

Petition P-04-628

To improve access to education and services in British Sign Language

October 2018



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About the Committee

The Petitions Committee was established on 28 June 2016 to carry out the functions of the responsible committee set out in Standing Order 23.

Its role is to consider all admissible petitions that are submitted by the public. Petitions have to be about issues that the National Assembly had powers to take action on. The petitions process enables the public to highlight issues and directly influence the work of the National Assembly. Its specific functions are set out in Standing Order 23.

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Current Committee membership:



Janet Finch-Saunders AM
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Recommendations

Recommendation 1. The Welsh Government should support British Sign Language as a minority language, and encourage local authorities to recognise it as the first language of many Deaf children and young people when providing support and education services. Page 13

Recommendation 2. We recommend that the Welsh Government gives consideration to the development of a national charter for delivery of services and resources, including education, to Deaf children and young people and their families. We believe that such a charter, underpinned by the Equality Act 2010 and the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, would enable Local Authorities to plan and resource support within a nationally recognised framework, and help to ensure consistency of provision throughout Wales. Page 13

Recommendation 3. We welcome that the Welsh Government has indicated that British Sign Language is actively being considered in the new curriculum being developed for schools and settings in Wales, specifically as part of the Literacy, Languages and Communication Area of Learning Experience. We therefore recommend that the opportunity to learn British Sign Language is made available to children at all levels of education. As part of this we encourage the Welsh Government to continue to explore the creation of GCSE first-language sign language with Qualifications Wales. Page 16

Recommendation 4. We recommend that the Welsh Government continues its engagement with the Welsh Local Government Association on Workforce Planning for SEN specialist services, with a particular focus on teachers working with Deaf and hard of hearing children and young people. This should include consideration of the longer term sustainability of these services. As part of this we support the introduction of a minimum standard BSL qualification for learning assistants supporting Deaf children and young people. Page 19

1. The Petition

1. Deffo! is a forum for young deaf people in Wales. Its aim is to improve access to the services available to Deaf Young People in Wales, and to encourage participation in the Deaf community.¹ Deffo! was initially part of the British Deaf Association but following a loss of funding for the Welsh Deaf Youth Forum² the initiative is now supported by the Swansea Deaf Centre.

2. The following petition³ was submitted by Catherine Robins-Talbot on behalf of Deffo! Wales Deaf Youth Forum, using the National Assembly for Wales' online petitions system.

We call on the National Assembly for Wales to urge the Welsh Government to improve access to education and services in British Sign Language to improve the quality of life for Deaf people of all ages.

Improve Access for families to learn BSL: When a child is diagnosed as being Deaf/hard of hearing parents should be offered free/subsidised BSL lessons (BSL level one costs approximately £300 per person). By using speech alone, Deaf children struggle/fail to develop communication skills missing important milestones. Learning other languages through BSL (English/Welsh) will improve the child's understanding and comprehension.

Introduce BSL on the National Curriculum: Deaf Children and young people who are taught BSL at an early age will have better access to their education and an improved wellbeing. BSL should be available in schools and taught by qualified Deaf teachers, for all to learn as this would achieve better access for all in society. We believe that BSL should be offered as a language for all learners as a qualification. GCSE Welsh (and other modern languages) are not always offered to Deaf students: this also needs to be improved.

Improving access to Education in BSL for Deaf Children and Young People: Currently they have limited access to Education in BSL, and often experience under qualified support. There is a massive gap in the education of Deaf children, as many are wrongly treated as having a Learning Disability. This has a negative impact on their development in life, reducing independence with poor

¹ Deffo! [Facebook page](#)

² British Deaf Association, [Welsh Deaf Youth project to end, 24 October 2013](#)

³ National Assembly for Wales, [P-04-628 To improve access to education and services in British Sign Language](#)

education, resulting in under-employment. They need adequately qualified Communication Support Workers available in school.

Making Services and resources accessible in BSL for Deaf young people:

Enabling BSL users to access information in their preferred language via digital resources to services such as Education, Health care, Social Services and public transport, giving them equality to access as an equivalent to Welsh Language access.

3. The petition gathered 1,162 signatures using a combination on the Assembly's online petitions facility and a paper petition.
4. The Petitions Committee (the Committee) would like to thank the petitioners for drawing our attention to this important issue and for their hard work and dedication throughout the process.
5. We would also like to place on record our thanks to all those who have provided evidence to the Committee including the petitioner, relevant Ministers and their officials and others who have responded to our requests for information.

Background

6. The most recent Consortium for Research in Deaf Education (CRIDE) Survey (2016/17) on educational provision for deaf children in Wales shows that in 2017 there were 2,642 deaf children in Wales.⁴ The Welsh Government Pupil Level Annual School Census (PLASC) shows that in 2017 there were 3,116 pupils whose major special educational need was hearing impairment (in local authority maintained schools).⁵
7. Some of the issues raised by the petition were highlighted recently in the UK-produced Oscar-winning film *The Silent Child*.⁶ The short movie has helped to raise awareness of the challenges faced by Deaf children and young people in daily life as they seek to communicate with friends and family.

⁴ National Deaf Children's Society, [CRIDE survey of educational provision for deaf children](#)

⁵ Welsh Government, [School Census Results, 2017](#) (PDF, 792KB)

⁶ www.thesilentchildmovie.com/

8. Since the Committee first considered the petition there have been a number of developments in education policy including the roll out of new curriculum and assessment arrangements in Wales following the Donaldson Review⁷ and the passage of the Additional Learning Needs and Tribunal (Wales) Act.⁸

⁷ Welsh Government, [New school curriculum](#)

⁸ National Assembly for Wales, [Additional Learning Needs and Education Tribunal \(Wales\) Bill](#)

2. Timeline of consideration by the Petitions Committee

- 9.** The petition was first considered by the Petitions Committee at its meeting on 24 March 2015. The Committee considered an initial response from the Minister for Education and Skills, Huw Lewis AM and further background and rationale provided by the petitioners.
- 10.** The Committee continued to consider the petition throughout 2015 through written correspondence with the then Minister for Education and Skills and with the petitioners. Following the Assembly elections in May 2016, the present Petitions Committee then engaged with the Minister for Lifelong Learning and Welsh Language, Alun Davies AM, on this subject.
- 11.** Oral evidence sessions were held with the petitioners on 23 May 2017 and with the then Minister for Lifelong Learning and Welsh Language, Alun Davies AM, on 27 June 2017.
- 12.** During its consideration of the petition, the Committee has also encouraged action through other routes. These have included, encouraging the Minister to engage with Deffo! as part of the consultation on the recommendations of the report into a fundamental review of curriculum and assessment arrangement from Foundation Phase to Key Stage 4.
- 13.** The Committee also highlighted the petition to the Chair of the Children, Young People and Education Committee, and requested that Deffo! be included as part of that Committee's consultation on the Additional Learning Needs and Tribunal Bill.
- 14.** The Committee considered a summary of the evidence it had received during May 2018 and subsequently agreed to produce a report and recommendations on the issues raised by the petition.

The Petitioners' ambitions

- 15.** The petition seeks action in four main areas. To:
- Improve access to families to learn British Sign Language (BSL), and specifically that parents should be offered free or subsidised lessons;
 - Introduce BSL on the curriculum for all learners;

- Improve access to education in BSL for Deaf Children and Young People; and
- Make services and resources available for BSL for Deaf Young People in areas such as education, health, social services and public transport.

16. The remainder of this report considers each of these aspects in turn.

3. Improving access for families to learn British Sign Language

17. The petitioners highlight the challenges faced by families where a child is diagnosed as being Deaf or hard of hearing. Providing BSL classes for parents and siblings can be a vital way to support such families and facilitate good communication. The petitioners have advised the Committee that BSL classes for adults at level one cost approximately £300 per person. This was also highlighted during our oral evidence session with the petitioners in May 2017 when Helen Robins-Talbot of Deffo! told the Committee:

“They start off at an average of £300 for level 1, going up to anything from £1,200 to £1,600 for level 3, which we think is the appropriate level... to be able to communicate effectively with your children if you’re going to develop them educationally.”⁹

18. Many of these classes are provided for through adult education courses meaning that there are no, or limited, opportunities for families, including siblings of Deaf/hard of hearing children, to learn BSL together. Where such provision is available the cost can be prohibitive, especially for those families on low incomes or in receipt of benefits. Correspondence from the petitioners in March 2015 indicated that:

“We have knowledge of a parent seeking BSL provision, who has had to access this through the support of a local charity, rather than any local authority provision. The charity has also sought to link with local colleges to access funding, for this individual and others in their peer group, and this has been rejected, without signposting to alternative provision.”¹⁰

19. The petitioners recognise that learning BSL is a choice rather than a medical need and, as such, provision of BSL classes risks being squeezed out during times of financial pressure. It was proposed that, as a counter to this, the Welsh Government could recognise BSL as a minority language, and that local authorities should consider it to be the first language of many Deaf and hard of hearing children and young people.

⁹ Record of Proceedings, [23 May 2017](#), para. 134

¹⁰ [Petitioners to the Committee](#), 17 March 2015 (PDF, 574KB)

20. Ministers have consistently indicated to the Committee that responsibility for support for families where a child is Deaf or hard of hearing lies with local authorities. This was reiterated by the Minister for Lifelong Learning and Welsh Language during his evidence to the Committee in June 2017. The Families First Programme operated by local authorities uses the *Team Around the Family* (TAF) model which aims to:

“[...] pull together the right people from the right agencies to ensure that a family receives the right advice, help and support in a timely manner.”¹¹

21. Should it be determined that support for BSL provision for the family is required it is the responsibility of the local authority to put the appropriate arrangements in place. In response to this, Deffo! indicated that their users did not recall having an opportunity to engage with the Families First Programme.

“None of the users we represent recall engagement with Families First... We do not doubt that the Team Around the Family Model is supposed to achieve solutions such as this, but the evidence suggests to the contrary.”¹²

22. The petitioners stated that they had informally contacted local authorities in Wales to enquire about access. They told the Committee that:

“I went home and I rang the local authorities, a number of them, and they said that there is no facility whereby parents – that is what we’re aiming for – of deaf children can actually access free sign language courses, or there’s nothing for children either... Then we were told that there was finance available which would be through the local authorities. So, again, I went home and I rang around, and yes, lifelong learning does have a budget for adult education. However, it was perceived, at that time, for there to be no need for BSL classes.”¹³

23. Similarly, whilst the Welsh Government provides funding to Further Education Colleges, the planning and delivery of learning provision is determined by each institution according to local needs and Welsh Government priorities. The Minister told the Committee:

¹¹ [Minister for Education and Skills to the Committee](#), 6 May 2015 (PDF 189KB)

¹² [Petitioners to the Committee](#), 20 May 2015 (PDF 366KB)

¹³ Record of Proceedings, [23 May 2017](#), para. 135

“[...] because the overall approach we take to local government funding is that we allow and we expect local government to be government and not local administration of national Government, and that means that we enable and provide the opportunity for local authorities to take decisions that best reflect their priorities and the areas within which they are responsible.”¹⁴

OUR VIEW

We believe that it is vital for parents and siblings of Deaf and hard of hearing children and young people to be offered an opportunity to learn how to communicate through the medium of British Sign Language. Whilst recognising that it is up to Local Authorities and Further Education Colleges to determine their own spending priorities, we are of the view that the Welsh Government could do more to guide local authorities to treat BSL as a language need, rather than a response to a medical need, which may help to reframe the conversation about adequate provision.

Recommendation 1. The Welsh Government should support British Sign Language as a minority language, and encourage local authorities to recognise it as the first language of many Deaf children and young people when providing support and education services.

Recommendation 2. We recommend that the Welsh Government gives consideration to the development of a national charter for delivery of services and resources, including education, to Deaf children and young people and their families. We believe that such a charter, underpinned by the Equality Act 2010 and the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, would enable Local Authorities to plan and resource support within a nationally recognised framework, and help to ensure consistency of provision throughout Wales.

¹⁴ Record of Proceedings, 27 June 2017, para. 123

4. British Sign Language on the National Curriculum

24. The petitioners advised the Committee that the majority of Deaf children in mainstream school provision do not have access to BSL in school, but are taught Sign Supported English (SSE). They explained that, not only does this form of communication not transfer to the external environment, Deaf and hard of hearing children must still learn BSL to communicate with their own community.

25. The petitioners suggest that including BSL on the national curriculum would not only extend the use of BSL beyond the Deaf and hard of hearing community, but have the additional benefit of allowing Deaf young people to interact as equals with their peers in social, economic and learning networks.

26. Representatives from Deffo! emphasised this during their oral evidence, with the suggestion that:

“[...] having BSL on the national curriculum would affect everybody, obviously, and deaf people go to airports, they go to shops, they go to jobs, and so every day there’s the potential to meet deaf people. And so having it on the curriculum for everybody means that you’re allowing better access. It’s not only about providing access for deaf people, but it’s also giving other people skills to interact.”¹⁵

27. In an initial response from the Minister for Education and Skills, the Committee was advised that under the Education Act 1996 local authorities have a duty to provide suitable education for all children, including those who have Special Educational Needs (SEN).¹⁶ Therefore, where a child’s needs have been identified as requiring provision for BSL to enable them to access the curriculum, this should be accommodated.

28. In 2015 the Welsh Government published a report into a fundamental review of curriculum and assessment arrangements from Foundation Phase to Key Stage 4. As a consequence of the review the Minister indicated that there would be a consultation on the proposed vision and purpose for Welsh education.

29. Deffo! expressed frustration that they had not had an opportunity to contribute to the first phase of the fundamental review of curriculum and

¹⁵ Record of Proceedings, 23 May 2017, para. 168

¹⁶ Minister for Education and Skills to the Committee, 6 March 2015 (PDF 191KB)

assessment and indicated that it was unclear what level of engagement on the review had been achieved by the Deaf community. However, they did welcome an opportunity to be involved in the next phase.

30. Through communication between the Committee and the petitioners, and the Committee and the Minister, it became apparent that the opportunity to be involved in the consultation on the Donaldson review did not materialise. Deffo! decided to request a meeting with the Minister, and in December 2015 the Committee agreed to ask the petitioners to consider accepting the offer of a meeting with officials in the first instance. A meeting with Welsh Government officials and Alun Davies, Minister for Lifelong Learning and the Welsh Language ultimately took place in the autumn of 2016.

31. Separate to the work of the Committee, Mike Hedges AM asked the First Minister during Questions on 17 January 2017 whether he would support the creation of GCSE first-language sign language, and for it to be treated as the equivalent of first-language Welsh and English at GCSE. In response, the First Minister committed to raise the matter with Qualifications Wales.¹⁷ During our discussions with the Minister in June 2017 it was noted that Qualifications Wales had not responded positively to this request, but that other avenues could be explored.¹⁸

32. During these discussions the Committee was advised that as part of the curriculum and assessment review a decision had been made to include BSL as part of the learning area of language, literacy and communication. However further detail would be required to determine how this would be demonstrated.

“The curriculum development is in its second stage. It’s still fairly high level. There are six areas of learning, one of which is language, literacy and communication, which is the relevant one. They’ve been considering, at this point, what would come within the scope and boundaries—so, what it would contain. They’ve already made the decision that it would contain British Sign Language. So, the next phase of work they will have is what detail goes into that area of learning experience.”¹⁹

33. In their oral evidence in May 2017 Deffo! noted that having BSL on the curriculum would result in better access for everybody. The petitioners also took

¹⁷ Record of Proceedings, [17 January 2017](#), paras. 5-6

¹⁸ Record of Proceedings, [27 June 2017](#), para. 131-3

¹⁹ Record of Proceedings, [27 June 2017](#), para. 134

this opportunity to emphasise the importance of ensuring access to learning BSL at an early age:

“What we’re actually asking for, through the petition, is for BSL to be put on the national curriculum to give everyone the opportunity to learn it, because the way we’re looking at it is that the more people in society who can sign, even if it’s just your local shopkeeper who can ask you what you want, or you go to a local pub and want a pint – and, instead of having to point at everything, someone can then say ‘Oh, you want a pint’, you know. So, we think that if it’s in education then people will take it on.”²⁰

OUR VIEW

We are pleased that those who have been involved in the development of the new curriculum and assessment arrangements have included BSL as part of the Literacy, Languages and Communication Area of Learning Experience, although we understand that the detail of the curriculum is still being developed.

However, we are disappointed that Qualifications Wales has not responded positively to the suggestion of a new GCSE qualification in first-language sign language, particularly as this has the demonstrated support of the First Minister. Shortly before the publication of this report we noted that the UK Government has now indicated that it will give consideration to introducing a GCSE in British Sign Language.

Recommendation 3. We welcome that the Welsh Government has indicated that British Sign Language is actively being considered in the new curriculum being developed for schools and settings in Wales, specifically as part of the Literacy, Languages and Communication Area of Learning Experience. We therefore recommend that the opportunity to learn British Sign Language is made available to children at all levels of education. As part of this we encourage the Welsh Government to continue to explore the creation of GCSE first-language sign language with Qualifications Wales.

²⁰ Record of Proceedings, [23 May 2017](#), para. 150

5. Improving access to education in BSL for Deaf Children and Young People

34. Through their petition Deffo! sought to highlight the limitations for Deaf children and young people when they are treated as having a learning disability, rather than being users of a language other than English. They claim that this has a negative impact on their development, reduces their independence and results longer-term in under-employment.

35. Deffo! referred to a 2014 report²¹ which indicated that:

- the average contact with a Teacher of the Deaf is 3 hours per week – less than the target of 270 hours per year;
- 13% of Deaf pupils have designated BSL lessons;
- 27% have 1-2-1 tuition;
- 40% feel that they have access to Deaf role models; and
- 38% of the 67 qualified Teachers of the Deaf are expected to retire within 15 years.

36. Deffo! suggest that many Teachers of the Deaf do not have a BSL qualification, and that many are being replaced by teaching assistants. They argue that the data appears to evidence that the framework of SEN provision is not working appropriately to ensure access to BSL.

37. In response to the concerns raised by Deffo! Ministers have advised that local authorities have a statutory duty to identify, assess and make provision for children with SEN. This includes responsibility for ensuring that appropriately qualified staff are available in schools where a learner has been identified as requiring BSL provision.²² Funding is provided through the Revenue Support Grant (RSG) to allow local authorities to meet their statutory duties regarding special educational needs provision. The RSG allows flexibility to deliver services to meet local needs and the discretion to fund specific support as required.²³

²¹ National Deaf Children's Society, [CRIDE survey of educational provision for deaf children, 2014](#) (PDF, 366KB)

²² [Minister for Education and Skills to the Committee](#), 6 March 2015 (PDF 191KB)

²³ [Minister for Education and Skills to the Committee](#), 6 May 2015 (PDF 189KB)

38. Deffo! consider that this flexibility can work against the provision for BSL, which it recognises is a choice rather than a medical need. To counter this, the petitioners suggest that funding for BSL could be ring-fenced. In September 2015 they also suggested that directing responsibility for the education of Deaf young people to local authorities leads to inconsistency of provision with no national benchmarks, standards or frameworks.²⁴

Additional Learning Needs and Education Tribunal (Wales) Bill

39. In March 2015 the Minister noted that the Welsh Government was reforming the legislative framework for supporting learners with SEN by introducing a unified legislative framework to support children and young people aged 0-25 with additional learning needs. The draft Additional Learning Needs and Education Tribunal (Wales) Bill was published in July 2015 and the Minister encouraged Deffo! to submit their views. At that stage the Committee wrote to the Committee for Children, Young People and Education to ask that Deffo! be included in any consultation on additional learning needs, and to bear the petitioners in mind if undertaking any pre-legislative work.

40. Work on the Additional Learning Needs and Education Tribunal (Wales) Bill continued throughout the duration of the Committee's consideration of the petition. The legislation forms one part of the wider Additional Learning Needs Transformation Programme (ALN-TP). In early 2017 Deffo! advised the Committee that in their view the Additional Learning Needs legislation did not meet the needs of their community, and did not specifically address the issues raised within the petition.²⁵

41. When providing oral evidence in May 2017, the group reiterated their view that Deaf young people should be treated as a minority language group and not necessarily be classified as disabled or with having special educational needs (although they recognise that some Deaf children and young people may well have additional needs).

“[...] the ALN Bill at the moment doesn't hold a lot of water with our parents because it specifically targets SEN. There is no provision within the ALN Bill that actually says, 'This is how we're going to look after your deaf children'.”²⁶

²⁴ [Petitioners to the Committee](#), 14 September 2015 (PDF 825KB)

²⁵ [Petitioners to the Committee](#) – 13 March 2017 (PDF 474KB)

²⁶ Record of Proceedings, [23 May 2017](#), para. 198

42. The Additional Learning Needs and Education Tribunal (Wales) Act became law in Wales on 24 January 2018.

Workforce Planning and Development

43. In May 2015 the Minister also indicated that a study of Workforce Planning for SEN Specialist Services was underway, and this included qualified teachers for the deaf. Correspondence from the Minister in February 2017 indicated that data was being collected, in conjunction with the Welsh Local Government Association (WLGA), on specialist workforce issues to provide intelligence to understand issues and actions required, including for bilingual specialist services.

44. The Minister discussed this further during his evidence session in June 2017. He advised that the issue of children being taught and helped by learning assistants with no knowledge of BSL would be explored, and that any qualification or minimum standard that might be introduced would be a dynamic rather than a static standard.

OUR VIEW

The Committee believes that the implementation of our first two recommendations in this report would go some way to addressing the concerns raised by the petitioners in this regard. In particular, encouraging local authorities to recognise BSL as the first language of many Deaf children and young people and developing a national charter for delivery of services and resources, including education, to Deaf children and young people and their families would provide a framework within which to address issues like 1-2-1 tuition or contact with a Teacher of the Deaf.

Having an adequate supply of qualified Teachers of the Deaf is of crucial importance, and with 2 in 5 of those teachers expected to retire within the next 15 years there is an imperative to safeguard sustainability of provision.

Recommendation 4. We recommend that the Welsh Government continues its engagement with the Welsh Local Government Association on Workforce Planning for SEN specialist services, with a particular focus on teachers working with Deaf and hard of hearing children and young people. This should include consideration of the longer term sustainability of these services. As part of this we support the introduction of a minimum standard BSL qualification for learning assistants supporting Deaf children and young people.

6. Making services and resources for Deaf young people available in British Sign Language

45. The final aspect of the petition called for services and resources to be accessible for Deaf young people in BSL.

46. In response the Minister stated that the National Assembly for Wales does not have the power to legislate about any language other than Welsh. He suggested that a more practical way of widening the provision of BSL services may be through equality objectives set by public authorities required under the Equality Act 2010 and the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

47. However, Deffo! contended they had evidence to indicate that many Deaf young people fail to access services with the reasonable adjustment to which they are entitled under the Equalities Act 2010. In correspondence to the Committee in March 2015 they referred to a BBC survey which suggested that this can be as high as 90% in respect of health provision within GP surgeries.²⁷

48. In December 2015 Deffo! noted that much of their communication with the Minister since submitting their petition had taken place through the Committee.²⁸ They considered that this was evidence of a lack of communication channels for stakeholders and families of Deaf children to raise their concerns directly with the Welsh Government. Subsequently the petitioners did have an opportunity to meet with the Minister and Welsh Government officials.

49. During their oral evidence session in 2017, Deffo! made comparisons with the English education system which has specific provision for children and young people who are Deaf and hard of hearing.²⁹ Witnesses relayed their own experience of attending boarding school in England, and the benefits which had accrued from being surrounded by peers who were all communicating through BSL. The witnesses also noted that there is only one Deaf youth worker for the whole of Wales.

²⁷ [Petitioners to the Committee](#), 17 March 2015 (PDF 574KB)

²⁸ [Petitioners to the Committee](#), 1 December 2015 (PDF 355KB)

²⁹ Record of Proceedings, [23 May 2017](#), para. 182-6

50. In his oral evidence session, the Minister reiterated his view that all children should normally be educated in mainstream schools, as long as that remains compatible with the special education provision that their learning needs call for. He also noted that the provision of youth work was a matter for local authorities and not the Welsh Government.³⁰

OUR VIEW

We believe that our earlier recommendation in relation to the development of a national charter for the delivery of services and resources to Deaf children and young people will help to address some of the final issues raised by the petitioners. Such a framework would help to ensure consistency of service provision across local authorities and provide a structure of accountability where such provision does not meet suitable standards.

We also wish to note that the general approach of Ministers to our consideration of this petition has indicated a reluctance to recognise the role which could be played by national government to increase opportunities for Deaf and hard of hearing children and young people. We acknowledge that local authorities certainly have a key role to play in this matter – and should be accountable for the delivery of local services. However, we do not accept that national government does not have responsibility for ensuring that appropriate and consistent levels of BSL provision and support exist across Wales. We consider that our recommendations would help to achieve this.

³⁰ Record of Proceedings, [27 June 2017](#), paras. 162-3 & 192