

# **RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

# WELSH LANGUAGE CABINET STEERING GROUP

# 10 OCTOBER 2018

## WELSH LANGUAGE SERVICES - INTERNAL AUDITS OF COMPLIANCE

## REPORT OF THE DIRECTOR OF PUBLIC HEALTH, PROTECTION, AND COMMUNITY SERVICES IN DISCUSSION WITH THE RELEVANT PORTFOLIO HOLDER CLLR G. HOPKINS

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# 1. <u>PURPOSE OF THE REPORT</u>

- 1.1 The purpose of the report is to provide the Welsh Language Steering Group with an outline of the process adopted by Welsh Language Services for auditing departmental compliance with Welsh language standards, highlighting areas of potential non-compliance and to offer corrective solutions.
- 1.2 A sample of the audits completed by the Compliance Officer can be seen at Appendix 1 and Appendix 2.

## 2. <u>RECOMMENDATIONS</u>

It is recommended that the Welsh Language Cabinet Steering Group:

- 2.1 Note the content of the report;
- 2.2 Consider whether further information is required;
- 2.3 Approve the implementation of further audits in order to reduce risk to the Council and to offer corrective solutions to service areas.

## 3. REASONS FOR RECOMMENDATIONS

3.1 The Welsh Language (Wales) Measure 2011 established a legal framework to impose a duty on local authorities to comply with Standards of conduct in relation to the Welsh Language. In particular, this means that Local Authorities cannot treat the Welsh language less favourably than the English

language, and must promote and facilitate the use of the Welsh language therefore making it easier for people to use it in their daily life.

- 3.3 The Standards affect all areas of the Council's work and a penalty of up to £5,000 can potentially be applied by the Commissioner for each proven breach of a standard.
- 3.4 The Council has been subject to a number of statutory investigations which can take up to 18 months to complete. Such investigations have been costly in terms of officer time. Most recently, after an investigation carried out in accordance with section 71 and Schedule 10 of the Welsh Language (Wales) Measure 2011, the Welsh Language Commissioner determined that Rhondda Cynon Taf County Borough Council failed to comply with Standard 4 (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). This Standard applies even if language preference has been determined.
  - 3.5 Undertaking regular internal audits to assess the level of compliance of Council services ensures that any potential breaches, or any areas where there are particular challenges, can be identified and addressed swiftly before any complaint is made to the Welsh Language Commissioner's Office.

# 4. BACKGROUND

- 4.1 The structure of the Welsh Language Services unit was reviewed, and job descriptions revised, in readiness for the implementation of the Welsh Language Statutory Standards so that the Council would be better prepared for the impact of the Compliance Notice issued in September 2015, as amended in 2016. Within the new structure the post of Welsh Language Development Officer was replaced by a Compliance Officer post. This was a significant change and highlighted to all Council services the new legal status afforded to the Welsh language and the importance of compliance with the new legislation.
- 4.2. Advice was sought from the Council's Audit Team on the approach to be adopted when undertaking audits and the Welsh Language Compliance Officer has worked closely with the Audit team on developing the necessary processes.
- 4.3 Since the introduction of the Welsh Language Standards further legislation has been passed by the Welsh Government including the Wellbeing of Future Generations Act and the Cymraeg 2050 strategy which has further highlighted the importance of the Welsh language and meeting the requirements of the Standards is central to the success of many of them.
- 4.4 As noted in 3.3 above, failure to comply with the requirements of the Standards would put the Council at risk, both financially and from a reputation aspect. The Compliance Officer therefore not only undertakes audits to assess compliance against the standards but also provides a wide range of

advice and support to Council officers on how to overcome any challenges they face in relation to embedding the relevant standards in their service areas.

## 5. <u>CURRENT POSITION</u>

- 5.1 Full audits of two service areas have been undertaken since appointing to the post of Compliance Officer mid way through the last financial year. Further audits are underway, one of which is as a direct result of the Welsh Language Commissioner's determination that Rhondda Cynon Taf County Borough Council failed to comply with Standard 4.
- 5.2. In addition to creating an opportunity to measure compliance, the two audits have been found to afford senior officers an opportunity to develop further understanding of the Standards and how they are uniquely relevant to their service area as well as gaining insight into the national context. Furthermore, they provide an opportunity to raise concerns and discuss any barriers.
- 5.3 Audit reports are compiled, covering the Standards' 10 themes namely the 5 classes of Standards (service delivery; policy making; operational; promotion; record keeping) and the supplementary Standards which apply to the 5 classes.
- 5.4 A level of compliance is awarded to each class, i.e. a percentage figure for the relevant Standards where there is evidence of compliance. There are five levels identified on the recording spreadsheet. This allows the Compliance Officer to create the most comprehensive picture of services and compliance according to themes from the Standards rather than against each individual Standard. This approach is easier for senior officers to monitor and allows departments to prioritise certain themes which require more focus than others.
- 5.5 The audit report also makes recommendations on actions required in order to comply or improve processes.
- 5.6 For both the service areas subject to full audits to date (Human Resources and Library Service) compliance has been achieved in a number of areas. Nevertheless, evidence suggests that further work needs to be progressed in order to achieve full compliance.

## 6. NEXT STEPS

- 6.1 Welsh Language Services will continue to implement an audit cycle focusing on areas as outlined in the Welsh Language Commissioner's Annual Assurance report. Follow-up audits will also be undertaken to check on the Progress made by services where improvements have been recommended.
- 6.2 Officers from Welsh Language Services will present a paper at the Welsh Language Commissioner's Successful Practices Seminar in November 2018 on implementing audits in the context of compliance with statutory linguistic

duties as this has been identified as an area of good practice in the Commissioner's Annual Assurance Report.

6.3 The Compliance Officer will continue to work closely with departments in order to resolve issues, including sharing evidence on how other service areas and authorities have overcome these as the main aim of the audits is not to humiliate, but to support and reduce risk to the Council.

## 7. EQUALITY AND DIVERSITY IMPLICATIONS

7.1 An Equalities Impact Assessment is not required for the purposes of this report.

## 8. CONSULTATION

8.1 A consultation is not required for the purposes of this report.

## 9. FINANCIAL IMPLICATION(S)

9.1 There are no financial implications aligned to this report. However, costs and resources may be required by service areas as instances of non-compliance are identified. In addition to the staffing costs involved with the Welsh Language Commissioner's investigations, determination by the Welsh Language Commissioner for non-compliance could incur financial penalties of up to £5,000.

## 10. LEGISLATION CONSIDERED

10.1 Welsh Language (Wales) Measure 2011 and Welsh Language Statutory Standards 2015 regulate this area of work.

## 11. <u>LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE</u> WELL-BEING OF FUTURE GENERATIONS ACT

- 11.1 The Welsh language is a cross-cutting theme in the Corporate Plan and underpins all corporate priorities as the Council is required to comply with the amended Compliance Notice issued by the Welsh Language Commissioner in September 2016 under the Welsh Language (Wales) 2011 Measure in addition to Strategies regarding the Welsh Language published by the Welsh Government.
- 11.2 The work undertaken by the Welsh Language Compliance Officer is part of the longer-term approach to ensuring that all Council Services comply with the requirements of the Welsh Language Standards. The approach adopted is one of collaboration with services areas to reduce the risk of non-compliance and prevent complaints in relation to the Council's compliance with the Welsh Language Standards being made to the Welsh Language Commissioner's Officer. A range of services have been involved in providing feedback on the process adopted, and the close working relationship with the Audit team has ensured that there is an integrated approach to auditing across the Council.

- 11.3 The work outlined in this report is particularly relevant to the following wellbeing goals:
  - An Equal Wales it ensures that residents in Rhondda Cynon Taf can access services in their preferred language
  - A Wales of vibrant culture and thriving Welsh language it supports the normalisation of the Welsh language and its use in daily life.

## 12. <u>CONCLUSION</u>

- 12.1 The increased level of compliance as a result of the Compliance Officer's involvement and support is firm evidence of growth and development. As the audit system develops, further benchmark evidence will be available to every Council department. Then, a second full audit of departments will allow the Council to measure continued compliance with the Standards, with progress seen against the action points within the original audit report.
- 12.2 The Welsh Language Commissioner aims to encourage compliance through empowering and enabling organisations. One of the ways by which the Welsh Language Commissioner achieves this is by drawing attention to examples of successful practices. Rhondda Cynon Taf's decision to implement a cycle of audits with regards to how service areas comply with the Welsh Language Standards have been noted publicly by the Welsh Language Commissioner as an example of good practice and, as such, should be shared with, and hopefully implemented by other organisations.

# **GROUP: CHIEF EXECUTIVE**

AUDIT NAME: WELSH LANGUAGE STANDARDS – HUMAN RESOURCES

DATE DRAFT REPORT WAS ISSUED: 15/11/2017

DATE FINAL REPORT WAS ISSUED: XX/XX/XXXX

## INTRODUCTION

Rhondda Cynon Taf CBC was issued a Compliance Notice under Section 44 Welsh Language (Wales) Measure 2011 on 30/09/2015. In order to assess the Council's current position we require each service area to be audited against the Welsh Language Standards.

# SCOPE & OBJECTIVES

In accordance with the Chief Executive's directive, Internal Audits will be conducted with all Service Areas with the aim of reducing the risk for the authority. A review of compliance against the Welsh Language Standards is to be completed in order to facilitate this aim and to support services to overcome any barriers to compliance. It will also be used to identify areas of good practice to share with other service areas.

# AUDIT OPINION

The Welsh Services department would like to thank you and your staff for your co-operation in facilitating the audit. Good progress has been made in embedding the Standards since their introduction in 2016. The department's investment in Welsh Language Training for a number of staff is to be commended.

The report highlights where good practice has been achieved (Met). Nevertheless, evidence suggests that further work needs to be progressed in order to achieve full compliance.

The recommendations are not exhaustive, as embedding the Standards is an evolving process. In some instances, Standards have been highlighted in yellow. These Standards have not been audited and have not affected your compliance levels. The reason for this is that they are not exclusive to HR and the nature of the Standard is so complex that a degree of compliance would be difficult to achieve in all service areas. In addition, compliance in some areas are dependent on the support of other service areas e.g. translation services.

#### COMPLETED BY

Thomas Tudor Jones Welsh Language Compliance Officer <u>Thomas.t.jones@rctcbc.gov.uk</u> 01443 570003

For further advice on achieving compliance, please do not hesitate to contact the officer named above who will be happy to help.

The Welsh Language Standards are grouped into 10 separate sections. Each section is given a compliance level as described in more detail below. Subject to agreement the department's compliance levels will be forwarded to the Sub Cabinet Group with responsibility for the Welsh Language for further scrutiny.

Where Standards or sections have not been applicable to a service area they are not contained within this report.

Levels	Compliance Level 1	Compliance Level 2	Compliance Level 3	Compliance Level 4	Compliance Level 5
Definition	Compliance Level one means that 0-25% of the Standards applicable to that service area have been met.	Compliance Level two means that 26-50% of the Standards applicable to that service area have been met.	Compliance Level three means that 51-75% of the Standards applicable to that service area have been met.	Compliance Level four means that 76-99% of the Standards applicable to that service area have been met.	Compliance Level five means that service area is <i>currently</i> fully compliant with the Standards applicable to them.
Risk Factors	<ul> <li># Serious risk of complaint</li> <li># Serious risk of</li> <li>complaint from the Welsh</li> <li>language Commissioner</li> <li># Repeated non-</li> <li>compliance could result</li> <li>in £5,000 fine</li> <li># Urgent action needed</li> </ul>	<ul> <li># Risk of complaint</li> <li># Risk of complaint from the Welsh language Commissioner</li> <li># Repeated non- compliance could result in £5,000 fine</li> <li># Urgent action needed</li> </ul>	<ul> <li># Possible risk of complaint</li> <li># Possible risk of</li> <li>complaint from the Welsh</li> <li>language Commissioner</li> <li># Repeated non-</li> <li>compliance could result</li> <li>in £5,000 fine</li> <li># Action needed</li> </ul>	# Minimal risk of complaint # Minimal risk of complaint from the Welsh language Commissioner # Report recommendations to be followed to reach Level 5	# No immediate risk # Continued monitoring needed to maintain Standard # Good practice example

A. Service Delivery Compliance Level 3 - 70%

No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the Standard	Target Date for Implementation & Responsible Officer
1	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.	Met	Training Team Most recent correspondence in Welsh received by Training Team on 4/03/2016 and a reply within 2 days demonstrates a little delay.		Ongoing record information in the evidence file.	RD Ongoing
2	When you correspond with an individual ("A") for the first time, you must ask A whether A wishes to receive correspondence from you in Welsh, and if A responds to say that A wishes to receive correspondence in Welsh you must – (a) keep a record of A's wish, (b) correspond with A in Welsh when corresponding with A from then onwards, and (c) send any forms you send to A from then onwards in Welsh.	Met	All Current communication with external partners are based on established language preference. Equalities Team Disability Forum members' language preference has been established and correspondence with certain members is through the medium of Welsh.		Training Team Source a copy of Members' Language preference for any future correspondence. <u>All</u> Be mindful that new interactions with individuals beyond our organisation must be afforded this choice where RCTCBC are the initiating/leading partner. A record must be kept.	RD Ongoing
4	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.	Met	Equalities Holocaust Memorial Day Event email to Members.			

5	If you don't know whether a person wishes to receive correspondence from you in Welsh, when you correspond with that person you must provide a Welsh language version of the correspondence.	Occupational Health Letter sent to staff of partner organisations (who are external clients) is in English only.	Not Met	<ul> <li><u>Occupational Health</u></li> <li><u>a)</u> English to be translated. Welsh and English version to be sent when language preference has not been established.</li> <li><u>b)</u> Language Preference question to be added to the initial referral = language of correspondence thereafter.</li> </ul>	Waiting for letters to be translated. Bilingual to be sent out initially until the referral form is changed in the new system upgrade to request language preference. RD – 1 <sup>st</sup> Aug '18
6	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).	As above	Not Met	As above	As above

7	You must state - (a) in correspondence, and (b) in publications and official 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 any correspondence in Welsh, and that corresponding in Welsh will not lead to delay.	Met	All Disclaimer included in each external email and on the footer of official Council paper.		
8	When a person contacts you on your main telephone number (or numbers), or on any helpline numbers or call centre numbers, you must greet the person in Welsh.	Met	All Main telephone number is the Council contact centre which has capacity to deal with calls in Welsh.		
9	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.	Met	All Main telephone number is the Council contact centre which has dedicated Welsh Language Service - this option is promoted at the start of the call cycle.		

11	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 matter; and (b) no Welsh-speaking member of staff is available to provide a service on that specific subject matter.	Met	All 2 calls presented to HR via their advertised number - 01443 442100 - were dealt with entirely in Welsh and transferred to a Welsh-speaking HR Officer.		
12	When you advertise telephone numbers, helpline numbers or call centre services, you must not treat the Welsh language less favourably than the English language.	Met	<u>All</u> Number is identical.		
13	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.	Met	All Number is identical.		

14	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.		Recruitment Website Occupational Health Appointment & Referral Letters Equalities Carers and Disability Event Poster	Not Met	All Review where the main number is published and include - <i>Croesawn alwadau yn y Gymraeg.</i> <i>We welcome calls in Welsh.</i> Melsh Services Discuss with Design Unit.	RD Included and ongoing staff benefits letters changing by 31.5.18. AD Training letters by 31.5.18.
16	Your main telephone call answering service (or services) must inform persons calling, in Welsh, that they can leave a message in Welsh.	Met	All Published numbers direct customers to the contact centre where this Standard is adhered to.			
17	When there is no Welsh language service available on your main telephone number (or numbers), or 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.	Met	All Published numbers direct customers to the contact centre where this Standard is adhered to.			
19	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	Met	Employment Services / Schools 2 calls presented to HR on the day of the audit were dealt with entirely in Welsh.		<b><u>All</u></b> Remind all staff that they should seek out a Welsh-speaker if a Welsh Language call is received, offer a call back if there isn't anyone available, only then are they to offer for the conversation to continue in English.	Equalities team recent appointment is a Welsh speaker.

	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.				
20	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.	All Partially Met. 6 calls presented on audit days used the following greeting "Bore Da / Good Morning, Occupational Health or Human Resources"	Not Met	All Full greeting needs to be bilingual. <i>Quick win -</i> <i>Bore Da / Good Morning <officer name=""></officer></i> All Voicemails to be re-recorded to include an offer for people to leave messages in Welsh. Standard message - <i>Dwi ddim ar gael i ateb eich galwad ar hyn o bryd. Gadewch neges a wna'i gysylltu yn ôl. Croeso i chi adael neges yn y Gymraeg.</i> Sorry I'm not available to take your call at the moment. Please leave a message and I'll get back to you.	1.2.18 ML Greeting is now Adnoddau Dynol, Human Resources including 'Bore Da/Prynhawn Da' and 'X S'yn siared' with the corresponding English if they feel confident enough. RD Ongoing, voicemails completed in OH, no other voicemails.

21	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.		No evidence presented.	This Standard has not been audited and as such does not affect your compliance level. This Standard is not exclusive to HR and the nature of it is so complex that a degree of compliance would be difficult in all service areas.	
27	If you invite more than one person to a meeting (which does not relate to the well being of one or more of the individuals invited), you must ask each person whether they wish to use the Welsh language at the meeting.	Met	Equalities Currently facilitate, although do not lead, a number of partnership meetings with external customers / organisations. Language preference is not captured as we are not the lead authority. Training Team Attend, although do not lead on the SEWLAN network. All Unlikely that HR Staff deal with arranging and lead on meetings with more than one persons in attendance.	All When inviting external organisations/individuals to a meeting we should either capture language preference at the beginning of the relationship or include the following message in invites - <i>Croeso i chi ddefnyddio'r Gymraeg yn y</i> <i>cyfarfod dim ond i chi roi gwybod erbyn</i> <i>xx/xx/xx</i> You are welcome to use Welsh at the meeting, just let us know by xx/xx/xx should you wish to do so.	RD 5.18

35	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).	Met	Equalities Carers and Disability Event Poster 2017 EET Jobs Fair poster 2017			
36	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 displayed at the event and in relation to audio announcements made at the event).		Equalities Partially Met Carers and Disability Event 2017 information will be bilingual. Services offered will not be. EET Jobs Fair information is bilingual. CV writing workshop currently is not.	Not Met	All When funding at least 50% of an event the services offered to the public must also be available in Welsh. Workforce planning to take into account the need for Welsh-speaking staff. Sub- contracting work to third party WL providers (Menter laith etc) could be another avenue to pursue.	Any Local Authority based information will be bilingual and LA workshops will be offered in Welsh. There is no control over outside bodies material. Welsh speaker now employed from 2018. MW
					<b>EET</b> Upskill already fluent Welsh-speaking team members to provide workshops in Welsh should the need arise.	Now employ 4 welsh speakers and all workshops are now offered in Welsh. SW.

37	Any publicity or advertising material that you produce must be produced in Welsh, and if you produce the advertising material in Welsh and in English, you must not treat the Welsh language version less favourably than you treat the English language version.	Met	Equalities Carers and Disability Event Poster 2017 EET Jobs Fair poster 2017			
38	Any material that you 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.	Met	Equalities Carers and Disability Event Poster 2017 EET Jobs Fair poster 2017		Equalities & EET Signing-in sheets also need to be bilingual.	MW 31.5.18 (Equlaities) EETS invitations to training are bilingual, there are no signing in sheets.SW
43	Any brochure, leaflet, pamphlet or card that you produce in order to provide information to the public must be produced in Welsh.	Met	EET Careers and the Working World booklet is bilingual.			
44	If you produce the following documents, and they are available to the public, you must produce them in Welsh - (a) policies, strategies, annual reports and corporate plans; (b) guidelines and codes of practice; (c) consultation papers.	Met	Equalities Annual Equality Report, published online.		<b>Equalities</b> New Strategic Equality Plan to be translated and published at the same time as the English. Continue publishing AER in Welsh.	
50	Any form that you produce for public use must be produced in Welsh.		Partially Met <u>Recruitment &amp;</u> <u>Equalities</u> Application & Equalities monitoring form. <u>Occupational</u> <u>Therapy</u> Self-referral	Not Met	Occupational Health Self-referral information that is forwarded to employees needs to be bilingual and needs to capture language preference.	Counselling packs are available in Welsh. RD

			information		
50A	If you produce a Welsh language version and a separate English language version of a form, you must ensure that the English language version clearly states that the form is also available in Welsh.	Met	<u>Equalities</u> Pride Surveys	<u>All</u> Continue with the good practice of creating bilingual forms and include the following in the footer of each English only form. <i>This document is also available in Welsh.</i> <i>Please contact xxx to request a copy.</i>	
50B	If you produce a form in Welsh and in English (whether separate versions or not), you must ensure that the Welsh language version is treated no less favourably than the English language version, and you must not differentiate between the Welsh and English versions in relation to any requirements that are relevant to the 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 form).	Met	Equalities Pride Surveys demonstrate no differentiation between Welsh and English. Welsh always positioned first.		

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 favourably than the English language on your website. You must comply with Standard 52 in relation to the following by 31/03/2017 ¢ the body's corporate website You must comply with Standard 52 in relation to the following by 31/03/2018. ¢ all other websites		Recruitment Website pages <u>EET</u> Care 2 work, job centre plus, step in the right direction website pages.	Not Met	Recruitment         4 heading/link description changes necessary         "~~CAND_PROFILE_OPTIONS~~" Should read -         Dewisiadau Proffil         "~~CANDIDATE_TERMS~~" should be deleted from the register a profile page.         ~~FORGOT_PASSWORD_FORM_LINK~~ should read -Wedi anghofio eich cyfrinair?         ~~REGISTER_NEW_ACCOUNT_LINK~~ should read - Creu cyfrif newydd         EET Website pages are currently in English only. Send to translation team and upload as soon as you get them back.	AD Complete
55	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	Met	Recruitment & EET Website clearly indicates language choice at the top of the page.		Complete actions in Standard 52.	

	English page.					
56	You must provide the interface and menus on every page of your website in Welsh.	Met	Recruitment & EET Website menus and interface are available in Welsh and English.		Complete actions in Standard 52.	
64	Any reception service you make available in English must also be available in Welsh, and any person who requires a Welsh language reception service must not be treated less favourably than a person who requires an English language reception service. You must comply with Standard 64 in relation to the following by 30 March 2016: ¢ the body's main reception service You must comply with Standard 64 in relation to the following by 31 March 2018: ¢ every other reception service	Met	Occupational Health Receptionist is Welsh and conducts interactions confidently in both languages.		All Proactively recruiting a Welsh-speaker has enabled this department to be fully compliant. This Standard is one of the most challenging for the local authority. Da iawn AD.	RD 1.18 ongoing
67	You must display a sign in your reception which states (in Welsh) that persons are welcome to use the Welsh language at the reception.			Not Met	Welsh Services Forward sign to be displayed.	RD 11.5.18
68	You must ensure that staff at the reception who are able to provide a Welsh language reception service wear a badge to convey that.			Not Met	Welsh Services Forward lanyard for Welsh Speaking staff.	RD completed 3.18

81	You must promote any Welsh language service that you provide, and advertise that service in Welsh.	<b>EET</b> Careers and the Working World Provision Outlines Booklet lists all courses available, at a cost, to schools and also available in Welsh.	Not Met	<b>EET</b> Any new print-run of the booklet should include active offers in the Welsh and English sides. "This Training is available in Welsh".	Delivery of programme has changed, booklet no longer required. All new marketing material produced will state "This Training is available in Welsh "
82	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.			This Standard has not been audited and as such does not affect your compliance level. This Standard is not exclusive to HR and the nature of it is so complex that a degree of compliance would be difficult in all service arears. Further strategic work needs to be completed to achieve compliance	

	3. Policy Making Compliance Level 5 – 100%						
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the Standard	Target Date for Implementation & Responsible Officer	
88	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.	Met	All Policy Review Group established to update policies. Consultation with Welsh Services where applicable.		All Continue to work with Welsh Services to update policies to reflect the Standards. Equalities Include the need to update organisations Equality Impact Assessment in the soon to be published Strategic Equalities Plan in order to include scrutiny of the EqIAs.	30.12.18 MW	

89	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.	Met	All Policy Review Group established to update policies. Consultation with Welsh Services where applicable.	AllContinue to work withWelsh Services to updatepolicies to reflect theStandards.EqualitiesInclude the need to updateorganisations EqualityImpact Assessment in thesoon to be publishedStrategic Equalities Plan inorder to include scrutiny ofthe EqlAs.	30.12.18 MW
90	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.	Met	All Policy Review Group established to update policies. Consultation with Welsh Services where applicable.	All Continue to work with Welsh Services to update policies to reflect the Standards. Equalities Include the need to update organisations Equality Impact Assessment in the soon to be published Strategic Equalities Plan in order to include scrutiny of the EqIAs.	30.12.18 MW
91	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.		Department have yet to publish a consultation document since the introduction of the Standards.	Equalities Strategic Equalities Plan Consultation to take this into account. EqIA to be more robust by having more scrutiny.	30.12.18 MW

92	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.	Department have yet to publish a consultation document since the introduction of the Standards.	Equalities Strategic Equalities Plan Consultation to take this into account. EqIA to be more robust by having more scrutiny.	30.12.18 MW
93	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.	Department have yet to publish a consultation document since the introduction of the Standards.	Equalities Strategic Equalities Plan Consultation to take this into account. EqIA to be more robust by having more scrutiny.	30.12.18 MW
95	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.	Department do not commission or undertake research.		

96	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 a 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.	Department do not commission or undertake research.	
97	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.	Department do not commission or undertake research.	

	erational bliance Level 2 - 49%					
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the Standard	Target Date for Implementation & Responsible Officer

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.	Recruitment Information is available on request but no consistent approach to offering at the moment.	Not met	Recruitment a) Additional line to be added to 1st Interview invite template "Should you be successful and offered the role, please let us know if you'd like your contract of employment in Welsh or English."	AD Paper App – CT 1.3.18 Complete
				<b>b)</b> Initial contact email from HR to be bilingual to ask for language preference. Template email already forwarded.	AD Paper App – 1.3.18 Complete
				<b>c)</b> HR Schools Officers to make sure that pre- appointment letter is bilingual in order to capture the language preference of the candidate before sending contract out.	NP 1.3.18 Language Preference is noted on Application form.
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 employee in Welsh.	Recruitment Information is available on request but no consistent approach to offering at the moment.	Not Met	Recruitment When the action above is completed, HR Officers will know to send supporting information (pre appointment letter in Welsh too)	1.3.18 Preference noted at start of appointment

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.	Partially Met <u>People Development</u> <u>Team</u> Current roll out of Performance Documentation for GR14s and above is bilingual.	Not met	People developmentTeamContinue working withWelsh Language ServicesTeam on this project.All documentation to beposted on RCT Source somanagers can also accessbilingual versions forWelsh-speaking staff.	DH 10 <sup>th</sup> June 2018
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.	Partially Met <u>People Development</u> <u>Team</u> Current roll out of Performance Documentation for GR14s and above is bilingual.	Not Met	People developmentTeamContinue working withWelsh Language ServicesTeam on this project.All documentation to beposted on RCT Source sothat managers can alsoaccess bilingual versionsfor Welsh-speaking staff.	DH 10 <sup>th</sup> June 2018
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 that is the employee's wish you must provide any such documents to him or to her in Welsh.	Partially Met <u>People Development</u> <u>Team</u> Current roll out of Performance Documentation for GR14s and above is bilingual.	Not Met	People developmentTeamContinue working withWelsh Language ServicesTeam on this project.All documentation to beposted on RCT Source sothat managers can alsoaccess bilingual versionsfor Welsh-speaking staff.	DH 10 <sup>th</sup> June 2018

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.	Met	All SA3 form available bilingually. Annual leave card available bilingually. Flexi record available bilingually.		<b><u>All</u></b> Signing in sheets need to be bilingual. Documents should be available on RCT Source so all managers can access.	RD OH and PDT flexi and training cards bilingual. Email sent to staff re preference 5.5.18.
105	If you publish a policy relating to behaviour in the workplace, you must publish it in Welsh.		All Document List provided by HR Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18
106	If you publish a policy relating to health and well-being at work, you must publish it in Welsh.		All Document List provided by HR Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18
107	If you publish a policy relating to salaries or workplace benefits, you must publish it in Welsh.		All Document List provided by HR Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18

108	If you publish a policy relating to performance management, you must publish it in Welsh.	All Document List provided by HR Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18
109	If you publish a policy about absence from work, you must publish it in Welsh.	<b><u>All</u></b> Document List provided by HR Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18
110	If you publish a policy relating to working conditions, you must publish it in Welsh.	Health & Safety Document List provided by H&S Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18
111	If you publish a policy regarding work patterns, you must publish it in Welsh.	All Document List provided by HR Officer of current progress being made to have policies updated/translated.	Not Met	Policy Review Group Continue with project of monitoring of translating and updating RCT Source with Welsh and English policies. RCT Source to be developed to have bilingual functionality.	AB/ML 1.4.18

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.	Met	All/Schools Organisation permits this and has dealt with Schools based staff through Welsh.			
112A	You must 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.		Partially Met All Grievance Policy updated to reflect this Standard.	Not Met	All Agree update, forward for translation and publish in both languages on RCT Source.	AB/ML 1.4.18
114	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 - (a) ask the member of staff whether he or she wishes to use the Welsh language at the meeting; (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 simultaneous translation service from Welsh to English at the meeting (unless you conduct the meeting in Welsh without translation services).		All Template letters produced in English only.	Not Met	<ul> <li><u>All</u></li> <li><u>a)</u> All template letters (Dignity at Work, Formal investigation, second stage interview) need to be sent out bilingually where no language preference has been established. They also need to be amended to reflect the need to offer translation services in a meeting <i>as well</i> as welcoming correspondence in Welsh.</li> <li>b) Long term project to capture language preference of all staff will eliminate need to provide bilingual letters suggested. Audit agree this ambitious project would make compliance easier.</li> </ul>	CT 1.3.18 ML 1.9.18

115	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 - (a) made the complaint in Welsh, (b) responded in Welsh to a complaint about him or about her, (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.	Met	<b><u>All</u></b> As highlighted by HR Advisors when a complaint/investigation reaches this stage and Welsh has been requested the reply is such that it is so personal that no pre- populated template is appropriate. All documents are sent to Welsh Translation.		Comply with Actions in Standard 114.	
116	You must allow all members of staff to respond in Welsh to allegations made against them in any internal disciplinary process.	Met	<u>All</u> Organisation permits this and has dealt with Schools based staff through Welsh. Grievance Policy updated to reflect this Standard.		Policy Review Group Publish updated Grievance Policy	
116A	You must - (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 (b) if you commence a disciplinary procedure in relation to a member of staff, inform that member of staff of that right.		Partially Met All Disciplinary Procedure updated to reflect this Standard.	Not Met	All Agree update, forward for translation and publish in both languages on RCT Source.	AB/ML 1.4.18

118	If you organise a meeting with a member of staff regarding a disciplinary matter that relates to his or her conduct you must - (a) ask the member of staff whether he or she wishes to use the Welsh language at the meeting, and (b) explain that you will provide a translation service for that purpose if it is required; and, if the member of staff 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).		Partially Met <u>All</u> Disciplinary Procedure updated to reflect this Standard.	Not met	<ul> <li>All</li> <li>a) Agree update, forward for translation and publish in both languages on RCT Source.</li> <li>b) All template letters (Dignity at Work, Formal investigation, second stage interview) need to be sent out bilingually where no language preference has been established. They also need to be amended to reflect the need to offer translation services in a meeting as well as welcoming correspondence in Welsh.</li> </ul>	AB/ML 1.4.18
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 conducted in Welsh, or (c) asked to use the Welsh language at a meeting regarding the disciplinary process.	Met	All As highlighted by HR Advisors when a complaint/investigation reaches this stage and Welsh has been requested the reply is such that it is so personal that no pre- populated template is appropriate. All documents are sent to Welsh Translation.		Comply with Actions in Standard 114.	

127	You must assess the Welsh languages skills of your employees.	All HR Officers completed surveys in early 2017. All new starters complete a mandatory online questionnaire on the recruitment website or paper copy if manual and HR Officers update Vision record with Welsh Language Skill. Testing of this system has resulted in a delay of 3-6 months before records are updated.	Not Met	All Input Welsh Language Skill after generating a new Vision account.	J Dixon 1.3.18
128	You must provide 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.	Training Team Some presentations are available bilingually. Registration forms not available bilingually.	Not Met	All a) Include policy statement and offer for the training to be in Welsh on courses highlighted in this Standard. b) Course content to be translated in readiness. c) Where vacancies arise in Training Teams, Welsh Language Skill level 5 to be considered for the JD in order to build capacity. ch) Registration forms/publicity for courses highlighted in this Standard need to be available in Welsh (Bilingual)	Policy statement included in all courses and course handouts in standard topics translated but still need to send other training docs. 31 <sup>st</sup> June 18. RD Registration forms 31.5.18.

129	You must provide training (in Welsh) on using Welsh effectively in - (a) meetings; (b) interviews; and (c) complaints and disciplinary procedures.	Met	All Cymraeg Gwaith intensive course available for staff to better their Welsh Language Skills.		Contact Welsh Language Tutor for more information.	
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.	Met	All Welsh Language Tutor currently providing lessons to the service area.			
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.	Met	All Welsh Language Tutor currently providing 30 week programme to staff.			
133	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.		People Development Team Corporate Induction Checklist	Not Met	People Development <u>Team</u> Corporate induction check list to be updated to include a section on 'Information on Welsh Language Standards' and available bilingually on RCT Source	RD Induction process under review and Welsh added. Checklist updated.
134	You must provide text 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.	Met	All Logos provided as part of Audit.		All Forward email provided during audit requesting staff add to their email signatures.	

135	You must provide 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 e-mail messages.	Met	<b><u>All</u></b> Wording is provided by the Translation Team. Email signatures inspected during audit highlighted some minor inaccuracies.	All Request all staff check for compliance. Forward email provided during audit.
136	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.	Met	Recruitment All Council posts prior to audit record Welsh Language as desirable. Update to Recruitment and Selection Policy will now assess which Welsh Language Level is necessary to complete the duties of the post in the context of the departments linguistic levels.	Policy Review Group         Agree amendments to         Recruitment and Selection         policy and publish.         E-recruitment website for         managers to be updated to         reflect Recruitment and         Selection policy.
136A	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.	Met	Recruitment JDs indicate language level and are published in Welsh at the same time.	

137	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.			Not Met	RecruitmentUpdate website and all'manual' application formsto include -Cewch gyflwyno ffurflengais yn Gymraeg ac nichaiff ei thrin yn llai ffafriolna ffurflen a gaiff eichyflwyno yn SaesnegAn application form may besubmitted in Welsh, andwill not be treated any lessfavourable than a formsubmitted in English.	J Davey 1.3.18
137A	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; (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.	Met	Recruitment All supporting information available on the recruitment website is available bilingually.			
137B	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).	Met	<b><u>Recruitment</u></b> No delay observed during audit. Online application process allows for information regarding decisions to be emailed in English and Welsh simultaneously.			

139	You must ensure that your application forms for posts - (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 (b) explain that you will provide a translation service 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).	Met	<b><u>Recruitment</u></b> Invite to interview email asks in both English and Welsh if they'd like their interview to be undertaken in Welsh and that we will provide a translation service for that purpose.		
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.	Met	Recruitment No delay observed during audit. Online application process allows for information regarding decisions to be emailed in English and Welsh simultaneously.		
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 language text.	Met	All Signs were compliant. Some signs were posted prior to the compliance notice.	All Remove out of date posters.	

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.	Met	All Signs were compliant. Some signs were posted prior to the compliance notice and as such the English is positioned before the Welsh.	All Remove out of date posters.
143	You must ensure that the Welsh language text on signs displayed in your workplace is accurate in terms of meaning and expression.	Met	All Meaning was accurate on corporate signs.	

D. Record Keeping Compliance Level 4 - 86%

No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the Standard	Target Date for Implementation & Responsible Officer
147	You must keep a record, in relation to each financial year, of the number of complaints you receive relating to your compliance with Standards.	Met	All Process demonstrates that HR always contact Welsh Language Services with regards to complaints concerning the language so that one central database can be updated.			
148	You must keep a copy of any written complaint that you receive that relates to your compliance with the Standards with which you are under a duty to comply.	Met	All Process demonstrates that HR always contact Welsh Language Services with regards to complaints concerning the language so that one central database can be updated.			
149	You must keep a copy of any written complaint that you receive that relates to the Welsh language (whether or not that complaint relates to the Standards with which you are under a duty to comply).	Met	All Process demonstrates that HR always contact Welsh Language Services with regards to complaints concerning the language so that one central database can be updated.			

151	You must keep a record (following assessments of your employees' Welsh language skills made in accordance with Standard 127), of the number of employees who have Welsh language skills at the end of each financial year and, where you have that information, you must keep a record of the skill level of those employees.	Met	Vision records hold this information to allow for reporting.			
152	You must keep a record, for each financial year of - (a) the number of members of staff who attended training courses offered by you in Welsh (in accordance with Standard 128), and (b) if a Welsh version of a course was offered by you in accordance with Standard 128, the percentage of the total number of staff attending the course who attended that version.		Partially Met <u>People Development</u> <u>Team</u> Training Team hold copies of registration forms and made available for reporting each year.	Not Met	People Development <u>Team</u> Send registration forms to translation. Include policy statement and question on the bottom of each relevant registration form in order to capture and report on this data accurately.	Policy statement included. Forms need translating by end of June 18.
153	You must keep a copy of every assessment that you carry out (in accordance with Standard 136) in respect of the Welsh language skills that may be needed in relation to a new or vacant post.	Met	Recruitment All posts, during audit period, were Welsh as desirable. Going forward all posts will be Welsh Language Level 1 essential and an assessment completed for why a higher level isn't required.		<b><u>Recruitment</u></b> E-recruitment website to be updated in line with amendments to Recruitment and Selection Policy enabling the Council to capture assessments and report on these where necessary.	

154	You must keep a record, in relation to each financial year of the number of new and	Met	Recruitment All posts, during audit	
	vacant posts which were categorised (in		period, were Welsh as	
	accordance with Standard 136) as posts		desirable. This means a	
	where - (a) Welsh language skills are		single count of advertised	
	essential; (b) Welsh language skills need to be		posts is necessary in order	
	learnt when appointed to the post; (c) Welsh		to report on this.	
	language skills are desirable; or (ch) Welsh		Going forward all posts will	
	language skills are not necessary.		be Welsh Language Level	
			1 essential and a single	
			count will be necessary to	
			report on this.	

# F. Supplementary - Operational Compliance Level 5 - 100%

No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the Standard	Target Date for Implementation & Responsible Officer
170	(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 operational Standards with which you were under a duty to comply during that year.	Met	Record Keeping Standards allow reporting on the necessary information to produce this report. Welsh Services Unit request this			
	(2) The 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 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 151); (b) the number of members of staff who attended training courses you offered in Welsh during the year (on the basis of the records you kept in accordance with Standard 152); (c) if a Welsh version of a course was offered by you during that year, the percentage of the total number of staff attending the course who attended the Welsh version (on the basis of the records you kept in accordance with Standard 152);		information on an annual basis.			

(ch) the number 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, (on the basis of the records you kept in accordance with Standard 154); (d) the number of complaints that you received during that year which related to your compliance with the operational Standards with which you were under a duty to comply. (3) You must publish the annual report no later than 30 June following the financial year to which the report relates. (4) You must publicise the fact that you have published an annual report. (5) You must ensure that a current copy of your annual report is available - (a) on your website, and (b) in each of your offices that are open to the public.

#### GROUP: CHILDREN & COMMUNITY SERVICES

AUDIT NAME: WELSH LANGUAGE STANDARDS - LIBRARY SERVICES

DATE DRAFT REPORT WAS ISSUED: 21/03/2018

#### DATE FINAL REPORT WAS ISSUED: 05/04/2018

## INTRODUCTION

Rhondda Cynon Taf CBC was issued a Compliance Notice under Section 44 Welsh Language (Wales) Measure 2011 on 30/09/2015. In order to assess the Council's current position we require each service area to be audited against the Welsh Language Standards.

## SCOPE & OBJECTIVES

In accordance with the Chief Executive's directive Internal Audits will be conducted with all Service Areas in order to reduce the risk for the authority. A review of compliance against the Welsh Language Standards is to be completed in order to facilitate this aim and to support services to overcome any barriers to compliance. It will also be used to identify areas of good practice to share with other service areas. AUDIT OPINION

The Welsh Services department would like to thank you and your staff for your co-operation in facilitating the audit. Good progress has been made in embedding the standards since their introduction in 2016. The report highlights where good practice has been achieved (Met). Nevertheless, evidence suggests that further work needs to be progressed in order to achieve full compliance.

Special mention should be awarded to Hirwaun Library for its promotion of Welsh Language Classes, Coffee Mornings and a Book Club and Mountain Ash for identifying Welsh Learner appropriate stock. Replication, where appropriate, should be sought across the entire service and strong promotion of these services to our communities.

It would be remiss of this overall opinion section not to mention a less than satisfactory service afforded during telephone 'mystery shops'. Whilst this report identifies the need for refresher training for all frontline staff, it is not deemed appropriate that customers presenting their query in Welsh have to request again for a Welsh language service (which should have been offered). Furthermore, it was disappointing to have to listen to staff members discuss in a negative tone (as a result of not putting the customer on hold) "Ahh someone wants to speak Welsh, I think it's that Welsh language guy". This attitude neither promotes the use of the Welsh language nor complies with the spirit of the legislation with regards to providing an equitable service in Welsh. Additionally, it does not align with expected basic standards of the Local Authority. This exact response was not replicated across the service, however the inconsistent approach to Welsh language queries was evident. Much work is needed in this area, which targeted training should address and thus be viewed as a priority for all staff.

The recommendations are not exhaustive, as embedding the standards is an evolving process. In some instances, standards have been highlighted in yellow. These standards have not been audited and have not affected your compliance levels. The reason for this is that they are not exclusive to Library Services and the nature of the standard is so complex that compliance would be difficult to achieve at this juncture.

COMPLETED BY
Thomas Tudor Jones
Welsh Language Compliance Officer

## Thomas.t.jones@rctcbc.gov.uk 01443 570003 For further advice on achieving compliance, please do not hesitate to contact the officer named above who will be happy to help.

The Welsh Language Standards are grouped into 10 separate sections. Each section is given a compliance level as described in more detail below. Subject to agreement the department's compliance levels will be forwarded to the Sub Cabinet Group with responsibility for the Welsh Language for further scrutiny.

Where standards or sections have not been applicable to a service area they are not contained within this report.

Levels	Compliance Level 1	Compliance Level 2	Compliance Level 3	Compliance Level 4	Compliance Level 5
Definition	Compliance Level one means that 0-25% of the standards applicable to that service area have been met.	Compliance Level two means that 26-50% of the standards applicable to that service area have been met.	Compliance Level three means that 51-75% of the standards applicable to that service area have been met.	Compliance Level four means that 76-99% of the standards applicable to that service area have been met.	Compliance Level five means that service area is <i>currently</i> fully compliant with the standards applicable to them.
Risk Factors	<ul> <li># Serious risk of complaint</li> <li># Serious risk of complaint from the Welsh language Commissioner</li> <li># Repeated non- compliance could result in £5,000 fine</li> <li># Urgent action needed</li> </ul>	<ul> <li># Risk of complaint</li> <li># Risk of complaint from the Welsh language Commissioner</li> <li># Repeated non- compliance could result in £5,000 fine</li> <li># Urgent action needed</li> </ul>	<ul> <li># Possible risk of complaint</li> <li># Possible risk of complaint from the Welsh language Commissioner</li> <li># Repeated non- compliance could result in £5,000 fine</li> <li># Action needed</li> </ul>	<ul> <li># Minimal risk of complaint</li> <li># Minimal risk of complaint from the Welsh language Commissioner</li> <li># Report</li> <li>recommendations to be followed to reach Level 5</li> </ul>	<ul> <li># No immediate risk</li> <li># Continued monitoring needed to maintain standard</li> <li># Good practice example</li> </ul>

	A. Service Delivery									
	Compliance Level 3 – 53%									
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer				
	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.		Partially Met Email correspondence sent to all sites. All but one response was in Welsh.	Not Met	All staff to be reminded to send correspondence to <u>translation-</u> <u>cyfieithu@rctcbc.gov.uk</u> where no Welsh language speaker available to answer and that all replies need to be in the language preference of the customer/client.	Nick Kelland (April 14 <sup>th</sup> , 2018)				
2	When you correspond with an individual ("A") for the first time, you must ask A whether A wishes to receive correspondence from you in Welsh, and if A responds to say that A wishes to receive correspondence in Welsh you must – (a) keep a record of A's wish, (b) correspond with A in Welsh when corresponding with A from then onwards, and (c) send any forms you send to A from then onwards in Welsh.	Met	Current communication with external partners is based on established language preference.		<ul> <li>i) Any new contact should be made bilingually in order for customers to express language choice.</li> <li>ii) Use corporate headed paper so that an active offer to reply in Welsh is made.</li> <li>iii) Update membership form to include question around Language preference and record in the Library Management System from now on.</li> </ul>					

4	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.		<ul> <li>Template email for book collections is in English only.</li> <li>Email for items overdue has a Welsh version.</li> </ul>	Not Met	Develop standard templates for use across all libraries. They have to be sent out <b>bilingually</b> in all instances (regardless of recorded language preference).	Nick Kelland (April 14 <sup>th</sup> , 2018)
5	If you don't know whether a person wishes to receive correspondence from you in Welsh, when you correspond with that person you must provide a Welsh language version of the correspondence.		<ul> <li>Email for book collections is in English only. No record of language choice.</li> <li>Stamp used to issue Library books.</li> </ul>	Not Met	<ul> <li>As above</li> <li>Purchase new stamp so that dates only show</li> <li>xx/xx/xx or a new stamp with bilingual months</li> <li>xx/Tach-Nov/xx</li> </ul>	Richard Reed (Cost of replacing stamps in one batch is prohibitive and so these will be replaced as and when the current stamps become obsolete.).
6	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).		Email for book collections is in English only.	Not Met	As above	Nick Kelland (April 14 <sup>th</sup> , 2018)
7	You must state - (a) in correspondence, and (b) in publications and official 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 any correspondence in Welsh, and that corresponding in Welsh will not lead to delay.	Met	All email signatures and disclaimers viewed during audit include this information.		Make sure to use corporate headed paper for letters with individuals so that this offer is default given via the footer.	

8					i) Send refresher email advising staff that Welsh greetings are mandatory. Nick Kelland (April 14 <sup>th</sup> , 2018)
	When a person contacts you on your main telephone number (or numbers), or on any helpline numbers or call centre numbers, you must greet the person in Welsh.	Calls presented to each service location were not always fully greeted in Welsh.	Not Met	<ul> <li>i) All calls to be greeted with a full Welsh greeting first (equivalent of that to be said in English).</li> <li>ii) Make all staff aware and organise refresher training with our Welsh Language Tutor.</li> </ul>	ii) Arrange refresher training with Welsh Language Tutor Richard Reed Nushin Chavoshi- Nejad (June, 2018)
9	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.	RCT Council definition of this standard is that greeting in Welsh promotes a Welsh Service. This Standard is reliant on Standard 11. Calls presented to each service location were not always fully greeted in Welsh.	Not Met	<ul> <li>i) All calls to be greeted with a full Welsh greeting first (equivalent of that to be said in English).</li> <li>ii) Make all staff aware and organise refresher training with our Welsh Language Tutor.</li> </ul>	<ul> <li>i) Email reminder to staff.</li> <li>Nick Kelland (April 14<sup>th</sup>, 2018)</li> <li>ii) Arrange refresher training with Welsh Language Tutor</li> <li>Richard Reed Nushin Chavoshi- Nejad (June, 2018)</li> </ul>

11	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 matter; and (b) no Welsh speaking member of staff is available to provide a service on that specific subject matter.		Call transfer or call-back options sometimes given but no consistent approach.	Not Met	<ul> <li>i) All staff to be reminded that Welsh language calls should be</li> <li>dealt with in Welsh</li> <li>transfer to a Welsh speaking member of staff</li> <li>call back option offered</li> <li>only then continue in English.</li> <li>Refresher training</li> <li>ii) Organise refresher training for all staff to know how to deal with basic queries.</li> </ul>	<ul> <li>I0 Email reminder to staff. Work on guidelines for staff. Nick Kelland Richard Reed (May 20<sup>th</sup>, 2018)</li> <li>ii) Arrange refresher training with Welsh Language Tutor</li> <li>Richard Reed Nushin Chavoshi- Nejad (June 2018)</li> </ul>
12	When you advertise telephone numbers, helpline numbers or call centre services, you must not treat the Welsh language less favourably than the English language.	Met	Number is identical			
13	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.	Met	Number is identical			
14	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.		No evidence of compliance.	Not Met	Any publication of your telephone number to include the below "Croesawn alwadau yn y Gymraeg We Welcome calls in Welsh".	Carry out an audit of current posters and leaflets and amend where necessary. All future publications to carry Welsh language statement.

						Nick Kelland Richard Reed (June 1 <sup>st</sup> , 2018)
16	Your main telephone call answering service (or services) must inform persons calling, in Welsh, that they can leave a message in Welsh.	Met	No voicemails in operation.		SLT mobile numbers to be updated to provide Welsh Language voicemail.	
17	When there is no Welsh language service available on your main telephone number (or numbers), or 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.		Call transfer or call-back options sometimes given but no consistent approach.	Not Met	All staff to be reminded that Welsh language calls should be - dealt with in Welsh - transfer to a Welsh speaking member of staff - call back option offered - only then continue in English.	Email reminder to staff. Work on guidelines for staff. Nick Kelland Richard Reed (May 20 <sup>th</sup> , 2018)

19	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.	Calls presented to service dealt with in Welsh on 3 occasions. Apology given twice only and in all other instances no call back offered. One interaction was very disappointing - Staff <i>"I don't speak Welsh."</i> Customer <i>"Ok is there someone there that does"</i> Staff <i>"I'll have to check."</i> Customer not put on hold and had to listen to a negative reaction to the request Staff (overheard as not put on hold, negative tone) <i>"Ahh someone wants to speak Welsh. I think it's that Welsh Language guy".</i>	Not Met	<ul> <li>i) Welsh Language refresher training to be organised for all frontline staff to cover the basics on dealing with Welsh queries.</li> <li>ii) All staff to be reminded that Welsh language calls should be</li> <li>dealt with in Welsh</li> <li>transfer to a Welsh</li> <li>speaking member of staff</li> <li>call back option offered</li> <li>only then continue in English.</li> </ul>	i)Arrange refresher training with Welsh Language Tutor Richard Reed Nushin Chavoshi- Nejad (June 2018) ii) Email reminder to staff. Nick Kelland (April 14 <sup>th</sup> )
20	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.	Calls presented to each service location were not always fully greeted in Welsh.	Not Met	<ul> <li>i) All calls to be greeted with a full Welsh greeting first (equivalent of that to be said in English).</li> <li>ii) Make all staff aware and organise refresher training with our Welsh Language Tutor.</li> </ul>	i) Nick Kelland (April 14 <sup>th</sup> ) ii) Richard Reed (June 2018)

21	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.		No evidence presented.	This Standard has not been audited and as such does not affect your compliance level. This Standard is not exclusive to Libraries and the nature of it is so complex that a degree of compliance would be difficult in all service areas.	
24	If you invite one person only ("P") to a meeting you must ask P whether P wishes to use the Welsh language at the meeting, and inform P that you will, if necessary, provide a translation service from Welsh to English for that purpose.	Met	No evidence provided as meeting of this sort unlikely for this service area.	Each invite should include an active offer. Suggested text below. "Croeso i chi ddefnyddio'r Gymraeg yn y cyfarfod dim ond i chi roi gwybod i ni erbyn xx/xx/xx. You are welcome to use Welsh at the meeting, just let us know by xx/xx/xx should you wish to do so."	
24A	If you have invited one person only ("P") to a meeting and P has informed you that P wishes to use the Welsh language at the meeting, you must arrange for a simultaneous translation service from Welsh to English to be available at the meeting (unless you conduct the meeting in Welsh without the assistance of a translation service).	Met	Service aware of process	As with all other requests - contact <u>translation-</u> <u>cyfieithu@rctcbc.gov.uk</u>	

27	If you invite more than one person to a meeting (which does not relate to the well being of one or more of the individuals invited), you must ask each person whether they wish to use the Welsh language at the meeting.	Met	No evidence provided as meeting of this sort unlikely for this service area.	All invitations to meetings to external parties (the public, external organisations) to include an active offer. Suggested text below. "Croeso i chi ddefnyddio'r Gymraeg yn y cyfarfod dim ond i chi roi gwybod i ni erbyn xx/xx/xx. You are welcome to use Welsh at the meeting, just let us know by xx/xx/xx should you wish to do so."."	
27A	If you have invited more than one person to a meeting (which does not relate to the well-being of one or more of the individuals invited), 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 translation service from Welsh to English to be available at the meeting.	Met	No evidence of this being applicable	As above	
27D	If you have invited more than one person to a meeting (which does not relate to the well-being of one or more of the individuals invited), and all of the persons invited have informed you that they wish to use the Welsh language at the meeting, you must arrange for a simultaneous translation service from Welsh to English to be available at the meeting (unless you conduct the meeting in Welsh without the assistance of a translation service).	Met	Officers aware of process for arranging this service.	Contact <u>translation-</u> cyfieithu@rctcbc.gov.uk with all requests.	

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 attending is welcome to use the Welsh language at the meeting.		Consultation Events re: Community Hubs does not promote this standard	Not Met	<ul> <li>i) All advertising material encouraging the public to join a public meeting should include an active offer. Suggested text below.</li> <li>"Croeso i chi ddefnyddio'r Gymraeg yn y cyfarfod dim ond i chi roi gwybod i ni erbyn xx/xx/xx. You are welcome to use Welsh at the meeting, just let us know by xx/xx/xx should you wish to do so."""</li> <li>ii) Welsh Language Services to highlight with Consultation Team.</li> </ul>	i) All future advertising materials to include recommended text. Nick Kelland Richard Reed (Ongoing)) ii) Welsh Language Compliance Officer (April 2018)
31	When you send invitations to a meeting that you arrange which is open to the public, you must send the invitations in					
	Welsh.	Met	Consultation poster			
32	If you invite persons to speak at a meeting that you arrange which is open to the public 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 translation service from Welsh to English for that purpose (unless you conduct the meeting in Welsh without a translation service).	Met	Public meetings only held on consultation matters which are facilitated by Council officers.			

33	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 - (a) that they are welcome to use the Welsh language, and (b) that a simultaneous translation service is available. You must comply with standard 33 in every circumstance, except: ¢ 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	C	onsultation Events re:		All advertising material encouraging the public to join a public meeting should include an active offer, suggested text below. Where no response has been had our exemption allows for us not to present simultaneous translation at the meeting. "Croeso i chi ddefnyddio'r Gymraeg yn y cyfarfod dim ond i chi roi gwybod i ni erbyn xx/xx/xx. You are welcome to use Welsh at the meeting, just	All future advertising materials to include suggested text. Nick Kelland Richard Reed (Ongoing) Welsh Language Compliance Officer
	that he or she wishes to use the Welsh language at the meeting.		ommunity Hubs does not romote this standard	Not Met	let us know by xx/xx/xx should you wish to do so."	(April 2018)
34	If you display any written material at a meeting that you arrange which is open to the public, you must ensure that that material is displayed in Welsh, and you must not treat any Welsh language text less favourably than the English language text.	P C C fu st in po	artially Met onsultation re: ommunity Hubs does not illy comply with this andard as some formation on design oster only available in nglish.	Not Met	<ul> <li>i) All information to be fully bilingual, do not erect unless it is, bar external providers.</li> <li>ii) Welsh Language Services to highlight with Consultation Team.</li> </ul>	i)Monitor written material for public meetings and do not display if only available in English Nick Kelland Richard Reed (Ongoing) ii) Welsh Language Compliance Officer (April 2018)

35	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).	Met	<ul> <li>Stories &amp; Craft Posters</li> <li>World Book Day Poster</li> <li>A Talk by Kate Crockett</li> <li>Poster</li> <li>A Talk by Catrin Collier</li> <li>Poster</li> </ul>		All posters compliant.	
36	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 displayed at the event and in relation to audio announcements made at the event). Any publicity or advertising material that you produce must be produced in Welsh, and if you produce the advertising material in Welsh and in English, you must not treat the Welsh language version less	Met	<ul> <li>Kate Crockett event, simultaneous translation service offered.</li> <li>Welsh only Stories &amp; Craft sessions</li> <li>Welsh only World Book Day events.</li> </ul>		We must ensure that 'Services' offered to the public during an event do not treat the Welsh Language less favourably. Welsh speaking members of staff should be used for public events to greet and provide a full Welsh service to the public attending even if the core event is in English.	
	favourably than you treat the English language version.	Met	compliant expect those highlighted in Standard 61.		bilingual (preferred), or Welsh and English posters.	
38	Any material that you 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.		Leaflets in libraries.	Not Met	If back to back design, we must make sure that both versions are on display.	Send email notifying staff Nick Kelland (April 14, 2018)

42 43	Any licence or certificate you produce must be produced in Welsh.	Met	Summer Reading Challenge Certificates published in Welsh and English (back-to-back). All Library locations had		Ensure that both sides are completed on every occasion.	
	Any brochure, leaflet, pamphlet or card that you produce in order to provide information to the public must be produced in Welsh.	Met	Welsh and English versions of their brochures, leaflets and pamphlets.		Make sure that both versions are on display.	
44	If you produce the following documents, and they are available to the public, you must produce them in Welsh - (a) policies, strategies, annual reports and corporate plans; (b) guidelines and codes of practice; (c) consultation papers.		Policies (email from Richard Reed 06/03/2018)	Not Met	Translate all policies available to the public, ensuring that bilingual forms are available if policy demands.	Schedule for translation agreed with Translation Unit all policies to be translated by September 15 <sup>th</sup> . Richard Reed
45	Any rules that you publish that apply to the public must be published in Welsh.		Partially Met - Membership Form - Abusive Behaviour Poster - Policies (email from Richard Reed 06/03/2018), - Fire Evacuation Procedures	Not Met	<ul> <li>i) Translate all policies available to the public, making sure to produce bilingual forms where they are required of the policy.</li> <li>ii) Provide each site with bilingual Fire Evacuation Procedures poster to allow for standard approach across service area.</li> <li>iii) Bylaws to be reviewed on a Wales wide level, Welsh translation should be provided by Welsh Government.</li> </ul>	<ul> <li>i) Schedule for translation agreed with Translation Unit all policies to be translated by September 15<sup>th.</sup>.</li> <li>Richard Reed</li> <li>ii) Replace all existing Fire Evacuation Procedure posters</li> <li>Richard Reed (June12, 2018)</li> <li>iii) Richard Reed Nick Kelland (November 2018)</li> </ul>

48	If you produce a document in Welsh and in English (whether separate versions or not), you must not treat any Welsh language version less favourably than you treat the English language version.	Met	Membership form			
49	If you produce a Welsh language version and a separate English language version of a document, you must ensure that the English language version clearly states that the document is also available in Welsh.		Library Strategy 2015 to 2018	Not Met	All separated documents should note the following "Mae'r dogfen yma ar gael yn y Gymraeg. Cysylltwch â xx i gweld copi. // Gweler copi Cymraeg yma xx. This document is also available in Welsh. Please contact xxx to request a copy // View the Welsh copy here xxx."	Nick Kelland Richard Reed (July 2018)
50	Any form that you produce for public use must be produced in Welsh.	Met	Membership form			
50A	If you produce a Welsh language version and a separate English language version of a form, you must ensure that the English language version clearly states that the form is also available in Welsh.	Met	Membership form			
50B	If you produce a form in Welsh and in English (whether separate versions or not), you must ensure that the Welsh language version is treated no less favourably than the English language version, and you must not differentiate between the Welsh and English versions in relation to any requirements that are relevant to the 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 form).	Met	Membership form			

51	If you pre-enter information on a Welsh					
	language version of a form (for example,					
	before sending it to a member of the public					
	in order for him or her to check the content					
	or to fill in the remainder of the form), you		No evidence of this. All			
	must ensure that the information that you		forms are left blank in both			
	pre-enter is in Welsh.	Met	languages.			
52		Wiet	Find your nearest library			
02			only available in English.			
			1) Join the library -			
			formatting differences.			
			2) Join the library - Welsh			
			link not working and			
			service not available in			
			either language.			
			3) Library catalogue -			
			Compliant.			
			4) Library Catalogue - link			
			broken on Welsh and			
			English for 'Library information'			
			5) Librarybooks.co.uk -		i) Amond abortfalls	
			External Site.		i) Amend shortfalls	
			6) Bolindadigital - External		highlighted in evidence	
			Site.		column. Publish all content,	I) Menna
	You must ensure that - (a) the text of each		7) Library books, DVD or		from now on, in Digital	James
	page of your website is available in Welsh,		CD - Renew an item -		Archives bilingually.	(October
	(b) every Welsh language page on your		Links not reflected in		ii) Public access computers	2018)
	website is fully functional, and (c) the		Welsh content.		should be available with	ii) Menna James
	Welsh language is not treated less		8) Public access		Welsh and English	Nick Kelland
	favourably than the English language on		computers - Content and		Microsoft packages.	(November 2018)
	your website. You must comply with		links not the same.		Explore with ICT.	iii) Menna James
	standard 52 in relation to the following		9) Children's library -		iii) RCTNetloan homepage	Nick Kelland
	by 31/03/2017 $\phi$ the body's corporate		Compliant.		to be produced bilingually.	(November 2018)
	website You must comply with		10) E-books and online		iv) Computer background	iv) Menna James
	standard 52 in relation to the following		library resources - content	Not	image updated to have	Nick Kelland
	by 31/03/2018. $\phi$ all other websites		compliant.	Met	Welsh appear first.	(October 2018)

		<ul> <li>11) Borrow box - External.</li> <li>12) Transparent Language Online - External.</li> <li>13) Digital Archives - Non compliant.</li> <li>14) Search library resources - Make a reference library enquiry link not working in Welsh.</li> <li>15) Online Information Resources content not matching. PDF's not matching.</li> <li>16) Library Transport link and page only available in English.</li> <li>17) Lost or stolen library card link missing.</li> </ul>			
55	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.	Partially Met See standard 52	Not Met	As above in Standard 52 evidence column.	

56						
	You must provide the interface and menus on every page of your website in Welsh.		Partially Met See standard 52	Not Met	As above in Standard 52 evidence column.	
57	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.	Met	No published apps.	With		
58	When you use social media you must not treat the Welsh language less favourably than the English language. You must comply with standard 58 in relation to the following by 31/03/2017: ¢ when using social media on your main account. You must comply with standard 58 in relation to the following by 31/03/2018. ¢ when using social media on all other accounts.	Met	Facebook page.			
59	If a person contacts you by social media in Welsh, you must reply in Welsh (if an answer is required).	Met	Facebook Page response.			
60	You must ensure that any self service machines that you have function fully in Welsh, and the Welsh language must be treated no less favourably than the English language in relation to that machine.		Photocopiers	Not Met	Discuss with Procurement colleagues the need for central contract with Xerox to supply dual language options on the public use printers/photocopiers.	All of our Photocopiers are supplied by procurement who negotiate licenses.

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 favourably than the English language text.	Partially MetPont-y-clun - Blue BadgePosterChurch Village - Read thebest teenage fictionaround posterPorth - Sickness at Workposter.Abercynon - CommunityFolderTonypandy -USB/Headphones Poster,DVD Rental Poster, CoffeeMorning Poster,Allotments Poster.Llantrisant - Nophotography or filmingposter.	Not Met	Make sure that the good work of compliance continues in this area and update highlighted posters to include Welsh text.	Richard Reed Nick Kelland (June 2018)
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 be read first.	<u>Partially Met</u> As above	Not Met	As above	
63	You must ensure that the Welsh language text on signs is accurate in terms of meaning and expression.	Partially Met Google translate used in one instance. Poster removed.	Not Met	Make sure to utilise existing Welsh Language speakers and have <u>Translation-</u> <u>cyfieithu@rctcbc.gov.uk</u> to QA the poster before publication. Google Translate is not to be used unless proofread by Level 5 Welsh Language Speaker	Nick Kelland (May 2018)

64	Any reception service you make available in English must also be available in Welsh, and any person who requires a Welsh language reception service must not be treated less favourably than a person who requires an English language reception service. You must comply with standard 64 in relation to the following by 30 March 2016: ¢ the body's main reception service You must comply with standard 64 in relation to the following by 31 March 2018: ¢ every other reception service		Compliance date not yet passed, but audited all libraries in advance.	Not Met	Continue to invest in Staff Development. Prioritise frontline refresher training for all staff to know how to deal with basic queries.	Richard Reed Nushin Chavoshi- Nejad (June 2018)
67	You must display a sign in your reception which states (in Welsh) that persons are welcome to use the Welsh language at the reception.	Met	Audit of all libraries.			
68	You must ensure that staff at the reception who are able to provide a Welsh language reception service wear a badge to convey that.	Met	Audit of all libraries.		Continue to issue staff with Welsh Language lanyards if they are Welsh speakers. Visibility is key.	Richard Reed (Ongoing)
81	You must promote any Welsh language service that you provide, and advertise		Partially Met Stories and Craft Sessions poster	Not	<ul> <li>i) Welsh Language</li> <li>Services to work with</li> <li>Library Services to promote</li> <li>Welsh Language provision.</li> <li>ii) Welsh book stock needs</li> <li>to be in prominent position</li> <li>within libraries. Many</li> <li>examples where provision</li> <li>is covered by boxes and</li> <li>photocopiers which doesn't</li> </ul>	i) Welsh Language Compliance Officer (Ongoing) ii) Richard Reed
	that service in Welsh.		SLA Contracts	Met	promote service provision.	(October 2018)

82	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.	Met	Stories & Craft Posters World Book Day Poster	Build capacity through recruitment.	
83				Renew book insert so that the bottom logo reads Welsh first (with agreed corporate 'Taf' used in both Languages). "Llyfrgelloedd Bwrdeistref Sirol Rhondda Cynon Taf // Rhondda Cynon Taf County Borough Libraries" Renew junior membership cards so that Welsh URL is provided.	
	When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.	Met	New corporate branding outside libraries complies (Welsh First).	Renew adult membership cards so that Welsh appears first and a Welsh URL is provided.	
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: ¢ 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.	Met	Service does not offer 'educational courses'. The library service facilitates classes (through in-kind benefit) for external and internal departments to provide courses.		

86	If you develop an education course that is			
	to be offered to the public, you must			If educational course is to
	assess the need for that course to be			be developed and run by
	offered in Welsh; and you must ensure			the service. Contact Welsh
	that the assessment is published on your			Language Services for
	website.	Met	As above.	advice on assessments.

	B. Policy Making								
	Compliance Level 2 – 50%								
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer			
88	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.	Met	Marketing Policy & 5 year Promotional Strategy - Demonstrates commitment to Welsh Language promotion.		Maintain this approach of considering Welsh Language implications when renewing policies. (Standard 44 + 45) before translation.				
89	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.	Met	Marketing Policy & 5 year Promotional Strategy - Demonstrates commitment to Welsh Language promotion.		Maintain this approach of considering Welsh Language implications when renewing policies. (Standard 44 + 45) before translation.				

90	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)		Marketing Policy & 5 year Promotional Strategy - Demonstrates commitment	Maintain this approach of considering Welsh Language implications when renewing policies.	
	treating the Welsh language no less favourably than the English language.	Met	to Welsh Language promotion.	(Standard 44 + 45) before translation.	

91					
				The Council has a legal duty to look at how its decisions impact on the Welsh Language. Consultations should ask the following questions under The Welsh Language Measure 2011 and Welsh Language Standards.	
				Please let us know how you feel these proposals could affect the following: Opportunities for persons to use the Welsh Language	
				< >	
				Treating the Welsh	
				Language no less	Nick Kelland
	When you publish a consultation document			favourably than the English Language	Corp Policy Department
	which relates to a policy decision, the			< >	(Christopher
	document must consider, and seek views on,			Do you have any ideas on	Davies)
	the effects (whether positive or adverse) that			how we could shape the	(ongoing)
	the policy decision under consideration would			decision differently in order	Welsh
	have on - (a) opportunities for persons to use			to have increased positive	Language
	the Welsh language, and (b) treating the			effects on the Welsh	Compliance
	Welsh language no less favourably than the	Consultation questionnaire	Not	Language?	Officer (April
	English language.	re: Community Hubs	Met	< >	2018)

92	1				
32				The Council has a legal duty to look at how its decisions impact on the Welsh Language. Consultations should ask the following questions under The Welsh Language Measure 2011 and Welsh Language Standards.	
				Please let us know how you feel these proposals could affect the following: Opportunities for persons to use the Welsh Language < >	
	When you publish a consultation document which relates to a policy decision the			Treating the Welsh Language no less favourably than the English Language	Nick Kelland Corp Policy Department
	document must consider, and seek views on, how the policy under consideration could be formulated or revised so that it would have			< > Do you have any ideas on how we could shape the	(Christopher Davies)
	positive effects, or increased positive effects,			decision differently in order	(ongoing) Welsh
	on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh			to have increased positive effects on the Welsh	Language Compliance
	language no less favourably than the English	Consultation questionnaire	Not	Language?	Officer (April
	language.	re: Community Hubs	Met	< >	2018)

	93					
					The Council has a legal duty to look at how its decisions impact on the Welsh Language. Consultations should ask the following questions under The Welsh Language Measure 2011 and Welsh Language Standards.	
					Please let us know how you feel these proposals could affect the following:	
					Opportunities for persons to use the Welsh Language < >	
					Treating the Welsh	Nick Kelland
		When you publish a consultation document which relates to a policy decision the			Language no less favourably than the English Language	Corp Policy Department (Christopher
		document must consider, and seek views on,			< >	Davies)
		how the policy under consideration could be			Do you have any ideas on	(ongoing)
		formulated or revised so that it would not have adverse effects, or so that it would have			how we could shape the decision differently in order	Welsh Language
		decreased adverse effects, on - (a)			to have increased positive	Compliance
		opportunities for persons to use the Welsh			effects on the Welsh	Officer (April
		language, and (b) treating the Welsh language	Consultation questionnaire	Not	Language?	2018)
		no less favourably than the English language.	re: Community Hubs	Met	< >	

	C. Operational								
	Compliance Level 4 – 95%								
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer			
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.	Met	Documents available on Inform > Here		Make Staff aware via email.				
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.	Met	Documents available on Inform > Here		Make Staff aware via email.				
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 that is the employee's wish you must provide any such documents to him or to her in Welsh.	Met	Documents available on Inform > <u>Here</u>		Make Staff aware via email.				
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.	Met	Documents available on Inform > <u>Here</u>		Make Staff aware via email.				

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.	Met	HR Policy Updates to reflect this.	Awareness raising
112A	You must 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.	Met	HR Policy Updates to reflect this.	Awareness raising
114	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 - (a) ask the member of staff whether he or she wishes to use the Welsh language at the meeting; (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 simultaneous translation service from Welsh to English at the meeting (unless you conduct the meeting in Welsh without translation services).	Met	HR Policy Updates to reflect this.	Awareness raising
115	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 - (a) made the complaint in Welsh, (b) responded in Welsh to a complaint about him or about her, (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.	Met	HR Policy Updates to reflect this.	Awareness raising

116	You must allow all members of staff to respond in Welsh to allegations made against them in any internal disciplinary process. 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).	Met Met	HR Policy Updates to reflect this. Document explaining this available on Inform > <u>Here</u>		Awareness raising Awareness raising	
127	You must assess the Welsh languages skills of your employees.		14 records remaining	Not Met	Complete audit with staff who haven't responded.	Completed
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.	Met	Corporate Session covering basics given to staff.		Organise refresher training	
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.	Met	2 members of staff supported to further Welsh language skills.		Encourage more staff to continue with learning to better equip the service to deal with the public in Welsh.	
134	You must provide text 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.	Met	No emails used the logo. Logo available in inform.		WLS to launch Language Level Email Badges. Info to follow.	
135	You must provide 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 e-mail messages.	Met	All email signatures compliant.			

136	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.	Met	Most recent job uploaded as Welsh desirable.	Comply with your SSE recommendations and employ Welsh speakers during next recruitment.	
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 language text.	Met	Audit of all libraries.	Health and Safety Executive poster is available in Welsh <u>here</u> .	
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.	Met	Audit of all libraries.		
143	You must ensure that the Welsh language text on signs displayed in your workplace is accurate in terms of meaning and expression.	Met	Audit of all libraries.		

			Ch. Promotion					
	Compliance Level 5 – 100%							
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer		
145	You must produce, and publish on your website, a 5-year strategy that sets out how you propose to promote the Welsh language and to facilitate the use of the Welsh language more widely in your area; and the strategy must include (amongst other matters) - (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 (b) a statement setting out how you intend to reach that target; and you must review the strategy and publish a revised version on your website within 5 years of publishing a strategy (or of publishing a revised strategy).	Met	<ol> <li>Developed Welsh Language activities during half term.</li> <li>Increased number of Cymraeg i Blant sessions hosted in Libraries.</li> <li>Cymraeg i Oedolion classes hosted in Libraries.</li> <li>Welsh Language Book club in Hirwaun Library.</li> <li>Roald Dahl sessions in Welsh.</li> <li>Welsh Learner friendly books identified in Mountain Ash Library.</li> </ol>		<ul> <li>i) Develop relationship with Welsh Language Schools for Sixth Form students to volunteer at libraries as part of their Welsh Bac Courses (5 year strategy)</li> <li>ii) Promote Welsh Language books stock with School pupils.</li> <li>iii) Explore promotion of 'Every Child a Member' with all our Welsh Language Schools to promote usage.</li> <li>iv) Libraries to build relationships with local Welsh Language Schools to encourage attendance.</li> <li>v) Identify Welsh Learner appropriate stock and mark up for promotion with Welsh Learner classes.</li> </ul>			

	D. Record Keeping										
	Compliance Level 5 – 100%										
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer					
147	You must keep a record, in relation to each financial year, of the number of complaints you receive relating to your compliance with standards.	Met	Awareness		Forward a copy of all complaints to <u>Welshlanguageofficer@rctcbc.gov.uk</u> in order that the authorities central register may be updated.						
148	You must keep a copy of any written complaint that you receive that relates to your compliance with the standards with which you are under a duty to comply.	Met	Awareness		Forward a copy of all complaints to <u>Welshlanguageofficer@rctcbc.gov.uk</u> in order that the authorities central register may be updated.						
149	You must keep a copy of any written complaint that you receive that relates to the Welsh language (whether or not that complaint relates to the standards with which you are under a duty to comply).	Met	Awareness		Forward a copy of all complaints to <u>Welshlanguageofficer@rctcbc.gov.uk</u> in order that the authorities central register may be updated.						

	Dd. Supplementary - Service Delivery								
	Compliance Level 5 – 100%								
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer			
155	You must ensure that a document which records the service delivery 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 - (a) on your website, and (b) in each of your offices that are open to the public.	Met	Copy of Standards in all service locations.						
156	You must - (a) ensure that you have a complaints procedure that deals with the following matters - (i) how you intend to deal with complaints relating to your compliance with the service delivery standards with which you are under a duty to comply, and (ii) how you will provide training for your staff in relation to dealing with those complaints, (b) publish a document that records that procedure on your website, and (c) ensure that a copy of that document is available in each of your offices that are open to the public.	Met	Copy of procedure available in all service		Corporate update to policy in 2018. Welsh Services to send new copy out.	Welsh Language Compliance Officer (August 2018)			

157	You must - (a) ensure that you have arrangements for (i) overseeing the way you comply with the service delivery standards with which you are under a duty to comply, (ii) promoting the services that you offer in accordance with those standards, and (iii) facilitating the use of those services, (b) publish a document that records those arrangements on your website, and (c) ensure that a copy of that document is available in each of your offices that are open to the public.	Met	Copy of Standards in all service locations.	Welsh Language Services to provide updates.	
158	(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 service delivery standards with which you were under a duty to comply during that year. (2) The annual report must include the number of complaints that you received during that year which related to your compliance with the service delivery standards with which you were under a duty to comply. (3) You must publish the annual report no later than 30 June following the financial year to which the report relates. (4) You must publicise the fact that you have published an annual report. (5) You must ensure that a current copy of your annual report is available - (a) on your website, and (b) in each of your offices that are open to the public.	Met	Copy available in each service location.	Welsh Language Services to provide updates.	Welsh Language Compliance Officer (August 2018)

	Ff. Supplementary - Promotion							
	Compliance Level 5 – 100%							
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer		
173	You must ensure that a document which records the promotion 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 - (a) on your website, and (b) in each of your offices that are open to the public.	Met	Copy available in each service location.					

	G. Supplementary - Record Keeping							
	Compliance Level 5 – 100%							
No.	Standard	Met	Evidence	Not Met	Possible action for improvement to be considered to meet the standard	Target Date for Implementation & Responsible Officer		
175	You must ensure that a document which records the record keeping 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 - (a) on your website, and (b) in each of your offices that are open to the public.	Met	Copy available in each service location.					