y ganolfan cynllunio iaith

welsh centre for language planning

Review of organisations' recruitment arrangements and assessment of the need for Welsh language skills

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Part 1 : Background and introduction

1.1 Background

The Welsh Language Commissioner has commissioned this report, in accordance with their function as regulator of the measures established by the Welsh Language (Wales) Measure 2011. Part of the Commissioner's function is to continually monitor and review how public bodies in Wales implement the Welsh Language Standards imposed on them in accordance with the Measure, and to provide guidance and advice on the implementation of the Standards where appropriate.

Among the measures in the Language Standards that organisations are required to implement, there are a range of commitments relating to the recruitment and appointment of staff with a view to ensuring sufficient numbers of officers who are bilingual in both Welsh and English to enable the organisations to provide bilingual services to the public in Wales.

1.2 Aim

The aim of this study is to provide an independent evaluation of how organisations that are subject to the Welsh Language Standards assess the need for Welsh language skills for vacant and new positions. In addition, the report offers an assessment of how these assessments contribute to the success of organisations in recruiting Welsh-speaking staff. It is acknowledged that there is a relationship between recruiting Welsh-speaking staff and an organisation's capacity to operate in Welsh, and the study will address that.

1.3 The Welsh Language Commissioner's Requirements

In commissioning this report, the Commissioner wished:

- to receive robust data and evidence on how the recruitment process itself influences the effectiveness of organisations to increase workforce capacity,
- for this research to establish a baseline for the current situation in order to consider how to increase capacity of Welsh language skills within organisations over time,
- for the research to identify successes that can be shared with other organisations for adoption,
- for the research to identify and learn from any challenges or barriers that may arise in implementing the recruitment process.

In order to respond to these requirements, a research programme, agreed with the Welsh Language Commissioner, was designed and implemented to gather the evidence.

1.4   Objectives of this report

This report is the result of research conducted based on methodology agreed with the Welsh Language Commissioner (WLC). Based on the research findings, this report:

- introduces an independent evaluation of how the way in which organisations assess the need for Welsh language skills contributes to their success in recruiting Welsh-speaking staff thus increasing their capacity to operate in Welsh;
- includes examples of successful practice and highlights risks in practice and trends observed;
- considers the adequacy and suitability of the assessments conducted of the linguistic requirements of the vacancies and highlights trends or practices where there is evidence that they lead to success in recruiting Welsh-speaking staff;
- identifies trends or practices that have an adverse effect on the success of the recruitment process.

In addition to the text of this report, the core evidence gathered through information recording templates and subsequent interviews, together with a summary of the findings, are presented separately to the WLC.

1.5   Overview of methodology

Identifying a sample of organisations to be questioned

As different organisations were subject to different versions of the Regulations that specify the Language Standards, a sample of 24 organisations were selected, which included a cross-section as follows:

Type of organisation according to the relevant regulations	Number of organisations
No. 1 Regulations	5
No. 2 Regulations	5
No. 4 Regulations	1
No. 5 Regulations	5
No. 6 Regulations	4
No. 7 Regulations	4
Total	**24**

The exact organisations were agreed upon with the Commissioner. Based on information held by the Commissioner, the organisations likely to offer examples of

varied practices and good practice were selected as well as a cross-section of organisations subject to the various Regulations 1-7.

Agree upon the research questions and evidence requirements, led by the Commissioner

It was agreed to try to ascertain to what extent the organisations would follow the advice provided to them by the Commissioner in order to respond to the challenge of recruiting Welsh speakers. Therefore, research questions were specified based on the actions recommended by the Commissioner in their advice documents *Recruitment: Good Practice Advice Document* (Welsh Language Commissioner 2020), *Code of Practice for the Welsh Language Standards (Number 1) 2015* – the section on '*Standards relating to recruiting and appointing*' (Welsh Language Commissioner 2020) and *Welsh as a way of working* – the section *'Focus on compliance in job advertising and recruitment processes'* (Welsh Language Commissioner 2022).

The following research questions were agreed:

- What arrangements are in place to carry out an assessment of the linguistic needs of jobs and categorise jobs in accordance with the requirements of the relevant standards (including the factors considered, the guidance for staff carrying out the assessment, scrutiny process and approval of the assessment)?
- What are all the steps involved in the recruitment process from start to finish (including the assessments, advertising the positions, receipt of applications, interviews and appointments)?
- What was the outcome of the recruitment process in relation to three exemplar posts and how successful was it (giving reasons as to why it has been successful or unsuccessful)?
- Were the Welsh language skills needs met?
- Were there any practices that worked well?
- What obstacles or challenges, if any, did the organisation face during the process?
- Were any additional steps required to ensure that the necessary Welsh language skills were met?
- If conditions to learn Welsh have been set for roles, how are these conditions checked?
- What arrangements are in place to support new staff to develop the required language competencies?

The Commissioner also required us to collect evidence on three exemplar posts from each organisation, namely:

- a lower level position (such as an administrative officer or receptionist)

- an intermediate level post (such as executive officer)

- a senior level post (such as a manager or senior officer)

tracking each organisation's approach to the three posts through the recruitment and appointment process.

Familiarising ourselves with key documentation

We studied relevant documentation to gain full understanding of the requirements of the Welsh Language Standards in relation to assessing the need for Welsh language skills for vacant and new positions for organisations. These were the requirements included in the No. 1-7 Regulations prepared in accordance with the Welsh Language (Wales) Measure 2011. In addition, we studied key documents prepared by the Commissioner to provide guidance and advice on the recruitment process, specifically *Recruitment: Good Practice Advice Document* (Welsh Language Commissioner 2020), *Code of Practice for the Welsh Language Standards (Number 1) 2015* – the section on *'Standards relating to recruiting and appointing'* (Welsh Language Commissioner 2020) and *Welsh as a way of working* – the section *'Focus on compliance in job advertising and recruitment processes'* (Welsh Language Commissioner 2022).

Research Instruments

Evidence-gathering template in Word format
A bilingual template was produced to collect data from the 24 organisations. Microsoft Word was used for this. The template asked a series of open questions about the recruitment and appointment process - questions based on the research questions set out above. The questions also invited organisations to submit relevant supplementary documentation with their answers. A pilot was conducted to ensure that the questions/requirements were interpreted consistently. The template text was modified as necessary in response to the findings of the pilot.

Privacy notices and information leaflets
A bilingual privacy notice and explanatory materials have been produced with information about the project to ensure the informed consent of research participants. The privacy notices detailed the nature of the data collected. It was not envisaged that any personal data would need to be collected in relation to this research other than the names and work emails of contacts within organisations. It was arranged for all personal data to be password protected and encrypted on IAITH computer equipment. Only specific staff had access to this data.

The core data from the templates was presented to the Commissioner. Before transferring the data to the Commissioner, we checked that personal details and any other identifiable data had been omitted. Arrangements have been made to ensure that IAITH staff would delete any personal data once we have completed the project.

Collecting the written evidence

WLC staff distributed an evidence-gathering template to the contact individuals within the 24 organisations via e-mail. Responses had been received from all organisations by the end of January 2023.

Initial analysis of the written evidence

The detail and quality of the responses to the series of questions were checked in the template sections, as well as examples of the recruitment experience for three exemplar posts. The main intention at this stage was to develop our understanding of the data and identify the gaps that would need to be filled by seeking further information from the organisations, either in subsequent interviews or via subsequent written questions. Our initial analysis of the evidence was shared with the Commissioner's officers.

Rectifying the gaps in the evidence

Having identified the gaps in the evidence, rather than holding interviews to fill the gaps, it was agreed to seek further evidence from the organisations by asking each of the 24 organisations to respond to the additional questions below.

1.   Generally, in your opinion, have the recruitment arrangements you described been an effective way for your organisation to appoint Welsh-speaking individuals, and to increase the Welsh language skills capacity within your workforce?

      - If the arrangements were successful, what was the reason for their success?

      - If the arrangements have not been successful, what was the reason for their lack of success?

2.   To what extent have you taken into account the Commissioner's advice and findings in their annual assurance reports and advice documents when implementing your recruitment processes? Do you follow the recruitment procedures described in the Commissioner's advice document on Recruitment [(comisiynyddygymraeg.cymru)](comisiynyddygymraeg.cymru)?

Final analysis of the evidence

The data submitted by the organisations on the templates and subsequently presented in their responses to the additional questions was analysed. There are elements of quantitative and qualitative analysis in our handling of the data. Our

analysis is thematic in the Braun & Clarke (2006) approach, identifying themes in the data that will form part of the framework.

The main themes agreed upon and which provide a framework for the structure of this report are those described by the WLC in specifying the expected outputs of our study, namely:

- introduces an independent evaluation of how the way in which organisations assess the need for Welsh language skills contributes to their success in recruiting Welsh-speaking staff, thus increasing their capacity to operate in Welsh;
- includes examples of successful practice and highlights risks in practice and trends observed;
- considers the adequacy and suitability of the assessments conducted of the linguistic requirements of the vacancies and highlights trends or practices where there is evidence that they lead to success in recruiting Welsh-speaking staff;
- identifies trends or practices that have an adverse effect on the success of the recruitment process.

When analysing the data we referred to the advice documents issued by the WLC to organisations on recruitment and appointment processes, namely *Recruitment: Good Practice Advice Document* (Welsh Language Commissioner 2020), *Code of Practice for the Welsh Language Standards (Number 1) 2015* – the section on *'Standards relating to recruiting and appointing'* (Welsh Language Commissioner 2020) and *Welsh as a way of working* – the section *'Focus on compliance in job advertising and recruitment processes'* (Welsh Language Commissioner 2022). In the evidence submitted by the organisations, the extent to which they followed the advice and guidance provided for them was sought.

The organisations in this study are anonymous, and are referred to by numbers 1 to 24 in the body of the report – for example, organisation 1, organisation 17 and so on. A key to these numbers was presented to the WLC liaison officer, so that relevant Commissioner's officers can identify to which organisation each number refers.

Limitations

The analysis presented in this report is based on the self-reported data of the 24 organisations that contributed to the study. There may also be gaps in the information and evidence they presented. The study does not claim to be a detailed reflection of the practices of all bodies subject to the Language Standards. It should therefore be kept in mind that the interpretation of the evidence contained in this document is based upon that which is reported by the organisations.

Part 2 : Findings

Within the framework of the proposed outputs described above, the structure of the report tracks the stages in the recruitment and appointment process, broadly following the order of the questions posed to the organisations in the WLC questionnaire, and the additional questions subsequently asked.

In this section, we present our analysis and evaluation of how organisations have undertaken the various stages of the recruitment and appointment process, based on the evidence presented by the 24 organisations themselves.

Under the main subheadings in the text below, a factual summary is provided of the evidence presented in the answers to the WLC questionnaire. We present the evidence in clusters of responses, and under each cluster of responses, in the text box, we present our evaluation. Our evaluation weighs up the responses based on recommended good practice in the WLC advice documents, as well as on our extensive experience of advising, monitoring, and assisting public bodies.

Our findings are presented below, broken down according to the main areas in question.

2.1 Assessing the linguistic requirements of vacant and new positions

Assessment process or procedure

Of the 24 organisations questioned through the WLC questionnaire, five noted that they used a bespoke flowchart to objectively assess the need for language skills **(organisations 8, 15, 19, 21, 22)**. Of the 24 organisations, two **(organisations 19, 20)** noted that the relevant manager(s) recorded the outcome of the assessment by entering it into a digital computer system.

Two organisations **(organisations 21, 24)** noted that they offered training on determining the linguistic requirements of posts to managers responsible for recruiting and appointing.

Six organisations **(organisations 5, 6, 9, 18, 20)** stated that their relevant managers followed written internal guidelines to determine the linguistic requirements.

Two organisations **(organisations 9, 15)** noted that the relevant managers consult with their language officer(s)/unit to determine the requirements, and one other **(organisation 19)** noted that the manager(s) will consult with the language unit "if the managers are uncertain at all" and "if necessary".

EVALUATION: We consider the above methods to be examples of good practice, which are in line with the procedures recommended by the WLC. To ensure the best possible practice, we consider that a combination of all the above methods would be a complete way of assessing the linguistic requirements of posts.

Two organisations **(organisations 9, 18)** noted that the geographical location of the post was a material consideration when determining the linguistic requirements of posts.

One organisation **(organisation 10)** noted that the linguistic capacity of the team was a material consideration when determining the linguistic requirements of a post.

One other organisation **(organisation 7)** stated that it would consider the extent to which the post-holder would be in contact with the public when determining its linguistic requirements.

EVALUATION: We consider all the above to be good practice if incorporated in a bespoke and comprehensive tool to determine the linguistic requirements of posts – e.g. considerations in a flowchart, or in a computer digital questionnaire which includes these considerations along with all other relevant considerations, with the flowchart or digital questionnaire guiding their users to formulate objective conclusions about the needs.

Three organisations **(organisations 3, 12, 16)** noted that they did not have guidance for managers, as these responses show:

- "We do not have guidance for managers to help them consider what Welsh Language skills may be necessary. We rely on manager's judgement" **(organisation 3).**
- "Senior Managers and there is no specific training to carry out the assessments. The roles are looked at holistically and a decision is made on the Welsh language requirements level" **(organisation 12)**.
- "They tend be done more informally, assessment by the hiring manager on whether there is a Welsh language need for the role, why that may be etc. [...] No training or guidance (is) provided. Recruitment forms were re-developed to take the assessment into account, but no guidance is currently given to staff" **(organisation 16)**.

EVALUATION: We consider that the arrangements described above do not comply with the WLC's advice and recommendations in the guidance documents *Recruitment: Good Practice Advice Document (Welsh Language Commissioner 2020), Code of Practice for the Welsh Language Standards (Number 1) 2015* – the section on *'Standards relating to recruiting and appointing'* (Welsh Language Commissioner 2020) and *Welsh as a way of working* – the section *'Focus on compliance in job advertising and recruitment processes'* (Welsh Language Commissioner 2022). These practices do not provide objective and transparent

assessments of the linguistic needs of posts. We note that the managers making the decisions do so without training, guidance or written guidelines. By relying on individual subjective assessments according to their own light, rather than on systematic, transparent and objective assessments based on the business needs of the organisation, this shortfall could adversely affect the success of the recruitment process by not achieving objective balance, transparency, and consistency. Furthermore, decisions arising from these arrangements could pose a risk to the organisation by being open to challenge on the grounds of maladministration and failure to comply with the Welsh Language Standards.

One organisation **(organisation 23)** noted that bespoke guidelines had been drafted but that they were not yet operational at the time of answering the WLC questionnaire.

EVALUATION: Action without objective and transparent recruitment methods in place poses a risk to the organisation by making its recruitment decisions open to challenge on the grounds of lack of objectivity, transparency, and consistency.

Assessing the categories of skills required

In their advice document (op.cit, 2020, p.9) the Welsh Language Commissioner states in accordance with the standards:
"*Organisations must place the post into one of the following categories:*
- *Welsh language skills are essential*
- *Welsh language skills are desirable*
- *Welsh language skills need to be learnt after being appointed to the post*
- *Welsh language skills are not necessary*"

Of the 24 organisations questioned, only three use each of these four categories when communicating their requirements **(organisations 7, 22, 24)**.

Only two categories, "Essential" and "Desirable" are used by seven of the organisations questioned **(organisations 9, 11, 13, 15, 18, 21, 23)**.

Five organisations use the categories "Essential" and "Desirable" as well as other unique categories **(organisations 8, 10, 17, 19, 21)**.

Welsh is essential (at least Welsh level 1) for all posts in three organisations **(organisations 1, 5, 14)** although two offer opportunities for applicants to be appointed provided they commit to learning Welsh to the required level **(organisations 1, 5)**.

Some organisations mentioned categories referring to a condition requiring willingness or commitment to learn Welsh or improve Welsh language skills, allowing for the applicant to be appointed on that condition **(organisations 7, 5, 9, 17, 19, 21)**.

Organization 19 includes among its categories "Being able to demonstrate an understanding of the bilingual nature of the organisation and the area".

EVALUATION:
(1) We consider that the above varied practices are good practice. They are all in line with the spirit of the guidance issued by the WLC, although some use variations on the definitions recommended in the WLC advice document.

(2) However, we note that the majority of the organisations questioned do not uphold the practice of including a category that allows candidates to be appointed provided that they learn Welsh / improve their Welsh following their appointment. As a result, it appears that the majority of organisations (especially those located outside the most Welsh areas) are missing an opportunity to increase the numbers of their Welsh-speaking staff in this way – e.g. **organisations 9, 12, 13, 16, 21. Organisation 21** referred to the difficulty of assessing the attainment skills of someone appointed on such a condition, and yet the majority of organisations offer training in Welsh language skills to new staff, and it could be assumed that attainment assessment methods are linked to many of those opportunities.

Organisations 13, 18 and 23 advertise the majority of posts with "Welsh desirable".

EVALUATION: We know from previous study experience that the "Welsh desirable" requirement may be used by some organisations in order to try to appeal widely in terms of attracting Welsh applicants and learners at various proficiency levels, who would not be confident enough about the standard of their Welsh language skills to apply for a "Welsh essential" post. However, when there is a real need to appoint applicants who are fluent and confident in their Welsh, the "Welsh desirable" category is not guaranteed to attract such candidates. It may also not appeal to potential applicants who are very keen to get a job where they can use their Welsh in the workplace, professionally and socially.

The WLC also advises against the practice of using the "Desirable" category as a second stage of the advertising process if an advertisement stating "Welsh essential" fails to attract suitable applicants. Changing the job skills needs in such a way is contrary to the requirements of the standards (although it should be noted that there are exceptions where such a change is permitted). The WLC advice document (op.cit, 2020, p.13, para 4.9) emphasises that *"If the organisation has assessed that Welsh is essential for a post, those requirements should not be changed unless significant changes have been made to the duties and responsibilities of the post, including ensuring another means of providing the Welsh language service or another significant change in circumstances."*

Scrutiny of assessments

Due to the need to scrutinise the assessments of the linguistic requirements of individual posts, the WLC advises that it is "essential that assessments are based on the understanding of the need for Welsh language skills. It is also important to have solid arrangements to ensure assessments are being completed." (op.cit., 2020, para.4.1).

According to the responses received from the organisations in question, around a third of organisations do not have a system in place to scrutinise the initial assessments of the linguistic requirements of posts in the way described by the WLC, but the remainder of the sample has some form of scrutiny.

Seven of the 24 organisations **(organisations 5, 8, 19, 10, 15, 17, 18)** described how many steps they have in their processes to scrutinise the initial assessment of the linguistic requirements. A common pattern among these organisations is that a department/service manager prepares the initial recruitment requirements, and that the HR department and/or Senior Manager(s) or Management Team checks the first assessment of the linguistic requirements.

Within **organisations 8, 19, 15** a Welsh Language Officer or a language unit are among those consulted about the linguistic requirements. **Organisation 6** also consults with the Language Officer "if further consultation is required". **Organisation 19** described several stages in their recruitment process, involving multi-departmental scrutiny (planning, finance, human resources, language unit).

Within **organisation 7**, a "resources panel" approves details of all posts before it is advertised, and it is noted "the human resources department is part of the process of drafting job descriptions and person specifications with the relevant managers".

EVALUATION: We consider that the above arrangements are good practice to scrutinise the initial assessments of the linguistic requirements of posts.

Eight of the 24 organisations reported that they did not have arrangements in place to scrutinise the initial assessments of the linguistic requirements of posts, namely **organisations 3, 4, 12, 13, 16, 20, 21, 23.**

These organisations provided the following responses:
- "This is solely the Manager's decision. We do not have a system in place to check the manager has chosen the correct category of Welsh required for the role. We trust managers to ensure they are doing it correctly" **(organisation 3)**.
- "N/A" **(organisation 4** - to a question on this very issue).
- "As mentioned Senior managers will decide on the level of Welsh [sic] language skills required" **(organisation 12).**

- "The Service does not currently have a formal Scrutiny and approval process in place for decisions regarding the Linguistic Requirements of posts" **(organisation 13)**.
- "Nothing at present but we are recruiting a Welsh Language Development Manager which will help with this" **(organisation 16)**.
- "Currently, no scrutiny takes place as to whether the correct category is chosen following assessment by the Recruiting Manager [...] "New/ vacant posts cannot be advertised until the linguistic requirements have been assessed and included on the Recruitment Requisition form. This is checked by the HR Administration team prior to any post being advertised" **(organisation 20)**.
- "No regular arrangements are in place at present [...] in the past, the Welsh language team have undertaken ad-hoc spot-checks to assess whether assessors are using the tool and following the process. These checks have found that staff are claiming to be using the assessment tool, however this has not been reflected in the number of Welsh essential vacancies advertised by the Health Board" **(organisation 21)**.
- "Currently, the organisation does not have arrangements in place to carry out scrutiny and approve the assessment of linguistic requirement for new and vacant posts. It is the recruiting managers responsibility to assess should the role require Welsh language skills" **(organisation 23)**.

EVALUATION: We do not consider that the arrangements described by the seven organisations above comply with the methods recommended by the WLC. (op.cit., 2020, sections 4.1 - 4.2). The arrangements are flawed because they are, in all cases, over-dependent on the subjective judgement of an individual manager. There is no rigorous and transparent process in place to carry out the assessments or scrutinise them. This can pose a risk to these organisations by making them open to challenge on the basis that appropriate administrative arrangements are not in place to ensure the robustness and validity of the assessments of linguistic requirements of posts.

2.2 Communicating the language requirements of posts

The language of advertisements

According to their responses to the WLC questionnaire, the vast majority of the 24 organisations advertise all posts bilingually in Welsh and English **(organisations 3, 5, 6, 8, 10, 11, 12, 13, 14, 15, 18, 19, 20, 21, 23, 24). Organisation 3** added that it advertised some posts in Welsh only, namely "Welsh essential posts which we advertise in Welsh only".

Organisation 7 advertises all posts in Welsh, with some posts advertised bilingually on the "rare" occasions when Welsh language skills are not essential.

EVALUATION: we consider that the above arrangements are in accordance with the Welsh Language Standards and the spirit of good practice recommended by the WLC.

Five organisations **(organisations 2, 8, 16, 17, 21)** noted that they only advertised some posts bilingually. Of these,
- **organisation 2** explains "currently it is the front-line posts that are being prioritised for translation and seamless bilingual advertising".
- **organisation 16**, only jobs for which "Welsh is essential" are advertised in Welsh.
- **organisations 17 and 21**, the practice of advertising in Welsh varies according to which jobs are advertised.

EVALUATION: The requirement, in accordance with the Welsh Language Standards, is to ensure that all recruitment advertisements for jobs in relation to Wales are published in Welsh or bilingually unless that Welsh language skills are not necessary for the post.

Organisation 9 notes that it advertises all posts based in Wales bilingually, but posts based outside Wales are an exception to this practice.

EVALUATION: This custom does not fall neatly into the category of good practice or bad practice. It depends on the nature of the job and the extent of its association with Wales.

Advertising on websites and social media

All 24 organisations involved use electronic methods to advertise new and vacant positions. They advertise on their own websites and partner websites. The comments by **organisation 10** are typical:
- "We always use our own bi–lingual website to advertise vacancies, our social media accounts, and our stakeholder networks especially when the work of the post is relevant to specific community groups."

The answers received refer to advertising on Facebook and Twitter and recruitment websites,
- "The Recruitment Department makes full use of social media, recruitment websites and the press" **(organisation 14)**.
- "Individual roles may also be promoted via corporate social media profiles" **(organisation 21)**.

EVALUATION: These practices are now normative, and most organisations have staff involved in communicating on electronic media such as websites and social media.

Organisation 15, which operates in a catchment area where the percentages of Welsh speakers are relatively low, describes a creative approach to recruiting Welsh speakers:

- "For particular posts such as [XXX] we target on social media that we are seeking Welsh language skills or those who attended Welsh language schools and may need some support in refreshing their skills. We hold specific Welsh language awareness sessions for [specific named roles]."

EVALUATION: We consider these practices to be good and innovative, creatively responding to the challenge of recruiting Welsh speakers and learners, and developing their skills as necessary, in an area that is "less Welsh" than others.

Advertising all posts on Welsh language websites

According to the responses received, three organisations advertise all of their vacancies and new posts on Welsh language websites:

- We routinely use Welsh medium advertising platforms such as Golwg, Lleol.net and Swyddle, for all posts regardless of linguistic skill requirements" **(organisation 10).**
- "We pay to advertise all roles on 'Swyddle' to encourage more applicants with Welsh language skills [...] We advertise all posts on 'Swyddle' (including all Level 1 Welsh language posts) ... We have made massive improvements in the number of Welsh Speakers in [our organisation] by using Swyddle, engaging with Schools, Universities and colleges and promoting Welsh language skills on social media and job adverts" **(organisation 15).**

The third organisation in this group notes

- "We advertise with lleol.cymru for every external vacancy" **(organisation 8).**

EVALUATION: We consider that these practices acknowledge that many potential job applicants may wish to use Welsh in their workplaces and focus on Welsh language websites to look for opportunities to do so.

Advertising posts on Welsh language websites only under certain conditions

This is the practice of the majority of the 24 organisations questioned (namely **organisations 2, 3, 5, 6, 8, 9, 13, 17, 18, 19, 20, 21, 22, 23, 24**). The most common trend is for organisations to use Welsh language websites to advertise posts for which higher, specific or specialist Welsh language skills are "essential". The following responses are typical of this category of organisations:

- "The Equalities and Welsh Language Team advocate the use of the following sites where Welsh Language Skills are essential. LinkedIn, Lleol.Cymru, Golwg, Safle Swyddi" **(organisation 2).**

- "Welsh essential posts are advertised on: 'Lleol', 'Golwg', 'Y Cymro',"
  (organisation 3).
- "[We] use specific Welsh medium sites such as lleol.net and Golwg when
  recruiting to posts with a higher linguistic level, or when posts are specialist ones"
  (organisation 5).
- "For posts where there are specific linguistic requirements we will also advertise
  on Welsh language job websites e.g. Safle Swyddi and Lleol.com. The post of
  [job title] has recently been advertised with the essential oral and written
  language requirement, and was advertised on the Swyddle and Golwg 360
  websites. From time to time we will also advertise on specialist job websites and
  other places depending on the expertise of the post [...] Where Welsh language
  skills are a necessary requirement, they are advertised on specific Welsh
  language job websites e.g. Swyddle Golwg 360, Safle Swyddi and Lleol.com"
  (organisation 6).
- "When we have Welsh Essential role/s we routinely advertise on Safle Swyddi
  and occasionally Lleol.Cymru by arrangement if for a specialist Welsh Essential
  Job. i.e., Welsh Language Translator" **(organisation 13).**
- "All Welsh Essential vacancies are advertised on Lleol.net" **(organisation 24).**

EVALUATION: These practices may be a means of targeting Welsh speakers and
learners who wish to apply for posts for which knowledge of the Welsh language is
required to varying degrees. But as the majority of jobs in most organisations (with
rare exceptions) are jobs for which the Welsh language is not required, and unless
those posts are also advertised on Welsh language websites, opportunities are lost
to attract Welsh speakers who use these websites to search for other kinds of jobs –
e.g. technicians, craftspeople, accountants, computer science, the environment,
management jobs and so on – i.e. jobs that do not have significant direct contact
with the public. It would be good practice to advertise a wide range of posts on
Welsh language websites, not just "language-related" posts, in order to develop a
bilingual workforce across all organisation departments.

Advertisements - Communicating information about linguistic requirements in advertisements / job description / or person specifications

Eleven organisations stated that they set out the language requirements of a post in
the recruitment advertisement and/or job description and/or person specification
(organisations 6, 10, 13, 14, 15, 16, 17, 19, 20, 21, 24).

One organisation provides a web link to its skills levels matrix in its advertisements,
to match the language requirements **(organisation 14)**.

In its response to the WLC questionnaire, **organisation 6** provided the following
information with an example of a job advertisement:

- "Where there is a significant shortage in an area or where there is no link or need to report, then we might categorise a job differently and make it clear that support and training is available to improve or build confidence in Welsh language skills." This is stated in the advert: "Don't worry if you don't have previous experience or training, we are more interested in your potential. We can also offer help with language improvement if necessary."

We should point out that one example was given, and we do not yet know whether this is a regular practice by **organisation 6,** or a one-off.

EVALUATION: We consider that the above bodies noting the language requirements in the advertisement as well as in the job description is good practice, as recommended by the WLC (op.cit., 2020, section 6.5).
Furthermore, we consider that two innovative and winning methods are the practice of **organisation 14** in providing a web link to its skills level matrix, and the way in which **organisation 6** stated in its advertisement that help will be offered to the appointee to improve their language skills.

One organisation notes that the language requirements are noted in the advertisement but not in the job description:

- "Job descriptions are generic e.g. [job title]. Welsh language skills will be essential for some [job title] roles, and will be desirable for others. However, the same job description is relevant to their work, so the language requirements of the role/ vacancy are detailed in the advertisement rather than in the job description" **(organisation 18)**.

EVALUATION: We consider it better to follow the advice of the WLC, namely "It is advantageous for advertisements and job descriptions to be clear when describing the necessary skill or qualification to work through the medium of Welsh."
(op.cit.,2020, section 6.5).

Two organisations **(organisations 3, 12)** stated that they only specify the language requirements of a job in advertisements under special conditions. One of these two sets out the language requirements in the advertisement if the ability to speak Welsh is essential for the post.

- "If Welsh language skills are essential for a role, we state this in English and Welsh at the beginning of the job advertisement and advertise in Welsh only [...] If the role is not Welsh essential, we state one of five Welsh language competency levels (see answer to Question 9) in the job description and person specification" **(organisation 3)**.

The other organisation only specifies the language requirements in the advertisement in the following circumstances:

- "Unless the top level of Welsh language requirements are required it is not highlighted on the advertisement" **(organisation 12).**

EVALUATION: If Welsh language skills are required at any level (not at the highest level only) we consider that this should be noted in the job description in addition to the advertisement (as is already required under the standards) as good practice.

The answers of three organisations state that the language requirements are only specified in their job descriptions and/or person specifications, rather than in their advertisements:

- "The language requirements of the role are included in each job description (on page 27 of our Recruitment and Selection Policy). Each individual job advertisement on the jobs website states, 'See the Job Description for the Welsh Language skills requirements for this post'" **(organisation 1)**.

Organisation 10 states that it tends to refer mainly to Welsh language skills in the job description and person specification:

- "The main vehicle for this is the job description and person specification. We will normally reference and draw attention to Welsh language skills on the advert (and other vehicles for advertising the post, such as on social media posts) especially where the needs assessment determines the language skill to be an essential need" **(organisation 10)**.

Organisation 11 simply answered:

- "The linguistic requirements are included in the job description."

EVALUATION: The above organisations include the linguistic requirements beyond the advertisements, in other parts of the recruitment package. Waiving the requirements from the advertisement is considered a practice contrary to the standards. The standards require any job categorised as 'essential', 'desirable' or 'to be learnt' to specify that in the job advert. While it is acceptable to elaborate on the exact linguistic requirements of a job in a job description, it is expected that the basic category (whether 'essential', 'desirable' or 'to be learnt') is in the advertisement itself.

Advertisements – writing the advert

The WLC questionnaire did not include a question about the use of templates to produce recruitment advertisements (question 11, Part A, was the closest question to this). However, there was some evidence of this in the responses received, and therefore we share that evidence as it may be of interest to the WLC. For example, **organisation 6** noted that its officers used standard templates when producing the advert.

- "We use standard templates for job descriptions, application forms and advertisements. They all include spaces to specify the Welsh language requirements of the role" **(organisation 6)**.

EVALUATION: The use of standard templates to produce job advertisements can be good practice which facilitates an objective recruitment and appointment process.

On the other hand, there was evidence that **organisation 2** does not use such a template or guidance, and that its managers are free to produce advertisements and decide on the nature of any references to the Welsh language according to their own light:

- "The Manager has discretion to include all relevant details in the advert as appropriate. If the post is Welsh 'Essential', the advert will confirm: 'The ability to speak Welsh is regarded as essential to the undertaking of this post'" **(organisation 2)**.

There may be a suggestion in these comments that the Welsh language is not mentioned unless fluency is essential to the advertised post.

EVALUATION: We do not consider that the arrangements described by **organisation 2** above comply with the methods recommended by the WLC (op.cit., 2020, sections 4.1 - 4.2). The arrangements are flawed because they are over-dependent on the subjective judgement of an individual manager. If there is no arrangement to check and ensure the robustness and validity of the assessments of the linguistic requirements of posts, this can pose a risk to the organisation as it could be challenged on the basis that there are no appropriate administrative arrangements in place to determine linguistic requirements.

2.3 Producing a job description, person specification and application form

Some organisations reported that they use standard templates for producing a job description and/or a person specification and/or application form:

- "We have templates for the Job Advert and Job description. Below are examples" **(organisation 9)**.
- "The managers complete the initial job templates. These templates contain standard elements for each post and linguistic requirements are one of those elements. Below is an instance of the example wording in a template for the role of Senior Clerical Officer" **(organisation 19)**.
- "We use standard templates for job descriptions, application forms and advertisements. They all include spaces to specify the Welsh language requirements of the role" **(organisation 6)**.
- "We use a standard application form available in Welsh and English. We have standard job description templates. Recruitment managers can review job descriptions and advertisements before they are issued" **(organisation 17)**.

EVALUATION: Using standard templates to produce a job description, person specification and/or job application form is good practice, which facilitates an objective recruitment and appointment process, in line with the WLC's advice.

- "A job description must be provided in Welsh and English for all recruitment applications, together with an assessment of the necessary language requirements for the role" **(organisation 6)**.

- "Descriptions in 'everyday language' are used (rather than reference to levels). A bank of descriptions is available in the Code of Practice and in the templates for job descriptions" **(organisation 19).**

EVALUATION: (i) It is good practice to provide all job descriptions bilingually and (ii) intentionally producing job descriptions "in everyday language" is imaginative and proactive good practice.

Several organisations noted that they included a question on their application form inviting the applicant to indicate in which language they would like to be interviewed:

- "Under the new Welsh Language Standards (Standard 135), we will ensure that our application forms for jobs provide space for individuals to indicate whether they wish to use Welsh at interview or any other assessment method" **(organisation 9)**.

EVALUATION: Good practice, and practice required by the Welsh Language Standards, is to include a question on the application form offering the applicant a language choice for an interview.

Organisation 12 includes a web link to information on skill levels in its job descriptions

- "Within each job profile is a mention to the Welsh language skills required and a hyper link to a document that describes the levels of skills. Please see appendix one."

EVALUATION: Including a web link in the job description to guide the applicant to information about the organisation's skills level framework, rather than including the framework in the text of the job description itself, is good practice, as this could complicate the text of the description.

One organisation stated that it shared information about the language requirements of the post between the person specification and the job title:

- "The specific required level of Welsh language skills is detailed in the person specification of Welsh essential vacancies. Where a vacancy is a Welsh Essential version of a role that also exists (or has previously or may exist in the future) in a Welsh Desirable form, this will be indicated in the job title e.g., Online [...] Coordinator (Welsh Essential). Welsh desirable vacancies indicate that Welsh language skills are desirable in the person specification" **(organisation 21)**.

EVALUATION: It is good practice to include the linguistic requirements attached to the job title, as well as in the person specification and/or job description.

2.4 Assessing Welsh language skills and using Welsh in interviews

In accordance with the Welsh Language Standards they adopted, eight organisations in the questionnaire **(organisations 5, 6, 7, 9, 14, 18, 22, 24)** noted that they offer candidates the opportunity to choose to be interviewed in Welsh or English. The following commitments provide examples of this:

- "On the application form for each post the applicant can state whether they wish the interview to be conducted in Welsh or English" **(organisation 5)**.
- "Candidates can ask for the interview to be conducted in Welsh (whether the role requires Welsh language skills or not)" **(organisation 24)**.

Fourteen **(organisations 2, 5, 6, 9, 10, 11, 12, 14, 15, 17, 18, 20, 22, 24)** noted that arrangements were in place to ensure that interviews could be conducted through the medium of Welsh.

Organisations' responses regarding their arrangements for implementing these aspects show a range of different methods for (i) using Welsh in interviews and (ii) testing an applicant's ability in Welsh as part of the interview process.

For testing and assessing applicants' standard of spoken Welsh and fluency, the most common method used by the organisations is to rely on the member/s of the interview panel to ask questions in Welsh and observe the candidate's language use.

There are also other assessment methods. These include bespoke in-depth tests; pre-interview assessment; assessing the standard of Welsh in the candidate's application; and conducting a written test where the ability to write Welsh is essential to the post. The variety is reflected in the answers below.

One organisation assesses Welsh language skills as a requirement for each of its posts, even at Entry level (the most elementary level):

- "Assessing level 1 and 2 Oral Welsh language skills. A Welsh test will be conducted as part of the interview (a thorough test). It is also a fair test, which encourages the use of natural Welsh. Note that this language assessment is conducted separately from the interview: This is noted at interview and a language assessment will follow by telephone before appointment" **(organisation 14)**.

EVALUATION: From all the evidence received on this aspect, we consider that the practices of **organisation 14** are the best practice for assessing language skills as part of the interview. The practices of **organisation 14** are consistent and systematic, with the Welsh level of each candidate tested individually.

A considerable number of organisations note that they used to test the applicant's Welsh if they were applying for a post for which Welsh is "essential" **(organisations**

3, 4, 6, 8, 10, 11, 20, 21, 22, 23, 24). However, it is interesting to note that they do not mention any arrangements for using the Welsh language in interviews for other posts, if the ability to speak Welsh is not essential for those.

Apart from the arrangements of **organisation 14**, the most common method of testing language skills among the other organisations is that a member or members of the interview panel assess an applicant's oral skills by asking one or more of the interview questions in Welsh. In such a situation, it is assumed that the Welsh member or members of the panel assess the standard of the applicant's ability to *speak* Welsh.

An exception to this pattern is **organisation 14** and two other organisations **(organisations 7 and 1)**, which appear, according to their answers, to always test candidates' ability in Welsh at all interviews.

Organisation 7, notes:
- "The recruitment panel will also consider being able to communicate in the language as part of the interview."

This can be interpreted to mean that the candidate's Welsh is tested at each interview (although this is not entirely clear from the answer received).

Organisation 1 states that:
- "Applicants are expected to answer at least one question in Welsh in order to assess their ability in the language."

Almost all organisations also state that they will ask at least one question in Welsh if Welsh is essential to the post.

> EVALUATION: If applicants are required to be able to *speak* Welsh at some level, we consider that it is good practice to test the applicant's ability at the interview. There was no evidence of exactly how Welsh language panellists at interviews will assess and evaluate an applicant's ability when they answer a question or questions orally in Welsh. It seems that the effectiveness of the test depends on panellists' ability to assess accurately. There was no evidence that interview panellists received and used guidelines for assessing the linguistic ability of applicants. We consider that providing guidance to panellists on assessing the linguistic ability of panellists to be good practice.

Two organisations require that all interviews are bilingual to some extent, including interviews with candidates who chose to be interviewed in Welsh as well as candidates who chose to be interviewed in English for a job for which Welsh is essential:
- "All candidates will be able to choose in which language the interview will be conducted. For posts where Welsh is essential all questions, other than one, for candidates who wish to be interviewed in Welsh will be asked in Welsh and the remaining one will be asked in English (due to the bilingual requirements of the role). On the other hand, if an applicant for such a vacancy asked for an interview

in English, then at least one question would be asked in Welsh" **(organisation 18)**.

- "We [...] interview for [staff for one of our departments] through 50% interview in English and 50% interview in Welsh to ensure they have the appropriate skills in both languages" **(organisation 15).**

From experience, we believe that the practice of asking at least one or more questions in English may be quite common among the bodies concerned when they interview applicants for posts for which fluency in Welsh is essential, and for which applicants chose to be interviewed in Welsh, although there was no further evidence of this in the answers to the WLC questionnaire.

> EVALUATION: When an applicant has chosen to have an interview in Welsh, to fulfil that wish and the requirements of the standards, it must be ensured that Welsh is the main language of the interview. Where fluency in both Welsh and English is equally important to the post, it is reasonable to test an applicant's ability in both languages.

Some organisations also referred to setting a written test **(organisations 7, 24, 5, 6, 13, 18)**, whether it be a bespoke test or an assessment of the applicant's written application. Some organisations receive the assistance of language unit staff or translators in assessing applicants' standard of written Welsh **(organisations 8, 10, 21, 22)**.

One organisation **(organisation 18)** asks candidates to self-assess their language skills:

- "Each candidate will be given a Welsh self-assessment form. For vacancies where Welsh language skills are essential applicants are advised that they must complete the self-assessment. For posts where Welsh language skills are desirable, it is not mandatory to complete the form, however it is encouraged."

Organisation 18 also uses a Welsh Language Assessment Centre to assess the language standard of candidates wishing to be interviewed in Welsh or applying for a post for which Welsh is essential.
Several organisations scrutinise the candidate's written Welsh on their application in order to assess the standard of their written Welsh (for example, **organisations 13, 10, 19, 20**).

> EVALUATION: If applicants are required to be able to *write* Welsh at some level, we consider that it is good practice to test the applicant's ability at the interview or before the interview. In terms of assessing the candidate's writing skills level, an assessment by language unit staff or external assessor or translators may be very helpful.

Several organisations referred to their use of simultaneous translation service to translate from Welsh to English at interview panels. Simultaneous translation is provided for the benefit of non-Welsh speaking panellists at interviews where the

applicant has chosen to conduct an interview in Welsh, or where Welsh is used because the applicant is interviewed for a post for which the Welsh language is essential **(organisations 8, 22, 20, 6, 21, 5, 2)**.

It is interesting to note that one organisation **(organisation 14)** has resisted using simultaneous translation in recruitment interviews, explaining:

- "Applicants have the choice of being interviewed in Welsh or English. Until the end of 2022, there was an option for candidates wishing to be interviewed in Welsh to do this sometimes by using simultaneous translation at the interview. However, [name of organisation] has noted that this is not sufficient and that the process of using simultaneous translation services places Welsh speakers at a disadvantage. This will change from the beginning of the 2023 financial year – where Welsh panels will be available for applicants who choose to be interviewed through the medium of Welsh."

EVALUATION: We consider that best practice is to make every effort to ensure that Welsh-speaking candidates have the best possible opportunity at an interview to express themselves directly to the panellists, demonstrating their fluency and standard of expression without a third party translating their words. **Organisation 14** has expressed the view that "the process of using simultaneous translation places Welsh speakers at a disadvantage". **Organisation 14's** intention to ensure that "Welsh panels will be available for applicants who choose to be interviewed through the medium of Welsh" is very good practice. The advantage of this arrangement is that it establishes the Welsh language as the primary default, normative language of the interview, rather than giving the applicant the impression that the organisation must make exceptional, extraordinary arrangements to facilitate the use of the Welsh language at interview.

Ideally, therefore, best practice would be to ensure that panel members, and the Chair, are able to understand and speak Welsh, and that they do this by default. If this is not possible, the second best option would be to ensure that the majority of panellists or as many as possible can speak Welsh and are very willing to use Welsh at the interview. If these two options are not feasible due to a shortage of Welsh speakers to act as panellists, then preferably the Chair is at least bilingual and very willing to steer the interview bilingually and speak Welsh directly with the applicant.

We consider that the applicant is at a disadvantage if the majority of panellists rely on simultaneous translation in order to understand their Welsh answers at interview, as they cannot communicate directly with members and demonstrate their oral skills and expressions, in a situation where they are very keen to do so.

One organisation operating in an area where the percentage of Welsh speakers is low and the percentage of its Welsh-speaking staff is also low, referred to an arrangement to receive the support of the local Menter Iaith at interviews to be conducted in Welsh.

- "Menter Iaith [local] have assisted with the interview process in the past when there was no Welsh language speaker available." **(organisation 2).**

EVALUATION: In organisations where the percentage of Welsh-speaking staff is low and there is difficulty in convening a panel of internal Welsh interviewers, good practice is to take advantage of the external and specialist local resources available so that Welsh language interviews can be arranged for applicants.

Two organisations reported that there were occasions when they could not provide a Welsh interview to candidates:
- "If the role is a 'Welsh essential' role, then at least one member of the interview panel will be a fluent Welsh speaker. We also use the services of a simultaneous translator that we buy in. Also, at least one of the questions and / or assessments will be undertaken in Welsh. Where a role is Welsh essential, we endeavour to have an interview panel who are all fluent in Welsh but the size of our organisation and in most cases, the specialist nature of the role, may not allow this" **(organisation 8)**.
- "Some questions or all interview questions could be asked and assessed in Welsh. This typically doesn't happen though due to the panel requirements expected; 3 panel members with a mix of diversity regarding sex, age and ethnicity as well as someone from outside of the team recruiting. Due to this requirement, it is unlikely that we will have panel members that meet all of these requirements as well as speaks or writes in Welsh" **(organisation 16)**.

EVALUATION: Failure to provide an interview in Welsh to an applicant who has chosen to have an interview conducted in Welsh is contrary to the organisations' Welsh Language Standards and risks a failure of implementation of the Standards.

In organisations where the percentage of Welsh-speaking staff is low and there is difficulty in convening a panel of internal Welsh interviewers, organisations should take advantage of the external and specialist local resources available so that Welsh language interviews can be arranged for applicants.

In two of the organisations **(organisations 21 and 23)** an individual manager is responsible for deciding how the language skills of candidates are assessed:
- "The Recruitment Manager(s) responsible for the vacancy in question are expected to assess all essential and desirable requirements as part of the job role [...] If required, members of the Welsh Language team can join a recruitment panel in order to carry out an assessment of candidates' Welsh language skills; this will only happen where the Recruiting Manager(s) have requested it however" **(organisation 21).**
- "There are no formal arrangements in place. Assessment of linguistic skills at interview is dependent on the recruiting manager conducting the interview [...] As

an example, at Switchboard Operator interviews, candidates were asked to have a conversation in Welsh as part of the interview process to assess their linguistic skills" **(organisation 23).**

EVALUATION: We do not consider that the arrangements described by **organisations 21 and 23** above comply with the methods recommended by the WLC (op.cit., 2020, sections 4.1 - 4.2). The arrangements are flawed because they are over-dependent on the subjective judgement of an individual manager. If there is no agreed procedure to determine how applicants' language skills are assessed, this can pose a risk to the organisation as it could be challenged on the basis that there are no appropriate administrative arrangements in place to assess candidates' skills.

There is little evidence of any scoring systems for the linguistic ability of applicants. However, one organisation states that it has the following arrangements:

- "Ordinarily, Welsh Language Assessments will only be undertaken for posts that require a Level 3 or above [...] "We do not explicitly specify that the Welsh Language levels should be scored alongside other skills, experience and competences as set out as Essential or Desirable in the job profile. However, if the Welsh Language level for the post is a Level 3 or above, it is implied that we would expect the shortlisting panel to assess the applicant against this criterion" **(organisation 5)**.

EVALUATION: We consider it to be good practice to provide and implement a scoring system to assess language skills in interviews and tests, so that they can be weighted alongside other professional competencies that may be required of the post.

2.5 Post recruitment practices to promote the learning and development of Welsh language skills, the use of Welsh and staff awareness

There was a great deal of information from the organisations about their varied good practice to facilitate and promote Welsh language learning, to develop Welsh language skills and to disseminate information about the language amongst their staff.

All organisations offer opportunities for staff to learn Welsh or develop Welsh language skills, either during working hours or after work.

A selection and cross-section of good practice recorded by the organisations in this respect are summarised below.

Organisation 1

- "We offer a range of formal Welsh language training throughout the year. Learn Welsh is our main provider. There is a dedicated page on Welsh language support on our professional development site, 'The Learning Fund', and officials may apply at any time... A range of other support is also available from the Welsh language and training teams, including: Mentor support from Policy and Welsh Language Promotion Officer, , [sic] Peer support from Welsh language champions, Weekly tea and chat sessions, Cysill and Cysgeir spellcheckers and dictionaries, A specific vocabulary for the area of work.

Organisation 2

- "[The organisation] has provided conversational Welsh courses for staff and elected members since 2001. Courses are also accessible to members of the public and staff members from partner organisations to attend. The courses range from basic taster courses for beginners to courses, which cater for those who are now fluent Welsh speakers." [...] "The Welsh Language Awareness course is provided for staff in line with Standard 132."

Organisation 3

- "All staff are offered an opportunity to develop Welsh Language skills on appointment. The Welsh Language Officer advertises Welsh language courses internally that are run by Learn Welsh Ceredigion – Powys – Carmarthenshire. However, the onus is on the new staff member whether they take the course up."

Organisation 4

- "We have just arranged a weekly Welsh language course, which staff can enrol on to when starting."

Organisation 6

- "Staff have access to Work Welsh courses during working hours, free of charge, including 10-hour online taster courses. If staff are required to learn Welsh or wish to do so, they will either be enrolled on a public course or if there are sufficient numbers of staff we will hold a closed course for staff through Cardiff University."

Organisation 9

- "There are also opportunities for workers to practice their Welsh, or enhance their skills. We have a good relationship with the Centre for Learning Welsh, and Nant Gwrtheyrn Centre. Over the years, a number of staff have taken advantage of the opportunities available here for initial courses – language improvement. Three members of staff from the England directorate are also starting Welsh language courses in January, which are funded by us."

Organisation 10

- "All posts advertised by [this organisation] require candidates to demonstrate at least a basic "Courtesy" level of Welsh language skills within an agreed timeframe. Candidates are expected to evidence those skills on appointment or participate in Welsh learning within the first year of appointment (subject to the availability of provision). This is intended to be the start of a process of

continuous improvement in Welsh language skills supported by training and other learning and practice opportunities in the workplace. In previous years for staff with existing advanced Welsh language skills, we invested in term time weekly advanced Welsh learning lessons with a contracted Tutor. The content of each lesson was bespoke and developed to respond to current pieces of work or current challenges for the learners such as conference speeches or written work." Reference is also made to "courtesy level course [that] is sourced and paid for by the organisation, therefore, participation and completion of the learning is monitored."

Organisation 12
- "Staff are encouraged to attend training sessions to improve their Welsh language and this can be seen in the increase in the level of Welsh language skills within the organisation."

Organisation 13
- "All staff have access to a Learning fund by application. The fund can be used for Welsh Language Courses within a certain budget. The Service Advertises once a year for staff who are interested to study Welsh part time and be funded by the Service. We are currently working together with the Media and Communications Department to advertise opportunities for staff to learn Welsh in 2023."

Organisation 15
- "All new starters undertake a Level 1 Welsh mandatory Course which has been designed by [our organisation] and is delivered by the Welsh Language Policy Officer. During delivery of the Level 1 course, new starters are informed that they may volunteer to attend Welsh courses provided by [a local college] in order to improve their current level of Welsh language skills – whatever that may be. All employees are informed that they will be:
    - allowed to attend lessons during working hours (subject to the exigencies of the [organisation])
    - given time off in lieu (lesson time only) if they attend Welsh lessons when on rest days
    - fully funded to attend course and sit examinations.
  [The organisation] has a Welsh Speakers and Learners Network of volunteers. One of the Network's areas of activity is providing peer support for Welsh learners and improvers, including monthly on-line Siop Siarad sessions to practice spoken Welsh."

Organisation 17
- "After completing the induction process, details of individuals who are required to learn Welsh will be sent to the Welsh Language Department to arrange support, training and monitoring. All members of staff are encouraged to attend the Work Welsh programme."

Organisation 18
- "We have a Welsh Language Training programme in place that gives all our staff the opportunity to learn Welsh for work purposes during work hours. All new and existing staff with no Welsh language skills are required to attend a short course

to be able to pronounce place names, personal names and basic greetings in Welsh. All members of staff are encouraged to develop their Welsh language skills for work purposes. Any workers required to learn Welsh as a condition of their employment would be required to follow an agreed language training programme.

- "We currently support any employee who wishes to attend Welsh classes outside working hours, but pays their course fees. We also review applications for people who wish to undertake intensive Welsh courses during work hours (e.g. residential weeks) and support them when they are in a position to use their Welsh at work – [...] We offer the Work Welsh Welcome online course to all staff who wish to complete it during work hours, and this is mandatory for reception staff. However, we do not currently give people time off work to attend classes on a weekly basis."

Organisation 19

- "Every member of staff in the [organisation] has the opportunity to learn Welsh for free during working hours. There is a very wide range of opportunities available – through tutorials, online learning, conversation sessions etc."

Organisation 20

- "Welsh Language Coordinators in each department and faculty are responsible for sharing details of Welsh Language courses with staff in their areas."

Organisation 24

- "New staff can note on their Welsh language questionnaires if they require support to progress their Welsh skills. The Welsh language services team co-ordinate. Regular messages are posted in the all staff 'Global email' advertising various Welsh language courses / opportunities. Recently signed up to a new scheme with Cymraeg Gwaith – we've been provided with a tutor for a year to work with existing and new staff to build their confidence to use the Welsh language through a series of 'Confidence Building Courses' run throughout the year. New Welsh language 'Taster sessions' are being offered from March 2023; a session open to any staff, existing or new (all new staff will receive a direct email to sign up)."

> EVALUATION: Overall, we consider that the above selection of good practice in learning Welsh, improving Welsh language skills and awareness raising training for staff following their appointment, could be a useful "package" of ideas to share in order to promote good practice within organisations.

As part of their induction of new staff, several of the organisations questioned include in-house training to raise awareness of the language, the relevant legislation and the Language Standards, and the opportunities to learn Welsh / develop language skills.

Organisation 7

- "[This organisation] informs new staff as part of their induction that training on developing Welsh language skills is available to them and what they need to do to attend. Staff can also ask for support and training if they feel they would benefit."

Organisation 8

- "Through the induction process all staff undertake a Welsh language module. All staff are able, through their line manager to request to learn Welsh and if that is the case then provision is made for them to attend Welsh learners courses. The Learning & Development Policy also outlines other areas where you can continue to develop skills through Welsh medium audits, coffee and chat sessions or buddy scheme."

Organisation 11

- "The Welsh language is an integral part of our induction framework. Sessions on the Welsh Language Standards are delivered for all new staff. We offer Welsh language training to any member of staff applying."

Organisation 16

- "Our national induction process has been revised and the Welsh language element forms part of the induction for all staff. In addition to existing inductions and introductions to Welsh in the workplace, a bespoke presentation is now delivered to all new investigators across England and Wales to explain how the Welsh Language Standards apply to them in their day-to-day role."

Organisation 21

- "During the mandatory induction process that all staff undertake at the start of their time in [the organisation], the opportunity for staff to receive training in developing Welsh skills is highlighted. [The organisation] will cover the costs of Welsh lessons undertaken via their staff. More information is available on the [organisation's] intranet, and these opportunities are periodically promoted via internal channels."

Organisation 9

- "Under the new Welsh Language Standards, information on the Welsh language requirements of the Fund will be provided to staff at the Corporate Induction meeting and as part of the Wales induction process. In addition, all new members of staff in the Wales Directorate should receive an induction to the [organisation's] Welsh Language Standards from either the Welsh Language Officer or another member of the Welsh Language Team in the first two weeks of their employment."
- "At this induction meeting, staff will learn about the general requirements of the legislation relating to the Welsh language, the Welsh language standards of the [organisation], how it relates to their individual post and who to ask for further information and guidance. Non-Welsh speaking staff or Welsh speakers who are not confident in their spoken Welsh will receive a phonetic articulation card on how to answer all external calls bilingually and will receive information about Welsh classes and language improvement classes in their local area if they are interested."

EVALUATION: Sharing an understanding of the importance of the Welsh language and bilingualism within the organisation during the induction of new staff is required under the Welsh Language Standards and the above are practices that organisations could adopt to satisfy this requirement. A range of new recruits may

join the organisation after a period of working in the private sector, where the Welsh language legislation is not operational, so they may be unfamiliar with the bilingual ethos and approaches, and the opportunities to learn Welsh or develop Welsh language skills.

Two organisations described the arrangements they have in place to promote informal networking among learners and Welsh speakers:

- "We also run informal clubs for staff to practice and use their Welsh beyond the classroom, in order to increase confidence and use. These plans include a Digital Transition Club and a Welsh Buddy scheme" **(organisation 6)**.

- "As the Welsh Language Unit we have established a staff network [...] staff who are either Welsh speakers or learners, and it is run by the Welsh Language Unit staff. The network provides an opportunity to share experiences and support each other" **(organisation 22)**.

EVALUATION: Establishing such networks is good practice, which is a useful way of bringing Welsh speakers and learners together to practice Welsh in informal settings.

One other organisation notes that it takes advantage of the use of e-mails to promote Welsh internally by corresponding with staff bilingually:

- "All staff emails are produced bilingually promoting the use of the Welsh language internally" **(organisation 8)**.

EVALUATION: Using e-mails is a method of communication that reaches almost all members of staff in an organisation. This idea of bilingual correspondence is good practice when communicating with all staff, or groups of staff – e.g. by department or workplace. It can be a very useful resource to help Welsh speakers and learners to familiarise themselves with written Welsh.

Organisation 5 has a specific officer who advises staff on the support available to develop Welsh language skills:

- "[This organisation] has a dedicated Learning & Development Advisor for the Welsh Language as part of the People Management Division. The Advisor can work with teams and individuals to identify and signpost to provision and support and they also lead on the relationship with the National Centre for Learning Welsh" **(organisation 5)**.

EVALUATION: Designating a dedicated officer is good practice, which provides focus for promoting and motivating individuals and teams to take advantage of the support available to develop Welsh language skills.

As well as Welsh learning training or developing Welsh language skills, one organisation refers to providing training through the medium of Welsh on other subjects:

- "Some training courses have taken place in a naturally bilingual format in the past when the coach and participants will have bilingual skills such as First Aid, Driver Training or RMS. However, they were not formally organised as Welsh medium courses. Unfortunately, during the reporting period, the provision of training courses in general has been reduced due to COVID" **(organisation 14)**.

EVALUATION: It is a requirement under the Welsh Language Standards to provide training through the medium of Welsh or bilingually on some specific subjects and it would be good practice to do so on other subjects. It can allow trainees to become accustomed to the Welsh terminology of their respective fields, and this in turn can boost the confidence of Welsh-speaking staff and Welsh learners alike in their use of Welsh in the workplace.

2.6 Maintaining a record of language skills

The majority of the organisations in question confirmed that they keep a record of the language skills of staff and workplaces **(organisations 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 16, 17, 18, 21, 22, 23, 24)**. The record is kept on a computer system without exception.

Several organisations state that they regularly review and update their record of language skills:

- "Employee data skill levels are recorded on the HR system, ResourceLink. The data is reviewed regularly throughout the year and is used to identify those that do not meet the language requirements for their role. A full staff audit was last completed in 2017, with departmental audits scheduled for the future. However, staff language skills are updated if they receive a language assessment or have completed and passed a course. The system is also updated when new employees join the organisation" **(organisation 5)**.

- "A record is kept of the workforce's language skills and is reviewed annually as part of our reporting process. Staff can choose to record whether they speak Welsh (and other languages) or whether they are learning them on their Intranet profile. However, for the purposes of workforce Welsh language planning, a self-recording system for the level of Welsh language skill is used on our electronic human resources system, CIPHR. The levels recorded are consistent with the Welsh for Adults National Curriculum, which is also consistent with the Common European Framework of Reference for Languages (CEFR) [...] Staff skills are recorded on the electronic resource system (CIPHR) – see above. This enables managers to identify the current language skills of their teams and what is necessary when completing the Welsh Language Requirements Assessment form which is part of the recruitment process" **(organisation 6)**.

- "The [organisation's] human resources system has the ability to keep information about the linguistic skills of the workforce. Staff are able to record the information voluntarily and the human resources department asks the workforce to update their details on the HR system several times a year. Each year, we report on the figures in our annual report on Welsh Language Standards. We also provide an opportunity for staff to identify their linguistic skills in our annual anonymous diversity, inclusion and representation questionnaire" **(organisation 7)**.

- "In the case of [the branch in] Wales, we hold an annual language skills monitoring questionnaire here in this [organisation]. The questions refer to reading, speaking and writing skills" [...] Monitoring language skills - In Summer 2011 the first Language Skills Questionnaire was sent out to staff to enable us to obtain accurate information, for the first time, about the number of Welsh speakers and learners we have in [the branch in] Wales. This information helps us to ensure that we have sufficient Welsh speakers at all times, and helps us to report accurate information to the Welsh Language Commissioner. A Language Skills Questionnaire is now being sent to all staff in [the branch in] Wales every year to enable us to compare results year on year" **(organisation 9)**.

Organisation 3 records language skills at the time of appointing staff, but there is no evidence that it continually updates the record as does **organisation 5**:

- "We keep a record of the Welsh language skills of employees on our HR system, Trent. We can report on what is in the Trent system as often as is needed via our Business Intelligence Unit. Welsh Language skills are entered onto Trent at the time of employment (we take the information from candidates' application forms)."

A similar situation can be found with **organization 17** where staff have the option of making a record of their language skills but no evidence was provided of planned and continuous updating of this information as part of human resource management:

- "Employees can update their language of choice and skill levels at any time through the Employee Self-Service portal in the Human Resources system."
- "Human Resources do not currently carry out skills mapping or succession planning activity – this is being introduced as part of the people strategy in 2023."

It appears that the language skills record of staff in these organisations is all based on a self-assessment by each individual officer, as no reference is made in the answers to assessments by an independent assessor (e.g. by a language tutor).

EVALUATION: Corporate good practice is to ensure that a record of the language skills of individuals, teams and workplaces, is regularly reviewed; and it is also good practice to continually update the information about individuals as they develop their language skills and qualifications. Keeping a record of the language skills of staff is an important element in planning and managing the workforce's language skills resources, and this practice is subject to one of the Welsh Language Standards, adopted by all organisations.

Organisation 1 carries out an annual assessment of the Welsh language skills of members of staff as part of the annual meeting with each individual member of staff to review performance:

- "The performance review process ('the annual conversation') is an annual assessment of the Welsh language proficiency of all members of staff along with any development needs."

This process helps staff and managers to identify further learning pathways. Also, if staff receive training to develop their Welsh language skills, or if staff are appointed provided that they learn Welsh or develop their Welsh language skills, it is a means of assessing the learner's progress and attainment.

EVALUATION: We consider that it is good practice to assess the Welsh language skills of members of staff as part of the "annual evaluation" of individuals' performance. This is a way of (i) identifying the learning needs of individual staff (ii) measuring the progress and attainment of individuals as they develop their Welsh language skills (iii) identifying gaps in Welsh language skills within teams and departments and (iv) identifying the language skills resources of the Welsh organisation by workplace.

One organisation said that they do not keep a record of their staff's language skills.

- "No, due to lack of resource. However, with new appointments made recently, a review on Welsh language skills and the Authority's support is being updated" **(organisation 4)**.

Similarly, another organisation stated that it does not have a process in place to record how many posts were advertised with the 'Welsh essential' requirement.

- "We are currently unable to report on how many jobs we advertised where Welsh was essential. We have no process in place to record this" **(organisation 3).**

EVALUATION: The shortcomings of **organisations 4 and 3** in this regard mean that they do not comply with their imposed Language Standards on Record Keeping. This poses a risk to both organisations as their recruitment decisions could be challenged on the basis that they do not have the necessary information to be able to administer the recruitment process appropriately as required by statute.

2.7 The extent to which organisations' recruitment arrangements have been successful, according to their own findings

Having analysed the responses of the 24 organisations to the questions in the questionnaire sent to them by the WLC, the main gaps in the evidence were identified. The WLC agreed that further evidence should be sought from the organisations by asking each of the 24 organisations to respond to the additional questions below.
 The questions were:

1.   Generally, in your opinion, have the recruitment arrangements you described been an effective way for your organisation to appoint Welsh-speaking individuals, and to increase the Welsh language skills capacity within your workforce?

- If the arrangements were successful, what was the reason for success?
- If the arrangements have not been successful, what was the reason for their lack of success?

2.   To what extent have you taken into account the Commissioner's advice and findings in their annual assurance reports and advice documents when implementing your recruitment processes? Do you follow the recruitment procedures described in the Commissioner's advice document on Recruitment (comisiynyddygymraeg.cymru)?

These two questions are designed to respond to one of the main requirements of the WLC when commissioning the research, namely:

- "to receive robust data and evidence on how the recruitment process itself influences the effectiveness of organisations to increase workforce capacity".

The answers to these two questions provide useful information about the findings of the organisations themselves about the reasons for their success or lack of success in recruiting Welsh speakers. This evidence is absolutely central to the study, because the whole purpose of the arrangements that the WLC has been asking about in its questionnaire is to ensure the success of the recruitment process based on good practice. In addition, the answers received shed light on the findings of the 24 organisations on the usefulness and effectiveness of the recommended arrangements and the various advice provided by the WLC to organisations on recruitment issues.

As this section is so integral to the study, as organisations comment on the success or lack of success of their recruitment arrangements, and the perceived reasons for this, we quote from their answers at length in order to present the "first-hand" evidence.

The answers to the above questions can be split under the following headings for ease of reference:

- Types of success
- Types of lack of success
- Reasons for success
- Reasons for lack of success.

A breakdown of the organisations' findings under these headings is summarised below.

Types of success

An increase in the number/percentage of staff with Welsh language skills

Four organisations reported that they succeeded in increasing the number and/or percentage of Welsh speakers in the workforce as a result of the arrangements described by them.

- "They have been successful in that we have increased our number of Welsh speakers within the Office and therefore increased our skills" **(organisation 12)**.
- "Generally, the arrangements and policies [this organisation] has in place have been successful in attracting Welsh speakers to posts in the organisation and increasing the number and percentage of Welsh speakers [...] In 2006 the majority of officers and staff [of this organisation] had Level 0 and Level 1 skills – 53% of the workforce (66% if including Level 2).
Over the past 16 years [the organisation] has succeeded, mainly through recruitment, in increasing percentages in terms of Levels 3-5 from 34% in 2006 to 74% in 2022. A fuller breakdown of the levels is set out below in our Skills Policy. Now, there is no member of the workforce [of this organisation] without any Welsh language skills – apart from those newly recruited who have a fixed period of time to reach their level in accordance with the terms of their appointment" **(organisation 14)**.
- "Since March 2020 to Feb 2023 we have increased the number of level 4 and 5 Welsh speakers from 49 personnel to 89" **(organisation 15)**.
- "The Welsh language skills recorded within the [organisation] have increased those recorded with level 5 - proficiency has increased from 1,014 in April 2019 to 1,309 in February 2023" **(organisation 24)**.

Successful recruitment of people with relevant language skills / Welsh language skills

Seven organisations responded that they had succeeded in recruiting applicants who had the Welsh language skills relevant to the posts they advertised.

- "Up to the pandemic, the recruitment arrangements have been quite successful, and we can be confident that we have been able (in the main) to recruit people with the relevant language skills to the posts" **(organisation 5)**.
- "...Our recruitment arrangements are generally effective and we succeed in appointing Welsh-speaking individuals" **(organisation 6)**
- "By placing the posts on a number of websites outside the organisation, such as Lleol.Cymru, we place the organisation at the centre of the community, and attract individuals with Welsh-speaking skills" **(organisation 9)**.
- "The recruitment practices have been an effective way to appoint Welsh speaking individuals and as a result, we are able to provide every function of our statutory remit in Welsh and English due to our bilingual workforce" (**organisation 10).**
- "The Service believes that its practices to appoint Welsh speaking individuals have been successful," **(organisation 13)**.
- "Generally, the arrangements and policies [the organisation] has in place have been successful in attracting Welsh speakers to posts in the organisation [...] **(organisation 14)**.

- "When new areas have been established and Welsh language skills are needed e.g. [local liaison] team in 2020/21, [organisation] has designated the posts as Welsh Essential and succeeded in recruiting Welsh speakers" **(organisation 19)**.

<u>Successfully filling some posts with Welsh language skills requirements</u>
- "The practice has been partly successful as we have recruited some Welsh speakers for vacancies where we have stated "Welsh Essential/Desirable" **(organisation 17)**.
- "We are currently collecting end of year information on our recruitment activities and therefore do not currently have numbers to share with you. However, we can say that most of the positions for which Welsh is Essential have been filled" **(organisation 11)**.
- "The [organisation] has had some success in embedding Welsh language consideration into recruitment processes. Of note, was the success enjoyed when recruiting to the organisation's Switchboard Team. Welsh language skills are now included as an essential criterion when recruiting Switchboard Operators. The buy-in and understanding from the Switchboard Team was integral to the success and led to the recruitment of Welsh speaking Switchboard Operators" **(organisation 23)**.

> EVALUATION: The first two categories appear to be the most relevant measure of success for the recruitment arrangements summarised by the relevant organisations and referred to in the body of the report. Four organisations note that they succeeded in increasing the number / percentage of their Welsh speakers and seven organisations noted that they successfully recruited Welsh speakers. Therefore 11 out of the 24 organisations recorded success – less than half of the sample. Furthermore, a further three organisations reported that they had been partially successful. Overall, just over half of the organisations questioned - 14 out of 24 - answered that they had experienced success or partial success. Given that the recruitment of Welsh speakers is a vitally important element to the successful implementation of the Welsh Language Standards, the WLC may be disappointed in finding that less than half of the sample stated that they have experienced unequivocal success.

<u>Successfully maintaining the same number/percentage of staff with Welsh language skills</u>
- "The [this organisation] has been able to maintain the capacity of Welsh speakers across several areas of work" **(organisation 19)**.

<u>Organisations reporting that they have a high percentage of staff with Welsh language skills</u>
- "According to the annual report's data on Welsh language standards last year, over 90% of our workforce have skills in the language" **(organisation 1)**.
- "The majority of our staff speak Welsh" **(organisation 7)**.
- "We have a large number of bi-lingual staff members in the Team – currently 15 out of 24 people have language skills at intermediate level or above. Additionally, four of those fifteen people are occupying roles that would not currently be

advertised as Welsh essential. This feels like our practices have been successful and demonstrates the whole workforce's commitment to the Welsh language" **(organisation 10)**.

An increase in staff who wish to improve their Welsh language skills
- *"We have seen an increase in the number of staff who have decided to improve their Welsh language skills"* **(organisation 4)**.

An increase in the opportunities available to staff to use the Welsh language
- *"It has been effective as gives Welsh speakers the opportunity to apply in their first language and to undergo recruitment/selection events in their first language"* **(organisation 24)**.

EVALUATION: It is interesting to note that these comments have been offered to answer a question about "increasing the Welsh language skills resource" – namely successfully recruiting Welsh speakers. The comments received in all four categories above describe very positive indicators in terms of retaining a significant number/percentage of Welsh speakers **(organisations 19, 1, 7, 10)**; increasing staff interest in developing Welsh language skills **(organisation 4)** and providing opportunities for Welsh-speaking applicants to use their Welsh in the recruitment process **(organisation 24)**. However, despite the positiveness of these statements, they do not shed light on the extent to which more Welsh speakers were recruited because of the arrangements in question, if at all (**organisation 24** is an exception, which reported that it also succeeded in increasing the number of staff with the necessary skills).

Types of lack of success

Failing to attract fluent Welsh speakers
- "Although our practices might not have attracted many more fluent Welsh speakers..." **(organisation 4)**.

Failure to attract Welsh speakers to fill certain types of posts
- "As noted in our annual report 2021-22, recruitment to certain posts, for example front of house posts where Welsh language skills are required, remains difficult" **(organisation 6)**.
- "There was little success in recruiting to some Welsh essential posts, especially in digital and project management" **(organisation 11)**.
- "Still need to recruit more Welsh speakers for [one of our departments]" **(organisation 15)**.
- "However, some managers have noted difficulty in recruiting when posts are advertised as Welsh essential with a lack of Welsh language applicants" **(organisation 24)**.

The most obvious thing about the responses to this sub-question (namely "If the arrangements have not been successful, what was the reason for their lack of success?) is how few responses we received. Although 11 organisations all reported a lack of recruitment success, only five described what types of failure they had. It is

not possible to evaluate the lack of success for these five organisations, and their responses above, without receiving further information about their advertising methods and what managers believe are the reasons for the shortage of applications for posts for which the ability of the Welsh language is essential. Also, as other organisations are experiencing more success than those mentioned above in recruiting Welsh speakers – even in catchment areas with challenging demography – arrangements for organisations to share information with each other may be beneficial in this respect. It will also be useful for them to take into account the relevant factors recognised in this report.

Reasons for success

Their categorisation system for the language needs of posts*
Whilst we have placed each of the comments below under this single subheading for ease of reference, please note that there is considerable variation in why success is attributed to their categorisation system

- "Since 2019 we have removed the practice of describing vacancies as ones where Welsh language skills are desirable. Rather, there is an element of ability in the language or a commitment to learning, linked to every job we advertise... We believe that this change, together with our robust language policy, succeeds in communicating an image and corporate identity that values Welsh language ability" **(organisation 1)**.
- "We have seen an increase in the number of staff who have decided to improve their Welsh language skills. This might be in part due to the Welsh language being required or desirable for all roles within the [organisation], and each role being assessed for language level" **(organisation 4)**.
- "Welsh Language Skills requirements are comprehensive and part of the job description of every member of staff in [this organisation] **(organisation 14)**.
- "The [organisation] has had some success in embedding Welsh language consideration into recruitment processes. Of note, was the success enjoyed when recruiting to the organisation's Switchboard Team. Welsh language skills are now included as an essential criterion when recruiting Switchboard Operators. The buy-in and understanding from the Switchboard Team was integral to the success and led to the recruitment of Welsh speaking Switchboard Operators. Being able to identify the level and type of Welsh language skills required also made the process an effective one" **(organisation 23)**.

Clear communication regarding the language skills needs of jobs
- "When a specific level of Welsh language skills was noted in accordance with the requirements of the post, an increase was seen in the number of suitable applicants" **(organisation 22)**.

Collaboration with schools and higher education colleges
- "We also believe that collaboration with schools and further and higher education providers has been instrumental in recruiting young Welsh speakers leaving education. According to 2021/22 data we saw an increase in the number of staff appointed in the under 25 age group. We try to use our influence as a major employer in the area to raise awareness amongst students of the importance of

Welsh language skills when applying for public sector jobs. One specific example was working with Grŵp Llandrillo-Menai and the Coleg Cymraeg Cenedlaethol to create a website for students in health, care and childcare emphasising the importance of the language, the Welsh language in the health, care and childcare sector in [our operational area]" (**organisation 1**, quoting from its website).

- "Contacting all Welsh Medium schools and sending them a prospectus on careers in [our area of work]" **(organisation 15)**.
- "These practices have been successful as identifying specific job boards, attending career events and direct sourcing allows us to attract suitable candidates with the language skills" **(organisation 16)**.

Advertising on Welsh websites / social media

- "In the cases where we have successfully appointed individuals who best match the requirements of the roles, including the Welsh language, we believe that advertising on job websites that specialise in Welsh-only roles has helped. In addition, targeted recruitment can also contribute to success" **(organisation 7)**.
- "By placing the posts on a number of websites outside the organisation, such as Lleol.Cymru, we place the organisation at the centre of the community and attract individuals with Welsh speaking skills" **(organisation 9)**.
- "Paying to advertise all vacancies through Swyddle" **(organisation 15)**.
- "The things that have contributed to the success of the recruitment are using specialist recruitment websites to advertise the posts e.g. Safle Swyddi, Golwg 365 and targeted Social Media posts" **(organisation 18)**.
- "We think success is related to the following: Advertising on Welsh medium job sites..." **(organisation 10)**.

Deliberate attempt to comply with the Welsh Language Commissioner's guidelines

- "What was successful was the development of guidelines and practices, good practice in line with the requirements of the Welsh Language Standards, the guidance and learning of the Welsh Language Commissioner, and from other organisations. Implementing that learning, and developing the information already provided" **(organisation 8)**.
- "Having a Code of Practice on Appointing in accordance with the Welsh Language Standards has been key. An important part of that document is the flowcharts providing guidance on determining the language requirements of posts. These charts give transparency to the process and facilitate discussion. It has also been very important to link the Code of Practice with recruitment systems (where a language requirement needs to be identified before the post is processed) as well as monitoring systems. A new system is being implemented soon (ITrent system) and the requirements of the Code of Practice will also be incorporated into that system" **(organisation 19)**.

Intentional effort by the organisation to promote the Welsh language internally

- "We think success is related to the following: ...
  - Being flexible and supportive, recruiting people with existing/latent Welsh language skills and supporting them to improve
  - Providing a work environment where Welsh is spoken and used daily, helping with opportunities to practice.

- o Providing individual learning solutions and bespoke tutoring for the workplace.
  - o Being clear in recruitment literature that Welsh language is important to the organisation and the children and young people we work with and for" **(organisation 10)**.

- "The policy has been proactive and has emphasised that the ability to speak Welsh is very important to the organisation [...] In addition to recruitment, there is an emphasis on Welsh speaking levels associated with promotions which have prompted many of the workforce to improve their linguistic skills in order to progress in the organisation.
  We emphasise the importance of the Welsh language in every job training and there are two committees that regularly oversee and scrutinise our plans to promote the Welsh language within [the organisation] namely:
  • The Welsh Language, Equality, Diversity and Inclusion Tactical Committee
  • The Welsh Language, Equality, Diversity and Inclusion Strategic Board
  The Tactical committee meets every six weeks and the Strategic Board every three months.
  As well as this, we have a Welsh Language Champions committee responsible for informally promoting the Welsh language in the workplace. The Champions are a network of volunteers who provide advice on developing Welsh language skills in the workplace, providing guidance on Welsh language issues in their departments and helping Welsh learners working at the same sites as them" **(organisation 14)**.

- "Use of awareness sessions in Welsh, encouraging applications in Welsh" **(organisation 15)**.

Setting targets

- "Some of the recruitment practices have been effective and successful. In terms of graduates and trainees, a target to recruit a number of Welsh speakers has helped to increase the Welsh language skills within the workforce" **(organisation 8)**.

EVALUATION: (i) The answers that attribute success to the job categorisation approach and "communicating needs" confirm that clearly describing the language competencies required can be effective. (ii) The answers under the "Working with schools and universities' sub-heading are interesting. Three organisations mention such collaboration here, and two other organisations mention it under the heading on "how they could improve their recruitment arrangements" (see below). This suggests that organisations value and benefit from such collaboration. (iii) 'Advertising on Welsh websites' is identified and praised by several organisations as a reason for success, and the WLC may wish to give greater prominence to this type of targeted advertising in any revised advice documents. (iv) Three organisations noted that their "intentional effort" to promote the Welsh language internally had helped to bear fruit in their recruitment efforts. (iv) One organisation noted that targeting "graduates and trainees" had helped to increase Welsh language skills in the workplace.

Some of these comments reflect some of the guidance given in the WLC documents, but the Commissioner may wish to consider giving greater prominence to the elements set out here when revising and updating the guidance documents.

Reasons for lack of success

<u>Flaws in communicating the language requirements of posts to applicants</u>
- "We did not use the categories of Standard 136 when advertising posts. Instead, we used our own levels of competence in Welsh. However, if the Welsh language is essential for a post, we state this in English and Welsh [...] The language of our current Welsh language ability descriptions is complicated and unclear in places – particularly at the highest levels of competence. They probably lead to some not applying, thinking that their Welsh is not good enough. In identifying the level of ability required, we must be specific about the linguistic needs, what skills are required, and what skills are not required. Higher Welsh language speaking skills may be needed, but basic skills in writing and reading" **(organisation 3)**.

<u>Lack of awareness training and lack of clear guidance for managers</u>
- "Managers responsible for recruitment have not received language awareness training for some time – or none at all for new managers due to Covid-19. As a result, they do not know which areas of the county have a high proportion of Welsh speakers. This has led to the appointment of non-Welsh speaking staff in positions where capacity is required in the language. We do not have guidelines to help managers give detailed consideration to the linguistic needs of the post. We relied on the views of managers" **(organisation 3)**.

This organisation also referred to another specific shortcoming, namely lack of guidance in the form of a "decision tree/ flowchart":
- "We did not use a decision tree to help managers to assess and identify the category in accordance with Standard 136. The Welsh Government has sent out a decision tree they use and we can use the tips on page 9 of the Commissioner's document, Recruitment: Good practice advice document" **(organisation 3)**.

Another example of a weakness was provided – namely a weakness in the arrangements for scrutinising the linguistic requirements of posts, recognising that the scrutiny of assessments does not take place until it is too late:
- "We have an arrangement whereby a Welsh Language Officer and Recruitment Consultant check job eligibility levels, but this happens after they have been advertised. This must happen before the post is publicised. We can only scrutinise a sample of posts as we advertise an average of between 50 and 60 jobs per month. Therefore, it is not practical for the Welsh Language Officer to check all posts. We must therefore issue guidance to recruitment officers which includes a summary of the Commissioner's recruitment advice document so that they can validate the level of ability of posts themselves as they receive them" **(organisation 3)**.

They provide another example again:

- "We have two recruitment policies, which can be confusing for managers: Recruitment and the Welsh Language Policy and Recruitment and Selection Policy. Neither refers to Standard 136. We will rectify this by combining the two policies and including guidance for managers on Standard 136 in a revised recruitment policy" **(organisation 3)**.

- "The previous arrangements (i.e. asking managers to discuss any new posts/vacancies and the need for Welsh language skills with the Welsh Language Unit) were not sufficient or effective for the organisation to appoint Welsh-speaking individuals and increase the Welsh language skills resource within the workforce, as not enough managers were having these discussions with the Welsh Language Unit about the linguistic needs of their team/department, as part of the job creation and advertising process. As a result, the Welsh Language Officer has worked closely with the Human Resources Department over the last year to formalise these processes and establish new arrangements" **(organisation 20)**.

EVALUATION: The shortcomings identified above relate to issues that are subject to advice and guidance from the WLC. It appears that there was no compliance with the advice - and associated good practice was not adopted - when operating in the situations described here.

Lack of applications from Welsh speakers / catchment demography

- "Although our practices might not have attracted many more fluent Welsh speakers (likely due to low number of Welsh speakers in close proximity to our HQ in [name of town in south Wales])" **(organisation 4)**.

- "Generally, a low number of Welsh speakers apply for jobs. This corresponds to the linguistic demographic of the area. Although the proportion of posts advertised with Welsh desirable has increased year on year, being able to recruit fluent Welsh speakers to some of these posts is a challenge. We use Welsh language recruitment websites and Welsh language networks, but still have low numbers applying. We are doing work with Welsh speaking students in our schools and colleges but this will take time to bear fruit" **(organisation 22)**.

- "...Some managers have noted difficulty in recruiting when posts are advertised as Welsh essential with a lack of Welsh language applicants [...] A number of possibilities may be responsible for the lack of Welsh language speakers applying for certain posts – time of year of advertisement, lack of professionals within expert area" **(organisation 24)**.

EVALUATION: A number of organisations operate in catchment areas where there is a low percentage of Welsh speakers or a shortage of Welsh-speaking candidates. Some have been more successful than others in responding to this challenge, as outlined in a number of responses quoted in the body of the report. As some other organisations are having more success than those mentioned above in recruiting Welsh speakers in catchment areas with challenging demography, arrangements for organisations to share information with each other and benefit from each other's

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experiences may be beneficial in this respect. Tackling this problem requires creative and innovative responses. The WLC may wish to consider whether they can offer guidance on these issues, as well as promoting the sharing of information about the approaches of more successful organisations.

Wider labour market recruitment challenges / Impacts of pandemic

- "Up to the pandemic, the recruitment arrangements were quite successful [...] In terms of our recruitment arrangements, and its success – it must be noted that the situation facing us now as an employer is complicated and complex. Recruitment is a challenge across [the organisation] and there are a number of sectors, such as care, where we receive no job applications. This puts pressure on us in terms of service delivery but also in terms of the availability of Welsh Language skills. A further piece of work to look at this is underway by the Assistant Chief Executive" **(organisation 5)**.

- "We understand that recruitment difficulties are common in all sectors following the pandemic" **(organisation 6)**.

- "In the cases where we have not been successful, this has been due to a decrease in candidate levels across the UK since Covid. ONS evidence shows that vacancies continue to fall which reduces the demand for staff, but unemployment remains incredibly low at 3.7% resulting in fewer candidates. This contributes to a difficulty in overall recruitment (ONS March 2023)" **(organisation 7)**.

- "Where recruitment has not been successful the reasons relate to the overall availability of candidates who meet the generic criteria for the role and the general shortage of candidates for roles such as Administrative posts" **(organisation 15)**.

- "Organisational operational pressures have also made recruitment in general very challenging. A high turnover rate, high staff sickness levels, and a large number of vacancies across the organisation, have all added to the pressures we have experienced as a service. With patient care and safety being a priority, teams and departments have often focussed on recruiting people as soon as possible and sometimes consideration for Welsh language skills have not necessarily formed part of their immediate thinking" **(organisation 23)**.

The organisation does not offer sufficiently competitive salaries

- "Anecdotally we think we may struggle as our salary is not comparable with some organisations for Welsh Speakers" **(organisation 15)**.

The organisation is so large that it is difficult to implement the language measures in all parts of it

- "[This organisation] is one of the largest employers in the area, providing a diverse range of services to patients and service users. The nature and size of the organisation makes it challenging to reach all corners and ensure that Welsh language skills are given the necessary consideration where needed. To address the situation, the Welsh Language Officer is currently engaging with [service board 1 and service board 2] in turn to improve their understanding and compliance with the Welsh Language Standards. The [organisation] is also soon to establish Rhwyd-iaith, a Welsh Language Staff Network, which will promote

use of Welsh in the workplace and good practice throughout the organisation"
(organisation 23).

EVALUATION: These reasons relate to issues that are slightly beyond the scope of
the guidance and advice given to date by the WLC on recruitment issues. Wider
recruitment problems/difficulties following the pandemic is one of the most common
reasons given for lack of success. Uncompetitive salaries **(organisation 15)** are also
mentioned. Comments from **organisations 5, 6, 7, 15** highlight challenges in the
current labour market as a whole. **Organisation 23** highlighted the problem of
ensuring sufficient priority to recruit Welsh speakers across all parts of an
organisation that is of a very substantial size.

We recognise how much these more general difficulties can affect efforts to recruit
Welsh speakers. However, we note that it is possible that other reasons also
contribute to their failure to attract suitable candidates (see 'Limitations', p8 of this
document).

Additional comments from six organisations on how they could improve their recruitment arrangements

The WLC questionnaire did not ask for additional comments in addition to the
answers to their questions. However, as well as responding to the specific additional
questions about the success or otherwise of their recruitment arrangements, and the
reasons for this, six organisations **(organisations 9, 5, 2, 11, 3, 13)** submitted
further comments setting out how they could improve their arrangements.

The way in which the language skills needs of posts are categorised / communicated
- "...We will continue to work on our practices to ensure we are better able to
  differentiate the 'type' of skills required for different posts, whether these are
  essential or desirable [...] We will also work to encourage more Welsh essential
  recruitment across the authority whilst acknowledging the acute recruitment
  issues faced by many of our service areas" **(organisation 2)**.
- "We do, however, understand that potential applicants need further clarity in
  terms of the exact nature of the levels and skills required when applying. We
  need to explain more clearly to people the exact duties within the posts e.g.
  Welsh language skills in terms of delivering to community groups or offering
  advice to members of the community – where there may not be an obligation to
  prepare detailed reports to a committee" **(organisation 5)**.
  "...We are aware that our recruitment arrangements can be developed, in order to
  attract applicants who can speak Welsh, e.g. placing the Welsh language as a
  skill in a more prominent position on job advertisements. Consideration can also
  be given to whether there is room for us to ask applicants who are applying for a
  post where Welsh is not an Essential / Desirable skill if they would be willing to
  attend a course or training to develop their Welsh language skills." **(organisation
  9)**.
- "We have recently published a new Welsh Language Strategy and recruitment
  aspects are an important element of the document. We will reflect any
  advice/comments in the Commissioner's reports in undertaking this work. Here
  are a few things we want to develop further during the first year:

[...] review how language skills are categorised in job descriptions (reading, speaking, writing, understanding) with a focus on specific skills required for each role" **(organisation 11)**.

Further collaboration with schools/colleges/universities
- "Our relationship with colleges and universities needs to be strengthened to promote opportunities for school leavers" **(organisation 3)**.
- "The Service recognises that there is room for improvement with the number of Welsh speakers within the workforce, this is something that needs to be taken into consideration e.g., increase our presence at Careers events in Welsh medium schools, and consider the provision of Welsh Language learning for new starters into the Service" **(organisation 13)**.

Considering the Welsh learning provision for new staff
- "...Consider the provision of Welsh Language learning for new starters into the Service" **(organisation 13)**.

EVALUATION: The way in which skills are categorised is the burden of the comments received from four of the six above organisations **(organisations 2, 5, 9, 11)** about how they could improve their recruitment arrangements. For **organisations 3 and 13** strengthening their relationships with schools, colleges and universities is a way of promoting employment opportunities (and it is interesting to note that this has also been a subject heading in the "reasons for success" above). **Organisation 13** adds that consideration needs to be given to providing Welsh language training for newly appointed staff.

These additional comments demonstrate the ability of the above organisations to be self-critical in considering their current recruitment arrangements, and their desire to try to respond creatively to the challenges they describe. This proactive approach recognises that organisations need to be creative and progressive to take further action to ensure more effective recruitment arrangements. This may also be a message that the WLC will want to promote further.

Conclusion

- It is significant that just under half of the sample of organisations – 11 out of 24 – recorded with certainty that their recruitment arrangements had been a successful / effective way of appointing Welsh-speaking individuals, and increasing the Welsh language skills resource within their workforces.

- Thirteen of the 24 organisations stated that they adhered to the recruitment arrangements recommended in the WLC's recruitment advice documents. This is interesting because our analysis of the raw data (in the form of Excel spreadsheets submitted separately to the WLC) suggests that their recruitment practices do not adhere as closely to the guidance documents as they believe.

- Please also note that nine of the 24 organisations gave ambiguous or vague answers about the extent to which they adhere to arrangements recommended in the WLC guidance documents.

- Two organisations noted / suggested that they do not follow the advice in the WLC guidance documents **(organisations 3, 17)**. **Organisation 3** has provided completely honest answers about its shortcomings in terms of the effectiveness of its recruitment arrangements and its lack of compliance with the Commissioner's guidance and advice.

- The series of "Evaluations" we propose in text boxes in the body of the report summarises the responses of the organisations and highlights their good practice, poor practice and non-compliance with the WLC guidance documents. We trust that our evaluations will assist WLC officers as they:

  - Consult with organisations and provide them with guidance on complying with their Welsh Language Standards,
  - Update and amend the WLC guidance documents on recruitment matters,
  - Share the good and innovative practices identified in this study,
  - And encourage organisations to respond creatively and imaginatively to recruitment challenges and difficulties affecting their ability to recruit Welsh speakers, but which are beyond the issues on which the WLC can provide formal guidance.