

AGENDA ITEM 7 (URGENT ITEM)

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

CABINET

23rd JULY, 2015

WELSH LANGUAGE STATUTORY STANDARDS: DRAFT COMPLIANCE NOTICE: SECTION 47 WELSH LANGUAGE (WALES) MEASURE 2011 – WELSH LANGUAGE CABINET STEERING GROUP RESPONSE.

REPORT OF THE SECRETARY TO THE CABINET

1. PURPOSE OF THE REPORT

To present, for Cabinet Members' information and approval the proposed Councils response to the Draft Compliance Notice: Section 47 Welsh Language (Wales) Measure 2011, which was served on the Council on the 22nd June, 2015 and was recently considered and agreed by the Welsh Language Cabinet Steering Group.

2. RECOMMENDATIONS

It is recommended that the Cabinet approve the proposed response to the Welsh Language Commissioner as outlined within Appendix A of the report, in respect of the draft compliance notice for Rhondda Cynon Taf Council.

3. BACKGROUND

3.1 On the 22nd July, 2015 the Welsh Language Cabinet Steering Group met to consider the contents of the Draft Compliance Notice issued by the Welsh Language Commissioner on the 22nd June, 2015.

3.2 During the meeting the Group discussed in detail the potential impact of the standards as outlined within the draft compliance notice on the Council and also considered a proposed Council response to the Draft Compliance Notice.

3.2 Members were made aware that under the Draft Compliance Notice issued on the 22nd June, Rhondda Cynon Taf Council is required to meet 168 of the 176 standards as follows:-

- 143 standards within 6 months
- An additional 23 to be complied with within 1 year
- The final 2 to be complied with within 2 years.

3.3 It was noted that the Council already comply with a large number of the standards included in the Draft Compliance Notice; although the group

felt that a small number of the standards should be challenged with the Commissioner as 'unreasonable or disproportionate' for the Council to achieve. Members agreed that those standards that could be implemented would be adopted, and relevant plans would be prepared to ensure that they comply with the legislation.

- 3.4 The draft response to the Commissioner as agreed by the Welsh Language Cabinet Steering Group is attached as appendix A to this report, and will need to be presented to the Commissioner by the 24th July.
- 3.5 The Commissioner will analyse the Councils response and decide whether or not to revise the notice. The finalised compliance notice will be issued by the end of September 2015 and implementation of individual standards will be required within 6 months, 12 months or 2 years depending on the timescales indicated in the notices.
- 3.6 The Welsh Language Cabinet Steering Group also agreed that in addition to the response, the Chair (and in his role as Welsh Language Champion) would also make representation to the Welsh Government, advising of the Councils commitments to fulfil the Welsh Language standards required, but also to press the extent of the challenges facing local authorities in meeting the standards in conjunction with the ambitious timescales and that further funding from Welsh Government would assist in its implementation.
- 3.7 The Welsh Language Cabinet Steering Group terms of reference, as directed under the Leader's Scheme of Delegation, is to provide strategic direction and support in respect of the Welsh Language within the Council. The group's recommendations to take forward the attached draft response will therefore need to be endorsed by the Cabinet.

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL
REPORT OF THE DIRECTOR OF EDUCATION AND LIFELONG LEARNING

**WELSH LANGUAGE STATUTORY STANDARDS: DRAFT COMPLIANCE
NOTICE: Section 47 WELSH LANGUAGE (WALES) MEASURE 2011**

Authors: Wendy Edwards, Head of Community Learning
Steffan Gealy, Head of Welsh Language Services Unit

1. Purpose of the Report

The purpose of the report is to:

- 1.1 Inform the Welsh Language Cabinet Steering Group of the content of the Draft Compliance Notice issued by the Welsh Language Commissioner on 22nd June 2015;
- 1.2 Provide Members with information regarding the potential impact of the standards as outlined in the Draft Compliance Notice on the Council
- 1.3 Gain approval for the proposed Council response to the Draft Compliance Notice.

2. Recommendations

It is recommended that the Welsh Language Cabinet Steering Group:

- 2.1 Note the content of the report;
- 2.2 Consider and comment on the information provided;
- 2.3 Approve the response to the Welsh Language Commissioner as outlined in Appendix 3

3. Background

- 3.1 The Welsh Language (Wales) Measure 2011 creates a system for setting duties on organisations in the form of Welsh Language Standards. These duties apply to delivering services in Welsh, considering the impact of policy decisions on the Welsh language and promotion of the Welsh language.

- 3.2 Exercising Welsh language duties is not a new development as all local authorities have been implementing Welsh Language Schemes that were established in 1993 by the Welsh Language Act.
- 3.3 The aim of the Welsh Language Standards is to build on the work of the language schemes by ensuring consistency for individuals in terms of access to Welsh-medium services across Wales and clarity as to what individuals can expect to receive in Welsh.
- 3.4 There are 176 standards included in the Welsh Language Standards Regulations (No.1) 2015 that were approved on 24th March 2014. These came into force on 31st March 2015.
- 3.5 The standards are categorised as follows:
- A **service delivery standard** will be a type of duty imposed to promote or facilitate the use of the Welsh language or to ensure that the Welsh language is treated no less favourably than English when persons that are subject to the standard deliver services to others, or when they deal with others in connection with the delivery of those services.
 - A **policy making standard** will be a type of duty which will require persons to consider the effect of their policy decisions upon opportunities for other persons to use the Welsh language, or upon treating the Welsh language no less favourably than English.
 - An **operational standard** will be a type of duty imposed to promote and facilitate the use of the Welsh language in relation to the carrying out by a person of their functions, business or other undertaking.
 - A **promotion standard** will be a type of duty imposed in respect of taking steps to promote and facilitate the use of the Welsh language more widely.
 - A **record keeping standard** will be a duty imposed in respect of keeping and maintaining details regarding compliance with the other four standards as well as any other complaints concerning the language.
- 3.6 On 22nd June 2015, Rhondda Cynon Taf County Borough Council received its Draft Compliance Notice and a covering letter from the Welsh Language Commissioner (Appendices 1 & 2) outlining:
- the specific standards the Council is required to comply with,
 - the timescale within which each standard must be implemented, and
 - the deadline by which the Council must respond with any concerns regarding the standards and/or timescales required.

- 3.7 The Compliance Notice is unique to each organisation and replaces the statutory Welsh Language Scheme. The draft notice specifies that the Council needs to start implementing the new Standards from September 2015.

4. Consultation Period

- 4.1 A consultation period of 4 weeks on the Draft Compliance Notice started on 22nd June 2015 and closed on 20th July 2015. Following a submission of a formal request, the Commissioner gave Rhondda Cynon Taf County Borough Council an additional 2 days so that the Welsh Language Cabinet Steering Group can consider its response to the Draft Compliance Notice. Accordingly a response is required from this Council by 24th July 2015.
- 4.2 The consultation on the Draft Compliance Notice is the final stage in a wide-ranging consultation and opinion gathering process. The Council is under no obligation to respond to the consultation if it is satisfied with the requirements of its Draft Compliance Notice. However the Council may challenge individual standards and/or the timescale for implementation of individual standards if it is believed that the standard or timescale is unreasonable or disproportionate.
- 4.3 In the first instance the challenge will be considered by the Welsh Language Commissioner, but any challenge other than on timescale (i.e. after receiving the final Compliance Notice) may be referred to a Welsh Language Tribunal for consideration and will require supporting evidence.
- 4.4 The Commissioner will analyse the response and decide whether or not to revise the Notice. The finalised Compliance Notice will be issued by the end of September 2015 and implementation of individual standards will be required within 6 months, 12 months or 2 years depending on the timescale indicated in the Notice.

5. Content of the Draft Compliance Notice

- 5.1 Under the Draft Compliance Notice issued on 22nd June 2015 Rhondda Cynon Taf Council is required to meet 168 of the 176 standards as follows:
- 143 standards within 6 months
 - An additional 23 to be complied with within 1 year
 - The final 2 to be complied with within 2 years

A full copy of the Draft Compliance Notice can be seen at Appendix 2.

- 5.2 It should be noted that a large number of the Standards included in the Draft Compliance Notice are currently included in the Council's Welsh

Language Scheme and these should have been embedded across services in recent years. However additional requirements have been introduced.

- 5.3 The effect of the statutory standards is that greater compliance will be required by **all** Council services. The legislation is designed to effect a cultural shift from reacting to requests for Welsh medium services to being proactive when offering services. Individuals now have language rights and Welsh cannot be treated less favourably than English.
- 5.4 This shift in emphasis and the introduction of new Standards over and above the requirements of the current Welsh Language Scheme will require substantial additional work and there will be resource implications for the Council.
- 5.5 In order to provide a corporate view of the Compliance Notice, a Strategic Group consisting of representatives from the following services met to assess the Standards and to identify whether they were achievable or not as required by the Compliance Notice:

- Education and Lifelong Learning
- IT and Customer Care,
- Human Resources,
- Cabinet Office and Public Relations
- Audit

The above services are regarded as those that are highly likely to be affected by the Standards while the presence of Audit was instructive as they have been involved in assessing compliance in respect of the Welsh Language across a range of services recently so have a broad perspective across the organisation.

- 5.6 A system of Red, Amber, Green was agreed as the basis of identifying whether each Standard was:
- currently being implemented within their service,
 - were capable of being implemented within a longer time frame, or
 - deemed to be disproportionate or unreasonable.

The proposed response to the Commissioner is based on these responses which crystallized areas of concern that were common across services.

6. Standards to be challenged as unreasonable or disproportionate

- 6.1 Standards **25, 28, 41, and 64** have been assessed as being disproportionate and unachievable. Standards relating to simultaneous translation (**24,24A, 27A, 27D, 32, 33, 74, 79, 114, 118, 139**) are also

considered to be unreasonable in respect of full compliance across all services.

- 6.2 **Standards 25 and 28** relating to well-being meetings being conducted in Welsh are arguably unreasonable and indeed potentially detrimental to service delivery in sensitive areas such as social services. While every effort is made to provide Welsh speaking staff to deal with issues relating to the well-being of individuals, the lack of suitably qualified Welsh – speaking personnel in sectors such as social work will make these Standards unachievable over the short to mid term. The Council already assesses posts to see whether the Welsh language is an essential prerequisite and will continue to do this so that capacity is increased over an extended period of time. The Council will provide Welsh medium well-being meetings whenever possible as is currently the case.
- 6.3 **Standard 41** requires Council agendas, minutes and other papers available to the public which relate to management board or cabinet meetings to be produced in Welsh. The Council currently provides the agendas of cabinet meetings in Welsh but there would be significant financial and procedural implication for the Council should there be a need to translate all of the other documents referred to in this Standard. Analysis of the word count of the publicly available documents relating to cabinet meetings which have taken place over the past year indicates that on the basis of a cost of £80 per 1,000 words translated, the Council would have had to budget for additional costs in excess of £120,000. There is no capacity in the Welsh Translation team to meet this level of demand for translation and with Council budgets being significantly reduced, it is deemed to be unreasonable to apply this standard at this time.
- 6.4 Every effort is currently made to ensure that customers who contact the Council are provided with a Welsh speaking option. However the Council cannot guarantee that every reception area has this option available throughout the year as required by **Standard 64**. Bearing in mind the linguistic profile of the county it is impossible to ensure that sufficient staff with Welsh language skills are available to cover all eventualities.
- 6.5 The Council currently purchases simultaneous translation services from other organisations when required for some public meetings and some meetings with staff. However it would not be possible to meet the obligations that relate to simultaneous translation as outlined in Standards **24,24A, 27A, 27D, 32, 33, 74, 79, 114, 118, 139** of the Compliance Notice for a number of reasons. Simultaneous translation is a very specialist skill which is not currently available within the Council. The cost of the service bought in at present is approximately £50 per hour and if required for a large number of meetings throughout the year this would be prohibitive at a time of reducing budgets. Finding suitably qualified personnel to deliver

this service would also be a challenge if all public sector organisations are required to meet these Standards.

7. Standards that require a longer timescale for implementation

- 7.1 Standards **44, 52, 70, 85, 86, 100 – 111** require a longer timescale for implementation.
- 7.2 Text-based Standards are achievable over time as practices become embedded and capacity is developed. **Standard 44** relates to policies, strategies, plans and consultation documents, a large number of which are already being translated. However to ensure full compliance an extension to 2 years would be more realistic than the current 6 month target.
- 7.3 **Standard 52** relates to information on the Council website much of which is currently bilingual. However an extension to 2 years for implementation would enable the Council to ensure the new processes being introduced to secure a bilingual service will have sufficient time to be embedded.
- 7.4 **Standard 70** refers to the need to ensure that Welsh text is placed above any English text in all public notices or displays. In order to reduce the cost implication of this Standard the timescale for implementation needs to be extended to 2 years so that the relevant products can be addressed as and when they need to be replaced. We currently meet this standard in respect of new notices and displays but it will take time to replace all such products if a gradual approach is taken, for example, notices and displays are replaced only when they have been damaged or are due for renewal.
- 7.5 **Standards 85 and 86** refer to education courses being offered to the public (aged 18+) and impose a requirement that these courses must be offered in Welsh, the need for them in Welsh is assessed and those assessments published on the website. The adult community learning courses for 2015/16 have already been planned and brochures produced ready for distribution. Consequently an extension of 1 year is required to provide the Council with an opportunity to put the relevant procedures in place. In addition it would be useful if there was a definition of 'education courses' – do they for example refer to training courses for School Governors?
- 7.6 **Standards 100 to 111** relate to the publication of HR policies. There are currently around 100 such documents in place and it is suggested that the best approach to ensure compliance with these standards is to translate the documents as they are reviewed. It is suggested therefore that the

timescale for wholesale implementation of this standard is 2 years as opposed to the 6 months indicated in the Compliance Notice.

8. Other issues

- 8.1 There needs to be more clarity provided by the Commissioner in respect of the use of terms in the Standards, some of which can be interpreted differently and will have an impact on the extent of the work required to ensure the Standards are met. For example, there is lack of consistency in the use of terms such as 'reception,' 'reception services', and 'offices.' Council Officers have been liaising with the Commissioner's Office to seek clarification on a range of terms so that we are clear about expectations.

9. Potential Impact

- 9.1 There are financial implications for the Council in respect of the implementation of the Welsh Language Standards, the full extent of which cannot as yet be identified. However these are not insubstantial in some areas as outlined in the potential cost of translating cabinet papers above.
- 9.2 There are capacity issues for areas such as the Welsh Language Services team as it is envisaged that the workload on translators will increase significantly. In addition the need for awareness-raising across the Council to ensure effective implementation of **Standards 1,11, 19, 20, 25*, 27, 27A, 27D, 28*, 63, 69, 70,99, 132, 141, 142** will require additional support for the Welsh Language Development Officer. (* if these two standards are not revoked). There are also resource and capacity implications for the Cabinet Office and Public Relations in respect of **Standard 58** which relates to social media.
- 9.3 There will be an increased responsibility to ensure that switchboards and reception areas (including Help-lines) that deal with the public offer a bilingual service and a comprehensive sign-posting service to Welsh-medium services. Specific staff training will be required for staff working in these areas to ensure they adopt the correct approach.
- 9.4 Welsh language training must be offered under the new standards where service delivery requires it. Accordingly, additional resources will need to be considered to up-skill staff. Improving the linguistic skills of existing staff will be, in the longer term, more cost effective for the Council and leave it less exposed to any potential civil penalties.
- 9.5 All Council services will be affected to some extent. It is not possible at present to identify to what extent areas will be affected.

10. Conclusion

- 10.1 The Council has a good track record of implementing its Welsh language Scheme and providing opportunities for residents to access services through the medium of Welsh. Nevertheless implementation of the Compliance Notice as it stands will pose a significant challenge.
 - 10.2 It is important that the Standards that have been identified as being unreasonable and/or disproportionate are challenged appropriately while those that can be implemented are adopted and relevant plans prepared to ensure they comply with the legislation.
 - 10.3 It is hoped that the Commissioner will realise the extent of the challenge facing local authorities at present and consider the evidence being presented to her within the context of the current financial climate so that she feels able to extend timescales where appropriate and revoke the standards which have been assessed by the Strategic group as being disproportionate and/or unreasonable.
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Appendices to be included with report to the Welsh Language Cabinet Steering Group

Appendix 1: Letter from Welsh Language Commissioner

Appendix 2: Compliance Notice outlining standards to be achieved and their timescale

Appendix 3: Proposed Council response to the Compliance Notice

APPENDIX 1



Swyddog Iaith Gymraeg
Cyngor Bwrdeistref Sirol Rhondda Cynon Taf
Y Pafiliynau
Parc Hen Lofa'r Cambrian
Cwm Clydach
Tonypandy
CF40 2XX

26/06/2015

Annwyl Caroline Murphy,

**Safonau'r Gymraeg – ymgynghoriad ar eich hysbysiad cydymffurfio [Adran 47
Mesur y Gymraeg (Cymru) 2011]**

Ymhellach i'r llythyr ar 22 Mehefin 2015 yn cyflwyno hysbysiad cydymffurfio i Gyngor Bwrdeistref Sirol Rhondda Cynon Taf ar gyfer ymgynghoriad, ysgrifennaf i'ch hysbysu fod y gwallau canlynol yn yr hysbysiad a anfonwyd atoch.

Roedd safonau 118; 154 a 159 wedi eu hepgor mewn camgymeriad o'r hysbysiad gwreiddiol.

Mae hysbysiad cydymffurfio diwygiedig wedi ei lunio i adlewyrchu hyn. Amgaeaf yr hysbysiad gyda'r llythyr hwn.

Os oes gennych unrhyw gwestiynau yn ystod cyfnod yr ymgynghoriad, mae croeso i chi gysylltu â'm swyddogion ar 0845 60 33 221 neu drwy ymchwiliad.safonau@comisiynyddygyymraeg.org.

Yn gywir

Dyfan Sion
ar ran Comisiynydd y Gymraeg

Comisiynydd y Gymraeg
Siambrau'r Farchnad
5-7 Heol Eglwys Fair
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Correspondence welcomed in Welsh and English

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Welsh Language Officer
Rhondda Cynon Taf County Borough Council
Y Pafiliynau
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26/06/2015

Dear Caroline Murphy

Welsh Language Standards – consultation on compliance notice [Section 47 Welsh Language (Wales) Measure 2011]

Further to the letter of 22 June 2015 issuing Rhondda Cynon Taf County Borough Council with a compliance notice for consultation, I write to inform you of the following errors in the notice that was sent to you.

Standards 118; 154; and 159 were mistakenly omitted from the original notice.

A revised compliance notice has been drawn up to reflect this. I enclose the notice with this letter.

If you have any questions during the consultation period, you are welcome to contact my officers on 0845 60 33 221 or at <mailto:standards.investigation@welshlanguagecommissioner.org>.

Yours sincerely

Dyfan Sion
on behalf of the Welsh Language Commissioner

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APPENDIX 2



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

COMPLIANCE NOTICE – SECTION 47 WELSH LANGUAGE (WALES) MEASURE 2011

Rhondda Cynon Taf County Borough Council – Issue Date:

Standards required to comply with within 6 months.

Standard Number	Class of Standard	Standard
1	Service Delivery	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.
4	Service Delivery	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.
5	Service Delivery	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.
6	Service Delivery	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).

7	Service Delivery	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.
8	Service Delivery	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.
9	Service Delivery	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.
11	Service Delivery	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.
12	Service Delivery	When you advertise telephone numbers, helpline numbers or call centre services, you must not treat the Welsh language less favourably than the English language.
13	Service Delivery	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.
14	Service Delivery	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.
15	Service Delivery	If you have performance indicators for dealing with telephone calls, you must ensure that those performance indicators do not treat telephone calls made in Welsh any less favourably than

		calls made in English.
16	Service Delivery	Your main telephone call answering service (or services) must inform persons calling, in Welsh, that they can leave a message in Welsh.
17	Service Delivery	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.
19	Service Delivery	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.
20	Service Delivery	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.
22	Service Delivery	Any automated telephone systems that you have must provide the complete automated service in Welsh.
24	Service Delivery	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.
24A	Service Delivery	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).
25	Service Delivery	If you invite an individual ("A") to a meeting, and the meeting relates to the well-being of A, you must - (a) ask A whether A wishes for the meeting to be conducted in Welsh, and (b) if A informs you that A wishes for the meeting to be conducted in Welsh, conduct the meeting in Welsh (without the assistance of a simultaneous or consecutive translation service).
27	Service Delivery	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.
27A	Service Delivery	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.
27D	Service Delivery	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).
28	Service Delivery	If you invite more than one person to a meeting, and that meeting relates to the well-being of one or more of the individuals invited, you must - (a) ask that individual or each of those individuals whether he or she wishes for the meeting to be conducted in Welsh, and (b) if that individual, or if each of those individuals, informs you that he or she wishes for the meeting to be conducted in Welsh, conduct the meeting in Welsh (without the assistance of a

		simultaneous or consecutive translation service).
30	Service Delivery	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.
31	Service Delivery	When you send invitations to a meeting that you arrange which is open to the public, you must send the invitations in Welsh.
32	Service Delivery	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).
33	Service Delivery	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.
34	Service Delivery	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.
35	Service Delivery	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).

36	Service Delivery	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).
37	Service Delivery	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.
38	Service Delivery	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.
42	Service Delivery	Any licence or certificate you produce must be produced in Welsh.
43	Service Delivery	Any brochure, leaflet, pamphlet or card that you produce in order to provide information to the public must be produced in Welsh.
44	Service Delivery	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.
45	Service Delivery	Any rules that you publish that apply to the public must be published in Welsh.
46	Service Delivery	When you issue any statement to the press you must issue it in Welsh and, if there is a Welsh language version and an English language version of a statement, you must issue both versions at the same time.
48	Service Delivery	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.

49	Service Delivery	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.
50	Service Delivery	Any form that you produce for public use must be produced in Welsh.
50A	Service Delivery	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.
50B	Service Delivery	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).
52	Service Delivery	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.
55	Service Delivery	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.
56	Service Delivery	You must provide the interface and menus on every page of your website in Welsh.
57	Service Delivery	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.

58	Service Delivery	When you use social media you must not treat the Welsh language less favourably than the English language.
59	Service Delivery	If a person contacts you by social media in Welsh, you must reply in Welsh (if an answer is required).
60	Service Delivery	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.
61	Service Delivery	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.
62	Service Delivery	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.
63	Service Delivery	You must ensure that the Welsh language text on signs is accurate in terms of meaning and expression.
64	Service Delivery	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.
67	Service Delivery	You must display a sign in your reception which states (in Welsh) that persons are welcome to use the Welsh language at the reception.

68	Service Delivery	You must ensure that staff at the reception who are able to provide a Welsh language reception service wear a badge to convey that.
69	Service Delivery	Any official notice that you publish or display must be published or displayed in Welsh, and you must not treat any Welsh language version of a notice less favourably than an English language version.
70	Service Delivery	When you publish or display an official notice that contains Welsh language text as well as English language text, the Welsh language text must be positioned so that it is likely to be read first.
71	Service Delivery	Any documents that you publish which relate to applications for a grant, must be published in Welsh, and you must not treat a Welsh language version of such documents less favourably than an English language version.
72	Service Delivery	When you invite applications for a grant, you must state in the invitation that applications may be submitted in Welsh and that any application submitted in Welsh will be treated no less favourably than an application submitted in English.
72A	Service Delivery	You must not treat applications for a grant submitted in Welsh less favourably than applications submitted in English (including, amongst other matters, in relation to the closing date for receiving applications and in relation to the time-scale for informing applicants of decisions).
74	Service Delivery	If you receive an application for a grant in Welsh and it is necessary to interview the applicant as part of your assessment of the application you must - (a) offer to provide a translation service from Welsh to English to enable the applicant to use the Welsh language at the interview, and (b) if the applicant wishes to use the Welsh language at the interview, provide a simultaneous translation service for that purpose (unless you conduct the interview in Welsh without a translation service).

75	Service Delivery	When you inform an applicant of your decision in relation to an application for a grant, you must do so in Welsh if the application was submitted in Welsh.
76	Service Delivery	Any invitations to tender for a contract that you publish must be published in Welsh, and you must not treat a Welsh language version of any invitation less favourably than an English language version.
77	Service Delivery	When you publish invitations to tender for a contract, you must state in the invitation that tenders may be submitted in Welsh, and that a tender submitted in Welsh will be treated no less favourably than a tender submitted in English.
77A	Service Delivery	You must not treat a tender for a contract submitted in Welsh less favourably than a tender submitted in English (including, amongst other matters, in relation to the closing date for receiving tenders, and in relation to the time-scale for informing tenderers of decisions).
79	Service Delivery	If you receive a tender in Welsh and it is necessary to interview the tenderer as part of your assessment of the tender you must - (a) offer to provide a translation service from Welsh to English to enable the tenderer to use the Welsh language at the interview, and (b) if the tenderer wishes to use the Welsh language at the interview, provide a simultaneous translation service for that purpose (unless you conduct the interview in Welsh without a translation service).
80	Service Delivery	When you inform a tenderer of your decision in relation to a tender, you must do so in Welsh if the tender was submitted in Welsh.
81	Service Delivery	You must promote any Welsh language service that you provide, and advertise that service in Welsh.
82	Service Delivery	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.
83	Service Delivery	When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.
85	Service Delivery	If you offer an education course that is open to the public and which is aimed specifically at persons aged 18 or under, you must offer it in Welsh.
86	Service Delivery	If you develop an education course that is to be offered to the public, you must assess the need for that course to be offered in Welsh; and you must ensure that the assessment is published on your website.
87	Service Delivery	When you announce a message over a public address system, you must make that announcement in Welsh and, if the announcement is made in Welsh and in English, the announcement must be made in Welsh first.
88	Policy Making	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.
89	Policy Making	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.
90	Policy Making	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.
91	Policy Making	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.
92	Policy Making	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.
93	Policy Making	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.
94	Policy Making	You must produce and publish a policy on awarding grants (or, where appropriate, amend an existing policy) which requires you to take the following matters into account when you make decisions in relation to the awarding of a grant - (a) what effects, if any (and whether positive or negative), the awarding of a grant would have on - (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh language no less favourably than the English language; (b) how the decision could be taken or implemented (for example, by imposing conditions of grant) so that it would have positive effects, or increased positive effects, on - (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh language no less favourably

		<p>than the English language;(c) how the decision could be taken or implemented (for example, by imposing conditions of grant) so that it would not have adverse effects, or so that it would have decreased adverse effects on -</p> <p>(i) opportunities for persons to use the Welsh language, and ii) treating the Welsh language no less favourably than the English language; (ch)whether you need to ask the applicant for any additional information in order to assist you in assessing the effects of awarding a grant on</p> <p>- (i) opportunities for persons to use the Welsh language, and</p> <p>(ii) treating the Welsh language no less favourably than the English language.</p>
95	Policy Making	<p>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.</p>
96	Policy Making	<p>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.</p>
97	Policy Making	<p>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.</p>
98	Operational	<p>You must develop a policy on using Welsh internally for the purpose of promoting and facilitating the use of the language, and you must publish that policy on your intranet.</p>

99	Operational	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.
112	Operational	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.
112A	Operational	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.
114	Operational	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).
115	Operational	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.
116	Operational	You must allow all members of staff to respond in Welsh to allegations made against them in any internal disciplinary process.

116A	Operational	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.
118	Operational	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).
119	Operational	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.
120	Operational	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).
122	Operational	You must ensure that - (a) the text of the homepage of your intranet is available in Welsh, (b) any Welsh language text on your intranet's homepage (or, where relevant, your Welsh language intranet homepage) is fully functional, and (c) the Welsh language is treated no less favourably than the English language in relation to the homepage of your intranet.
124	Operational	If you have a Welsh language page on your intranet that corresponds to an English language page, you must state clearly on the English language page that the page is also available in Welsh, and must provide a direct link to the Welsh language page on the corresponding

		English language page.
125	Operational	You must designate and maintain a page (or pages) on your intranet which provides services and support material to promote the Welsh language and to assist your staff to use the Welsh language.
127	Operational	You must assess the Welsh languages skills of your employees.
130	Operational	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.
131	Operational	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.
132	Operational	You must provide training courses so that your employees can develop - (a) awareness of the Welsh language (including awareness of its history and its role in Welsh culture);(b) an understanding of the duty to operate in accordance with the Welsh language standards;(c) an understanding of how the Welsh language can be used in the workplace.
133	Operational	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.
134	Operational	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.
135	Operational	You must provide wording for your employees which will enable them to include a Welsh language version of their contact details in email messages, and to provide a Welsh language version of any message which informs others that they are unavailable to respond to e-mail

		messages.
136	Operational	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.
136A	Operational	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.
137	Operational	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.
137A	Operational	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.
137B	Operational	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).
139	Operational	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).
140	Operational	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.
141	Operational	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.
142	Operational	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.
143	Operational	You must ensure that the Welsh language text on signs displayed in your workplace is accurate in terms of meaning and expression.
144	Operational	When you make announcements in the workplace using audio equipment, that announcement must be made in Welsh, and if the announcement is made in Welsh and in English, the announcement must be made in Welsh first.
147	Record Keeping	You must keep a record, in relation to each financial year, of the number of complaints you receive relating to your compliance with standards.
148	Record Keeping	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.
149	Record Keeping	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).
150	Record Keeping	You must keep a record of the steps that you have taken in order to ensure compliance with the policy making standards with which you are under a duty to comply.
151	Record Keeping	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.
153	Record Keeping	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.
154	Record Keeping	You must keep a record, in relation to each financial year of the number of new and vacant posts which were categorised (in accordance with standard 136) as posts where - (a) Welsh language skills are essential; (b) Welsh language skills need to be learnt when appointed to the post; (c) Welsh language skills are desirable; or (ch) Welsh language skills are not necessary.
155	Supplementary Service Delivery	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.
156	Supplementary	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

	Service Delivery	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.
157	Supplementary Service Delivery	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.
158	Supplementary Service Delivery	(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.
159	Supplementary Service Delivery	You must publish a document on your website which explains how you intend to comply with the service delivery standards with which you are under a duty to comply
160	Supplementary Service Delivery	You must provide any information requested by the Welsh Language Commissioner which relates to your compliance with the service delivery standards with which you are under a duty to comply.

161	Supplementary Policy Making	You must ensure that a document which records the policy making 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.
162	Supplementary Policy Making	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 policy making 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.
163	Supplementary Policy Making	You must - (a) ensure that you have arrangements for overseeing the way you comply with the policy making standards with which you are under a duty to comply, (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.
164	Supplementary Policy Making	(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 policy making standards with which you were under a duty to comply during that year. (2) The annual report must include the number of complaints you received during the year which related to your compliance with the policy making 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.
165	Supplementary Policy Making	You must publish a document on your website which explains how you intend to comply with the policy making standards with which you are under a duty to comply.

166	Supplementary Policy Making	You must provide any information requested by the Welsh Language Commissioner which relates to compliance with the policy making standards with which you are under a duty to comply.
167	Supplementary Operational	You must ensure that a document which records the operational 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.
168	Supplementary Operational	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 operational 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, and (b) publish a document that records that procedure on your intranet.
169	Supplementary Operational	You must - (a) ensure that you have arrangements for - (i) overseeing the way you comply with the operational standards with which you are under a duty to comply, (ii) promoting the services that you offer in accordance with those standards, and (iii) facilitate the use of those services, and (b) publish document that records that procedure on your intranet.
170	Supplementary Operational	(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. (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

		<p>number of staff attending the course who attended the Welsh version (on the basis of the records you kept in accordance with standard 152);(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.</p>
171	Supplementary Operational	You must publish a document on your website which explains how you intend to comply with the operational standards with which you are under a duty to comply.
172	Supplementary Operational	You must provide any information requested by the Welsh Language Commissioner which relates to compliance with which you are under a duty to comply.
175	Supplementary Record Keeping	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.
176	Supplementary Record Keeping	You must provide any records you kept in accordance with the record keeping standards with which you are under a duty to comply to the Welsh Language Commissioner, if the Commissioner asks for those records.

Standards required to comply with within a year.

Standard Number	Class of Standard	Standard
2	Service Delivery	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.
3	Service Delivery	When you send correspondence addressed to two individuals who are members of the same household (for example, the parents of a child) for the first time, you must ask them whether they wish to receive correspondence from you in Welsh; and if - (a) both individuals respond to say that they wish to receive correspondence in Welsh, you must keep a record of that wish and correspond in Welsh from then onwards when sending correspondence addressed to both of those individuals; (b) one (but not both) of the individuals responds to say that he or she wishes to receive correspondence in Welsh, you must keep a record of that wish and provide a Welsh language version of correspondence from then onwards when sending correspondence addressed to both of those individuals.
21	Service Delivery	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.
41	Service Delivery	If you produce the following documents you must produce them in Welsh— (a) agendas, minutes and other papers that are available to the public, which relate to management board or cabinet meetings; (b) agendas, minutes and other papers for meetings, conferences or

		seminars that are open to the public.
51	Service Delivery	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 must ensure that the information that you pre-enter is in Welsh.
100	Operational	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.
101	Operational	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.
102	Operational	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.
103	Operational	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.
104	Operational	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.
105	Operational	If you publish a policy relating to behaviour in the workplace, you must publish it in Welsh.

106	Operational	If you publish a policy relating to health and well-being at work, you must publish it in Welsh.
107	Operational	If you publish a policy relating to salaries or workplace benefits, you must publish it in Welsh.
108	Operational	If you publish a policy relating to performance management, you must publish it in Welsh.
109	Operational	If you publish a policy about absence from work, you must publish it in Welsh.
110	Operational	If you publish a policy relating to working conditions, you must publish it in Welsh.
111	Operational	If you publish a policy regarding work patterns, you must publish it in Welsh.
128	Operational	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.
145	Promotion	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).
146	Promotion	Five years after publishing a strategy in accordance with standard 145 you must - (a) assess to what extent you have followed that strategy and have reached the target set by it, and (b) publish that assessment on your website, ensuring that it contains the following information (i) the number of Welsh speakers in your area, and the age of those speakers; (ii) a

		list of the activities that you have arranged or funded during the previous 5 years in order to promote the use of the Welsh language.
152	Record Keeping	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.
173	Supplementary Promotion	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.
174	Supplementary Promotion	You must provide any information requested by the Welsh Language Commissioner which relates to compliance with the promotion standards with which you are under a duty to comply.

Standards required to comply with within 2 years.

Standard Number	Class of Standard	Standard
126	Operational	You must provide the interface and menus on your intranet pages in Welsh.

129	Operational	You must provide training (in Welsh) on using Welsh effectively in (a) meetings; (b) interviews; and (c) complaints and disciplinary procedures.
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Meri Huws

Meri Huws
Welsh Language Commissioner

Date: 22/06/2015

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APPENDIX 3

Section 47 Welsh Language (Wales) 2011 Consultation Response Form

Consultation closing date: 20 July 2015

Please note that the failure of a person to participate in a consultation does not prevent the Commissioner from giving the person a compliance notice. Section 56(4) of the Measure notes that it is the relevant person's responsibility to set out reasons why they consider the requirement to comply with a standard, or to comply with it in a particular respect, is unreasonable or disproportionate.

Note the standards included within this Compliance Notice (if any) which you consider to be unreasonable and / or disproportionate. Where appropriate, you should note whether varying a requirement (see examples below) to comply with a standard would make it reasonable and/or proportionate? In the same manner, you should note if there are any other accompanying standards relating to the same activity or issue which you consider to be reasonable and/or proportionate.

Standard Number	Supporting reasons or evidence	Would varying a requirement to comply with a standard make it reasonable and/or proportionate? For example introducing the requirement at different times, in different circumstances or in different areas. You should note what these are, noting all supporting reasons and evidence you consider relevant	Are there any other accompanying standards relating to the same activity or issue which you consider to be reasonable and/or proportionate? Please note the standard number and reasons / evidence
5	<p>Although this standard is rigorously applied in a significant number of departments at present, there are areas of inconsistency which need to be addressed.</p> <p>These emanate in part from the large number of changes that have occurred within Council structures and among Council personnel over</p>	<p>It is anticipated that additional time would be required to embed this across all service areas within the Council. Therefore an extension from 6 months to 1 year is requested.</p>	

	<p>the past year so that more awareness raising is required to be undertaken in areas that have seen the largest changes in order to ensure that new managers are fully aware of their responsibilities.</p>		
<p>25 and 28</p>	<p>There are insufficient numbers of bilingual specialist staff (e.g. social workers) available within the Council or indeed across the wider local authority partnership in South East Wales to ensure that these standards can be implemented consistently across all service areas.</p> <p>Despite having a robust Linguistic Skills Framework, recruitment of Welsh speaking staff into roles in these sectors, remains insufficient. It should be noted that there is a nation-wide shortage of social workers and associated professionals making the recruitment of suitable numbers of Welsh speakers even more challenging.</p> <p>The nature of the well-being meetings that occur often require rapid intervention to protect vulnerable individuals and their families. In such instances it is unreasonable to place an additional burden on the local authority in respect of ensuring that meetings</p>	<p>Currently there are 11,000 service users who have accessed the Rhondda Cynon Taf Council social care system in the last year (2014/15) of which 83 are Welsh speakers, this equates to less than 1%. This figure may be understated as the question regarding service delivery in Welsh may not have been proactively offered.</p> <p>We currently have 120 staff in the social care service area who have chosen to declare that they are Welsh speakers. However, we cannot guarantee on every occasion that bilingual staff with the appropriate social care qualifications and specialist skills will be able to meet the needs of Welsh speaking clients.</p> <p>It is requested that this standard be reduced to one whereby provision of a translator is provided at well-being meetings where a service users wants to speak in Welsh as this is a more achievable and proportionate requirement for a county with the linguistic profile of Rhondda Cynon Taf.</p> <p>Alternatively there could be a reasonable adjustment whereby a family member or close friend could act as advocate or translator as long as this is with the consent of the individual and respects the confidentiality of the vulnerable person.</p>	

	<p>can occur in Welsh without the presence of a translator. This could cause a delay in providing vital services for vulnerable service users which is a statutory duty placed on the Council by government and which is often governed by restrictive timescales.</p>		
44	<p>Many of the documents outlined in this Standard are currently translated. However, the anticipated additional workload of ensuring that this Standard is met (along with other standards identified in the Draft Compliance Notice) makes the timescale insupportable.</p>	<p>An extension from 6 months to 2 years is requested on the basis that a gradual approach will be easier to manage both in terms of cost and staff capacity, for example as and when policies are reviewed.</p> <p>It is also likely that there will be far fewer consultation documents and plans to be translated as time passes and non-statutory local authority services are significantly reduced or stopped.</p>	
52	<p>The Council has worked diligently to ensure that suitable processes are in place to provide a swift response to translating and uploading of pages onto the corporate website.</p> <p>However there remain challenges due to the swift turnaround required if Welsh is to be treated no less favourably than English on the website.</p> <p>One of the biggest challenges at present is ensuring that both</p>	<p>Extending the time frame to two years would give more opportunity for exercising a stepped approach to full compliance.</p>	

	<p>languages are uploaded simultaneously and that there is sufficient staff capacity focussed on this area that is developing rapidly.</p>		
64	<p>Whereas all customer facing staff are aware of their duties in relation to meeting and greeting bilingually, it would not be possible to provide a fully Welsh speaking service at all libraries and leisure centres due to the lack of Welsh-speaking personnel currently employed by the Council. By April 2015 11% of Council staff were registered as Welsh speaking with higher levels in areas such as Education compensating for much lower levels in some other departments such as HR.</p> <p>Reception services provided at the One4All Centres do not currently fully comply with this standard. Appointments booked where Welsh language needs are identified beforehand are fully supported in terms of advice but it is not possible to ensure that every drop-in can be dealt with in Welsh and there may not always be sufficient Welsh speakers to cover for holidays and sickness.</p> <p>The Council is fully aware of the</p>	<p>Currently very few staff have sufficient language skills for us to comply fully with this standard. The Council will continue to assess posts to identify those where Welsh is regarded as essential when posts become vacant, and to up-skill current employees in order to move towards a more sustainable Welsh service provision over time.</p>	

	<p>need to ensure sufficient numbers of Welsh speakers are available in key customer-facing areas and have processes in place to identify these needs. However as the numbers of Council staff are reducing and very little recruitment currently takes place, the emphasis is on training staff who have identified an interest in learning Welsh. This is seen as a more cost effective response to this standard but it is a longer term solution (albeit a sustainable one).</p> <p>Bearing in mind the above it is submitted that it is unreasonable to expect the Council to achieve this standard within any of the timescales available under the Draft Compliance Notice.</p>		
70	<p>Official notices encompasses a broad range of products, and it is submitted that it would be unreasonable in a local authority areas as large as Rhondda Cynon Taf, to require this standard to be implemented within 6 months.</p>	<p>A timescale of 2 years is requested in order to ensure full compliance and also to reduce unnecessary cost of replacing notices that continue to be in good repair.</p>	
<p>Any and all standards which allude to the use of Simultaneous Translation including:</p>	<p>Simultaneous translation is a specialist skill that is not available among Council staff at the present time and the service, when required, is purchased from private sector organisations that charge approximately £50 per hour.</p>	<p>Complying with these standards is felt to be too challenging for the foreseeable future due to the cost implication and also the lack of suitably qualified personnel to deliver the service.</p> <p>The Council will continue however to provide this facility in specific situations whenever it is able to do so and where it is assessed that</p>	

<p>Individual / Group Meetings 24, 24A, 27A, 27D</p> <p>Public Meetings: 32, 33</p> <p>Interviews: 74, 79</p> <p>HR Staff: 114, 118, 139</p>	<p>It is anticipated that as there are few qualified and experienced personnel to deliver this service across Wales, that there is a strong likelihood that the current cost per hour will increase as demand outstrips supply as all public sector organisations compete for the small number of simultaneous translators available. It is already difficult to engage this service at short notice. This can only worsen if these Standards are implemented.</p> <p>The Standards require this provision to be available far more widely than is currently the case and it is not possible to accurately assess the number of meetings and other situations where the service would be required under the Draft Compliance Notice.</p> <p>It is submitted that binding the Council to Standards that will require additional expenditure at a time when services to the community are being reduced is unreasonable in this instance and will do little to promote the use of Welsh within the county.</p>	<p>there is a value to doing so, for example, where a majority of members at a meeting have expressed a desire to speak in Welsh or in cases that relate to well-being of staff or members of the community is under discussion (as is currently the case).</p>	
<p>85, 86</p>	<p>Education courses for the post 18 sector are delivered by the Adult Community Learning Partnership led by the local authority. The Rhondda Cynon Taf partnership delivers a</p>	<p>An extension to the compliance notice (from six months to one year) would be required so that adult community courses in 2016/17 can be assessed for delivery in Welsh as required under these Standards and the assessments</p>	

	<p>variety of Welsh-medium courses to residents. However, these new standards cannot be implemented during the current academic year as courses (to begin September 2015) are already timetabled and have been included in a brochure that has already been published.</p> <p>It will not be possible therefore to reconsider the options currently on offer to the public.</p> <p>In addition it would be helpful if clarification could be provided of whether this standard would apply to other provision offered by the local authority including Governor Training.</p>	<p>then placed on the website.</p>	
100-111	<p>There are currently a large quantity of policies, procedures and supplementary documents in HR (in the region of 100). The financial implications of meeting the standard within the identified time frame would be prohibitive as the internal translation team do not have the capacity to undertake this work within such a limited time. Outsourcing the work to the private sector would place a financial burden on the Council that it would be unable to sustain in the current climate.</p>	<p>An extension to two years is requested to reflect the expected workload and taking into account the capacity of the Translation Team and Council priorities for promoting the Welsh language across the county. Policies may be translated on review as suggested for Standard 44.</p>	

	<p>It is suggested that these standards could be achieved in a more cost effective way if the policies are translated when they are reviewed/amended. This would reduce the burden on staff as the work would be spread out over a longer period of time. It is also submitted that the timescale is disproportionate considering the fact that only 11% of the staff are Welsh speakers. As the resident population has 12.9% Welsh speakers it is argued that focussing limited translation resources on public facing documents and communications will be more valuable in the longer term and have a wider impact in respect of promoting the Welsh language in the county.</p>		
<p>Standards (within 1 year)</p>			
41	<p>This standard is unreasonable and unachievable. The Council currently provides the agendas of cabinet meetings in Welsh but there would be significant financial and procedural implication for the Council should there be a need to translate all of the other documents referred to in this Standard. Analysis of the word count of the publicly available documents relating to cabinet meetings which have taken place over the past year indicates that on the basis of a cost</p>	<p>There are considerable challenges posed by this standard and it will be impossible to meet these challenges both in respect of funding, staffing capacity and structural procedures. It is therefore suggested that this Standard should be deleted from the Draft Compliance Notice.</p> <p>The Council will continue to translate Council agendas and will commit to translating documentation that has a specifically Welsh interest such as the documents produced for the cabinet's Welsh Language Steering Group (as is currently the case).</p>	

	<p>of £80 per 1,000 words translated, the Council would have had to budget for additional costs in excess of £120,000 per annum. There is no capacity in the Welsh Translation team to meet this level of demand for translation and with Council budgets being significantly reduced, it is deemed to be unreasonable to apply this standard at this time.</p> <p>.</p>		
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Pease return this form to standards.investigation@welshlanguagecommissioner.org.