



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Internal audits of compliance

Establishing internal formal processes for auditing departmental compliance with Welsh language standards

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Rhondda Cynon Taf County Borough Council utilises internal audit tools and processes in order to develop a firm understanding of compliance with the standards, and ensure that improvements are made.

BACKGROUND

Under the former Welsh language scheme regime, before the introduction of the Welsh language standards, there was no formal or robust structure in place for departments within Rhondda Cynon Taf County Borough Council to show how they complied with the language scheme. The Welsh language officer had to rely, to a degree, on the goodwill of departments providing an annual overview of their compliance. There was an informal process in place to collate information to measure any growth in Welsh language services.

Following the implementation of the standards – along with other legislation and strategies which mainstream the Welsh language, such as the Wellbeing of Future Generations Act and the Cymraeg 2050 strategy – the Council decided to revise its arrangements. The Council considered that the Welsh language played a key role in a number of the Welsh Government's latest policies, and that meeting the requirements of the standards was central to the success of many of them.

Discussions were held, which included the Chief Executive and the Performance Management Unit, to examine the best approach to measuring the current situation and measuring progress. A decision was taken to include the Welsh language as a question in one of the Council's most formal internal processes, the service self evaluation. Each head of service is required to complete an annual questionnaire which is the subject of a one-to-one challenge with the Chief Executive.

ACTIONS

RCT Audit Department's terms of reference were examined which, in essence, ensure that departments adhere to specific sets of policies, implementation frameworks etc. A decision was taken to establish the role of Compliance Officer within the Council's

Welsh Language Services, which would carry the same status as an officer from the audit department, and implement other processes utilised by the Audit Department.

This would create an opportunity to measure compliance, and chief officers would be given an opportunity, during the course of a formal week, to develop an understanding of the standards and the political context, be that internal or national. It would also provide an opportunity to raise concerns and discuss any barriers.

As a result, there would be a closer relationship between the Welsh language unit and other services. The Compliance Officer wears two hats; firstly, they conduct stuffy, black and white interviews in order to capture the essence of the service being examined, identify what is required in terms of the standards, and provide a detailed, rigorous and clear picture of the current situation. Secondly, they offer advice and support in terms of making progress.

Monitoring structures

The Council already invests in a Welsh Language Services unit which includes 14 members of staff: Welsh Language Services Manager, Deputy Manager, Senior Translator, 8 Translators, Compliance Officer, Tutor and Admin Assistant. The unit may implement progression steps in the name of the Chief Executive and strategic steps in the name of the Cabinet.

The Cabinet's Welsh Language Steering Group oversees strategic developments, examines reports from relevant departments on Welsh language related issues, and can present recommendations to the Council's Cabinet. The Group is responsible for monitoring the Council's progress in seeking to meet the Welsh language standards.

A working group, which includes chief officers, was established in order to ensure that the operational changes required are put in place, as well as ensure collaboration which will help services to address areas for improvement.

PRACTICAL ARRANGEMENTS

The Compliance Officer initiates the process by listing the standards relevant to the audit, depending on which Council department is being audited. Departments are unable to opt out of an audit. Then, and in the name of the Chief Executive and the Chief Auditor, the Compliance Officer will arrange an internal audit of the department in question, liaising with its senior management team (including the chief officer / manager / director).

Audits take place over 3-5 days (depending on the size of the department) and the officer explains to the chief officer / manager / director exactly which standards will be examined. In order to obtain an accurate picture of the customer service being offered to Council residents and staff, an audit covering the implementation of a number of the standards is undertaken via mystery shopper exercises etc.

The Compliance Officer will meet with service managers (including senior representation from within the department) on a formal basis in order to discuss and

request further evidence. More than one meeting is held occasionally in order to share the standards as a 'set' or theme and allow greater detail. Meetings provide an opportunity to challenge the status quo and discuss ways of improving processes where needed.

The Compliance Officer will examine areas which are the responsibility of the department being audited (e.g. the Council's Libraries department is responsible for 13 different sites) and then input the details accordingly. The spreadsheet used will record the evidence relating to compliance or non-compliance.

A report will be compiled, covering the standards' 10 themes – namely the 5 classes of standards (service delivery; policy making; operational; promotion; record keeping) and the supplementary standards which apply to the 5 classes.

A level of compliance is awarded to each class, i.e. a percentage figure for the relevant standards where there is evidence of compliance. There are five levels identified on the recording spreadsheet. This allows the Council to create the most comprehensive picture of services and compliance according to themes from the standards rather than against each individual standard. The Council believes that this approach is easier for senior officers to monitor. It also allows departments to prioritise certain themes which require more focus than others.

The report will also make recommendations on actions required in order to comply or improve processes.

A draft report is sent to senior managers for their consideration and to identify which officers will be responsible for the standards where there is non-compliance, before agreeing on a time frame. This allows the department to challenge the Compliance Officer in relation to any issue before a final version of the report is produced.

Following the formal audit and publication of the final report, the Compliance Officer will be on hand to offer advice and support, working alongside the department to monitor progress. This is a crucial element of the process. The Compliance Officer will have a detailed knowledge of how other departments and councils have gone about complying with some challenging standards. Advice and support is offered in various ways such as e-mail correspondence, over the phone or in regular meetings over a specified period.

IMPROVEMENTS AND BENEFITS

There is a long list of outcomes from establishing the new formal processes, such as:

- changing departmental policies;
- clarifying the meaning of standards;
- the robustness of an official audit platform;
- an audit undertaken on the same basis as other internal audits;
- the threat of services being hauled up in front of the audit committee;
- greater compliance with the standards (see below);
- mainstream the Welsh language into processes so that it is considered in all aspects of the Council's work;

- introduce electronic processes in order to reduce the risk of 'human error' (see below);
- produce departmental action plans;
- raise awareness;
- alleviate concerns amongst services and give the Welsh language context

The Council is able to measure progress as the audits set a benchmark, namely the current situation within relevant services. As noted above, a level of 1-5 is awarded for compliance, and the Compliance Officer will update the levels as departments work with them.

The increased level of compliance as a result of the Compliance Officer's involvement and support is firm evidence of growth and development. As the audit system develops, further benchmark evidence will be available to every Council department. Then, a second full audit of departments will allow the Council to measure continued compliance with the standards, with progress seen against the action points within the original audit report.

Specific examples

Some practical steps taken as a result of these processes include:

- the Council's e-recruitment system which asks all of the questions needed in order to comply with the standards, with language choice an essential component of the application form. The system also sends out messages in Welsh or English automatically depending on the user's preferred language;
- the Council's contact centres offer the option to use Welsh as part of the automated system;
- a fully bilingual online system so that residents can report, pay, apply, book or share their views in their preferred language. The Council is also investing in a number of other online systems (Leisure, Housing, Prices, Pensions) in order to increase the active offer to Valleys residents;
- the HR audit highlighted non-compliance in relation to 3 policies available in Welsh, but which did not state that the Welsh language was an essential part of communicating with members of staff. The Compliance Officer worked with the department in order to mainstream the Welsh language as an inherent part of the process, rather than a late addition. This would not necessarily have happened without a robust compliance unit, officer and arrangements.

In-house communication

A number of Council departments were concerned about how they would implement changes to their internal processes due to the lack of fluent Welsh speakers within departments. In order to alleviate these concerns, the Compliance Officer works closely with departments in order to resolve issues, including sharing evidence on how other departments and authorities have overcome these.

Several different departments within the Council have enquired how to interpret the standards as they don't always understand the context of the Welsh language (as they don't speak the language). Providing strategic and standard advice to all has allowed

the Council to implement an organisational and consistent interpretation of the standards rather than have each department responding differently depending on an individual interpretation of the standards.

There was a positive response to the new processes, and as a result of the guidance provided by the Chief Executive and Chief Auditor staff have considered it an official and formal process with the same power as any other audit. Council staff have considered it a good opportunity to examine the situation regarding the standards from a more independent perspective and offer very positive feedback that they are reassured that the Welsh Language Services department is there to offer support throughout the process, especially considering that the majority of staff at the Council do not speak Welsh.

HOW CAN THIS WORK FOR OTHER ORGANISATIONS?

Rhondda Cynon Taf County Borough Council believes that all of the factors involved in the establishment of internal formal processes for auditing departmental compliance with Welsh language standards can be transferred to other organisations. Below is a summary of the main elements:

- Include the Welsh language in service self evaluations
- Establish a working group which includes Chief Officers
- Establish the role of Compliance Officer within a robust Welsh Language Unit
- Conduct internal audits using recognised techniques and processes
- Put actions in place

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THE COMMISSIONER'S VIEW

By establishing the role of Compliance Officer within the Welsh Language Unit, Rhondda Cynon Taf County Borough Council has shown its commitment to ensuring compliance with the Welsh language standards and the principles of the Welsh Language (Wales) Measure 2011. Furthermore to the appointment, the position has the

same status as an officer from the audit department which reinforces its commitment further. Conducting audits across each department provides the Council with a clear organisational picture for putting actions in place for departments in their specific contexts. Here is an example of an organisation self-regulating compliance in a way which leads to improving the experiences of Welsh language users. I would like to see other organisations considering which self-regulating approaches are most appropriate for their particular contexts.