a process for public bodies to promote and facilitate BSL in their respective domains;
- establish a procedure for the investigation of complaints.

Do you agree with the proposed remit of the Commissioner, and are there any other provisions you would like to include in the Commissioner's remit? Please provide reasons for your answer.

We agree that the above remit is required and understand why Deaf BSL Signers/Users call for such a role. However as indicated believe there are wider discussions about the role of a Commissioner in protecting the wider rights of Deaf and Disabled People.

#### **Question 12: Do you agree that the BSL Commissioner and the BSL Advisory Panel members should be fluent users/signers?**

Yes

#### **Question 13: Do you think that the proposed BSL Commissioner and Advisory Panel should prioritise the following. Please tick all that apply and provide reasons for your answer.**

- Enabling deaf users/signers to lead the development of policies and implementation of services for BSL users/signers;
- Early years language support for deaf children and their families;
- Improving BSL provision in education;
- Access to interpreters in public services.

All of the above

**Question 14: Do you agree or disagree with the proposal to place a duty on the Welsh Government to prepare and publish an annual BSL report? Please provide reasons for your answer.**

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Yes

Yes, we completely agree with the proposal to place a duty on the Welsh Government to prepare and publish an annual BSL report. This would provide transparency, accountability, and a clear assessment of progress in meeting the needs of the Deaf community in Wales. In an ideal Wales, this duty would be extended beyond the Welsh Government to include both the public, private and third sectors, ensuring that accessibility and inclusion for BSL users are rolled out more broadly across Wales. This would foster a more inclusive society where the needs of the Deaf community are consistently addressed and supported.

**Question 15: Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum?**

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No