Telephone Services Verification surveys: Health Sector (No. 7 Regulations)

Cynnwys

1 Introduction

1.1 This year, we have reviewed our arrangements for monitoring and regulating the compliance of public organisations with their language duties, to ensure that they are in line with the goals of the Strategic Plan and the Regulatory Outcomes published in 2024-2025.

1.2 We were keen to develop monitoring and promotion methods that would give us more certainty about organisations' compliance. It was decided to plan verification surveys to be carried out on a quarterly basis, with results being reported back to the individual organisations within the same quarter.

1.3 One of the key benefits of this method of monitoring is that organisations are notified of any compliance issues in a timely manner throughout the year, giving them the opportunity to implement appropriate solutions promptly.

1.4 We have decided to inspect the health sector's phone services during this quarter, as data from our monitoring work over the last four years shows that this is one of the areas that continues to perform generally weakly within the sector.

1.5 This report provides an overview of the findings of the verification surveys carried out with organisations in the Health sector which are subject to the Welsh Language Standards No.7 Regulations. The report also presents recommendations to consider in order to ensure better compliance within your organisation.

1.6 Following the publication of the report and sharing the findings with the organisations individually, an organisation will be expected to report to us in three months, indicating the steps that have been put in place to respond to these recommendations.

1.7 This is an area that the Commissioner has drawn attention to in the past, and therefore it is a matter of concern should the failures continue. Depending on the organisations' response to these recommendations, the Commissioner may consider opening an investigation into the compliance of any organisations that continue to fail to comply.

2 Methodology

2.1 The 11 institutions that are subject to the Welsh Language Standards No. 7 Regulations ("No. 7 Regulations") were inspected during the months of October and November 2025.

2.2 The No. 7 Regulations contain a range of standards relating to telephone services, namely standards 8-20. These cover different types of calls, including calls to main telephone lines, calls to helplines or call centres, and calls to department direct numbers.

2.3 These surveys specifically focused on compliance with standards 8, 9, 10 and 20, which are the standards relating to calls to main telephone lines.

2.4 **Standard 8** states:

'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.'

2.5 **Standard 9** states:

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.

2.6 **Standard 10** states:

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 subject matter; and

(b) no Welsh speaking member of staff is available to provide a service on that specific subject matter.

2.7 **Standard 20** states:

'Any automated telephone system that you have must provide the complete automated service in Welsh.'

2.8 The nature of the telephone enquiries varied, including questions about ward visiting hours, hospital parking rules, and how to book appointments for specific services.

2.9 When carrying out the survey, the following main issues were checked:

- was there a Welsh greeting at the start of the call
- was the call dealt with in Welsh
- was there an automated telephone system providing the entire service in Welsh.

2.10 Three phone calls were made to the main phone line of three different hospitals or services in each organisation, resulting in a total of 33 calls across all the organisations inspected.

3 Findings and Trends

Standard 8

3.1 Compliance with standard 8 varied across the sector. When assessing compliance, two elements were considered: the initial greeting in any automated machine message, and any subsequent greeting after the caller has contacted a member of staff. However, in accordance with the Code of Practice for the No. 7 Regulations, only the first greeting is relevant for the purpose of compliance with standard 8.

'The requirements of this standard only apply to the first greeting made during the call. The language used for the rest of the call (including any subsequent greeting) will depend on the extent to which the person wishes the body to deal with him in Welsh or not, in accordance with standard 10.'

Compliance with standard 8

12% Not compliant
88% Fully compliant
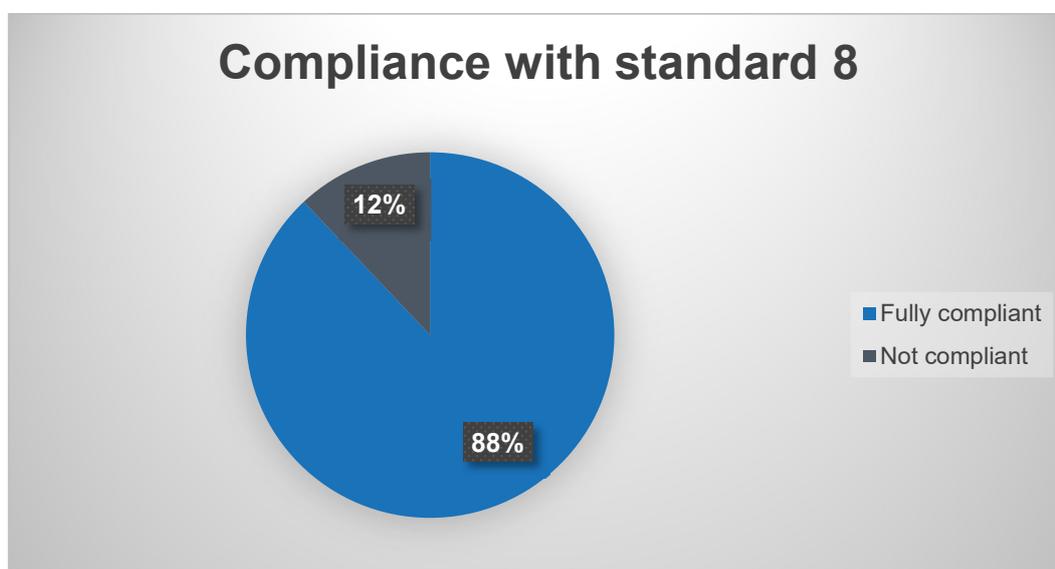
3.2 87.9% of the calls fully complied with the requirements of standard 8, as the first greeting was provided in Welsh. In the majority of cases, an automated machine message played which had been pre-recorded, and this message was bilingual—with the Welsh message usually being played first. In a small number of other cases, the call was answered by a member of staff, and that person immediately gave a Welsh greeting. The Code of Practice states:

A body may greet persons in Welsh via a pre-recorded message on an automated system or whereby a member of staff greets that person in Welsh when that member of staff answers the call.

3.3 In the majority of cases where there was a pre-recorded automated message, the caller was greeted first and then offered a language selection option. However, it was not always clear whether this option enabled the caller to:

- hear all the steps and all subsequent options in Welsh, or
- speak directly to someone through the medium of Welsh.

This ambiguity could affect the user's experience and make it more difficult to accurately assess the extent to which the service supported full Welsh provision.

3.4   After the caller chose the Welsh option and was connected to a member of staff, the majority of calls were answered with a Welsh greeting. However, in some cases, the subsequent greeting by the member of staff was in English only which affected compliance with standard 10.

3.5   The cases where there was a change from a Welsh greeting to an English greeting after the Welsh option had been chosen undermine the continuity of the Welsh service that is expected to be provided under Standard 10. Once a caller has expressed a clear choice to receive services through the medium of Welsh, that service should continue consistently throughout the interaction.

3.6   It was found that 12.1% of the calls did not comply with Standard 8 at all, as the initial greeting had been in English only. This occurred mainly in cases where the call was answered directly by a member of staff, rather than via a pre-recorded message, and a monolingual English greeting was provided at the start of the call.
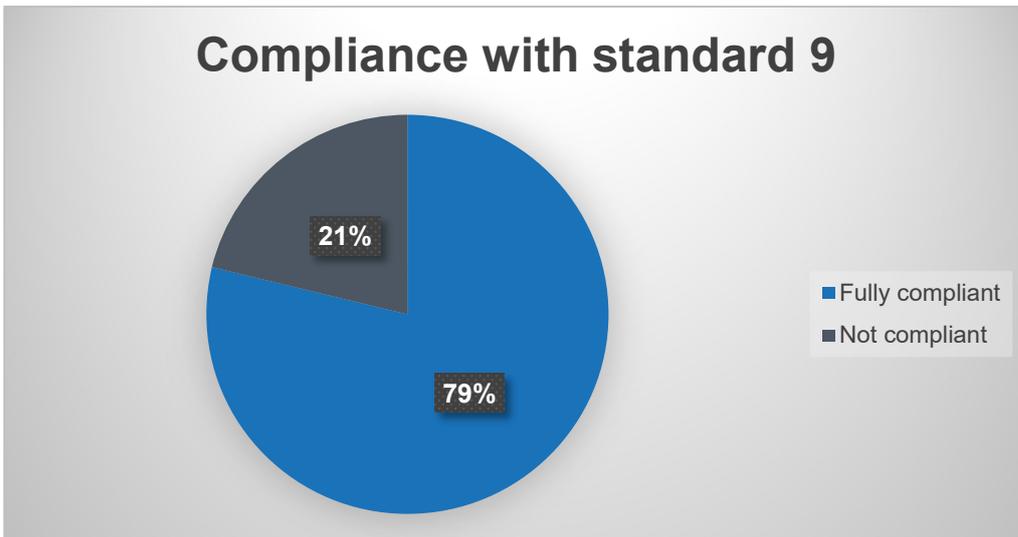
Standard 9

3.7   The code of practice for the No. 7 Regulations states the following for standard 9:

'A body is expected to be proactive in informing persons of the Welsh language telephone service. This is expected to happen at the earliest opportunity.

Greeting a person in Welsh on its own does not constitute informing a person that a Welsh language telephone service is available. A body is expected to go further than that in order to make it explicit that a Welsh language service is available.'

3.8   There are a number of ways that an organisation can comply with standard 9, including starting a conversation in Welsh in order to naturally highlight that a Welsh language service is available, offering a language selection option through an automated system, or proactively informing the caller of the availability of a Welsh language service at the start of the call. Although an organisation does not have to inform the person *in Welsh,* doing so would be considered good practice.

3.9   It was found that 78.8% of the calls complied with standard 9. They complied either by offering a language choice option in an automated message, or by a member of staff greeting the caller and starting the conversation in Welsh.

3.10   21.2% of calls did not comply with standard 9. The main reasons for this were the lack of a language selection option, or that a member of staff started the conversation in English without informing the caller that a Welsh language service was available.

Compliance with standard 9

- Fully compliant
- Not compliant

21%
79%

3.11 It should be noted that, although the level of compliance with standard 9 is relatively high - mainly because organisations are effective in *advertising* that a Welsh language service is available when a person calls, the provision of that service in Welsh was not consistently followed in practice. Indeed, this did not happen in the majority of cases. This is discussed further below, under standard 10.

Standard 10

3.12 Standard 10 is about dealing with calls in Welsh if a person so wishes, beyond the initial greeting. According to the standard, an organisation must deal with a call in Welsh once it knows that the person wishes to receive a service in Welsh, transferring the call to a member of staff who can deal with the specific subject in Welsh if necessary.

3.13 If there is no member of staff available who can deal with the call in Welsh on the specific subject matter in question, the call may be transferred to a member of staff who cannot deal with the call in Welsh, but who can provide a service on the specific subject matter. However, the code of practice states:

'It should be emphasised that a body must ensure that there is no member of staff available who can deal with the call in Welsh on the specific subject matter in question, before transferring the call to a member of staff who cannot deal with the call in Welsh.'

3.14 The phrase 'specific subject' is important to consider for standard 10, and the code of practice provides the following explanation:

'It should be noted that the phrase 'specific subject matter' does not include a general contact or enquiry. A body is expected to provide a Welsh language service when dealing with general enquiries, up to a point where a body needs to transfer a call to a non-Welsh speaking member of staff who can deal with a subject which needs a level of expertise or specific knowledge in order to deal with the enquiry. Such examples may include a specific issue or a specific case where only that non-Welsh speaking member of staff has the relevant information needed to deal with the call.'

3.15 Most of the survey calls related to general enquiries, such as asking for ward visiting hours, hospital parking arrangements, asking for more information about how to make a complaint, or how to make an appointment for a specific service. Considering the general

nature of these enquiries, the organisation would be expected to deal with the entire call in Welsh in order to comply with standard 10.

3.16 It was found that 36.4% of the calls complied with standard 10, that is, that the organisation dealt with the entire call in Welsh after being informed of the caller's choice of language, and not only during the initial greeting.

3.17 63.6% of calls did not comply with standard 10. The main reasons for this were that the organisation continued to deal with the call in English after being informed of the caller's preferred language, or transferred the call to another member of staff who was unable to provide a service through Welsh, even though the nature of the enquiry was a general one and therefore one that should have been able to be handled in Welsh.
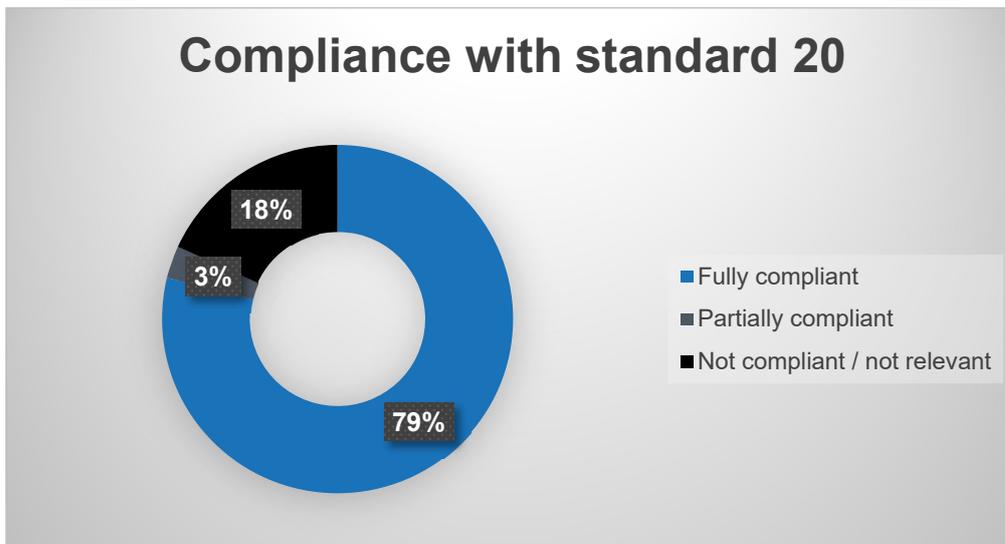

Standard 20

3.18 According to the code of practice for the No.7 Regulations, an organisation must ensure that any automated telephone system it has provides the entire automated service in Welsh. Schedule 1, Part 3, Paragraph 37 of the regulations states:

'In standard 20 an "automated" telephone system means a system that answers telephone calls and guides persons through a set procedure with a recorded message which, for example, asks a person to press different keys in order to choose different options.'

3.19 Of the calls made as part of the survey, they did not all contain an automated telephone message; some were answered directly by a member of staff.

3.20 It was found that 18.2% of the calls did not comply with standard 20, or that the standard did not apply to them. This was either because an automated message was not part of the answer, or because the automated message was in English only and therefore treated the Welsh language less favourably.

3.21 78.8% of the calls complied with standard 20, as the automated messages were fully bilingual, and often with the Welsh message coming first. 3% partially complied because the message in question contained more information in the English version.

3.22 The automated messages included a standard greeting, and offered the caller further options in terms of language choice. As a result, the messages also complied with the requirements of standard 8.

Compliance with standard 20

- Fully compliant — 79%
- Partially compliant — 3%
- Not compliant / not relevant — 18%

4 Conclusion and Recommendations

4.1 In general, the organisations complied very well with standard 8, with the vast majority of calls containing a Welsh greeting, whether through an automated message or through a direct greeting from a member of staff. Compliance with standard 9 was also relatively high, with the organisations advertising a Welsh telephone service well. However, there was evidence that there was less consistency in implementing that service in practice.

4.2 Compliance with standard 10 was significantly lower, with less than half of calls complying. This is in line with the point above that the organisations are good at advertising a Welsh telephone service, but less effective when implementing it in practice. Considering the general nature of the enquiries that were included in the survey, the organisations would be expected to be able to deal with these calls in Welsh. However, this often did not happen because the member of staff who answered the call was not proactive in offering a Welsh service, or, in some cases, a Welsh speaker was not available even after the caller asked for one.

4.3 The institutions complied very well with standard 20. Where the standard was relevant, the majority of the automated messages were bilingual, with the Welsh message coming first.

4.4 It should be noted that this survey has focused on standards relating to calls to main telephone lines, helplines or call centre numbers. Standards 17 and 18 relate to telephone calls to departments via direct line numbers, including staff members' direct line numbers. These standards also specify the need to provide a Welsh language service, including giving a Welsh greeting and dealing with the call in Welsh if the person so wishes, until 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.

4.5   Considering that there are a large number of departments within the health institutions, including extensive use of direct telephone numbers by departments and individual members of staff, it is important to ensure that the Welsh language provision is extended to these. It would be beneficial for the organisations to carry out a systematic internal audit of their telephone services in order to assess levels of compliance with these standards. It is also important to ensure that the relevant language officers are aware of all the telephone services available within their bodies, in order to support and supervise compliance.

4.6   As previously stated, telephone services continue to be a challenging area for the health sector, mainly due to the nature and structures of these services. Although this survey has shown high levels of compliance with certain standards when considering the services provided through main telephone lines, there is clear evidence that practical provision needs to be improved. In particular, it is necessary to ensure that patients and members of the public can receive a complete basic service in Welsh when contacting these main lines, and that the Welsh language provision is not limited to the greeting or the initial steps only.

4.7   The recruitment and planning of the workforce are key factors which influence the ability of the organisations to comply with the standards of the telephone services. This is also linked to the work being done in relation to standard 110. For example, when recruiting for front-line roles, the bodies should carefully consider the need to advertise more of those positions as ones where Welsh language skills are essential, or that Welsh language skills need to be learned when someone is appointed to the position, in order to increase capacity where there are currently gaps, and to strengthen compliance in the medium term.

4.8   Based on the findings of the survey, we present the recommendations below to the organisations that are subject to the Welsh Language Standards No.7 Regulations:

Recommendation 1:

Organisations should ensure that the language selection option in automated telephone messages is clear, unambiguous and consistent, so that callers understand exactly what choosing the Welsh option means in practice. In particular, it should be clearly stated whether choosing the Welsh option leads to:

- receiving a service from a member of staff who can deal with the call in Welsh; or

- continuing through the automated system in Welsh only.

This should help manage callers' expectations and avoid situations where callers choose the Welsh option but then receive a service in English, undermining confidence in the Welsh language provision.

Recommendation 2:

Members of staff who deal with telephone calls should be encouraged and supported to be proactive and consistent in informing callers that a Welsh language service is available, in

accordance with the requirements of Standard 9. This could be achieved by:

- including a standard statement at the start of the call, after the initial greeting, which clearly states that the call can be continued in Welsh if desired; and

- strengthening staff awareness, confidence and understanding of their duties under the standards, including the importance of the continuation of the Welsh language service after a choice of language has been expressed.

These steps should contribute to improving the transition between advertising the Welsh language service and providing it effectively in practice.

Recommendation 3:

Organisations should adopt a more strategic approach to workforce planning, based on staff language skills and the current gaps in Welsh language provision, particularly in roles relating to front line telephone contact. This could include:

- assessing the linguistic requirements of relevant positions, and designating an increasing number of positions as essential Welsh, or requiring learning skills in Welsh when someone is appointed to the position

- keeping an up-to-date record of the Welsh language skills of reception and call centre staff, and planning work rotas in accordance with those skills in order to ensure that a Welsh speaker is constantly available;

- targeting staff recruitment and development exercises specifically in order to address gaps identified in the Welsh language provision.

Implementing these steps would support compliance with Standard 10 and reduce the risk of failing to provide a Welsh language service after a choice of language has been expressed.

Recommendation 4:

Organisations should consider conducting a comprehensive internal audit of all their telephone services, including main telephone lines, call centres and direct line numbers of departments and staff members. This audit should:

- assess current levels of compliance with the relevant standards;

- identify any gaps or patterns of non-compliance;

- steering the process of determining clear courses of action, with ownership and priorities, to address any issues raised.

This would strengthen internal security arrangements and support continuous improvement in Welsh language provision.

Appendices

Appendix 1: Survey data

Number of calls in the survey - 33		
	Number	Percentage
Calls fully dealt with in Welsh (greeting and full response to the enquiry)	11	33.3%
Calls handled partly in Welsh (greeting only or only some Welsh)	8	24.2%
Calls dealt with in English or without receiving an answer at all	14	42.5%
Calls complying with standard 8	29	87.9%
Calls not complying with standard 8	4	12.1%
Calls complying with standard 9	26	78.8%
Calls not complying with standard 9	7	21.2%
Calls complying with standard 10	12	36.4%
Calls not complying with standard 10	21	63.6%
Calls fully compliant with standard 20	26	78.8%
Calls partially compliant with standard 20	1	3%
Calls not complying with/not relevant to standard 20	6	18.2%

Appendix 2: A list of the organisations that were part of the survey

Powys Teaching Health Board

Aneurin Bevan University Health Board

Swansea Bay University Health Board

Betsi Cadwaladr University Health Board

Cardiff and Vale University Health Board

Cwm Taf Morgannwg University Health Board

Hywel Dda University Health Board

Public Health Wales NHS Trust

Wales Ambulance Service University NHS Trust

Velindre University NHS Trust

Llais Wales