

# Response to the Welsh Language Commissioner's Initial Considerations

Policy and Resources Cabinet Board  
14 July 2016

# The Standards Journey

- Welsh Language (Wales) Measure 2011 (February)
- Standards Investigation (January 2014)
- Standards Investigation Response submitted (April 2014)
- Letter sent to Commissioner (April 2014)
- Commissioner's report to Welsh Government (June 2014)
- Welsh Government Draft Standards Consultation (Dec 2014)
- Response letter sent to Welsh Government (Dec 2014)
- Welsh Language Standards(No1)Regulations 2015 (March)
- Draft Compliance Notice Consultation (July 2015)
- Response and letter sent to Commissioner (July 2015)
- Final Compliance Notice (Sept 2015)
- Challenge submitted (January 2016)
- Further consultation on the Commissioner's Initial Considerations (June 2016)

## Standard 22

Automated telephone systems

Imposition day: 30/03/2016

### Difficulty

Social services – delays in safeguarding concerns being assessed and responded to inevitable due to need for translation

Mobile phones and telephone extensions – voice mail automated provisions in English only.

### Proposal

**Modify** - the standard should be confined to the Corporate Contact Centre alone in the first instance

## **Standards 26 & 26A and Standards 29 & 29A**

Meetings to discuss a person's wellbeing

Imposition day: 30/03/2016

### **Difficulty**

Practicality and cost  
of translation

Staff linguistic  
capabilities

### **Proposal**

**Modify** – to be applied  
except where the  
translation would  
prejudice the safety or  
wellbeing of the  
individual or where the  
service user does not  
wish to use a  
translation service

## **Standard 41**

Agendas and minutes

Imposition day: 30/03/2016

### **Difficulty**

Conflicting legal  
requirements

Linguistic capabilities  
of staff

Cost of simultaneous  
production of papers

### **Proposal**

**Not imposed at the  
present time**

## Standard 42

Licences and certificates

Imposition day: 30/03/2016

### Difficulty

Law Commission –  
issues regarding Welsh  
legal terminology  
Linguistic capabilities of  
staff  
Lack of local demand  
Translation cost

### Proposal

**Not imposed at this  
time**

## Standard 52

Website

Imposition day: 30/03/2016

### Difficulty

A transactional rather than a static website

Third party systems – English only

Cost and lead in times for planning and implementation

### Proposal

**Modify** - to clarify third party systems are not included and to explicitly exempt third party systems from the standard

## **Standards 61 & 62**

External signage

Imposition day: 30/03/2016

### **Difficulty**

Health and Safety concerns over the size of the sign and that Welsh will be first

### **Proposal**

**Modify** - to exempt signage where it would prejudice public safety

## Standard 64

Providing a reception service in Welsh

Imposition day: 30/03/2016

### Difficulty

Staff linguistic capabilities

Low public demand

Difficulties in recruiting staff with Welsh language skills

### Proposal

**Apply** to civic offices at Neath Port Talbot and Pontardawe

**Modify** for remaining 14 reception areas to provide bilingual services through a third party service

## **Standards 76,77,77A, 79 & 80**

Invitations to tender for a contract

Imposition day: 30/03/2016

### **Difficulty**

Staff linguistic capabilities

Translation - legitimacy of terminology

Legal issues, consequences and implications

### **Proposal**

Not applied at this time

# Standards 84 & 86

Education courses

Imposition day: 30/03/2016

## Difficulty

## Proposal

Staff linguistic  
capabilities

**Not imposed**

No demand

Cost of undertaking  
assessments

Technical and legal  
limitations

**Standards 99,100,101,102,103 & 104 and  
Standards 112,112A,114,115,116,116A,118 & 119**

Employee records

Imposition day: 30/03/2016

**Difficulty**

Staff linguistic  
capabilities

Translation costs

Consequential  
impacts

**Proposal**

**Modify** - the  
standards are not  
imposed other than  
for Welsh medium  
education settings

# **Standards 122,124 & 126**

Intranet

Imposition day: 30/03/2016

## **Difficulty**

Translation cost

Intranet home page  
not static

## **Proposal**

**Not imposed**

# **Standards 128 & 129**

Staff training

Imposition day: 30/03/2016

## **Difficulty**

Linguistic capabilities  
of managers and  
training section

## **Proposal**

**Not imposed**

## Standard 130

Welsh language training

Imposition day: 30/03/2016

### Difficulty

Linguistic capabilities of managers and training section.

Consequential impacts – disproportionate implications

### Proposal

**Accept** - provide opportunities for basic Welsh language sessions

**Not imposed** – provide opportunities for using the Welsh language in the role as manager

## **Standard 131**

Training to develop language skills  
Imposition day: 30/03/2016

### **Difficulty**

Linguistic capabilities of  
managers and training  
section

Consequential impacts  
– disproportionate  
implications

### **Proposal**

**Accept**

## **Standard 132**

Training - language awareness/standards/Welsh in work

Imposition day: 30/03/2016

### **Difficulty**

Training costs and  
time – pressures of  
workloads

Service areas affected  
differently by  
standards

### **Proposal**

**Modify** - applied to  
senior managers and  
service managers only  
and the remainder of  
employees are  
exempted

# **Standards 137,137A,137B,139 & 140**

Recruitment

Imposition day: 30/03/2016

## **Difficulty**

Limited external  
recruitment

Cost

Consequential impacts

## **Proposal**

**Modify** - applied to  
Welsh essential posts  
only and excludes the  
recruitment microsite  
until its replacement  
is possible.

## **Standards 141,142,143 & 144**

Internal signage and public announcements

Imposition day: 30/03/2016

### **Difficulty**

### **Proposal**

Cost

**Standards 141-143 –**  
further clarification  
required on the  
definition of a sign

**Accept - Standard 144**

## **Standards 145 & 146**

Strategy to promote the Welsh language

Imposition day: 30/03/2016

### **Difficulty**

Not able to control all factors that impact on the number of Welsh speakers

Lack of funding

Wellbeing and Future Generations Act responsibilities

### **Proposal**

**Modify** – the standard to exclude setting targets to increase the number of Welsh speakers in its area

## **Standard 154**

Recording the number of new and vacant posts

Imposition day: 30/03/2016

### **Difficulty**

Reduced capacity of  
HR section

### **Proposal**

**Modify** – the  
imposition date is  
extended by 12  
months