

Welsh Language Standards

Standard	What it says	Council's position 18 th July 2016	Commissioner's Response October 2016	Suggested approach
22	Any automated telephone systems that you have must provide the complete automated service in Welsh	Comply immediately in the Corporate Contact Centre. Extend timetable for compliance in the Social Services contact centres Introduce requirement for automated messaging when the Council renews its mobile phone contracts	Position unchanged	<p>ACCEPT</p> <p>The Council, would be able to comply with the standard in relation to the Corporate Contact Centre</p> <p>With the ongoing limitations in relation to Welsh language skills amongst the workforce the Council's ability to comply with the standards in relation to the Social Services Contact Centres is greatly restricted. In addition recruitment is currently through internal advertisement and so the pool of candidates with Welsh language skills is not being widened. The ongoing challenge in recruiting social workers, regardless of language skills, only exacerbates the problem faced by the Council. This in turn impacts on the council's ability to meet the standard in relation to social service contact centres.</p> <p>Therefore in order to allow the council an opportunity to explore how best to comply we would seek to extend the timescale to comply with the standard in relation to the Social Services Contact Centres to 30 March 2019.</p> <p>The position regarding automated messaging on mobile phones was clarified with the Commissioner's representatives was as such we would seek an exemption in relation to mobile phones due to the limitations of pre-recorded language options.</p>

26	If you invite an individual “A” to a meeting and the meeting relates to the wellbeing of A you must ask A whether A wishes to use the Welsh language at the meeting and inform A that you will, if necessary, provide a translation service from Welsh to English and from English to Welsh.	That the standards are applied except in circumstances where the Council can show reliance on translation services would prejudice the safety or wellbeing of the individual, or where the individual does not wish a translation services to be provided	Position unchanged	<p>ACCEPT</p> <p>Officers reached an understanding with the Commissioner’s office that the safety and wellbeing of the individual is paramount. Therefore the standard can be complied with on the understanding that where the individual does not wish for a translation service to be provided or where there is an urgent need to act there would be no expectation from the Commissioner that this would be imposed.</p>
26A	You must arrange for a simultaneous translation service from Welsh to English and from English to Welsh to be available at a meeting a) if the meeting relates to the wellbeing of an invited individual A and b) if A has informed you that A wishes to use the Welsh language at the meeting unless you conduct the meeting in Welsh without the assistance of a translation service.	That the standards are applied except in circumstances where the Council can show reliance on translation services would prejudice the safety or wellbeing of the individual, or where the individual does not wish a translation services to be provided	Position unchanged	<p>ACCEPT</p> <p>Officers reached an understanding with the Commissioner’s office that the safety and wellbeing of the individual is paramount. Therefore the standard can be complied with on the understanding that where the individual does not wish for a translation service to be provided or where there is an urgent need to act there would be no expectation from the Commissioner that this would be imposed.</p>
29	If you invite more than one person to a meeting, and that meeting relates to the wellbeing of one or more of the individuals invited, you must - (a) ask that individual or each of those individuals whether	That the standards are applied except in circumstances where the Council can show reliance on translation services would prejudice the safety or wellbeing of the	Position unchanged	<p>ACCEPT</p> <p>Officers reached an understanding with the Commissioner’s office that the safety and wellbeing of the individual is paramount. Therefore the standard can be complied with on the understanding that where the individual does not</p>

	he or she wishes to use the Welsh language at the meeting, and (b) inform that individual (or those individuals) that, if necessary, you will provide a translation service from Welsh to English and from English to Welsh for that purpose.	individual, or where the individual does not wish a translation services to be provided		wish for a translation service to be provided or there is an urgent need to act there would be no expectation from the Commissioner that this would be imposed.
29A	You must provide a simultaneous translation service from Welsh to English and from English to Welsh at a meeting - (a) if you have invited more than one person to the meeting, (b) if the meeting relates to the well-being of one or more of the individuals invited, and (c) if at least one of those individuals has informed you that he or she wishes to use the Welsh language at the meeting; unless you conduct the meeting in Welsh without the assistance of a translation service	That the standards are applied except in circumstances where the Council can show reliance on translation services would prejudice the safety or wellbeing of the individual, or where the individual does not wish a translation services to be provided	Position unchanged	ACCEPT Officers reached an understanding with the Commissioner's office that the safety and wellbeing of the individual is paramount. Therefore the standard can be complied with on the understanding that where the individual does not wish for a translation service to be provided or there is an urgent need to act there would be no expectation from the Commissioner that this would be imposed.
30	If you arrange a meeting that is open to the public you must state on any material advertising it, and on any invitation to it, that anyone	Withdrawn	Position unchanged	The challenge to this standard was withdrawn in July 2016 following a reassessment of the Council's position.

	attending is welcome to use the Welsh language at the meeting.			
33	<p>If you arrange a meeting that is open to the public, 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 -</p> <p>(a) that they are welcome to use the Welsh language, and</p> <p>(b) that a simultaneous translation service is available.</p> <p>You must comply with standard 33 in every circumstance, except:</p> <ul style="list-style-type: none"> • where an invitation or material advertising the meeting has asked persons to inform you whether they wish to use the Welsh language, and that no person has informed you that he or she wishes to use the Welsh language at the meeting. 	Withdrawn	Position unchanged	The challenge to this standard was withdrawn in July 2016 following a reassessment of the Council's position.
41	If you produce the following documents you must produce them in Welsh:	The standard should not be imposed	Position unchanged Standard has been varied already - see standard	The Council is unable to comply with this standard for the reasons provided in our earlier response.

	<p>(a) agendas, minutes and other papers that are available to the public which relate to management board of cabinet meetings</p> <p>(b) agendas, minutes and other papers for meetings conferences or seminars that are open to the public</p> <p>You must comply with standard 41(a) in every circumstance, except:</p> <ul style="list-style-type: none"> • other papers that are available to the public, which relate to management board or cabinet meetings. <p>You must comply with standard 41(b) in every circumstance, except:</p> <ul style="list-style-type: none"> • other papers for meetings that are open to the public. 			<p>While it appears other councils have been able to accept the standard, evidence circulated by a range of other councils demonstrates that in some instances, the standard is not being complied with fully, the content of minutes have been substantially changed to enable Welsh versions of the minutes to be produced in accordance with the other legal requirements governing the conduct of meetings, additional staff have been recruited, the priority that has needed to be given to the minutes has created a delay in other work being translated. The evidence from elsewhere confirms that the Council's assessment of the impact of this standard is accurate and would be unreasonable and disproportionate.</p> <p>The Council maintains that the imposition of this standard is not workable in practice as meeting agendas and minutes are subject of change up to the deadline for meeting papers to be published. There is a separate set of legal rules governing the production of papers for formal meetings of the Council and the basis of the Council's challenge is to avoid a situation where it would be seeking to satisfy conflicting legal requirements. If the Council's Democratic Services Team were of a different linguistic profile then this problem would not arise. However, as pointed out in the earlier submission, there is only one member of the team who speaks Welsh and who does not have sufficient competence to read or write in Welsh. Therefore the team is unable to operate bilingually and will be reliant on external translation services.</p> <p>However, the council seeks to find a workable</p>
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42	Any licence or certificate you produce must be produced in Welsh.	The standard should not be imposed	Prepared to extend the imposition date (6 months from date of determination)	<p>ACCEPT</p> <p>The Council would be able to comply with this standard if agreement on a variation to reflect the different licences or certificates that are issued could be reached. These fall into two categories:</p> <ul style="list-style-type: none"> • Licences and certificates that are displayed to the public • Licences and certificates which are not displayed to the public <p>The Council is able to provide bilingual licences/certificates that are displayed to the general public.</p> <p>The Council would be able to provide Welsh licences/certificates, which are not displayed to the public, where the individual has requested the licence/certificate in Welsh.</p>

52	You must ensure that a) the text of each page of your website is available in Welsh b) every Welsh language page on your website is fully functional and c) the Welsh language is not treated less favourable than the English language on your website	Clarification sought that the standard does not extend to third party systems that interface with the Council's website	Position unchanged but clarification that standard relates only to information Council is responsible for	Accept Further clarification had been received from the Commissioner's office that this standard would only apply to those webpages the Council is fully responsible for, with third party systems being outside of the standard.
61	When you erect a new sign or renew a sign (including temporary signs), any text displayed on the sign must be displayed in Welsh (Whether on the same sign as you display corresponding English language text or on a separate sign) and if the same text is displayed in Welsh and in English you must not treat the Welsh language text less favourable than the English language text	The standard should be amended to exclude those that would prejudice public safety if the standard were to be fully applied	Position unchanged – further evidence required to substantiate arguments	<p>Street Signs</p> <p>The requirement of the standard is achievable for most signs without compromising the original name of the road, however, there are some instances where this will always be a challenge, i.e. where there is no appropriate translation/where a translation bears no resemblance to what the street is predominantly known as, for example, Conduit Street, Constant Road.</p> <p>A variation reflecting this would be appropriate especially given the recent exercise undertaken by the Commissioner in respect of standardising place names where confirmation of locally used names and their spellings were sought.</p> <p>Additionally, the Council considers that the positioning of the Welsh text would hinder business and emergency services locating the address causing potential delays.</p> <p>A variation is therefore sought in respect of street signs with an exemption for those established roads which are known in English and where a Welsh</p>

				translation would be unsuitable especially if placed first.
62	When you erect a new sign or renew a sign (including temporary signs) which conveys the same information in Welsh and in English the Welsh language text must be positioned so that it is likely to read first.	The standard should be amended to exclude those that would prejudice public safety if the standard were to be fully applied	Position unchanged – further evidence required to substantiate arguments	<p>Street Signs</p> <p>The requirement of the standard is achievable for most signs without compromising the original name of the road, however, there are some instances where this will always be a challenge, i.e. where there is no appropriate translation/where a translation bears no resemblance to what the street is predominantly known as, for example, Conduit Street.</p> <p>A variation reflecting this would appear to be appropriate especially given the recent exercised undertaken by the Commissioner in respect of standardising place names where confirmation of locally used names, and their spellings were sought.</p> <p>Additionally, the positioning of the Welsh text would hinder business and emergency services locating the address causing potential delays.</p> <p>A variation is therefore sought in respect of street signs with an exemption for those established roads which are known in English and where a Welsh translation would be unsuitable especially if placed first.</p>
64	Any reception service you make available in English must also be available in Welsh and any person who requires a Welsh language reception	The standard is applied at Port Talbot Civic Centre, Neath Civic Centre and Pontardawe but modified to reflect the fact that a	Standard will be modified: By 30 March 2016 at: <ul style="list-style-type: none"> • Civic Centre Neath • Civic Centre Port Talbot • Civic Centre Pontardawe 	<p>Accept</p> <p>The proposed modification accepts the Council's position where a bilingual reception service may only be available in the specified areas due to language</p>

	service ,must not be treated less favourably than a person who requires an English language reception service	bilingual service may only be available in other reception areas via Skype or via a third party service.	By 30 March 2018 at: <ul style="list-style-type: none"> • Every other reception service 	and staffing limitations. It is proposed that the modification is accepted, with an amendment for accuracy in relation to the Hub, Pontardawe: <p>By 30 March 2016 at:</p> <ul style="list-style-type: none"> • Civic Centre Neath • Civic Centre Port Talbot • Hub Pontardawe <p>The proposed modification to comply at every other reception service by 30 March 2018 is acceptable providing the Commissioner accepts that a reception service offered in Welsh in these areas may not be in person but via Skype, other technological provision, third party service etc.</p>
65	If you arrange a visit or appointment in advance for a person (“P”) which will mean that P will come to your reception, you must ask P whether P wishes to receive a Welsh language reception service (unless you already know whether P wishes to receive that service in Welsh). You must comply with standard 65 until 30 March 2018		These are proposed in order to cover the time before the Standard 64 comes into force	Accept This is accepted as an interim standard for those reception areas where standard 64 comes into force on 30 March 2018.
65A	You must provide a face to face Welsh language reception service for a person (“P”) at your reception if you have		These are proposed in order to cover the time before the Standard 64 comes into force	Accept This is accepted as an interim standard for those reception areas where standard 64 comes into force

	<p>arranged a visit or appointment for P in advance and—</p> <p>(a) P has informed you in advance that P wishes to receive the service in Welsh, or</p> <p>(b) you are already aware that P wishes to receive the service in Welsh.</p> <p>You must comply with standard 65A until 30 March 2018.</p>			on 30 March 2018.
76	<p>Any invitations to tender for a contract that you publish must be published in Welsh, and you must not treat a Welsh language version of any invitation less favourably than an English language version.</p> <p>You must comply with standard 76 in the following circumstances:</p> <p>(a) If the subject matter of the tender for a contract suggests that it should be produced in Welsh, or</p> <p>(b) If the anticipated audience, and their expectations, suggests that the document should be produced in Welsh.</p>	The Council is not able to provide a competent legal service to meet this standard	Prepared to extend the imposition date (6 months from the date of determination)	<p>Accept</p> <p>With the modification and in light of the national review of the regulations recently announced by Welsh Government the Council has been able to reconsider its position. While it is acknowledged a small risk of noncompliance remains a possibility the Council is confident that any such risk would be manageable.</p>

77	When you publish invitations to tender for a contract, you must 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			<p>Accept</p> <p>In light of the national review of the regulations recently announced by Welsh Government the Council has been able to reconsider its position. While it is acknowledged a small risk of noncompliance remains a possibility the Council is confident that any such risk would be manageable.</p>
77A	You must 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 time-scale for informing tenderers of decisions).			<p>Accept</p> <p>With the modification and in light of the national review of the regulations recently announced by Welsh Government the Council has been able to reconsider its position. While it is acknowledged a small risk of noncompliance remains a possibility the Council is confident that any such risk would be manageable.</p>
79	If you receive a tender in Welsh and it is necessary to interview the tenderer as part of your assessment of the tender you must - (a) offer to provide a translation service from Welsh to English to enable the tenderer to use the Welsh language at the interview, and (b) if the tenderer wishes to use the Welsh language at the interview, provide a simultaneous translation service for that purpose			<p>Accept</p> <p>With the modification and in light of the national review of the regulations recently announced by Welsh Government the Council has been able to reconsider its position. While it is acknowledged a small risk of noncompliance remains a possibility the Council is confident that any such risk would be manageable.</p>

	(unless you conduct the interview in Welsh without a translation service).			
80	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.			Accept With the modification and in light of the national review of the regulations recently announced by Welsh Government the Council has been able to reconsider its position. While it is acknowledged a small risk of noncompliance remains a possibility the Council is confident that any such risk would be manageable.
84	If you offer an education course that is open to the public, you must offer it in Welsh. You must comply with standard 84 in every circumstance, except: <ul style="list-style-type: none"> • when an assessment carried out in accordance with standard 86 comes to the conclusion that there is no need for that course to be offered in Welsh. 	The standards should not be imposed. An alternative way of assessing the requirement for such courses should be developed which is less onerous	Position unchanged-interpretation of standard in line with regulations	Accept The Council could comply with this standard if the following exceptions were accepted: Courses where the content is determined by another organisation Where the accredited trainers providing the course are non-Welsh speakers In the Council's previous submission Communities First courses were highlighted. However, in light of recent announcements by Welsh Government the Council withdraws its comments in respect of Communities First courses
86	If you develop an education course that is to be offered to the public you must assess the need for that course to be	The standards should not be imposed. An alternative way of assessing the requirement for such	Position unchanged-interpretation of standard in line with regulations	Accept The Council could comply with this standard if the following exceptions were accommodated :

	offered in Welsh and you must ensure that the assessment is published on your website.	courses should be developed which is less onerous		<p>Courses where the content is determined by another organisation Where the accredited trainers providing the course are non-Welsh speakers</p> <p>In the Council's previous submission Communities First courses were highlighted. However, in light of recent announcements by Welsh Government the Council withdraws its comments in respect of Communities First courses</p>
99	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.	Standards only to be applied in Welsh medium schools	Position unchanged – but further evidence invited. Timetable for meeting the standard	HR contracts are not standardised across the Council. While there are some common features terms and conditions are not easily transferable with the majority of these specific to an individual. Meeting this requirement would entail time and cost implications for HR staff and would impact on the service available to more widely to non-Welsh speakers at a time when resources continue to diminish.
100	You must - (a) ask each employee whether he or she wishes to receive any paper correspondence that relates to his or her employment, and which is addressed to him or her personally, in Welsh, and (b) if an employee so wishes, provide any such correspondence to that		Position unchanged – but further evidence invited. Timetable for meeting the standard	<p>Accept</p> <p>On further consideration it would be possible to accept this standard with specific variations to reflect the size of the task and limitations in respect of current systems.</p> <p>Therefore a variation is proposed To accept in relation to new employees except for contractual documentation and where correspondence is generated from English only databases.</p>

	employee in Welsh.			To accept for all other employees by 30 March 2019 except for contractual documentation and where correspondence is generated from English only databases
101	You must ask each employee whether he or she wishes to receive any documents that outline his or her training needs or requirements in Welsh; and if that is the employee's wish you must provide any such documents to him or to her in Welsh.		Position unchanged – but further evidence invited. Timetable for meeting the standard	It would be possible to produce documentation to facilitate this as part of the Council's performance appraisal procedures. However, in relation to setting out individual training needs this is carried out by line managers in the annual performance appraisal and because of the linguistic profile of our managers, with lack of confidence/ability to use the Welsh language as part of the appraisal process it is unlikely that the majority will be able to comply with this.
102	You must ask each employee whether he or she wishes to receive any documents that outline his or her performance objectives in Welsh; and if that is the employee's wish you must provide any such documents to him or to her in Welsh		Position unchanged – but further evidence invited. Timetable for meeting the standard	It would be possible to produce documentation to facilitate this as part of the Council's performance appraisal procedures. However, in relation to setting out individual training needs this is carried out by line managers in the annual performance appraisal and because of the linguistic profile of our managers, with lack of confidence/ability to use the Welsh language as part of the appraisal process it is unlikely that the majority will be able to comply with this.
103	You must ask each employee whether he or she wishes to receive any documents that outline or record his or her career plan in Welsh; and if		Position unchanged – but further evidence invited. Timetable for meeting the standard	The council does not have career plans and as such the standard should not be applied.

	that is the employee's wish you must provide any such documents to him or to her in Welsh			
104	You must ask each employee whether he or she wishes to receive any forms that record and authorise - (a) annual leave, (b) absences from work, and (c) flexible working hours, in Welsh; and if that is an employee's wish, you must provide any such forms to him or to her in Welsh.		Position unchanged – but further evidence invited. Timetable for meeting the standard	Accept After further consideration the Council is able to comply with the standard. Variation The Council is able to produce documentation by 30 September 2017, however as this would also form part of the appraisal process full compliance would be more appropriate by 30 September 2018.
112	You must allow each member of staff - (a) to make complaints to you in Welsh, and (b) to respond in Welsh to any complaint made about him or about her.	Standards only to be applied in Welsh medium schools	Position unchanged – but further evidence invited. Timetable for meeting the standard	The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded. Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible. To clarify a point made in the Council's previous submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had Welsh language skills. Although not a large number, given the current and expected ongoing financial

				<p>situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
112A	<p>You must state in any document that you have that sets out your procedures for making complaints that each member of staff may -</p> <p>(a) make a complaint to you in Welsh, and</p> <p>(b) respond to a complaint made about him or about her in Welsh;</p> <p>and you must also inform each member of staff of that right.</p>		<p>Position unchanged – but further evidence invited.</p> <p>Timetable for meeting the standard</p>	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p> <p>To clarify a point made in the Council’s previous submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had Welsh language skills. Although not a large number, given the current and expected ongoing financial</p>

				<p>situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
114	<p>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 must -</p> <p>(a) ask the member of staff whether he or she wishes to use the Welsh language at the meeting;</p> <p>(b) explain that you will provide a translation service from Welsh to English for that purpose if it is required; and if the member of staff wishes to use the Welsh language, you must provide a</p>		<p>Position unchanged – but further evidence invited.</p> <p>Timetable for meeting the standard</p>	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p> <p>To clarify a point made in the Council’s previous submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had Welsh language skills. Although not a large number, given the current and expected ongoing financial</p>

	simultaneous translation service from Welsh to English at the meeting (unless you conduct the meeting in Welsh without translation services).			<p>situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
115	<p>When you inform a member of staff of a decision you have reached in relation to a complaint made by him or by her, or in relation to a complaint made about him or about her, you must do so in Welsh if that member of staff -</p> <p>(a) made the complaint in Welsh,</p> <p>(b) responded in Welsh to a complaint about him or about her,</p> <p>(c) asked for a meeting about the complaint to be conducted in Welsh, or</p>		<p>Position unchanged – but further evidence invited.</p> <p>Timetable for meeting the standard</p>	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p> <p>To clarify a point made in the Council’s previous submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had Welsh language skills. Although not a large number,</p>

	(ch) asked to use the Welsh language at a meeting about the complaint			<p>given the current and expected ongoing financial situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
116	You must allow all members of staff to respond in Welsh to allegations made against them in any internal disciplinary process.		Position unchanged – but further evidence invited. Timetable for meeting the standard	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p> <p>To clarify a point made in the Council’s previous submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had</p>

				<p>Welsh language skills. Although not a large number, given the current and expected ongoing financial situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
116A	<p>You must -</p> <p>(a) state in any document that you have which sets out your arrangements for disciplining staff that any member of staff may respond in Welsh to any allegations made against him or against her, and</p> <p>(b) if you commence a disciplinary procedure in relation to a member of staff, inform that member of staff of that right.</p>		<p>Position unchanged – but further evidence invited.</p> <p>Timetable for meeting the standard</p>	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p> <p>To clarify a point made in the Council’s previous submission the 25% of staff who indicated they would</p>

				<p>use the service was in fact 25% of staff who had Welsh language skills. Although not a large number, given the current and expected ongoing financial situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
118	<p>If you organise a meeting with a member of staff regarding a disciplinary matter that relates to his or her conduct you must</p> <p>(a) ask the member of staff whether he or she wishes to use the Welsh language at the meeting, and</p> <p>(b) explain that you will provide a translation service for that purpose if it is required;</p> <p>and, if the member of staff</p>		<p>Position unchanged – but further evidence invited.</p> <p>Timetable for meeting the standard</p>	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p> <p>To clarify a point made in the Council’s previous</p>

	wishes to use the Welsh language, you must provide a simultaneous translation service from Welsh to English at the meeting (unless you conduct the meeting in Welsh without a translation service).			<p>submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had Welsh language skills. Although not a large number, given the current and expected ongoing financial situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
119	When you inform a member of staff of a decision you have reached following a disciplinary process, you must do so in Welsh if that member of staff - (a) responded to allegations made against him or her in Welsh, (b) asked for a meeting regarding the disciplinary process to be		Position unchanged – but further evidence invited. Timetable for meeting the standard	<p>The Council is able to comply with this standard in relation to Welsh Medium schools as the service is already established and funded.</p> <p>Being mindful of the linguistic profile of its staff, the legal timescales associated with its complaints, discipline and grievance processes as well as the significant cost implications the Council would endeavour to respect language preference of staff accessing these procedures. However, this may not always be practical/possible.</p>

	<p>conducted in Welsh, or (c) asked to use the Welsh language at a meeting regarding the disciplinary process.</p>			<p>To clarify a point made in the Council's previous submission the 25% of staff who indicated they would use the service was in fact 25% of staff who had Welsh language skills. Although not a large number, given the current and expected ongoing financial situation this additional unfunded cost is unreasonable for the Council to meet.</p> <p>Consequently, the cost of meeting this standard would disproportionately impact on the service provided by HR to other staff regardless of their language skills and other support requirements.</p> <p>Additionally, with limited language skills amongst local trade union representatives there is a risk of a delay in obtaining representation if representatives not available. There is an expectation that matters are dealt with in a timely manner and failure to meet timescales could prejudice the handling of a case.</p>
122	<p>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 (c) the Welsh language is</p>	<p>The standards should not be imposed</p>	<p>over interpreted</p>	<p>Accept</p> <p>While it was considered that the Council had over interpreted the standard it remains the case that the intranet homepage is dynamic not passive. In order to fully comply a redesign into a passive homepage would be required and would diminish what the Council was trying to achieve.</p> <p>Therefore a variation is sought to accommodate this: to comply with the standard expect where dynamic</p>

	treated no less favourably than the English language in relation to the homepage of your intranet			features are available on the intranet homepage
124	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.	The standards should not be imposed	over interpreted	Accept This standard could be accepted as it refers in essence only to the homepage only.
126	You must provide the interface and menus on your intranet pages in Welsh	The standards should not be imposed	The standards should not be imposed	The Commissioner reconsidered the position and has determined this standard should not be imposed
128	These standards require the Council to provide internal training on recruitment, performance management, complaints and discipline, induction, health and safety and customer services in Welsh. Training would also be required in Welsh for using Welsh effectively in meetings, interviews and complaints and discipline procedures.	The standards should not be imposed	The standards should not be imposed	The Commissioner reconsidered the position and has determined this standard should not be imposed

129	You must provide training (in Welsh) on using Welsh effectively in: (a) meetings; (b) interviews; and (c) complaints and disciplinary procedures.	The standards should not be imposed	The standards should not be imposed	The Commissioner reconsidered the position and has determined this standard should not be imposed
130	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	Specific training for managers in their role of managers should be excluded from the standard	Preliminary determination to be made	Accept Having given further consideration to this standard the Council is minded to Accept the standard but remains of the view that a national training programme would be advantageous for all. It would allow for a more consistent content and approach as well as being more widely available.
131	You must provide opportunities for employees who have completed basic Welsh language training to receive further training free of charge, to develop their language skills.	Withdrawn	Preliminary determination to be made	The Challenge to this standard was withdrawn by the Council in July 2016
132	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	Specific training for managers in their role of managers should be excluded from the standard	Preliminary determination to be made	ACCEPT Having given further consideration the Council is minded to Accept the standard but remains of the view that a national training programme would be advantageous for all. It would allow for a more consistent content and approach as well as being more widely available.

	<p>culture)</p> <p>(b) an understanding of the duty to operate in accordance with the Welsh language standards</p> <p>(c) an understanding of how the Welsh language can be used in the workplace</p>			
137	<p>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.</p>	<p>Standard should apply to Welsh essential posts only</p>	<p>Prepared to extend the imposition date(6 months from the date of determination)</p>	<p>Accept</p> <p>On further consideration the Council is able to comply with this standard</p>
137A	<p>If you publish -</p> <p>(a) application forms for posts;</p> <p>(b) material that explains your procedure for applying for posts;</p> <p>(c) information about your interview process, or about other assessment methods when applying for posts;</p> <p>(ch) job descriptions;</p> <p>you must publish them in Welsh; and you must ensure that the Welsh language versions of the documents are treated no less favourably</p>	<p>Standard should apply to Welsh essential posts only</p>	<p>Prepared to extend the imposition date(6 months from the date of determination)</p>	<p>Accept</p> <p>On further consideration the Council is able to comply with this standard</p>

	<p>than any English language versions of those documents.</p> <p>You must comply with standard 137A in every circumstance, except:</p> <ul style="list-style-type: none"> • job descriptions where a post has been categorised as one where Welsh language skills are not necessary. 			
137B	<p>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 time-scale for informing individuals of decisions).</p>	<p>Standard should apply to Welsh essential posts only</p>	<p>Prepared to extend the imposition date(6 months from the date of determination)</p>	<p>Accept</p> <p>On further consideration the Council is able to comply with this standard</p>
139	<p>You must ensure that your application forms for posts -</p> <p>(a) provide a space for individuals to indicate that they wish to use the Welsh language at an interview or at any other method of assessment, and</p> <p>(b) explain that you will provide a translation service</p>		<p>Prepared to extend the imposition date(6 months from the date of determination)</p>	<p>Accept</p> <p>On further consideration the Council would be able to comply with the standard with some variation. A suggested variation to take into the following is sought:</p> <p>(a)</p> <p>Where a post is Welsh essential individuals are asked if they wish to use the Welsh language at interview in the 'invite to interview' email/letter.</p>

	from Welsh to English for that purpose if it is required; and, if the individual wishes to use the Welsh language at the interview or assessment, you must provide a simultaneous translation service at the interview or assessment (unless you conduct the interview or assessment in Welsh without that translation service).			(b) This requirement would be for Welsh essential posts only
140	When you inform an individual of your decision in relation to an application for a post you must do so in Welsh if the application was made in Welsh	Standard should apply to Welsh essential posts only	Prepared to extend the imposition date(6 months from the date of determination)	Accept On further consideration the Council is able to comply with this standard
141	When you erect a new sign or renew a sign in your workplace (including temporary signs), any text displayed on the sign must be displayed in Welsh (whether on the same sign as the corresponding English language text or on a separate sign), 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	Definition of a sign to be provided in order for the standard to be fully assessed	Position unchanged. Clarified that this applies to new signs only.	Accept The Council would be able to Accept this standard on the understanding that signs refer to fixed signs rather than notices. This would be further reinforced with the development of an internal policy to distinguish the difference between signs and notices.

	language text.			
142	When you erect a new sign or renew a sign in your workplace (including temporary signs) 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.		Position unchanged. Clarified that this applies to new signs only.	Accept The Council would be able to Accept this standard on the understanding that signs refer to fixed signs rather than notices. This would be further reinforced with the development of an internal policy to distinguish the difference between signs and notices.
143	You must ensure that the Welsh language text on signs displayed in your workplace is accurate in terms of meaning and expression.		Position unchanged. Clarified that this applies to new signs only.	Accept The Council would be able to Accept this standard on the understanding that signs refer to fixed signs rather than notices. This would be further reinforced with the development of an internal policy to distinguish the difference between signs and notices.
144	When you make announcements 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.		Different in October letter compared to initial consideration (we didn't comment on the initial consideration)	ACCEPT The Council is able to accept the standard with the modification stated in the initial consideration: You must comply with standard 144 in all circumstances except: making an announcement first in Welsh during a crisis or emergency
145	You must produce and publish on your website a 5 year strategy that sets out how you	The standard should exclude the need to set a target	Position unchanged	Accept The Council is able to accept the standard with the

	<p>propose to promote the Welsh language at facilitate the use of the Welsh language more widely in your area and the strategy must include</p> <p>(a) a target (in terms of the percentage of speakers in your area) for increasing or maintaining the number of Welsh speakers in your area by the end of the 5 year period concerned and</p> <p>(b) a statement setting out how you intend to reach that target and you must review the strategy and publish revised version on your website within 5 years of publishing a strategy (or of published a revised strategy)</p>			<p>understanding that targets can be set only where the activity is within the council's control or under its influence. Consequently, the Council is unable to set a target in respect of increasing the number of Welsh speakers within Neath Port Talbot.</p>
146	<p>Five years after publishing a strategy in accordance with standard 145 you must -</p> <p>(a) assess to what extent you have followed that strategy and have reached the target set by it, and</p> <p>(b) publish that assessment on your website, ensuring that it contains the following information -</p> <p>(i) the number of Welsh speakers in your area, and the</p>	<p>The standard should exclude the need to set a target</p>	<p>Position unchanged</p>	<p>Accept</p> <p>The Council is able to accept the standard with the understanding that targets can be set only where the activity is within the Council's control or under its influence. Consequently, the Council is unable to set a target in respect of increasing the number of Welsh speakers within Neath Port Talbot.</p>

	age of those speakers; (ii) a list of the activities that you have arranged or funded during the previous 5 years in order to promote the use of the Welsh language.			
154	<p>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 136A posts where:</p> <p>(a) Welsh language skills are essential</p> <p>(b) Welsh language skills need to be learnt when appointed to the post</p> <p>(c) Welsh language skills are desirable or</p> <p>(d) Welsh language skills are not necessary</p>	Extend imposition date to 30 th March 2017	Prepared to extend the imposition date to 30 th March 2017	<p>ACCEPT</p> <p>The Council is able to accept the standard as modified by the Commissioner</p>