



**RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**WELSH LANGUAGE CABINET STEERING GROUP**

**29 APRIL 2019**

**WELSH LANGUAGE STANDARDS COMPLIANCE REPORT  
TO THE WELSH LANGUAGE COMMISSIONER  
2018 – 2019**

**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. PURPOSE OF THE REPORT**

- 1.1 The purpose of the report is to provide the Welsh Language Steering Group with a copy of the Welsh Language Standards Compliance Report 2018 – 2019.

**2. RECOMMENDATIONS**

It is recommended that the Welsh Language Cabinet Steering Group:

- 2.1 Note the content of the report;
- 2.2 Approve the report for publication on Rhondda Cynon Taf County Borough Council's website, and approve the distribution of the report to each of the authority's offices that are open to the public by no later than 30 June 2019 so that it is made available to the public;
- 2.3 Approve arrangements for publicising the fact that the annual report has been published.

**3. REASONS FOR RECOMMENDATIONS**

- 3.1 Standards 158, 164 and 170 of the Compliance Notice issued under section 44 of the Welsh Language (Wales) Measure 2011 requires the Council to produce a report (an "annual report") in relation to each

financial year which outlines the way in which the Council has complied with:

- the Service Delivery Standards with which the Council were under a duty to comply during the year in question;
- the Policy Making Standards with which the Council were under a duty to comply during the year in question;
- the Operational Standards with which the Council were under a duty to comply during the year in question.

#### **4. BACKGROUND**

- 4.1 Rhondda Cynon Taf received its final Compliance Notice from the Welsh Language Commissioner on 30th September 2015 which outlined the Council's duty to meet 171 of the statutory Welsh Language Standards introduced by the Welsh Government under the Welsh Language (Wales) Measure 2011.
- 4.2 An application to challenge 14 of the Standards was presented to the Commissioner on 29 March 2016. This resulted in the imposition date for achievement of aspects of 3 of the standards (52, 58 and 64<sup>1</sup>) being postponed until 31<sup>st</sup> March 2018 so that progress against these are included for the first time in this Annual Monitoring Report.
- 4.3 The report at Appendix 1 covers the third full year of the implementation of the standards – from 1 April 2018 to 31<sup>st</sup> March 2019. The report must be published on the Council's website and made available in each of the Council's offices that are open to the public no later than 30 June 2019.
- 4.4 The Council is under a statutory duty to publicise the fact that it has published an annual report.
- 4.5. As well as complying with the aforementioned Standards in 3.1, this year's annual report must include the following:

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<sup>1</sup> Standard 52 – full compliance in respect of websites other than the corporate website was not required until 31/3/2018.

Standard 58 – full compliance in respect of social media other than the Council's main social media account was moved to 31/3/2018.

Standard 64 – areas defined as 'reception services' (for example, Libraries, Leisure centres etc) apart from the Council's main reception service was moved forward to 31/8/2018.

- the number of complaints that were received during the year that relate to the Council's compliance with the (i) service delivery (ii) policy making (iii) operational standards with which it was under a duty to comply;
- the number of employees who have Welsh language skills at the end of the year in question;
- the number of members of staff who attended training courses offered by the Council in Welsh during the year in question;
- the percentage of the total number of staff who attended training courses offered in Welsh by the Council during the year in question;
- the number of new and vacant posts that the Council 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 during the year in question.

## **5. CURRENT POSITION**

5.1 The Annual Monitoring Report at Appendix 1 describes in detail the work undertaken by the Council to ensure compliance with the Welsh Language Standards. Of particular note are the following:

- the introduction of Welsh Language Level 1 Training for all new appointees;
- The delivery of Welsh language tuition to 455 members of staff (March 2019) at all levels with additional Welsh language training in the Autumn term 2018 for Early Years and Family Support Service settings;
- Appointment of Senior Translator roles allowing for a more efficient service, with dedicated support for Democratic Services and the Cabinet Office.
- Provision of Welsh simultaneous translation services for all decision making Committees e.g. Scrutiny and Regulatory Committees;
- A new question introduced for use on all service change consultations to assess the impact that any change will have on the Welsh language or Welsh speakers;
- Ongoing review of Website pages with removal of non-compliant pages

5.2 Despite the good progress made by the Council, challenges remain as we seek to achieve full compliance. Particular areas that remain challenging include the following:

- The need to increase the number of Welsh speaking staff and to further develop the skills of current staff to learn Welsh so that services are able to provide services in the medium of Welsh (this has been identified as a need by nearly all Council services in their Service Self-evaluations 2018/19);
- Capacity to meet the increased demand for Welsh language tuition at Level 1 and to balance this with the need to provide continued skills development for staff who are at higher Welsh language skills levels;
- Capacity to meet the increased administrative burden related to the organisation and delivery of compulsory Welsh level 1 for all new appointees due to the number of new appointments;
- Promoting the use of Welsh among residents and staff as required under the Strategy for the Promotion and Facilitation of the Welsh Language;
- Monitoring the partnership elements of the 5 Year Strategy;
- Ensuring that all Council related websites and social media feeds are bilingual

5.3 Even in the face of some of the challenges identified at 5.2, feedback from the Welsh Language Commissioner during the annual meeting with their Compliance Officers remains very positive in respect of the progress made in Rhondda Cynon Taf. For example, officers from Welsh Language Services were invited to present their work at the Welsh Language Commissioner's Successful Practices Seminar in November 2018 at the Temple of Peace, Cardiff as implementing audits in the context of compliance with statutory linguistic duties was identified as an area of good practice in the Welsh Language Commissioner's Annual Assurance Report 18/19.

## **6. EQUALITY AND DIVERSITY IMPLICATIONS**

An Equalities Impact Assessment is not required.

## **7. CONSULTATION**

A consultation process was not required for this report, although all service areas contributed data to the report through their service self-evaluations.

## **8. FINANCIAL IMPLICATION(S)**

There are no financial implications aligned to this report. However, there may be costs and resources as yet not fully ascertained in respect of implementation of any recommendations by the Welsh Language Commissioner as well as continued implementation of the 171 Standards. Non-compliance with a Standard could incur financial penalties of up to £5,000.

## **9. LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED**

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

## **10. LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE WELL-BEING OF FUTURE GENERATIONS ACT.**

10.1 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.

10.2 The Annual Compliance Report outlines the work undertaken by the Council to comply with the Welsh language statutory standards that will contribute to the Welsh Government's longer-term goal of 1 million Welsh speakers by 2050. The work undertaken to achieve these standards involves working collaboratively with partners and residents to facilitate a wide range of opportunities for the use of the Welsh language in communities across the county. Achievement of the standards will prevent complaints from residents who have been unable to access services in the Welsh language.

10.3 The content of this report is directly related to Goal 6 of the Well-being of Future Generations Act - a Wales of vibrant culture and thriving Welsh language. Compliance with the standards will support the normalisation of the Welsh language and ensure that the Welsh language is treated no less favourably than the English language. It also contributes to the creation of a more equal Wales by providing opportunities for Welsh speakers to access Council services in the medium of Welsh if they so wish.

## 11. **CONCLUSION**

- 11.1 This is the third Annual Report published by the Council in respect of the way it has complied with the Statutory Standards which it is under a duty to comply with under the Welsh Language (Wales) Measure 2011. The report outlines the good progress made by service areas in embedding arrangements for delivering services through the medium of Welsh.
- 11.2 It is recognised that further work must be done, especially considering the need to meet the additional standards (52, 58 and 64) which are a challenge. However, the Council is confident that the systems developed to monitor compliance are robust and that support is available for service areas to further improve their performance where required.

### **Other Information:-**

**Contact Officer** - Wendy Edwards, Head of Community Learning  
Steffan Gealy, Service Manager, Welsh Language Services



**RHONDDA CYNON TAF**  
**COUNTY BOROUGH COUNCIL**

Welsh Language Standards Compliance Report to the  
Welsh Language Commissioner  
2018 – 2019

Prepared in accordance with the requirements of the  
Welsh Language (Wales) Measure 2011

April 2019

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## **INTRODUCTION: Welsh Language Standards**

Rhondda Cynon Taf received its final Compliance Notice from the Welsh Language Commissioner on 30<sup>th</sup> September 2015 which outlined the Council's duty to meet 171 of the statutory Welsh Language Standards established by the Welsh Government under the Welsh Language (Wales) Measure 2011. An application to challenge 14 of the Standards was presented to the Commissioner on 29 March 2016. Following consolidation and further consultation, the Welsh Language Commissioner determined that no action should be applied to 9 of the Standards which were subject to challenge and a variation should be applied to 5 of the Standards which were subject to challenge. The amended Compliance Notice was presented to RCTCBC on 9<sup>th</sup> September 2016.

### **Vision**

Rhondda Cynon Taf County Borough Council is committed to creating an environment which encourages its residents to use Welsh in their interaction with the Council and supporting staff to use Welsh in the workplace. In addition to working towards full compliance of the requirements of the Welsh Language Standards, the Council will aim to ensure that it delivers services in line with all key Welsh Government policies and strategies in relation to the Welsh language.

### **Governance and accountability**

In 2014 the Council established a Welsh Language Cabinet Steering Group as a sub-committee of the Council's Cabinet. It is a cross-party group with community representation. The Welsh Language Cabinet Steering Group oversees strategic developments, considers reports from relevant departments on Welsh language issues, makes recommendations to the Council's Cabinet and monitors Council-wide developments. It has responsibility for assessing the Welsh Language Promotion Strategy Action Plan and monitoring the Council's progress as it seeks to meet the Welsh Language Standards.

### **Links to Council Policies and Priorities**

The Council's commitments under the Welsh Language Standards are integrated into the authority's planning documents including the Improvement Plan 2015, the Council's Strategic Equality Plan, the Welsh in Education Strategic Plan (WESP) and the Corporate Plan 2016-2020. The Council's priorities are also informed by recent legislation including the Wellbeing of Future Generations (Wales) Act 2015 and the Social Care and Well-being Act, 2016 that place

responsibility on the Council to strengthen the Welsh language. The former Act requires public bodies to work towards seven well-being goals, one of which is 'A Wales of vibrant culture and thriving Welsh Language,' while the latter requires public service organisations into take into account the care and support services they provide to people who speak Welsh.

## **Reporting**

This year has been the third full year of implementing the Welsh Language Standards under the Welsh Language (Wales) Measure 2011.

The report will be published by 30 June in compliance with Standards 158 and 164. The report, including Appendix 1 details how the Council has complied with the following Supplementary Standards:

- Service Delivery Standards
- Operational Standards
- Policy Making Standards

The report also presents data on the required indicators as follows:

- number of staff who have Welsh language skills (Standard 151)
- number of staff who attended training courses listed in Standard 128 if offered in Welsh (Standards 152)
- percentage of the total number of staff who attended any courses listed in Standard 128 (Standards 152)
- number of new and vacant posts that were advertised during the year which were categorised as (i) Welsh language skills essential (ii) Welsh language skills needed to be learnt when appointed to the post (iii) Welsh language skills desirable (iv) Welsh language skills not necessary
- the number of complaints received

## Welsh Language Services Unit

The Council recognises that the Welsh Language Standards are to be given a high priority given the risks involved in terms of non-compliance and also because of its commitment to creating an environment that encourages its residents to use Welsh in their interaction with the Council and supporting staff to use Welsh in the workplace. It recognises whole Council support is needed in order to offer and promote Welsh language services from the first point of contact.

The Council invests in a 17 strong Welsh Language Services Unit, a growth of 3 more staff than in 17/18, which undertakes to support all services and to provide the following:

- advice and support for all service areas on their statutory responsibilities under the Standards
- translation of public facing documents
- in-house Welsh language tutoring
- identification of areas of potential non-compliance
- recording of customer complaints
- reporting on developments to the Welsh Language Cabinet Steering Group
- simultaneous translation at full Council and at other meetings which are open to Members (e.g. scrutiny committees)
- simultaneous translation support to all other service areas such as legal services, human resources
- attendance at the Fforwm Iaith
- liaison with Welsh-medium community organisations as appropriate
- representing the Council at external meetings and be the main point of contact with the Welsh Language Commissioner and relevant Welsh Government Departments.

A restructure of the Welsh Language Services Unit in 16/17 provided an opportunity to respond pro-actively to the new statutory environment and the type of work that needs to be undertaken to try and support all Council services to meet the Standards in a more cost effective manner.

A Compliance and Monitoring Officer role was created to monitor the performance of services across the Council and their compliance against the Welsh Language Standards that are relevant to them. Officers from Welsh Language Services were invited to present their work at the Welsh Language Commissioner's Successful Practices Seminar in November 2018 at the Temple of

Peace, Cardiff as implementing audits in the context of compliance with statutory linguistic duties was identified as an area of good practice in the [Welsh Language Commissioner's Annual Assurance Report 18/19](#).

A part-time Welsh Language Tutor role was also created to organise and deliver Welsh Language courses and sessions for Council staff. In the past, the Council paid external providers (e.g. the University of South Wales's Welsh for Adults Centre) to deliver sessions for internal staff but they lacked the desired success of tailoring the sessions to the relevant service areas. To date (31 March 2019), the internal tutor has tutored 455 members of staff at all levels. As expected, this number increased significantly from last year as all newly appointed staff are now expected to attend basic Welsh lessons as part of their induction.

A further mini-restructure of the service was agreed during 18/19 in response to the need to comply with additional Standards relating to simultaneous translation at Council meetings, translation of associated agendas, minutes and PowerPoint presentations and the Welsh Language Commissioner's determination 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'*). Consequently, two translators were appointed as Senior Translators and an additional translator post created. The appointment of the Senior Translators allows for a more efficient service, with dedicated support for Democratic Services and the Cabinet Office.

These roles may attract commercialisation opportunities in future by extending provision to other bodies which are subject to the Standards. Opportunities include the following:

### **Consultancy**

- Brief audit of compliance;
- Welsh Language Standards Raising Awareness Training/The Basics - for Board Members, Managers or Staff;
- More than just Words/ Active Offer training - for Board Members, Managers or Staff. This is related to the care/health sector;
- Production of pamphlets: What's Changed, Setting the Standards, Advice for Managers, Commissioned Partners obligations, Holding Bilingual Meetings, Work Welsh resources, Reception Branding, Lanyards, Posters.

## Welsh Language Training

- Welsh Language Level 1 Training (the basics, location specific);
- Welsh Language Raising Confidence Training (for existing Welsh Language Staff).

## Ongoing Support

- Ongoing support as and when via email or over the phone; or
- A series of consultancy meetings where advice face to face advice can be provided to Service Managers/Leaders etc.

Guidance documents and resources continued to be produced and disseminated during 2018-2019 and these are outlined below.

## Corporate Reception Poster

RCT Council is proud to embrace the Cymraeg logo as part of their corporate brand and wanted to create a 'Welcome to use Welsh' brand for our reception centres, thus encouraging the use of Welsh by members of the public and staff.

## Social Media Guidance

These guidelines have been produced in response to the growing presence the Local Authority has on social media – including, but not limited to; Snapchat, Instagram, Facebook and Twitter. These guidelines are to help content publishers comply with the relevant Standards.

## Decision Tree

In response to the Welsh Language Commissioner's determination that Rhondda Cynon Taf County Borough Council failed to comply with Standard 4 (*'When you send the same correspondence to several person, you must send a Welsh language version of the correspondence at the same time as you send any English language version'*), and staff feedback indicating a recurring question - **When should I send something bilingually and when can I send it in a single language?** – Welsh Language Services and colleagues in Public Health and Protection developed a decision tree for Standard and Non-Standard communications, for frontline staff and managers alike to proactively ensure compliance with the relevant Standards.

Building on the relationships between the Welsh Language Services Unit and all council service areas, it was agreed that due to the significance of the Standards, all service areas continued to report relevant developments in their Annual Service Self-Evaluations. The details noted in each Service Self-Evaluation are at Appendix 1 in accordance with Standards 158, 164 and 170.

## COMPLAINTS: STANDARD 158(2) 164(2) 170(2)(d)

The following complaints were received, or continued to be investigated, during/in 2018 - 2019:

Complaint Date	Nature	Via	Outcome / Response
July 2016 - Ongoing	Leisure services: Allegation of failure to comply with Welsh Language Standards	Welsh Language Commissioner (CSG130)	The Commissioner approved the Council's Action Plan to improve the provision of Welsh Medium Swimming Lessons across our county borough on 24 November 2017. The Council is currently working through the action plan. Remaining actions - <ul style="list-style-type: none"> <li>• Pilot lessons in the Cynon area of the County Borough</li> <li>• Begin provision in the Rhondda Area (April 2019).</li> </ul>
October 2017 - Ongoing	Pensions Service Allegation of failure to comply with Welsh Language Standards	Welsh Language Commissioner (CSG270)	The Council received its Proposed Decision Notice from the Commissioner on 13/03/2018, confirming the Council failed to comply with Standards relating to correspondence sent to multiple recipients. The Council has since completed the required action from the decision notice - Rhondda Cynon Taf County Borough Council must conduct a review of each standard letter it sends to

			<p>several persons in order to ensure a Welsh version is available.</p> <p>The Council must ensure that any correspondence sent to several persons is sent in Welsh at the same time as any English version.</p> <p><b>Timetable:</b> Within 90 days of issuing the Commissioner's final determination.</p> <p>The Council, as a result of the audit conducted, has developed a decision tree to help officers determine the language of all standard and non-standard correspondence.</p>
March 2018	Elected Member / Payroll Department: Letter sent to previous employee in English only re: Overpayment of Salary.	Member of the public.	All staff reminded to correspond in the individual's (staff or member of the public) preferred language or bilingually where this isn't recorded.
April 2018 (Linked to above)	Senior Leadership Team / Cabinet Office / Elected Members: Automated late payment letter sent regarding overpayment of salary in English only.	Member of the public	All staff reminded to correspond in the individual's (staff or member of the public) preferred language or bilingually where this isn't recorded. (Changes had yet to take effect from above advice).
June 2018 (Linked to above)	Senior Leadership Team / Cabinet Office / Elected Members: Council copied into a further complaint, sent directly to the	Member of the public	Investigation undertaken with Customer Complaints officers, updated system now sends correspondence in the language of the original complaint. The system also alerts Welsh Language Services of Welsh Language Complaints or complaint about the Welsh Language to enable us to

	Leader of Plaid Cymru, about an 'acknowledgement' letter re: above complaint being sent in English only.		advise on responses and reduce the risk of non-compliance.
May 2018	Highways Department: Allegation that temporary signage was erected in English only	Welsh Language Commissioner (CSG323)	Resolved that RCT Council was not responsible for erecting the signs. Welsh Government was responsible.
June 2018	Leisure Services: English only automated response.	Member of the public.	Template updated. Bilingual going forward.
June 2016	Energy Unit: Standard of Welsh translation on email re: renewable energy.	Member of the public.	Department reminded not to use Google Translate and to forward documents to central support service, via email, for translation.
June 2016	Disabled Childrens Team: Communication to parents in English only.	Member of the public.	Council wide regular communications audited as part of response to Commissioners investigation CSG270. Process now in place for all communications to be bilingual where language preference is not known and the corporate decision tree to be used by all staff going forward to reduce risk of non-compliance.
July 2018	Highways Department: Incorrect Welsh text on road works sign.	Member of the public.	Sign replaced by Council Contractor.
July 2018	Events Team: Email correspondence to Councillors in	Elected Member	Council wide audit of regular correspondence conducted as a required response to the Commissioners investigation CSG270. All services



	English only regarding up and coming event.		reminded that correspondence to be bilingual where language preference is not known. Introduced a corporate decision tree to be used by all staff going forward to reduce risk of non-compliance.
July 2018	Library Services: Allegation of failure to provide reception service in Welsh.	Member of the public.	Resolved that current process/approach – offering to source a Welsh Language Service via another member of staff (if the receptionist is not Welsh speaking) – is compliant with the reasonable and proportionate aspects of the Measure.
July 2018	Regeneration Department: Failure to provide email communication to Councillors in Welsh.	Elected Member	Council wide audit of regular correspondence conducted as a required response to the Commissioners investigation CSG270. All services reminded that correspondence to be bilingual where language preference is not known. Introduced a corporate decision tree to be used by all staff going forward to reduce risk of non-compliance.
July 2018	Employment, Education and Training Team: Failure to provide email communication to Councillors in Welsh.	Elected Member	Council wide audit of regular correspondence conducted as a required response to the Commissioners investigation CSG270. All services reminded that correspondence to be bilingual where language preference is not known. Introduced a corporate decision tree to be used by all staff going forward to reduce risk of non-compliance.
August 2018	Leisure Services: Welsh language version of push notifications and	Member of the public.	Department reminded not to use Google Translate and to forward documents to central support service, via email, for translation.

	Facebook posts not translated correctly.		
August 2018	Transport Department: Bus notice posted in English only.	Member of the public.	Department apologised and reminded of the need for all public facing publications to be bilingual.
September 2018	Elections Service: Allegation that there was no Welsh Language telephone service.	Member of the public	The Elections Service complied with the spirit of the legislation and provided an active offer for a Welsh speaker to call the member of the public back. They have acquired a list of Welsh speakers to call on in the future, to increase provision.
September 2018	Highways Department: Allegation that a plaque erected on a fountain in Pontypridd Town Centre did not have a Welsh version.	Member of the public	The plaque in question was only removed for cleaning and maintenance works to be conducted on the fountain. The plaque therefore was not renewed and no Welsh version was needed. Any renewal in the future will comply with the relevant Standards.
October 2018	Leisure Services: Translation of onsite poster not accurate.	Member of the public.	Department updated and re-posted the poster.
October 2018	Planning Services: Failure to provide email communication to Councillors in Welsh.	Elected Member	Electronic system that currently produces the automatic emails is being updated to allow for a bilingual template.
October 2018	Human Resources: Allegation of incorrect Welsh text provided on a job advert.	Member of the public.	Resolved that RCT Council was not responsible for the job description. A local school's board of governors was.
November 2018	Fleet Services: Incorrect Welsh text on an accessibility sign on RCT	Member of the public.	Sign replaced.

	Library's Mobile Library Vehicle.		
November 2018	RCT Arts Service: Incorrect Welsh text on Walesonline advertisement.	Member of the public.	Advertisement updated. Walesonline had changed the original graphics provided by RCT Arts Service.
November 2019	Education Department: Broken link to Welsh consultation questionnaire online.	Member of the public.	Link re-established.
February 2019	Inclusion Services: Allegation that there was a delay in written communication due to language preference (Welsh) of the complainant.	Member of the public.	The Inclusion Services agreed that some amendments to their process (bilingual information being sent to Schools) were necessary, but that on this occasion no Welsh Language Standard had been breached with their correspondence with the member of the public. Further audit work will be done with this service area to ensure compliance.
February 2019	Highways Department: English only signs being erected in the Pontypridd area.	Member of the public.	Contractor emailed to erect new signs.
March 2019	Highways Department: Allegation of inability to pay parking fine in Welsh, online at <a href="http://www.SWPG.co.uk">www.SWPG.co.uk</a>	Welsh Language Commissioner (CSG511)	Ongoing. The Council provided a full response to the request for information from the Commissioner's Office noting that a bilingual website is to be launched at the end of April 2019. This comes after a lengthy lobbying process with the third party provider to produce bilingually.

## STAFF WELSH LANGUAGE SKILLS: STANDARD 170(2)(a)

This section outlines the number of employees/post holders who had Welsh language skills at the end of 2018-2019 (March 2019). The figures are based on the records kept in accordance with Standard 151 based on the requirements of Standard 127.

Year	Staff Base *	Sta
17 - 18	7061	Nor
18 - 19	7067	Nor
Year	Staff Base *	Sta
17 - 18	7061	Nor
18 - 19	7067	Nor
Year	Staff Base *	Sta
17 - 18	7061	Nor
18 - 19	7067	Nor
18 - 19	7067	Nor
18 - 19	7067	Nor
18 - 19	7067	Nor
18 - 19	7067	Nor

\*Staff base is not a headcount, it incl

## TRAINING FOR STAFF: STANDARD 170 (2)( b) and ©

There was no change from the 2017-2018 position with regards to training on Recruitment & Advertising, Performance Management, Complaints and Disciplinary procedures, Induction Dealing with Public and Health and Safety, based on the records kept in accordance with Standard 152 based on the requirements of Standard 128.

## **RECRUITING TO EMPTY POSTS: STANDARD 170 (ch)**

The following figures are kept in accordance with Standard 154 based on the requirements of Standard 136. From September 2017 all new posts are designated Welsh essential Level 1 (basic Welsh) with options for managers to recruit on level 2 to level 5 depending on post. The number of posts at level 2 to 5 are as follows:

Welsh language Skills	L2	3
Welsh Language Skills	L3	0
Welsh Language Skills	L4	0
Welsh Language Skills	L5	8

### **Further information:**

Welsh Language Services Unit  
Rhondda Cynon Taf County Borough Council  
Pavilion D  
Clydach Vale  
Tonypany  
Rhondda Cynon Taf  
CF40 2XX  
Tel: 01443 570001

## **Appendix 1**

## **How the Council has complied**

The following details how the Council has complied with the relevant Standards during 17/18 based on individual Service Self-evaluations.

### **Public Health and Protection**

The service is actively engaged with the Welsh Language Service to ensure processes and communications are compliant with Welsh Language Standards. We have developed a Decision Making Chart to aid officers in achieving compliance. This has been identified as good practice and may be rolled out to other parts of the Council. As part of our review, we have already achieved the following:

- Ongoing review of Website pages / removal of non-compliant pages
- Review of all standard forms / letters
- All Facebook posts in Welsh and English – unless urgent, when goes out in English only and updated in Welsh asap
- Systems in place to capture language preference on our main database and during data collection (e.g. inspection forms) to ensure we respond appropriately.
- All correspondence from the Health and Wellbeing team is available in English and Welsh and we have incorporated feedback from the Welsh Language Standards team into how we improve provision.
- Supporting a number of staff to undertake intermediate Welsh language training as well as basic training.

### **Potential Areas for Improvement**

- Complete the update PH&P website pages to be fully bilingual
- Growth in number of Welsh speakers
- Continue to review all correspondence to ensure that it complies with WLS

### **Communications & Democratic Services**

Council Business Unit

- The services has significantly raised the profile of the language
- Availability of Welsh simultaneous translation services for all decision making Committees e.g. Scrutiny and Regulatory Committees;
- Dedicated translators team who work closely with the Council Business & Scrutiny teams;

- Bi-lingual dedicated Scrutiny web pages;
- Bi-lingual correspondence with all Elected Members via email/telephone;
- Provision for members of the public to address Committees through the medium of Welsh (via the newly published Protocol which encourages residents to use Welsh in their interaction with the Council);
- Interaction of staff within the Council Business and Scrutiny teams to use Welsh in the workplace

#### Consultation & Engagement

- All Consultation and Engagement documents are available in the Welsh language. We have an excellent working relationship with the Welsh language department within the Authority through the need to translate the vast majority of the work we undertake. We also assist the Welsh language department with their own consultations. The department continues to support staff members who want to learn Welsh to help them with engaging with Welsh speakers at the various engagements, which we deliver. We have introduced a new question to be used on all service change consultations to assess the impact that any change will have on the Welsh language or Welsh speakers.

### **Potential Areas for Improvement**

#### Council Business Unit

- Ensure consistent arrangements continue
- Take forward pilot to increase availability of the Welsh Language in decision records and presentations
- Work with translation unit to improve speed of translated non –urgent publications

#### Communications/Digital and Cabinet Office

- Work with Welsh Language to not just provide our services bilingually but increase the remit of our communications promotion to promote Welsh language and culture throughout the year e.g. St David's Day, Welsh language campaigns, Eisteddfod

#### Consultation & Engagement

- Continue to support staff to learn Welsh to provide a fully bilingual service to residents and reduce reliance on Welsh Translation Unit

## Community Wellbeing & Resilience

The Service continues to respond positively to the requirements of the Welsh Language Standards, with all written material available to the public, including online information and applications, now available bilingually.

Language skills are strengthened through recruitment where possible, although it is not always possible to recruit individuals with the necessary skills for the post who also have the necessary Welsh Language skills. When engaging with services, families are always asked for their language preferences and Welsh language speakers assigned to work with individual families. The Welsh in Education Strategic Plan (WESP) 2017-2020 was approved by WG on 15th March 2018. This plan details the Council's vision for Welsh Medium and Welsh Language Education. The WESP is closely aligned with the 5 year strategy for Welsh Language promotion. It was produced alongside internal and external stakeholders including Welsh Medium Community Organisations. The WESP contains a detailed action plan for the first time, and will be monitored through biannual meetings to ensure that progress is made against the outcomes. Both the Early Years and Family Support Service and the Youth Engagement and Participation Service have responsibilities for delivering actions within the WESP.

The Youth Engagement and Participation Service (YEPS) has a dedicated Welsh speaking Youth Engagement Officer (YEO) in each of the 4 Welsh secondary schools. The YEO offers support to young people to improve their resilience; delivers accredited courses and they are also the main point of contact for all after school provision offered by the service to young people. There were also activities offered throughout the school holidays through the medium of Welsh, such as Gorge Walking, Rafting, and Team Building.

The YEP Service has an SLA with Menter Iaith to deliver a programme of open access youth and targeted activities to young people living in RCT through the medium of Welsh. This includes the delivery of 4 Youth Forums across the Welsh Medium Secondary schools in RCT. The forums meet fortnightly with average attendance of between 6-10 young people per school. They also facilitate discussions with young people with a focus on Welsh language awareness and promote the opportunities provided throughout the year for young people to access learning



opportunities and gain accreditation. In 2017/2018 Menter Iaith delivered 15 sessions, through the medium of Welsh, to 107 young people.

## **Early Years and Family Support Service**

EYFSS has secured funding for LA staff to undertake additional Welsh language training in the Autumn term 2018. The aim is to roll out the training following the pilot wider to the commissioned Flying Start childcare settings in the Summer Term 2019. The 17-18 observational and assessment monitoring tool scores for the Welsh language element of the tool have increased to 78%, evidencing an increase of 7%. *The Benefits of Bilingualism* booklet is circulated within all FS commissioned and LA Childcare settings for staff to share with parents.

Parenting staff have all been trained to level 1 and are using Welsh phrases during evidence based groups and during face to face contacts with parents/children.

Talk and Play (TAP) staff currently use Welsh phrases when communicating with parents/children in their groups. The service uses 'phrase of the week' in order to up skill staff in their use of key Welsh words or sentences. All story books used in TAP groups are bilingual for storytelling and lending to parents and the team will occasionally read the Welsh version of the story. Welsh songs and rhymes are sung every week.

We continue to offer local authority and third sector organisations free usage of the facilities at the three Children Centres to deliver Welsh language training courses. Three Welsh themed family open days were held which included language taster sessions, clog dancing, a silent Welsh Disco and Welsh for beginners. Over 200 people attended the sessions over the 3 days. In addition to this we added a Welsh themed singing and dancing session to the Teddy bears Picnic, with over 3,500 in attendance.

All new staff across the Community Wellbeing and Resilience Service are supported to complete the LA's Introduction to Welsh training and fully supported to complete any further training in work time. The Early Years and Family Support Service is currently in the process of auditing staff's Welsh language ability in order to develop a training matrix to ensure that services are more able to provide services in Welsh. Currently the Parenting Team has no Welsh speakers/learners.

## **Potential Areas for Improvement**

- Continue to support staff wishing to develop their Welsh language skills.
- Alternative learning methods to be explored to allow more staff to access training to increase Welsh language proficiency across a range of roles.

## Customer Care

The single front door makes it easier for RCT to meet the Welsh Language Measure with an equal offer at first point of contact, using automated/advisor-based processes via:

- Bilingual website and splash page- website bilingual for all information and transactions.
- Key numbers offer a 'press 1' for Welsh option that takes the customer to a Welsh speaking services (callers do not wait any longer)
- One4aLL appointments offered and conducted in Welsh.
- One complaint from Commissioner investigated due to advisor error –able to evidence broad compliance with the standard.
- Web team identified range of online processes - all were translated ahead of Standards.
- Welsh Language Standard is an example of how consolidation can better support rather than e.g. fragmented receptions/switchboards etc.
- Service sits on officer Working Group.

WEB - specific actions have been undertaken:

- Forms – Audit of all in-house built forms undertaken. Minor amendments made.
- Email responses – All in house built forms now send email receipts from gwasanaethauigwsmeriaid@rctcbc.gov.uk if the form was completed in Welsh.
- An Audit of the Council's website has been undertaken and any non-compliant pages referred to appropriate Director or Head of Service.
- Support the Welsh Language Commissioner by providing timely feedback to any queries about service provision.

The following projects are underway:

- INFORM – A review of the Council's Intranet has been undertaken and several areas for improvement (functionality and content) identified.

- Welsh Addresses – Allow customers to search for Welsh place and street names when using in-house built forms.

#### Advisor Services

- Contact Centre local PI of 90% availability of Welsh Speaking Advisors.
- 2017/18 – 1,457 calls received (0.2% of all calls) with average response time of 97 seconds (41 seconds quicker than other daytime queues).
- Positive report from Welsh Commissioner audit – where Welsh service offered in all calls made (see evidence).
- Compliment via Social Media regarding service provided by Contact Centre in Welsh language (see evidence).

#### Potential Areas for Improvement

- Recruitment of Welsh speaking advisors and training of existing.

#### Employment & Skills

All areas of Employment and Skills are compliant with the Welsh Language Standards in relation to documentation, marketing and ensuring an active offer. There is a commitment to treating the Welsh language no less favourably than the English language so that Welsh-speaking customers can live their lives in Welsh if they wish to do so.

However, there are disparities in relation to the number of staff who can provide a Welsh-medium service which sometimes make it difficult to ensure a Welsh-medium interaction at all offices. There is also a difference in respect of how many customers request a service in Welsh across the programmes as can be seen below.

#### **ESF**

All ESF provision is available in Welsh, alongside bilingual paperwork and information.

To date, despite a proactive offer being made and recorded via claims, no participant has elected to receive provision/support in Welsh.

Currently 1 member of staff is fluent in Welsh and 2 are learners.

#### **CfW+**

The employment support programmes have developed a generic language preference form which is available to all participants to select their preferred method of communication. A spreadsheet is then compiled in area offices to ensure staff are aware of language requirements. To ensure compliance with Welsh Language Standards and to support all staff in their personal development training has been provided to make sure that all staff have reached a minimum level 1 standard and can respond to requests via the medium of Welsh. In addition 1 member of staff is fluent in Welsh and 6 members of staff have reached an intermediate level.

Working with Welsh language and graduate officers a 'Welsh what's changed' booklet has been developed to distribute of voluntary sector partners to aid them with compliance to the Welsh language Standards. In addition a raising awareness training session was offered to all voluntary sector commissioned partners.

Team members who are level 3 and above have lanyards identifying them as bi-lingual and happy to communicate via a community member's language of choice.

Social media channels have been developed for the new delivery areas and information posted is in Welsh and English. All printed communication is now produced in Welsh and English. Following the introduction of Communities for Work+ a new website has been created with a central landing page and links to the various delivery areas.

### ***Adult Education***

Adult Education is fortunate to have 22% of staff who are fluent in Welsh – this is mainly due to the requirement for all staff who work at Garth Olwg Lifelong Learning Centre to be Welsh-speaking as the centre is located on a Welsh –medium campus.

As Garth Olwg is the centre for enrolments and enquiries in relation to adult learning in the county, it is possible to guarantee a Welsh-medium interaction in relation to any contact about adult education.

Provision through the medium of Welsh is accessible in respect of courses – the number of courses offered in Welsh in 2017/18 was consistent with the number offered in the previous year. Indeed in recent years the numbers offered have been relatively consistent (between 16 and 20 annually).

The service has provided representation on the RCT Welsh language forum (Fforwm Iaith) and that in turn has facilitated the development of new opportunities through the medium of Welsh at Garth Olwg Lifelong Learning Centre. It has also facilitated work-based training for establishments such as Local Welsh based Nurseries and Menter Iaith Staff.

Work placements e.g. internship for students enrolled with the Coleg Cymraeg Cenedlaethol are currently being explored with 1 student due to start in January 2019. Also volunteering opportunities for Welsh speakers have been offered this year for Welsh speakers including a Welsh speaker who has additional learning needs.

The service has a presence at Parti Ponty every year and develops, in partnership with the Arts Service a high quality Welsh language theatre programme.

Good opportunities are on offer at Garth Olwg for the Taf area but it remains a struggle to develop opportunities more widely across the county although there is some evidence of positive developments in the Treorchy area and, through libraries at Hirwaun.

### **Potential Areas for Improvement**

- Undertake an internal audit of social media and printed materials to assess their compliance with the Welsh language Standards.

### **Human Resources**

We continue to support the development of Welsh language provision by supporting staff on Welsh courses, 2 staff continue to extend their Welsh ability following the refresher courses last year and all HR staff will be encouraged to attend the Level 1 training so that all HR staff will be graded as Level 1 trained.

- We have met all the criteria identified in the Welsh Language Audit.
- We continue to meet on a monthly basis with the compliance officer to review the policies and practices to include the active offer.
- We continue to support Welsh improvement lessons for those with a good basic knowledge to gain the confidence to support the service in Welsh provision

- We have amended the JD to include Level 1 in Welsh as an essential Criterion for all staff and are working with managers and the Welsh Language Service to ensure that all newly appointed staff achieve level 1.
- Despite some resistance we continue to work with the services and compliance officer to find compromises to achieve the training and explain and persuade services of the advantages and responsibilities within the Welsh Language Standards.
- We are confident that we can converse in writing in Welsh when required however the provision of a specialist service such as HR through the medium of Welsh to the appropriate standard is not achievable in the short term, we would need to recruit a Welsh speaking practitioner to achieve this aim.
- We ensure any external posters such as LGBT History Month event, Equality Objectives Consultation meet with 'Clear Print Guidelines' and Welsh Standards.

### **Potential Areas for Improvement**

- To work closely with the Vision team to ensure that the new system integrates Welsh language levels and preference into the personal record to make it easier to remain compliant within the Welsh Standards.
- To require all HR staff to attend level one training.

### **Leisure, Parks, Countryside, Registration & Bereavement Services**

LPCR &B Services continue to comply with Welsh language requirements in respect of publications, correspondence and interactions. All staff has access to training provision in language development, if identified as a need.

Additional swimming lessons through the medium of Welsh have been delivered in partnership with the Urdd, at Llantrisant Leisure Centre.

The Leisure for Life membership app is available in Welsh and all new fitness equipment has a Welsh option for the interactive display units.

The services have recruited a number of new employees with Welsh language skills.

## Potential Areas for Improvement

- Further recruitment of Welsh speaking delivery staff and engagement with community organisations that deliver through the Welsh language or bilingually.
- Further active promotion of training opportunities to staff

## Libraries

In 2018 the service has been subject to an audit by the Welsh Language Compliance Officer and the results were as follows:

Service delivery compliance level - 53%

Policy-making compliance level – 50%

Operational compliance level – 95%

Recordkeeping compliance level – 100%

The disappointing result for service delivery is accounted for by the following:

- Lack of consistency across some sites, for example, in telephone greetings or responses to Welsh-medium emails/requests – the Standards cannot be met unless all 13 venues comply so that even if one venue has not adhered to the relevant standard then the whole service fails on that standard
- The community hubs consultation events were not compliant as they did not include any reference to people being able to contribute in the Welsh language
- Issues with links on the website
- Photocopiers not having bilingual instructions etc.
- Library date stamps not bilingual
- Library policies not translated and the Library Strategy did not identify that a Welsh versions was available

The policy-making compliance level was adversely affected by the fact that the community hubs consultation did not include any reference to, or seek views on how the proposal affected the Welsh language or how to mitigate any adverse effect of the proposals on the Welsh language. The only library specific element that was not compliant in this section was the fact that 14 members of staff had yet to complete their staff Welsh language skills return.

An action plan has been developed in order to address the weaknesses identified and the majority of compliance errors have not been addressed where they have been within the area of control of the Library Service.

Of particular note is the fact that every member of the library service has been enrolled onto Welsh Language refresher courses. These have had an immediate impact on the service to the community with one customer contacting the manager to thank the Council for arranging the training as she was now not only greeted in Welsh by her local librarian but he could also maintain a short conversation with her.

The service continues to facilitate a range of Welsh-medium events and activities delivered by partner organisations including:

- Welsh language classes
- Welsh-medium Book Clubs
- Welsh-medium Parent and Toddler Groups
- Cymraeg i Blant
- Creative writing sessions in Welsh through
- Miri Mawr festivals
- Welsh Coffee Mornings

Welsh medium books are purchased and targeted at appropriate libraries but the % investment fell slightly this year (as recorded in 1.1) which means that the service failed to meet the indicator on the purchase of Welsh language books.

### **Potential Areas for Improvement**

- Ensure that the Welsh Language Action Plan is fully implemented and that managers monitor each area of compliance on a regular basis to secure continuous improvement.

### **Transportation**

The Transportation Service has reviewed and amended its Learner Travel Policy, Information and Arrangements to ensure that it is fully compliant with the new Welsh Language Standards.



Every effort is taken to ensure the Welsh Language is treated no less favourably than the equivalent service provision in English and standard letters for wide audiences have been reviewed and translated. Roadside bus timetables are bilingual, as well as all the material that promotes the Service's activities on the Council's website.

All parents are offered the opportunity to communicate with the Service in Welsh as part of the admissions process and records are kept. No one to date has requested this service. Three staff within the Service have a working knowledge of spoken and written Welsh and a further one is continuing to learn the language. During 2018 the Service received 2 requests for correspondence through the medium of Welsh, and 2 telephone calls from residents wishing to converse in Welsh were handled through the Call Centre. Again, no complaints were raised about the Service's use of the Welsh Language during this period.

There has been no real change in the number of learners (3,676) that are transported to a Welsh Medium or Dual Language Schools. This represents 32.6% of the total. An Equality Impact Assessment in June 2016 considered that the impact of the Learner Travel Policy, Information and Arrangements was substantially positive in its effects on the Welsh language community, provided that school transport was provided consistently and equitably, and that anomalies in provision were mitigated. The 2017 review ensured that this was the case and the identified anomalies were removed from September 2018.

### **Potential Areas for Improvement**

- Encourage more staff to learn Welsh.

### **Arts Service**

The RCT Theatres' brochure and website is bilingual and all our marketing complies with the Welsh Language Standards. Our social media platforms are also bilingual.

The service has updated its Welsh Language Plan, produced as part of our agreement with the ACW. We are continuing to support Gartholwg Lifelong Learning Centre in developing a Welsh language presented and participative programme. Following a successful tour of the classic text 'Miss Julie' through the medium of Welsh, we are also continuing to work with Gareth John Bale to co-produce Welsh language work to tour throughout Wales.

Of the 9 officers that form Wider Management Team within the service, 3 are Level 5 with a further 3 actively learning Welsh.

Staff continue to learn Welsh. Staff have lanyard's and email signatures to identify them as Welsh speakers.

### **Potential Areas for Improvement**

- Welsh language as essential in recruitment for BO staff and FOH staff
- Welsh language customer service training for box office and front of house staff
- Welsh language events and participation programme at RCT Theatres and supported at Gartholwg Lifelong Learning Centre
- Welsh Language pantomime

### **Children's Services**

Children's Services are compliant with the Welsh language minimum Standards. All Staff are aware of the Welsh language requirements and how this fits into their service area. Front line services dealing directly with service users make the active offer of communication in Welsh and arrangements have been made with Welsh speakers within the service to carry out such conversations as necessary. Service users preferring the medium of Welsh are highlighted within SWIFT.

Staff are encouraged and supported to attend training that enables them to learn Welsh. Managers have attended briefings and undertaken e-learning modules with regard to the Welsh language measures. Staff have been briefed and updated through team meetings.

- Both CTSB and CLA websites bi-lingual
- Correspondence about CLA CP to the public bilingual
- All publications bi-lingual

### **Potential Areas for Improvement**

- Encourage more staff to learn Welsh

## **Highways**

The Highway Maintenance and Management Service continues to embrace the Welsh Language Standards and accordingly has expanded the services it provides through the medium of Welsh. Following recent recruitment there are now four members of staff within the Service who have a reasonable knowledge of spoken and written Welsh and a number of staff who are currently engaged in courses to learn the language. Furthermore of the 4 apprentices taken on in September 3 are fluent Welsh speakers.

When we undertake residents consultations or when there are 'letter drops', all communications are undertaken bilingually i.e. through the medium of English and Welsh.

During the routine maintenance of sign or street nameplate renewal, all replacement signage is now bilingual. Provision of new street names is now Welsh only, thus further promoting the Welsh Language.

As part of mitigating the potential issue of customers wanting to discuss or pay parking fines in Welsh, we have established a direct link with the Council's call centre.

### **Potential Areas for Improvement**

- Further encouragement of staff to enter onto Welsh language courses.

## **Regeneration, Planning and Housing**

The Service has worked closely with the Welsh Language Unit in ensuring it complies with Welsh Language Standards. All documents and services are available in Welsh and English including all correspondence and publications. The Service also has a number of Welsh speakers who are able to facilitate face to face interaction, telephone calls and meetings

The service is currently working alongside the Welsh Language Unit to ensure all web pages and links are bilingual.

To date we have not received any public complaints or formal Commissioner investigations. Any issues which have been raised around provision of services or information in Welsh have been dealt with quickly and efficiently.

The nature of the work carried out by the service and the back office systems used makes recording and analysing Welsh Language usage and service requests difficult. This has been fed back to the Welsh Language Unit through a Welsh Language Commissioner Request for Information.

The service actively promotes Welsh in the workplace through encouraging staff to learn and speak Welsh. In addition, staff who have secured promotion within the service are attending Level 1 Welsh Language courses.

As part of the back office upgrade from Acolaid to Uniform Planning and Building Control have procured LinguaSkin to translate the Public Access facility offered on the website. This is a huge progress in our ability to offer a complete Welsh Language service to our customers.

### **Potential Areas for Improvement**

- More staff with Welsh Language skills

### **Streetcare & Waste Services**

The service is reviewing and working towards full compliance with the Welsh Language Standards in terms of policy documents, correspondence and face-to-face contact with the public.

Standard letters, leaflets, posters and highway signs are produced in both Welsh and English. We also ensure any information featured on our website is also bi-lingual and since the last meeting, we have checked out web pages to ensure bi-lingual information is provided.

To date we have not have any complaints from the Commissioner and have only needed to deal with 2 individual queries through the medium of Welsh since the last assessment. Colleagues from customer care assisted us during this process.

Staff are advised on induction on our service requirements under the Welsh Language Act. Since the last assessment, we have continued to identify and encourage staff who either would like refresher training or start a beginner's course on conversational Welsh. We have updated our training files on who in the service are fluent and partially fluent in conversing in Welsh.

The service strives to provide training opportunities and ensure all staff are appropriately trained and aware of Council policies. In order to ensure continuity of service delivery alternative methods of training and awareness raising is considered e.g. early morning training for waste and cleansing operatives in depots.

### **Potential Areas for Improvement**

- To offer staff who deal with members of the public on a daily basis Welsh Language training.

### **Adult Services**

Adult Services continues to respond effectively to the requirements of the Welsh Language Standards and Welsh Government's "Follow-on Strategic Framework for Welsh Language Services in Health and Social Services" launched in March 2017 – working closely with colleagues in the Council's Welsh Language Service and the Cwm Taf "More than Words" quarterly forum.

Adult Services provides an 'active offer' service with Welsh offered and selected, where relevant, at the point of contact and when engaging with families. Services are provided in the language of choice (and recorded on WCCIS) and Welsh language speakers assigned to work with them. Welsh language preference checks are a requirement at review when core data is checked.

All correspondence and written material available to the public, including online information and DEWIS, are now available bilingually following review in 2018 to ensure compliance with Welsh Language standards. All Council policies are considered in terms of their impact on equality issues (including the Welsh language) via the agreed reporting process. This, together with regular monitoring by the Council's equality team, ensures that policies are consistent with the Welsh Language Standards and other language initiatives.

Adult Services contract monitoring framework monitors each external provider's compliance with Welsh Language Standards.

Staff are encouraged and supported to attend training that enables them to learn Welsh. Managers have attended briefings and undertaken e-learning modules with regard to the Welsh Language. Welsh Language training has been incorporated into the Adult Services staff Induction Framework and all new staff undertake level 1 training.

During 2018, Adult Services received no complaints or any service user comments relating to the availability of Welsh language provision across the Service.

### **Potential Areas for Improvement**

- Ensure compliance of Welsh Language preference checks at review when core data is checked and that WCCIS is updated accurately
- Welsh Language requirements are met and, where appropriate strengthened, with external providers via the contract terms and conditions