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Iechyd Cyhoeddus
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Public Health
Wales

Name of Meeting

Board

Date of Meeting

29 May 2019 (Extraordinary meeting)

Agenda item:

1.290519

Welsh Language Standards

Executive lead:	Phil Bushby, Director of People and OD
Author:	Phil Bushby, Director of People and OD

Approval/Scrutiny route:	Business Executive Team Welsh Language Group
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Purpose

This paper seeks to provide an update and provide assurance on our organisational progress in respect of the Welsh Language Standards (No.7) Regulations 2018. It also recognises the importance of Welsh Language to our organisation more generally and seeks to highlight our enthusiasm and ambition beyond the requirements that are being imposed in May and November 2019.

Recommendation:				
APPROVE <input checked="" type="checkbox"/>	CONSIDER <input type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input checked="" type="checkbox"/>

The Board is asked to:

- **Receive assurance** that good progress is being made in respect of the standards and that work continues to find solutions for those which have proved difficult to achieve in the timescales set.
- **Approve** the challenges proposed for eight Welsh Language Standards

Note to reader – this paper will be covered as a single item within an Extraordinary Board meeting on the 29 May 2019 with the decision being recorded within the full Board meeting minutes on the 30 May 2019.

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	All Strategic Priorities/Well-being Objectives
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Summary impact analysis

Equality and Health Impact Assessment	Not Completed
Risk and Assurance	Risk 472 on the Corporate Risk Register states "PHW will fail to meet the new Welsh Language standards by the required deadlines". This paper therefore, relates directly to this risk and the mitigation of it.
Health and Care Standards	This report supports and/or takes into account the <u>Health and Care Standards for NHS Wales Quality Themes</u> Theme 7 - Staff and Resources Theme 3 - Effective Care Theme 5 - Timely Care
Financial implications	There are some additional costs centrally and throughout the organisation. These are an investment in central roles and through directorates balancing the challenge of the standards with other business priorities.
People implications	This is a significant change of mind-set for the whole organisation and requires all of us to think and act differently.

1. Purpose/ Background

Public Health Wales is currently implementing a Welsh Language Scheme prepared under the Welsh Language Act 1993. On 30 November 2018 Public Health Wales received a Welsh Language Standards (No.7) Regulations Compliance Notice from the Welsh Language Commissioner ('the Commissioner') which sets out the standards with which we must comply. We are required to be compliant with 80% of the standards by 30 May 2019, an additional 19% by 30 November 2019, and a further 1% by 30 November 2020. Our Compliance Notice is attached as Appendix 1.

2. Description/Assessment

2.1 Welsh Language Standards

The Welsh Language Officer has prepared a range of action plans for implementing the standards. These were distributed by the Director of People and Organisational Development on 4 February 2019.

The implementation and governance approach seeks to promote ownership of and accountability for the Welsh language in all areas and at all levels of the organisation.

Directorates have been encouraged to identify a person(s) in their team to link with the Welsh Language Officer with a view to working through the action plan(s) together. Directorates may add further actions and/or sub-actions as they see fit. As part of the implementation and governance approach, Directors have been asked to determine directorate arrangements which will provide them with assurance that all requirements are met in full by the deadlines stated in the action plan.

Each Directorate has worked well to assess each standard and give a view on which of these we will need to challenge.

The Diversity and Inclusion Team comprising the Diversity and Inclusion Manager and Welsh Language Officer has been strengthened with the addition of Diversity and Inclusion Support Officer. This has enabled a range of more corporate actions to have been completed and provide more central resources such as the new intranet 'Hwb'. This team is also available to offer support and guidance to directorate teams. It has also been good to work alongside other corporate functions such as Communications, Facilities and IT as they have helped facilitate some organisational wide solutions.

Right to challenge and appeal the compliance notice

Public Health Wales has the right to challenge and appeal the final Compliance Notice if it is of the opinion that one or more of the standards imposed is unreasonable or disproportionate. Should Public Health Wales determine that it wishes to challenge, it must follow procedures published by the Welsh Language Commissioner, 'Challenges and Appeals Procedure: Compliance Notices'.

Each directorate has responded to this request and have submitted their assessment of each standard. An overview of our position is attached as Appendix 1. This status report displays what we believe to be our current position. This decision has been arrived at following submission from each directorate and subsequent moderation through our Business Leads Group, Welsh Language Group and finally the central Welsh Language team.

There are eight standards that we propose challenging. Six of these standards are due for 30 May imposition with the remaining two due for 30 November imposition. It is important to note that these challenges relate to the timing of the 'imposition date' and not generally in terms of the wording or indeed their relevance to Public Health Wales. We have noted against each of these eight standards our rationale for challenging. For the vast majority of the standards, we believe we can comply and again, we have noted against each of these why we believe this to be the case. There are a few of these standards where we feel that there is a risk – for example see the comments against 38, 50 and 96 but we feel that these risks are manageable and do not warrant a challenge.

It is worth highlighting here, that there are two main topics within the Standards that have generated a lot of debate and are causing the most concern:

Standards 4 - 7. These relate to understanding the language preference of the people that you are corresponding with. Templates have been provided and it is possible for each area of our organisation to comply. This manual process risks duplication and nugatory effort. Therefore, an 'All Wales' solution is being developed. This forms the basis of the challenge for us and other parts of the Welsh NHS.

Standards 9 - 17. These deal with how we answer the telephone. Standard 17 especially causes concern although this does have a November imposition date. We are unsure how we can comply with this standard even with the later date. For ease, the wording of this standard is copied below:

"If a person contacts one of your departments on a direct line telephone number (including on staff members' direct line numbers), and that person wishes to receive a service in Welsh, you must deal

with the call in Welsh until such point as— (a) it is necessary to transfer the call to a member of staff who does not speak Welsh who can provide a service on a specific subject matter; and (b) no Welsh speaking member of staff is available to provide a service on that specific subject matter.”

2.2 Welsh Language – culture and ambition

Our organisational success in respect of making progress in respect of the Welsh Language is more than just whether or not we will be compliant with the Standards.

There are a range of things that we are doing as an organisation to help develop a positive culture. Some of these things are listed below but we welcome discussion and input as to how these activities can be further enhanced:

- Welsh Learners Practice Group
- Drop in sessions
- How to guides for answering the phone, arranging meetings, setting out of office messages and email signatures
- Posters and Communication campaign (currently being arranged in conjunction with our Communications Team)
- Developed and implemented the “Hwb” on the intranet
- Promotion of Welsh Language and culture events, e.g. Welsh Family Fun Day 06/04/2019
- Staff Facebook posts
- Planning a “Welsh Culture Week” in August, which will involve a range of speakers, a Welsh artist, a Welsh poet and a Welsh Choir

We are also keen to establish a range of items that demonstrate our ambition and maintain our momentum. We would like to:

- To embed in people’s thinking that if you are doing/producing something in English, they automatically think about doing it in Welsh
- To introduce basic Welsh words and phrases into everyone’s everyday language (e.g. Hwb)
- To reduce the “fear factor” by making things as simple as possible and providing assistance and support
- To increase the number of new learners year on year
- To increase the number of people who have accessed and completed the free 10 hour online learning course year on year
- To increase the number of people progressing to the next level of competence (Levels 1-5) year on year

- To increase the organisation's capacity for handling enquiries and communication in Welsh by increasing the number of Welsh Speakers and Welsh Essential posts each year

In their May 2019 meeting, the All Wales Chief Executive peer group discussed the importance of the standards and also the wider work sponsored by Welsh Government known as 'More than Just Words'. We will be participating in a review of this scheme and will also continue to support this wider initiative in the future. This meeting also noted that we should alert Welsh Government as to which standards we intended challenging. We will therefore be doing this before submitting our challenges to the Commissioner.

3. Well-being of Future Generations (Wales) Act 2015

The Welsh language is a cross-cutting issue and is relevant to all seven well-being objectives of the Well-being of Future Generations Act. It is of particular relevance to Theme 7: A Wales of vibrant culture and thriving Welsh language.

4. Recommendation

This paper aims to provide **assurance** that good progress is being made in respect of the standards and that work continues to find solutions for those that have proved difficult to achieve in the timescales set. In addition to this, that work continues to provide an appropriate culture and ambition for Public Health Wales as we continue to improve our engagement with the Welsh Language.

The Board is asked to **approve** the challenges proposed for eight Welsh Language Standards as detailed in the attached appendix.

Appendix 1 – Public Health Wales Compliance Notice and status report (see separate attachment)

COMPLIANCE NOTICE – SECTION 44 WELSH LANGUAGE (WALES) MEASURE 2011

Standard Number	Class of Standard	Standard	Imposition Day	Challenge?	Comment	Suggested Challenge Date
30 MAY 2019 – will be challenged						
4	Service Delivery standards	<p>When you send the same correspondence to several persons, you must send a Welsh language version of the correspondence at the same time as you send any English language version.</p> <p>You must comply with standard 4 in every circumstance, except:</p> <p><input type="checkbox"/> when you send the same correspondence to several persons, and all of those persons have informed you that they do not wish to receive correspondence in Welsh</p>	30/05/2019	Yes	<p>All-Wales We believe this standard is achievable through the development of a central record management systems (CRM) and would require a national approach to these systems thus enabling NHS Wales as a whole to comply. As such, the imposition date of 30/5/2019 is deemed to be unrealistic for the development of this system.</p> <p>NWIS requires additional time to develop, test and implement a system able to record language preferences of 'persons'. Two systems will need to be created. One system to note the language preference of 'persons' outside of the NHS Wales</p>	30/11/20

					<p>network and the other system to record to note the language preference of 'persons' within the NHS network, which currently contains 105,000 unique email users within the NHS network.</p> <p>It is anticipated that the systems would take approximately 12 months to develop, test and secure (by end May 2020), followed by 2 months to roll out as a national system across NHS Wales (end July 2020). There would be a further period of up to 6 months whilst the necessary information is collated and staff are trained and encouraged to use the systems. During this time staff in NHS Wales organisations would be able to make use of increasing captured language preferences, but it wouldn't be practical to ensure full compliance for several months</p>	
5	Service Delivery standards	If you don't know whether a person wishes to receive correspondence from you in Welsh, when	30/05/2019	Yes	As above	30/11/20

		you correspond with that person you must provide a Welsh language version of the correspondence.				
7	Service Delivery Standards	You must state - (a) in correspondence, and (b) in publications and notices that invite persons to respond to you or to correspond with you, that you welcome receiving correspondence in Welsh, that you will respond to correspondence in Welsh, and that corresponding in Welsh will not lead to delay.	30/05/2019	Yes	<p>Screening</p> <p>The Welsh language team are currently awaiting the implementation of a new translation service for correspondence.</p> <p>In Cervical Screening Wales, current NHAIS System embeds letters (Patient Result Letters and GP Letters). CSIMs (NHAIS Replacement) will allow us flexibility to update and amend letters</p> <p>Will therefore be challenging this standard on behalf of cervical screening</p>	30/11/19
9	Service Delivery Standards	When a person contacts you on your main telephone number (or numbers), or on any helpline numbers or call centre numbers, you must inform the person that a Welsh language service is available.	30/05/2019	Yes	<p>Screening</p> <p>Screening services are awaiting installation of new telephony system for one service with menu options (expected 10/19) and recruitment to Welsh speaker for vacancies</p>	30/11/19

					across service to support service resilience ongoing.	
10	Service Delivery Standards	When a person contacts you on your main telephone number (or numbers), or on any helpline numbers or call centre numbers, you must deal with the call in Welsh if that is the person's wish until such point as— (a) it is necessary to transfer the call to a member of staff who does not speak Welsh who can provide a service on a specific subject matter; and (b) no Welsh speaking member of staff is available to provide a service on that specific subject matter.	30/05/2019	Yes	Screening, Microbiology Screening services and Microbiology are awaiting installation of new telephony system/IT solution and recruitment to Welsh speaker vacancies to support service resilience.	30/11/19
16	Service Delivery Standards	When there is no Welsh language service available on your main telephone number (or numbers), or on any helpline numbers or call centre numbers, you must inform persons calling, in Welsh (by way of an automated message or otherwise), when a Welsh language service will be available	30/05/2019	Yes	Screening Screening services and Microbiology are awaiting installation of new telephony system/IT solution and recruitment to Welsh speaker vacancies to support service resilience.	30/11/19
30 NOVEMBER 2019 – may challenge						
17	Service Delivery Standards	If a person contacts one of your departments on a direct line telephone number (including on staff members' direct line numbers), and that person wishes to receive a service in Welsh, you must deal with the call in Welsh until such point as— (a) it is necessary to transfer the call to a member of staff who does not speak Welsh who can provide a	30/11/2019	Yes	PHW Insufficient members of staff who speak Welsh to be able to answer calls on direct line number calls in each programmes. Further	To be agreed Working towards a solution by November 2019

		service on a specific subject matter; and (b) no Welsh speaking member of staff is available to provide a service on that specific subject matter.			recruitment needed for Welsh speaking roles. Solution needs to be developed and agreed	
107A	Operational Standards	If you publish - (a) application forms for posts; (b) material that explains your procedure for applying for posts; (c) information about your interview process, or about other assessment methods when applying for posts; or (ch) job descriptions; you must publish them in Welsh; and you must ensure that the Welsh language versions of the documents are treated no less favourably than any English language versions of those documents.	30/11/2019	Yes	Challenges being made on an all-Wales basis. Developing 'All Wales' position with Shared Services.	To be agreed

30 MAY 2019 – on target to comply

1	Service Delivery standards	If you receive correspondence from a person in Welsh you must reply in Welsh (if an answer is required), unless the person has indicated that there is no need to reply in Welsh.	30/05/2019	No	This is already being carried out as standard procedure and staff are being informed of this duty via the Hwb.	
6	Service Delivery standards	If you produce a Welsh language version and a corresponding English language version of correspondence, you must not treat the Welsh language version less favourably than the English language version (for example, if the English version is signed, or if contact details are provided on the English version, then the Welsh version must be treated in the same way).	30/05/2019	No	This is already being carried out as standard procedure and staff are being informed of this duty via the Hwb.	
8	Service Delivery Standards	When a person contacts you on your main telephone number (or numbers), or on any	30/05/2019	No	This is already being carried out as standard procedure	

		helpline numbers or call centre numbers, you must greet the person in Welsh.			and staff are being informed of this duty via the Hwb.	
11	Service Delivery Standards	When you advertise telephone numbers, helpline numbers or call centre services, you must not treat the Welsh language less Favourably than the English Language	30/05/2019	No	New leaflets printed after May will have to be compliant but old stock will need to be used up first. We have confirmed this approach is compliant.	
12	Service Delivery Standards	If you offer a Welsh language service on your main telephone number (or numbers), on any helpline numbers or call centre numbers, the telephone number for the Welsh language service must be the same as for the corresponding English language service.	30/05/2019	No	This is already being carried out as standard procedure and staff have been asked to review their phone numbers.	
13	Service Delivery Standards	When you publish your main telephone number, or any helpline numbers or call centre service numbers, you must state (in Welsh) that you welcome calls in Welsh.	30/05/2019	No	Screening Diabetic Eye Screening Wales is currently reviewing all its letters, as part of service redesign. It has been decided that this will not be challenged. Sarah to work with team to make amendments to letters – use contingency money if necessary to help support this.	

14	Service Delivery Standards	If you have performance indicators for dealing with telephone calls, you must ensure that those performance indicators do not treat telephone calls made in Welsh any less favourably than calls made in English	30/05/2019	No	This is already being carried out as standard procedure and staff have been asked to review their phone numbers.	
15	Service Delivery Standards	Your main telephone call answering service (or services) must inform persons calling, in Welsh, that they can leave a message in Welsh.	30/05/2019	No	As above.	
18	Service Delivery Standards	When a person contacts you on a direct line number (whether on a department's direct line number or on the direct line number of a member of staff), you must ensure that, when greeting the person, the Welsh language is not treated less favourably than the English language.	30/05/2019	No	Guidance on greetings available on the Hwb.	
19	Service Delivery Standards	When you telephone an individual ("A") for the first time you must ask A whether A wishes to receive telephone calls from you in Welsh, and if A responds to say that A wishes to receive telephone calls in Welsh you must keep a record of that wish, and conduct telephone calls made to A from then onwards in Welsh. You must comply with standard 19 in every circumstance, except: <input type="checkbox"/> where it is necessary for a member of staff who does not speak Welsh to provide a service on a specific subject matter; and	30/05/2019	No	The variation on this standard (in blue) covers any challenges this could have caused.	

		<p><input type="checkbox"/> where no Welsh speaking member of staff is available to provide a service on that specific subject matter.</p> <p>The requirement under standard 19 to ask A whether A wishes to receive telephone calls from you in Welsh and to keep a record of A's wish applies each time a telephone call is made to A for the first time in relation to the specific matter of the call ("the matter in hand"); The requirement under standard 19 to conduct telephone calls made to A from then onwards in Welsh applies in relation to every call which involves the matter in hand</p>				
20	Service Delivery Standards	Any automated telephone systems that you have must provide the complete automated service in Welsh	30/05/2019	No	<p>NHS Collaborative</p> <p>It has been confirmed that the required changes to automated telephone system will be in place by June, therefore there will be no need to challenge this.</p>	
21	Service Delivery Standards	If you invite one person only ("P") to a meeting— (a) you must ask P whether P wishes to use the Welsh language at the meeting, and inform P that you will conduct the meeting in Welsh or, if necessary,	30/05/2019	No	This is already in our Welsh language scheme for individuals to request. A new requirement for NHS staff – solution is to procure	

		<p>provide a translation service from Welsh to English for that purpose, and (b) if P has informed you that P wishes to use the Welsh language at the meeting, you must conduct the meeting in Welsh or, if necessary, arrange for a simultaneous or consecutive translation service from Welsh to English to be available at the meeting.</p> <p>You must comply with standard 21 in relation to persons that are individuals by 30 May 2019.</p> <p>You must comply with standard 21 in relation to every other person by November 30 2019</p>			<p>an interpreter from the framework. Details of procuring translation via the Framework available on the Hwb.</p>	
22	Service Delivery Standards	<p>If you invite more than one person to a meeting, you must ask each person whether they wish to use the Welsh language at the meeting.</p> <p>You must comply with standard 22 in relation to persons that are individuals by 30 May 2019.</p> <p>You must comply with standard 22 in relation to every other person by November 30 2019</p>	30/05/2019	No	As above.	
22A	Service Delivery Standards	<p>If you have invited more than one person to a meeting, and at least 10% (but less than 100%) of the persons invited have informed you that they wish to use the Welsh language at the meeting, you must arrange for a simultaneous or consecutive translation service from Welsh to English to be available at the meeting.</p>	30/05/2019	No	As above.	

		<p>You must comply with standard 22A in relation to persons that are individuals by 30 May 2019.</p> <p>You must comply with standard 22A in relation to every other person by November 30 2019</p>				
22CH	Service Delivery Standards	<p>If you have invited more than one person to a meeting, and all of the persons invited have informed you that they wish to use the Welsh language at the meeting, you must conduct the meeting in Welsh or, if necessary, arrange for a simultaneous or consecutive translation service from Welsh to English to be available at the meeting.</p> <p>You must comply with standard 22CH in relation to persons that are individuals by 30 May 2019.</p> <p>You must comply with standard 22CH in relation to every other person by November 30 2019</p>	30/05/2019	No	As above.	
26	Service Delivery Standards	<p>If you arrange a meeting that is open to the public and at which public participation is allowed you must state on any material advertising it, and on any invitation to it, that anyone attending is welcome to use the Welsh Language at the meeting</p>	30/05/2019	No	Guidance on arranging meetings available on the Hwb.	
27	Service Delivery Standards	<p>When you send invitations to a meeting that you arrange which is open to the public and at which public participation is allowed, you must send the invitations in Welsh.</p>	30/05/2019	No	Guidance on arranging meetings available on the Hwb.	

28	Service Delivery Standards	If you invite persons to speak at a meeting that you arrange which is open to the public and at which public participation is allowed, you must— (a) ask each person invited to speak whether he or she wishes to use the Welsh language, and (b) if that person (or at least one of those persons) has informed you that he or she wishes to use the Welsh language at the meeting, provide a simultaneous or consecutive translation service from Welsh to English for that purpose (unless you conduct the meeting in Welsh without a translation service).	30/05/2019	No	Guidance on arranging meetings available on the Hwb.	
29	Service Delivery Standards	If you arrange a meeting that is open to the public and at which public participation is allowed, you must ensure that a simultaneous translation service from Welsh to English is available at the meeting, and you must orally inform those present in Welsh— (a) that they are welcome to use the Welsh language, and (b) that a simultaneous translation service is available. You must comply with standard 29 in every circumstance, except: <ul style="list-style-type: none"> ○ where an invitation or material advertising a meeting has asked the public to inform you whether they wish to use the Welsh language, and none of 	30/05/2018	No	Guidance on arranging meetings available on the Hwb.	

		them have informed you that they wish to use the Welsh language at the meeting				
30	Service Delivery Standards	If you produce and display any written material at a meeting that you arrange which is open to the public, you must ensure that the material is displayed in Welsh, and you must not treat any Welsh language text less favourably than the English language text	30/05/2019	No	<p>1000 Lives has proposed the following variation: You must comply with Standard 30 in every circumstance, except: Where an invitation or material advertising a meeting has asked the public to inform you whether they wish to use the Welsh language, and none of them have informed you that they wish to use the Welsh language at the meeting.</p> <p>We have written to WLC office seeking clarification and a variation – where no one has informed that they wish to use Welsh, there is no requirement to provide written Welsh materials. Awaiting reply.</p>	
31	Service Delivery Standards	If you organise a public event, or fund at least 50% of a public event, you must ensure that, in promoting the event, the Welsh language is treated no less favourably than the English language (for example, in the way the event is advertised or publicised).	30/05/2019	No	Guidance on arranging public events available on the Hwb.	

32	Service Delivery Standards	If you organise a public event, or fund at least 50% of a public event, you must ensure that the Welsh language is treated no less favourably than the English language at the event (for example, in relation to services offered to persons attending the event, in relation to signs you produce and display at the event and in relation to audio announcements made at the event)	30/05/2019	No	Guidance on arranging public events available on the Hwb.	
33	Service Delivery Standards	Any publicity or advertising material that you produce must be produced in Welsh, and if you produce the material in Welsh and in English, you must not treat the Welsh language version less favourably than you treat the English language version	30/05/2019	No	<p>Advice from WLC that this will need to be bilingual.</p> <p>Potential solution: employ a bilingual actor which will significantly reduce costs and avoid a time delay.</p> <p>Advice from Commissioner's Office Could be subject to Standard 33 (publicity material and advertising) Their interpretation is that 'publicity material' and 'advertising material' could include:</p> <ul style="list-style-type: none"> ○ pamphlets, booklets, sheets, posters, magazines, billboards, films, slogans, videos and sound clips (live or 	

					<p>recorded) that promote, give publicity to or explain elements of the body's work;</p> <ul style="list-style-type: none">○ materials that are created for exhibits, conferences or seminars about the body's work;○ advertisements that are made via electronic messaging, public greeting systems, posters or noticeboards and the press; and○ materials that are related to promotion campaigns and information services. <p>There's nothing in the regulations that exempt sound clips that are available to other organisations only, and there is nothing to say that a sound clip has to be on the general website in order to be subject to the standard either. Therefore the advice is that we must ensure that the podcasts</p>	
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					are also conducted in Welsh.	
34	Service Delivery Standards	Any material that you produce and display in public must be displayed in Welsh, and you must not treat any Welsh language version of the material less favourably than the English language version.	30/05/2019	No		
36	Service Delivery Standards	If you produce a form that is to be completed by an individual, you must produce it in Welsh	30/05/2019	No		
38	Service Delivery Standards	If you produce a document or a form in Welsh and in English you must— (a) not treat any Welsh language version less favourably than you treat the English language version (whether separate versions or not); (b) not differentiate between the Welsh and English version in relation to any requirements that are relevant to the document or form (for example in relation to any deadline for submitting the form, or in relation to the time allowed to respond to the content of the document or form); and (c) ensure that the English language version clearly states that the document or form is also available in Welsh	30/05/2019	No	Agreed in Welsh Language Group meeting that there is a risk here, but a LOW risk. It is in Welsh on one side and English on another (bilingual document). Again, this will be reviewed as current stocks are used.	
39	Service Delivery Standards	You must ensure that— (a) the text of each page of your website is available in Welsh, (b) every Welsh language page on your	30/05/2019	No	NHS Collaborative, Knowledge Directorate There is concern around the need to translate a fast-	

		<p>website is fully functional, and (c) the Welsh language is not treated less favourably than the English Language on your website</p>		<p>adapting site and the cost around this.</p> <p>It is hard to justify challenging this as we've already had advice from WLC office</p> <p>It has been agreed, given the advice from Commissioner that this is difficult to challenge.</p> <p>Advice from Commissioner's Office Confirmed that beta sites will be subject to the standards, saying the following: If the website is available to the public, then there isn't an exception to the requirements of the standards. It is a public website like any other. From looking at the principles of the standards too, not making the beta site bilingual from the start is putting Welsh language users at a disadvantage as there will not be an option for them to trial the site in their language of choice. This would still apply even if</p>	
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					the password protected access were used as it would be available to persons from outside the organisation. It is also argued that the presence of the Welsh language in the beta stage is paramount to testing in order to ensure that it is fully functional in Welsh too.	
42	Service Delivery Standards	If you have a Welsh language web page that corresponds to an English language web page, you must state clearly on the English language web page that the page is also available in Welsh, and you must provide a direct link to the Welsh page on the corresponding English Page	30/05/2019	No	Already being carried out as procedure.	
43	Service Delivery Standards	You must provide the interface and menus on every page of your website in Welsh	30/05/2019	No	Action needs to be taken in the directorate to translate these.	
44	Service Delivery Standards	All apps that you publish must function fully in Welsh, and the Welsh language must be treated no less favourably than the English language in relation to that app. You must comply with standard 44 in every circumstance, except: ○ clinical apps intended for Health Board and NHS Trust staff.	30/05/2019	No	As above.	

45	Service Delivery Standards	When you use social media you must not treat the Welsh language less favourably than the English language. You must comply with standard 45 in the following circumstances: ○ when using social media on your corporate and departmental accounts.	30/05/2019	No	Communications Teams are checking the Twitter accounts.	
46	Service Delivery Standards	If a person contacts you by social media in Welsh, you must reply in Welsh (if an answer is required).	30/05/2019	No	Same as correspondence	
47	Service Delivery Standards	When you— (a) erect a new sign or renew a sign (including temporary signs); or (b) publish or display a notice; any text displayed on the sign or notice must be displayed in Welsh (whether on the same sign or notice as you display corresponding English language text or on a separate sign or notice); and if the same text is displayed in Welsh and in English, you must not treat the Welsh language text less favourably than the English language text.	30/05/2019	No	For new signs – facilities are aware of these requirements	
48	Service Delivery Standards	When you— (a) erect a new sign or renew a sign (including temporary signs); or (b) publish or display a notice; which conveys the same information in Welsh and in English, the Welsh language text must be positioned so that it is likely to be read first.	30/05/2019	No	For new signs – facilities are aware of these requirements	

49	Service Delivery Standards	You must ensure that the Welsh language text on signs and notices is accurate in terms of meaning and expression.	30/05/2019	No	For new signs – facilities are aware of these requirements	
50	Service Delivery Standards	<p>Any reception service you make available in English at your reception must also be available in Welsh, and any person who requires a Welsh language reception service at your reception must not be treated less favourably than a person who requires an English language reception service.</p> <p>You must comply with standard 50 in relation to the following by 30 May 2019: the body's main reception services</p> <p>You must comply with standard 50 in relation to the following by 30 November 2019: every other reception service</p>	30/05/2019	Yes	<p>Screening Issues recruiting Welsh speaking staff in certain areas which make compliance difficult by 30 May 2019.</p> <p>It has been agreed that this will not be challenged. We accept that we have struggled to recruit required staff for a limited number of receptions. We will put a note to the Commissioner to this effect and continue to try and recruit as well as to explore more creative solutions.</p>	
52	Service Delivery Standards	<p>You must display a sign in your reception which states (in Welsh) that persons are welcome to use the Welsh language at the reception.</p> <p>You must comply with standard 52 in relation to the following by 30 May 2019: <input type="radio"/> the body's main reception services.</p> <p>You must comply with standard 52 in relation to the following by 30 November 2019:</p>	30/05/2019	No	Already in place	

		every other reception service				
53	Service Delivery Standards	You must ensure that staff at the reception who are able to provide a Welsh language reception service wear a badge to convey that	30/05/2019	No	Already standard procedure. Major campaign ongoing regarding increasing Welsh language visibility with Cymraeg Gwaith lanyards and badges.	
54	Service Delivery Standards	Any documents that you publish which relate to applications for a grant must be published in Welsh, and you must not treat a Welsh language version of such documents less favourably than an English language version	30/05/2019	No	Business Managers confirmed that this can be 'green' as we don't ask for applications for grants, nor do we inform applicants of a decision.	
55	Service Delivery Standards	When you invite applications for a grant, you must— (a) state in the invitation that applications may be submitted in Welsh and that any application submitted in Welsh will be treated no less favourably than an application submitted in English; and (b) not treat applications for a grant submitted in Welsh less favourably than applications submitted in English (including, amongst other matters, in relation to the closing date for receiving applications and in relation to the timescale for informing applicants of decisions)	30/05/2019	No	Guidance being developed	

56	Service Delivery Standards	When you inform an applicant of your decision in relation to an application for a grant, you must do so in Welsh if the application was submitted in Welsh.	30/05/2019	No	Business Leads confirmed that this can be 'green' as we don't ask for applications for grants, nor do we inform applicants of a decision.	
57	Service Delivery Standards	Any invitations to tender for a contract that you publish must be published in Welsh if the subject matter of the contract suggests that it should be produced in Welsh, and you must not treat a Welsh language version of any invitation less favourably than an English language version.	30/05/2019	No	See above	
58	Service Delivery Standards	When you publish invitations to tender for a contract, you must— (a) state in the invitation that tenders may be submitted in Welsh, and that a tender submitted in Welsh will be treated no less favourably than a tender submitted in English, and (b) not treat a tender for a contract submitted in Welsh less favourably than a tender submitted in English (including, amongst other matters, in relation to the closing date for receiving tenders, and in relation to the timescale for informing tenderers of decisions).	30/05/2019	No	See above	
59	Service Delivery Standards	When you inform a tenderer of your decision in relation to a tender, you must do so in Welsh if the tender was submitted in Welsh	30/05/2019	No	See above	

60	Service Delivery Standards	You must promote any Welsh language service that you provide, and advertise that service in Welsh.	30/05/2019	No	Already standard procedure.	
61	Service Delivery Standards	If you provide a service in Welsh that corresponds to a service you provide in English, any publicity or document that you produce, or website that you publish, which refers to the English service must also state that a corresponding service is available in Welsh.	30/05/2019		As above.	
62	Service Delivery Standards	When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.	30/05/2019	No	WLC has confirmed that this includes email addresses.	
63	Service Delivery Standards	If you offer an education course to one or more individuals, you must— (a) undertake an assessment of the need for that course to be offered in Welsh; (b) offer that course in Welsh if the assessment indicated that the course needs to be offered in Welsh	30/05/2019	No		
64	Service Delivery Standards	When you announce a recorded message over a public address system, you must make that announcement in Welsh and, if the announcement is made in Welsh and in English, the announcement must be made in Welsh first.	30/05/2019	No		

69	Policy Making Standards	When you formulate a new policy, or review or revise an existing policy, you must consider what effects, if any (whether positive or adverse), the policy decision would have on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	WL incorporated into the EHIA form	
70	Policy Making Standards	When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would have positive effects, or increased positive effects, on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	As above	
71	Policy Making Standards	When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would not have adverse effects, or so that it would have decreased adverse effects, on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	As above	

72	Policy Making Standards	When you publish a consultation document which relates to a policy decision, the document must consider, and seek views on, the effects (whether positive or adverse) that the policy decision under consideration would have on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	Guidance to be developed	
73	Policy Making Standards	When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would have positive effects, or increased positive effects, on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	Guidance to be developed	
74	Policy Making Standards	When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects, on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English Language	30/05/2019	No	Guidance to be developed	

75	Policy Making Standards	When you commission or undertake research that is intended to assist you to make a policy decision, you must ensure that the research considers what effects, if any (and whether positive or adverse), the policy decision under consideration would have on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	As standard 69.	
76	Policy Making Standards	When you commission or undertake research that is intended to assist you to make a policy decision, you must ensure that the research considers how the policy decision under consideration could be made so that it would have positive effects, or so that it would have increased positive effects, on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	As standard 69.	
77	Policy Making Standards	When you commission or undertake research that is intended to assist you to make a policy decision, you must ensure that the research considers how the policy decision under consideration could be made so that it would not have adverse effects, or so that it would have decreased adverse effects, on— (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language	30/05/2019	No	As standard 69.	

79	Operational Standards	You must develop a policy on using Welsh internally for the purpose of promoting and facilitating the use of the language, and you must publish that policy on your intranet	30/05/2019	No	Welsh Language Officer is developing a Policy Statement.	
82	Operational Standards	If you publish any of the following, you must publish it in Welsh - (a) a policy relating to behaviour in the workplace; (b) a policy relating to health and well-being at work; (c) a policy relating to salaries or workplace benefits; (ch) a policy relating to performance management; (d) a policy relating to absence from work; (dd) a policy relating to working conditions; (e) a policy relating to work patterns.	30/05/2019	No		
83	Operational Standards	You must allow and state in any document that you have that sets out your procedures for making complaints that each member of staff may - (a) make a complaint to you in Welsh, and (b) respond to a complaint made about him or about her in Welsh; and you must also inform each member of staff of that right.	30/05/2019	No		
85	Operational Standards	When you inform a member of staff (A) of a decision you have reached in relation to a complaint made by A, or in relation to a complaint made about A, you must do so in Welsh if A - (a) made the complaint in Welsh, (b) responded in Welsh to a complaint about A, (c) asked for a meeting about the complaint to be conducted in Welsh, or (ch) asked to use the Welsh language at a meeting about the complaint.	30/05/2019	No		
86	Operational Standards	You must - (a) allow and state in any document that you have which sets out your arrangements	30/05/2019	No		

		for disciplining staff that any member of staff may respond in Welsh to any allegations made against him or against her, and (b) if you commence a disciplinary procedure in relation to a member of staff, inform that member of staff of that right.				
87	Operational Standards	If you organise a meeting with a member of staff regarding a disciplinary matter that relates to his or to her conduct you must - (a) offer to conduct the meeting in Welsh or, if necessary, provide a translation service from Welsh to English for that purpose; and (b) if the member of staff wishes for the meeting to be conducted in Welsh, conduct the meeting in Welsh, or if necessary with the assistance of a simultaneous or consecutive translation service from Welsh to English.	30/05/2019	No	HR policies translated Procure a translator via the Framework	
88	Operational Standards	When you inform a member of staff ("A") of a decision you have reached following a disciplinary procedure, you must do so in Welsh if A - (a) responded to allegations made against A in Welsh, (b) asked for a meeting regarding the disciplinary procedure to be conducted in Welsh, or (c) asked to use the Welsh language at a meeting regarding the disciplinary procedure.	30/05/2019	No	As above	
89	Operational Standards	You must provide staff with computer software for checking spelling and grammar in Welsh, and provide Welsh language interfaces for software (where an interface exists).	30/05/2019	No	Cysgliad is now on the Hwb	
91	Operational Standards	You must ensure that – (a) the text of the homepage of your intranet is available in Welsh, (b) any Welsh language text on your intranet’s homepage (or, where relevant, your Welsh language intranet homepage) is fully functional, and	30/05/2019	No	Completed	

		(c) the Welsh language is treated no less favourably than the English language in relation to the homepage of your intranet.				
93	Operational Standards	If you have a Welsh language page on your intranet that corresponds to an English language page, you must state clearly on the English language page that the page is also available in Welsh, and must provide a direct link to the Welsh language page on the corresponding English language page.	30/05/2019	No	Completed	
94	Operational Standards	You must designate and maintain a page (or pages) on your intranet which provides services and support material to promote the Welsh language and to assist your staff to use the Welsh language.	30/05/2019	No	Being carried out	
96	Operational Standards	You must assess the Welsh language skills of your employees	30/05/2019	No	After speaking with WLG it was decided that this was only asking to assess the language skills by 30 May, and not to collate the responses. Survey has been sent to Comms for distribution week commencing 20 May	
99	Operational Standards	You must provide opportunities during working hours - (a) for your employees to receive basic Welsh language lessons, and (b) for employees who manage others to receive training on using the Welsh language in their role as managers.	30/05/2019	No	Underway	
100	Operational Standards	You must provide opportunities for employees who have completed basic Welsh language training	30/05/2019	No	We have been making this offer for the past 2 years	

		to receive further training, free of charge, to develop their language skills.				
101	Operational Standards	You must provide opportunities for employees to receive training, free of charge, to improve their Welsh language skills	30/05/2019	No	Underway	
102	Operational Standards	You must provide training courses so that your employees can develop - (a) awareness of the Welsh language (including awareness of its history and its role in Welsh culture); (b) an understanding of the duty to operate in accordance with the Welsh language standards; and (c) an understanding of how the Welsh language can be used in the workplace.	30/05/2019	No	Underway	
103	Operational Standards	When you provide information to new employees (for example by means of an induction process), you must provide information for the purpose of raising their awareness of the Welsh language.	30/05/2019	No	Covered in WEND event	
104	Operational Standards	You must provide - (a) wording or a logo for your staff to include in e-mail signatures which will enable them to indicate whether they speak Welsh fluently or whether they are learning the language, and (b) wording for your employees which will enable them to include a Welsh language version of their contact details in e-mail messages, and to provide a Welsh language version of any message which informs others that they are unavailable to respond to email messages.	30/05/219	No	Hwb went live end April	
105	Operational Standards	You must - (a) make available to members of staff who are able to speak Welsh a badge for them to wear to convey that; and (b) promote the wearing of the badge to members of staff.	30/05/2019	No	Visibility campaign underway	

106	Operational Standards	When you assess the requirements for a new or vacant post, you must assess the need for Welsh language skills, and categorise it as a post where one or more of the following apply - (a) Welsh language skills are essential; (b) Welsh language skills need to be learnt when appointed to the post; (c) Welsh language skills are desirable; or (ch) Welsh language skills are not necessary.	30/05/2019	No	Working with People Team to embed process	
107	Operational Standards	When you advertise a post, you must state that applications may be submitted in Welsh, and that an application submitted in Welsh will not be treated less favourably than an application submitted in English.	30/05/2019	No	SSP do this	
107B	Operational Standards	You must not treat an application for a post made in Welsh less favourably than you treat an application made in English (including, amongst other matters, in relation to the closing date you set for receiving applications and in relation to any timescale for informing applicants of decisions).	30/05/2019	No	Already underway	
108	Operational Standards	You must ensure that your application forms for posts provide a space for applicants to indicate that they wish an interview or other method of assessment in Welsh and if an applicant so wishes, you must conduct any interview or other method of assessment in Welsh, or, if necessary, provide a simultaneous or consecutive translation service from Welsh to English for that purpose	30/05/2019	No	With SSP	
109	Operational Standards	When you inform an applicant of your decision in relation to an application for a post, you must do so in Welsh if the application was made in Welsh.	30/05/2019	No	Trac	

111	Operational Standards	When you - (a) erect a new sign or renew a sign in your workplace (including temporary signs), or (b) publish or display a notice in your workplace; any text displayed on the sign or notice must be displayed in Welsh (whether on the same sign or notice as the corresponding English language text or on a separate sign or notice), and if the same text is displayed in Welsh and in English, you must not treat the Welsh language text less favourably than the English language text.	30/05/2019	No	Facilities are aware	
112	Operational Standards	When you - (a) erect a new sign or renew a sign in your workplace (including temporary signs); or (b) publish or display a notice in your workplace; which conveys the same information in Welsh and in English, the Welsh language text must be positioned so that it is likely to be read first.	30/05/2019	No	Facilities are aware	
113	Operational Standards	You must ensure that the Welsh language text on signs and notices displayed in your workplace is accurate in terms of meaning and expression.	30/05/2019	No	Facilities are aware	
114	Operational Standards	When you make a recorded announcement in the workplace using audio equipment, that announcement must be made in Welsh, and if the announcement is made in Welsh and in English, the announcement must be made in Welsh first.	30/05/2019	No	Facilities are aware	
115	Record Keeping standards	You must keep a record, in relation to each financial year, of the number of complaints you receive relating to your compliance with standards.	30/05/2019	No	Completed	
116	Record Keeping standards	You must keep a record (following assessments of your employees' Welsh language skills made in accordance with standard 96), of the number of employees who have Welsh language skills at the end of each financial year and, where you have	30/05/2019	No	Via ESR	

		that information, you must keep a record of the skill level of those employees.				
117	Record Keeping standards	You must keep a record, in relation to each financial year, of the number of new and vacant posts which were categorised (in accordance with standard 106) as posts where— (a) Welsh language skills are essential; (b) Welsh language skills need to be learnt when appointed to the post; (c) Welsh language skills are desirable; or (ch) Welsh language skills are not necessary.	30/05/2019	No	Trac	
118	Standards which deal with Supplementary Matters	You must ensure that a document which records the standards with which you are under a duty to comply, and the extent to which you are under a duty to comply with those standards, is available on your website.	30/05/2019	No	Now on the website	
119	Standards which deal with Supplementary Matters	You must— (a) ensure that you have a complaints procedure that deals with how you intend to deal with complaints relating to your compliance with the standards with which you are under a duty to comply, and (b) publish a document that records that procedure on your website.	30/05/2019	No	Changed have been made to the policy – awaiting confirmation as to whether it will need to go through policy approval procedure	
121	Standards which deal with Supplementary Matters	You must provide the Welsh Language Commissioner (if requested by the Commissioner) with any information which relates to your compliance with the service delivery standards, the policy making standards or the operational standards with which you are under a duty to comply.	30/05/2019	No	As standard procedure	
120	Standards which deal with Supplementary Matters	(1) You must produce a report (an “annual report”), in Welsh, in relation to each financial year, which deals with the way in which you have complied with the standards with which you were under a duty to comply during that year. (2) The	30/05/2019	No	As standard procedure	

		<p>annual report must include the following information (where relevant, to the extent you are under a duty to comply with the standards referred to)— (a) the number of complaints that you received during the year in question which related to compliance with the standards with which you were under a duty to comply (on the basis of the records you kept in accordance with standard 115); (b) the number of employees who have Welsh language skills at the end of the year in question (on the basis of the records you kept in accordance with standard 116); (c) the number (on the basis of the records you kept in accordance with standard 117) of new and vacant posts that you advertised during the year which were categorised as posts where— (i) Welsh language skills were essential; (ii) Welsh language skills needed to be learnt when appointed to the post; (iii) Welsh language skills were desirable; or (iv) Welsh language skills were not necessary. (3) You must publish the annual report no later than 6 months following the end of the financial year to which the report relates. (4) You must ensure that a current copy of your annual report is available on your website.</p>				
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30 NOVEMBER 2019 - on target to comply

37	Service Delivery Standards	<p>If you produce a document (but not a form) which is available to one or more individuals, you must produce it in Welsh- (a) if the subject matter of the document suggests that it should be produced in Welsh, or (b) if the anticipated audience, and their expectations,</p>	30/11/2019	No	As standard procedure	
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		suggests that the document should be produced in Welsh.				
80	Operational Standards	When you offer a new post to an individual, you must ask that individual whether he or she wishes for the contract of employment or contract for services to be provided in Welsh; and if that is the individual's wish you must provide the contract in Welsh.	30/11/2019	No	Possible all-wales challenge at later date	
81	Operational Standards	You must ask each employee ("A") whether A wishes to receive any of the following in Welsh, and if A wishes to receive one or more in 30/11/2019 Welsh you must provide it (or them) to A in Welsh - (a) any paper correspondence that relates to A's employment, and which is addressed to A; (b) any documents that outline A's training needs or requirements; (c) any documents that outline A's performance objectives; (ch) any documents that outline or record A's career plan; (d) any forms that record and authorise annual leave; (dd) any forms that record and authorise absences from work; (e) any forms that record and authorise flexible working hours. You must comply with standard 81 in every circumstance by 30 November 2019, except: when the activity is carried out through the use of the Electronic Staff Record (ESR). You must comply with standard 81 in every circumstance by 30 November 2020.	30/11/2019	No	OD team working on this	
84	Operational Standards	If you receive a complaint from a member of staff or a complaint about a member of staff, and a meeting is required with that member of staff, you	30/11/2019	No	Policies have been translated and a translator	

		must - (a) offer to conduct the meeting in Welsh or, if necessary, provide a translation service from Welsh to English for that purpose; and (b) if the member of staff wishes for the meeting to be conducted in Welsh, conduct the meeting in Welsh or, if necessary, with the assistance of a simultaneous or consecutive translation service from Welsh to English.			will be procured via the Framework	
90	Operational Standards	<p>You must ensure that - (a) the text of each page of your intranet is available in Welsh, (b) every Welsh language page on your intranet is fully functional, and (c) the Welsh language is treated no less favourably than the English language on your intranet.</p> <p>You must comply with standard 90 in relation to pages on your intranet that relate to the matters within the following operational standards:</p> <ul style="list-style-type: none"> • the use of the Welsh language within your internal administration • complaints made by staff • disciplining staff • developing skills through planning and training the workforce; and • recruiting and appointing 	30/11/2019	No	This is currently underway	
95	Operational Standards	<p>You must provide the interface and menus on your intranet pages in Welsh.</p> <p>You must comply with standard 95 in relation to the following:</p> <ul style="list-style-type: none"> • any page or homepage on your intranet that is available in Welsh in 	30/11/2019	No	This is currently underway	

		<p>accordance with standards 90 and/or 91;</p> <ul style="list-style-type: none"> any page you designate and maintain on your intranet in accordance with standard 94 				
97	Operational Standards	You must provide opportunities for training in Welsh in the following areas, if you provide such training in English - (a) recruitment and interviewing; (b) performance management; (c) complaints and disciplinary procedures; (ch) induction; (d) dealing with the public; and (dd) health and safety.	30/11/2019	No	OD team working on this	
98	Operational Standards	You must provide opportunities for training in Welsh on using Welsh effectively in - (a) meetings; (b) interviews; and (c) complaints and disciplinary procedures.	30/11/2019	No	OD team working on this	
106A	Operational Standards	If you have categorised a post as one where Welsh language skills are essential, desirable or need to be learnt you must - (a) specify that when advertising the post, and (b) advertise the post in Welsh	30/11/2019	No	Recruitment team working on this	
110	Operational Standards	You must publish a plan for each 5 year period setting out - (a) the extent to which you are able to offer to carry out a clinical consultation in Welsh; (b) the actions you intend to take to increase your ability to offer to carry out a clinical consultation in Welsh; (c) a timetable for the actions that you have detailed in (b).	30/11/2019	No		
110A	Operational Standards	Three years after publishing a plan in accordance with standard 110, and at the end of a plan's 5 year period you must - (a) assess the extent to which	30/11/2019	No		

		you have complied with the plan; and (b) publish that assessment within 6 months.				
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