
Senedd Cymru | Welsh Parliament

Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Bil Iaith Arwyddion Prydain (Cymru) | British Sign Language (Wales) Bill

Ymateb gan Cyngor Sir ddinbych | Evidence from Denbighshire County Council

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

The British Sign Language (Wales) Bill, which aims to promote and facilitate the use of British Sign Language (BSL) across Wales has key objectives we agree with in principal. Those are:

- Recognise BSL as a language in its own right.
- Promote and facilitate its use in public services.
- Improve access to education, healthcare, and other services for BSL users.
- Ensure BSL users are not treated less favourably than Welsh or English speakers

We agree with the Bill as it aligns with the Well-being of Future Generations (Wales) Act 2015 and The UN Convention on the Rights of Persons with Disabilities (CRPD).

There is a proposal to establish a Commissioner to formulate BSL standards, investigate complaints and monitor and report on usage every 5 years. It will be interesting to learn from you how this aligns with, or is different to, the role of the Equality Commissioner, Eryl Besse, appointed Equality and Human Rights Commission's new Welsh Commissioner and also other independent commissioners for Wales, including Rocio Cifuentes, the Children's Commissioner, and Rhian Bowen-Davies, the Older People's Commissioner for Wales, who champion the rights of children and older people respectively.

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

Our view is that Legislation will help deliver policy intentions by turning broad goals into enforceable actions. Legislation gives the Senedd and public bodies the legal power to act. Without it, policy goals may remain aspirational or voluntary. Laws make certain actions mandatory, ensuring consistent implementation. Legislation defines who must do what, by when, and how. This clarity helps us avoid confusion and ensures accountability. Legislation includes mechanisms for reporting, oversight, and enforcement. This helps track progress, identify gaps, and ensure compliance. Laws can help align national policy with international commitments, such as human rights conventions or climate agreements.

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

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

Yes, placing a duty on Welsh Ministers to promote and facilitate the use of British Sign Language (BSL) is workable, especially when supported by a structured policy framework and stakeholder engagement. The Welsh Government already has experience with similar duties under the Welsh Language (Wales) Measure 2011, which requires Ministers to promote and facilitate the Welsh language. The duty aligns with the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to work toward a more equal and inclusive Wales. Promoting BSL contributes directly to these national well-being goals.

2 - A duty on Welsh Ministers to publish national strategy and guidance

We believe that these are workable and national strategy and guidance are essential tools to support the rollout of the British Sign Language (Wales) Bill, ensuring that its goals are implemented effectively and consistently across Wales.

A BSL route-map will outline specific actions to promote and facilitate BSL, set goals, identify priorities and provide a timeline. National guidance will ensure public bodies understand their legal duties, best practice and develop and implement BSL plans.

3 - A duty on Welsh Ministers to publish BSL guidance

Producing BSL guidance as part of the rollout of the British Sign Language (Wales) Bill offers several important benefits that help ensure the legislation is implemented effectively, consistently, and inclusively across Wales. We believe this is an important element that will provide clarity, consistency and support which will enable careful monitoring and improvement.

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

We believe the duty on public bodies to publish BSL plans under the British Sign Language (Wales) Bill is widely seen as a positive and workable step toward improving accessibility and inclusion for Deaf BSL users. Requiring public bodies to publish BSL plans ensures that their commitments to BSL are visible and measurable. This duty complements existing obligations under the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to work toward a more equal and inclusive Wales. Publishing BSL plans supports these goals. By setting a standard for planning and reporting, the duty helps avoid a postcode lottery in BSL provision. It ensures that Deaf people in all parts of Wales can expect similar levels of access and support.

We would welcome your thoughts on how this additional publication work may be funded, mindful local authorities budgets are reducing every year.

5 - The appointment of a BSL adviser

There are benefits of a BSL advisor. A BSL Adviser would bring specialist knowledge of BSL, Deaf culture, and accessibility issues, helping to guide Welsh Ministers and public bodies in implementing the Bill effectively. The Adviser could ensure that BSL-related policies are consistent and aligned across sectors like education, health, and local government. This helps avoid fragmented or uneven provision. The Adviser could help track progress, identify gaps, and recommend improvements, supporting accountability and continuous development. However, establishing and maintaining the role may require additional funding, especially if the Adviser is expected to lead large-scale initiatives or oversee multiple sectors. The effectiveness of the Adviser depends on their authority and integration within government structures. If the role is too limited or advisory-only, it may lack the power to drive real change. There may be concerns about duplication with other equality or accessibility roles unless the Adviser's remit is clearly defined and coordinated.

6 - Reporting duties to be imposed on the public bodies and Welsh Ministers in relation to these duties.

By setting a standard for planning and reporting, the duty helps avoid a postcode lottery in BSL provision. It ensures that Deaf people in all parts of Wales can expect similar levels of access and support. Reporting duties will provide clarity, consistency and support which will enable careful monitoring and improvement.

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

Are there any barriers to the implementation of the Bill's provisions and does the Bill take account of them?

What are your views on the assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

Primary challenges for local authorities are the reduced capacity in resources to respond to this and discharge our potential duties around this and other Welsh Government initiatives whilst still maintaining our statutory functions and providing services to our communities. We would welcome any funding and / or advice taking this forward.

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

As above, we envisage challenges for local authorities are the reduced capacity in resources to respond to this and discharge our potential duties around this and other Welsh

Government initiatives whilst still maintaining our statutory functions and providing services to our communities. We would welcome any funding and / or advice taking this forward.

Anything else?