

To:

Dr Tracey Cooper  
Chief Executive  
Public Health Wales

*By email*

26 October 2021

Dear Dr Cooper,

### **CONCERNS OVER PUBLIC HEALTH WALES BSL VIDEO RE:SCREENING**

NRCPD, the national voluntary regulator for British Sign Language (BSL) Interpreters and Translators, and ASLI, the UK's largest professional body for Sign Language Interpreters and Translators have seen your release recently on Twitter, and other channels, of a statement presented as being in BSL explaining NHS Screening in Wales to Deaf audiences.

On the face of it, this approach to providing public information in an accessible format for Deaf people is to be applauded. However, the BSL translation in the video makes no sense to BSL users. In fact, when translated back from the BSL used into English for quality analysis purposes, it is incomprehensible.

As a regulator, NRCPD promotes the quality and professional standards of interpreters and translators for public protection. As a professional association, ASLI promotes standards for interpreters and translators, provides best practice guidance for professionals and offers advice for how public organisations can book the right registered professionals. We work hard across the UK public sector to get public bodies such as Public Health Wales to work only with registered professionals in the same way that only doctors and nurses regulated by the GMC and the NMC can work in the NHS. This ensures the safety of the Deaf patient, provides equal access to public information in line with the public sector equality duty and offers patients a malpractice complaints route if the quality of interpretation or translation is substandard.

You will have spent scarce public money on the video and it has been wasted on what we judge is "sub-Level 1" BSL signing. This has defeated the purpose of the statement as well as being insulting to Deaf people, failing them under the Equalities Act 2010 and denying them potentially life-affecting information.

In a letter to a constituent dated 22 November 2017, then Cabinet Secretary for Health and Social Services, Vaughan Gething MS, assured the BSL community that

the requirement for a BSL Interpreter under the All-Wales Standards for Accessible Communication and Information for People with Sensory Loss should mean a registered interpreter, and by extension this includes translators (by which we mean Deaf BSL users qualified and registered to carry out translation work). Registration with the NRCPD verifies that interpreters and translators are qualified to the right standard, committed to a Code of Conduct and accountable for their practice. And together with ASLI we require and expect professionals to continuously develop their professional their knowledge. We believe the person used for the video is not competent at the right level, is not a qualified, registered translator and is not adhering to the best practice guidance available to professionals from ASLI. Furthermore, a routine quality check by a registered translator would have revealed the extent of the failings in the translation before publication.

The NRCPD maintains a public database of registered translators that you can use to find properly qualified professionals who will provide you with faithfully translated BSL versions of the original English or Welsh text. We currently have an historically high 25 registered translators of whom 5 are in Wales so there is no reason why an appropriately skilled professional could not have been sourced. The public register can be searched here:

<https://www.nrcpd.org.uk/>

You may also wish to review the useful ASLI publication, “Best practice guidelines for booking interpreters in healthcare settings”. This was released in June 2020, and produced in collaboration with several Deaf organisations as well as with contributions from NRCPD and World Association of Sign Language Interpreters (WASLI). It can be found here:

<https://asli.org.uk/wp-content/uploads/2020/06/Best-Practice-for-Booking-Interpreters-in-Healthcare-settings-during-Covid-19-FINAL-1.pdf>

BSL is a language in its own right, with its cultural and linguistic roots in the UK’s Deaf population. Deaf people are entitled to expect the NHS to provide health-critical public information in an accessible form and it is an entirely reasonable step under the public sector equality duty, for you to use these public resources to engage the right professional. Any reputable agency providing such a service will know this too.

We know that Public Health Wales will receive complaints about this through the normal channels for members of the public, but together, as the national regulator and the largest professional association, we feel it is our responsibility to bring this to your attention directly and ask that you review the way Public Health Wales provides health information in BSL so the service is fit for purpose.

You tweeted last Friday that you will get in touch with us for support – NRCPD and ASLI are happy to help you in any review (much as we have with the recent NHS England Rapid Review of BSL) and we look forward to hearing from you.

The Minister is copied-in to this letter because she should be made aware of the casual way in which access to information for Deaf people has been dealt with here, but also because her predecessor is quoted above.

We look forward to working with you.

Yours faithfully



Marcus Hawthorn  
Executive Director and Registrar  
NRCPD



Jenny Koehring  
Chair of the Board  
ASLI

Copy to (by email):

Eluned Morgan MS, Baroness Morgan of Ely, Minister for Health and Social Services

Dr Andrew Goodall CBE, Chief Executive NHS Wales