



	Iechyd Cyhoeddus Cymru Public Health Wales	Name of Meeting People and Organisational Development Committee Date of Meeting 6 February 2024 Agenda item: 3.7
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Welsh Language Update	
Executive lead:	Neil Lewis, Director of People and Organisational Development
Author:	Sian Jones, Welsh Language Manager

Approval/Scrutiny route:	Neil Lewis, Director of People and Organisational Development
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Purpose
This paper gives a status report and update on Public Health Wales’ Welsh-language provision, including how we are meeting our statutory obligations, remedial actions we need to be taking, and our ambitions for the further development of a bilingual culture within the organisation.

Recommendation:				
APPROVE	CONSIDER	RECOMMEND	ADOPT	ASSURANCE
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Committee is asked to: <ul style="list-style-type: none"> • take assurance on Our current position with regard to our Welsh language provision – we are aware of where our weaknesses in compliance are and will continue to address these. • take assurance of the goals that we have set for the coming year – to promote our bilingual culture, to support our staff to develop their Welsh skills and to consolidate awareness across the organisation of each team’s compliance obligations. 				



Link to Public Health Wales [Strategic Plan](#)

Public Health Wales has an agreed strategic plan, which has identified seven strategic priorities and well-being objectives.

This report contributes to the following:

Strategic Priority/Well-being Objective	1 - Influencing the wider determinants of health
Strategic Priority/Well-being Objective	2 - Improving mental-well-being and building resilience
Strategic Priority/Well-being Objective	7 - Building and mobilising knowledge and skills to improve health and well-being across Wales

Summary impact analysis

Equality and Health Impact Assessment	There is no decision required here so an EHIA has not been completed.
Risk and Assurance	<p>Since March 2023 there has been:</p> <ul style="list-style-type: none"> • 1 formal investigation into PHW’s web estate by the Welsh Language Commissioner • 2 formal complaints by the Welsh Language Commissioner • 1 formal complaint by a member of the public via Putting Things Right. <p>During 2023 it became clear that the expectations of both the Welsh Language Commissioner and the Welsh speaking public is much higher than in previous years when the pandemic saw a hiatus and an excellent standard Welsh service is expected from PHW.</p> <p>Therefore our risk of non-compliance with Welsh language legislation has increased over the past year. (Linked to risk 207 of the Corporate Risk Register and Risk 4 of the Strategic Risk Register)</p>
Health and Care Standards	<p>This report supports and/or takes into account the Health and Care Standards for NHS Wales Quality Themes</p> <p>Theme 3 - Effective Care Theme 4 - Dignified Care Theme 7 - Staff and Resources</p>
Financial implications	There are ongoing financial implications of the Welsh Language Standards, particularly with regard



	to translation costs. Our future translation processes which were agreed with BET in 2023 have been outlined in this paper.
People implications	Recruitment to Welsh essential roles continues to be a priority and a challenge. Upskilling of staff within the organisation is also a focus within the work reported in this paper.



1. Purpose / situation

This paper gives a status report and update on Public Health Wales' Welsh-language provision, including how we are meeting our statutory obligations, remedial actions we need to be taking, and our ambitions for the further development of a bilingual culture within the organisation.

2. Background

Welsh Language provision in Public Health Wales is determined by various pieces of legislation and government policies. Our direct obligations are set out in the Welsh Language Standards, which are a comprehensive set of standards explaining what we must do with regards to providing services in Welsh, both internally and externally.

The Standards came into force during 2019, and they were mostly embedded well across the organisation by January 2020, thanks to the cooperation of all our directorates. The work was paused briefly in light of the pandemic but has fully restarted since April 2021.

PHW's Welsh Language Group meets quarterly and includes a representative from each Directorate, who cascade information about Welsh Language issues and undertake exception reporting back from their teams.

Our Welsh Language Hwb intranet site has been refreshed over the past few months, with support from a Project Manager within the POD Directorate and are now more engaging and easier to navigate for staff.

Since the last update to People and Organisational Development Committee we have employed a new Welsh Language Manager, who started in their role in April last year. Responsibility for Welsh Language issues sits with them and our Welsh Language Advisor.

The Welsh Language Team sit within the wider Employee Experience team. The Executive lead for Welsh Language is our Director of People and OD and our non-exec lead is our Vice Chair. There have been many developments in our Welsh language work over the past few months and this paper outlines examples of these.

3. Description/Assessment

3.1 Welsh Language Standards met

Since April the following Welsh Language Standards have been met:



- Our [Internal Use of Welsh Policy](#) was published on our SharePoint pages and our website in August 2023 in line with Welsh Language Standard 79. The policy was approved by PODCOM in March 2023 and covers the areas of leadership, learning, how we support our Welsh speakers and learners and how the Welsh language is an integral part of our culture as an organisation.
- Our [Clinical Consultation Plan](#) was approved in August 2023 and published in September in line with Welsh Language Standard 110. The Plan was co-drafted by our Clinical teams in the Screening and Help Me Quit Divisions and the Welsh Language Team and sets out objectives and actions that will increase Public Health Wales' ability to offer and undertake clinical consultations and specialist smoking cessation services in Welsh.
- Our latest [Welsh Language Standards Annual Report](#) was published on our [Welsh Language web page](#) at the end of September 2023 and highlights our compliance with the Welsh Language Standards generally, best practice from across the organisation and the areas that we will focus on over the next year.

3.2 Promoting the Welsh Language

Between November 27 and December 11, the Welsh Language Commissioner launched the Defnyddia dy Gymraeg (Use your Welsh) campaign. The purpose of the campaign was to encourage Welsh speakers and learners from all over Wales to use the language in their everyday life - at work, with the family, with colleagues, when going to the shop, face to face or on-line.

We celebrated the campaign internally and externally.

- Externally, we took the opportunity to promote our Welsh language social media channels to encourage more people to receive their information from us in Welsh. We did this by posting a series of comms directing users to our Welsh channels. We also changed our logo on our English Facebook page to include the Working Welsh logo.
- Internally, we worked with the other NHS Wales organisations to arrange a series of events in Welsh for all NHS Wales staff during the first week in December. Two sessions were provided by Public Health Wales staff; Dr Eleri Davies presented on 'Our work during and after the pandemic' and Gruffydd Weston presented on 'User Research and the importance of including Welsh speakers'.

3.3 Efa Gruffydd Jones visit to CQ2.

On December 07, (during the Defnyddia dy Gymraeg campaign) we welcomed Efa Gruffydd Jones, Welsh Language Commissioner) and Catrin Jenkins, our Compliance Officer, to our office in CQ2 to meet with Tracey Cooper, Kate Eden, Neil Lewis and other members of the People and Organisational Development Directorate.



Now that Efa has been in her role since January 2023, we saw this as a good opportunity to meet and for Efa to hear about the fantastic work being done across Public Health Wales to promote the Welsh Language. Slides were presented from various Directorates including Healthy Weight Healthy you, Time to Talk Public Health and our Ymlaen staff network.

Feedback from both the WLC's Office and PHW was that the visit was a very positive one and will benefit the relationship between the WLC and PHW, as well as the wider NHS system, by increasing the WLC's understanding of the work being undertaken in the NHS in Wales and the challenges we face.

3.4 Future Translation processes

Translation has been a challenge for many Directorates for a year or more with concerns raised in the corporate Welsh Language Group meetings, in meetings with departments and with individuals across the organisation. The main challenges highlighted were that:

- accessing translation currently can be complicated and time consuming for staff;
- as an organisation, we use a large amount of translators which leads to inconsistencies across our Welsh content and terminology
- translations returned from companies on the framework are not always correct and require detailed proof reading by staff before being made public
- publishing incorrect information in Welsh is an organisational risk for us for non-compliance with Welsh language legislation
- we don't currently have accurate details of the amount we translate or the amount we spend on translation per year.
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Additionally the Welsh Government provided translation framework contract came to an end officially in July 2023 (although PHW were able to agree a 12 month extension) which meant that we needed to act quickly to ensure an ongoing provision as well as make improvements.

In September a paper was presented to the Business Executive Team and a series of recommendations were agreed. There were:

- Establish one route for staff to access and receive completed translations.
- Employ a Translation Co-ordinator
- Centralise the budget for translation.
- Invest in translation memory software.
- Fund the Translation Co-ordinator and memory software from the efficiencies achieved by centralising budgets.
- Tender for a 3-year contract for translation services to supplement the NWSSP provision.



Next steps:

- The Job Description for the Translation Co-ordinator role is drafted and ready to be advertised
- We're working with procurement on the translation tender documents and these will be published soon.
- We're working with the Translation Unit at Shared Services to increase their SLA from 1,000,000 to 2,000,000 for the next financial year. (This will continue to increase year on year until 2026)

Changes will be implemented during the 2024 – 2025 financial year onwards.

3.5 Complaints and investigations

CS1051

In March 2023 we received a Standards Enforcement Investigation from the Welsh Language Commissioner's office on suspicion of non-compliance with Welsh Language Standards 39 across our web estate. This followed a complaint by a member of the public via the Welsh Language Commissioner regarding non-compliance with Standard 39 in October 2022.

As a result, the Welsh Language Commissioner held an audit of our websites and the results were consistent with the results of our own internal audit held between January – March 2023, which concluded that all but one of our websites (Healthy Weight Healthy You being 100% compliant) did not comply with Welsh Language Standard 39.

A response was returned to the Welsh Language Commissioner in September along with an action plan of remediation work on our web estate. A Welsh Language Web Content Checklist has also been shared with all staff. We have since employed a Welsh speaking Digital Content Officer who started in mid-November, and auditing and remediation work on the outstanding websites is progressing in line with the timeframe agreed with the WLC.

Social Media and Web Content Complaint

In April 2023, we received a complaint by a member of the public via the Putting Things Right team regarding information that was shared on our social media channels and information that was missing on our website.

The complaint raised 3 concerns:

1. That we had linked to English web information on our Welsh social media channels rather than to information that was already available in Welsh
2. Our English social media accounts did not indicate, in the information section, that a Welsh account is available;

3. On our web pages which include contact details, we did not include a statement which indicates that we welcome correspondence in Welsh.

A response was co-drafted by the Communications Team and the Welsh Language Team to the complainants satisfaction. Information regarding the complaint and lessons learnt have been shared with staff to avoid similar mistakes in the future.

CS1151

In May 2023, a member of Public Health Wales staff complained directly to the Welsh Language Commissioner that their line manager had refused them the opportunity to attend a residential Welsh course during the Summer.

The case was investigated and resolved internally. The member of staff was able to attend a Welsh residential course later in the year and no further investigation was launched by the Welsh Language Commissioner.

RHYDD6

In November 2023, 2 members of staff contacted the Welsh Language Team and the Welsh Language Commissioner with a complaint that a manager had asked them to not speak Welsh in the workplace. Further to this, we received a letter from the Welsh Language Commissioner in early December asking for further information on the matter, as preventing a person from using their Welsh is a breach of the Welsh Language Measure (2011).

The team in question worked closely with the Welsh Language Team to draft a response to the Welsh Language Commissioner and to support all members of staff involved. A response was submitted by December the 18th. The Welsh Language Commissioner subsequently confirmed that they would not be taking further action on this and are satisfied by the way it has been dealt with.

3.7 Welsh language skills of our workforce

We currently employ 316 members of staff who have recorded their Welsh as being at level 3 or above. This is an increase from the 304 which were recorded at the end of the last financial year. The majority of our staff have recorded their Welsh skills as 0 and we aim to move this group from level 0 to 1 in line with the More Than Just Words aim of all NHS Wales staff having a courtesy level of Welsh by 2027.

3.8 Developing the Welsh skills of our workforce.

We continue to encourage and support our staff to learn, develop and use their Welsh while they work for Public Health Wales.

According to our recent data, more of our staff are learning Welsh. Between April 1st and the middle of November, 21 members of staff have registered on courses across Wales, in comparison with 16 during the last financial year.

In the last financial year 85 members of staff completed the online Cymraeg Gwaith courses. Up to the until middle of November 2023, 64 have already registered, with 5 months to go. 5 members of staff have attended residential courses at Nant Gwrtheyrn since March 2023.

A unique offer will be available to the Health & Care sector in Wales over the next 3 years, commencing at the start of the next financial year. Welsh Government have invested 1.5 million to improve the Welsh skills within the sector and the Learn Welsh Centre will lead on this project.

There will be 3 offers available to staff:

1. Raising Confidence offer to all staff who already have Welsh skills but lack the confidence to use them at work. The project focuses on *speaking* skills and will be open to all staff who have recorded their Welsh skills as 2 or above on ESR.
2. Croeso / Courtesy Welsh course which will be available to those currently on level 0 Welsh to support with basic words and phrases and pronunciation.
3. A bespoke 1 to 1 offer for organisation leaders.

4. Our priorities over the next year

Over the next financial year, our main Welsh language priorities will be:

1. To implementing the translation processes outlined above
2. To deliver the web estate remediation work
3. To support Directorates to complete and submit the Compliance Action Plan to feed into our annual reports
4. To complete and deliver Welsh Language Awareness sessions to staff, starting with the clinical divisions highlighted in our Clinical Consultation Plan
5. To ensure our staff have the opportunity to take part in all aspects the Learn Welsh Scheme for the Health & Care Sector
6. To raise awareness across the organisation of our bilingual culture, as highlighted in our Internal Use of Welsh policy
7. To increase the number of Welsh speaking members of staff we have via our recruitment, workforce planning and development opportunities.

4.1 Well-being of Future Generations (Wales) Act 2015

This work has been put together following the five ways of working, as defined within the sustainable development principle in the Act, in the following ways:



The work outlined in this paper is concerned with embedding long-term changes in systems and procedures, in line with our People Strategy



Embedding Welsh-language procedures will prevent our organisation from failing to provide the service that is expected of us by the Welsh speakers we serve.



The work of the Welsh language team provides an integrated response to a number of cross-cutting frameworks, including the Welsh Language Standards, the More Than Just Words initiative, and the Health and Social Care Standards.



The Welsh language team are working closely with teams across PHW to help them to ensure they are meeting their obligations, providing practical help and support where needed.



Cultural work across the organisation described in this paper aims to increase the number of staff who can feel a sense of ownership of the Welsh language

5. Recommendation

The Committee is asked to:

- **take assurance** on Our current position with regard to our Welsh language provision – we are aware of where our weaknesses in compliance are and will continue to address these.
- **take assurance** of the goals that we have set for the coming year – to promote our bilingual culture, to support our staff to develop their Welsh skills and to consolidate awareness across the organisation of each team’s compliance obligations.