



Comisiynydd y  
Gymraeg  
Welsh Language  
Commissioner

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# Welsh Language Commissioner's Standards Report – Section 64 Welsh Language (Wales) Measure 2011

## **Public Bodies: General (4)**

[Ref: 20150529ASCCC(4) – 1]

# Contents

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1	Background and context	1
2	Standards investigation in relation to public bodies: general	2
3	Reasonableness and proportionality	4
4	Evidence received from relevant persons	6
5	Evidence received from members of the public	176
6	Evidence received by the Welsh Language Commissioner's Advisory Panel	182
7	Conclusions of the standards investigation	184
8	The next steps	200
	Appendix A – General comments received from members of the public in relation to round 2 of the standards investigations	201
	Appendix B - List of respondents to the standards investigation	206

# 1 Background and context

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011, is to promote and facilitate the use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the Commissioner's work:

- in Wales, the Welsh language should be treated no less favourably than the English language
- persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

On 7 November 2014 the Welsh Government published a document entitled 'Welsh Language Standards Regulations 2015'.<sup>1</sup> These proposed standards were developed to impose duties upon county councils and county borough councils in Wales, national park authorities and Welsh Ministers

On introducing the document, the following was noted by the Welsh Government:

The standards have been drafted so as to build on the language schemes. Organizations who will be required to comply with standards will now be required to take a more proactive, strategic approach to mainstreaming the Welsh language. We are confident that this will provide a solid foundation, enabling the Commissioner to improve services for Welsh-speakers.<sup>2</sup>

The Welsh Language Commissioner's standards investigations and the Welsh Government's evidence gathering exercise for composing their Regulatory Impact Assessment were based upon draft regulations, published on 7 November 2014.

The Welsh Language Standards (No. 1) Regulations 2015<sup>3</sup> came into force on 31 March 2015, following a debate and vote at a Plenary Meeting of the National Assembly for Wales.

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<sup>1</sup> <http://gov.wales/docs/dcells/consultation/141106-regulations-welsh-language-standards-en.pdf>

<sup>2</sup> <http://gov.wales/docs/dcells/consultation/141106-consultation-welsh-language-standards-en.pdf>

<sup>3</sup> <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

## 2 Standards investigation in relation to public bodies: general

In accordance with section 62 of the Welsh Language (Wales) Measure 2011, an exploration notice was presented on 31 October 2014 for the attention of the following individual persons:

- Auditor General for Wales (AGW)
- Professional Standards Authority for Health and Social Care (PSA)
- Youth Justice Board for England and Wales (YJB)
- Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)
- Independent Police Complaints Commission
- Equality and Human Rights Commission (EHRC)
- Local Democracy and Boundary Commission for Wales (LDBCW)
- UK Commission For Employment and Skills (UKCES)
- Welsh Local Government Association (WLGA)
- Valuation Tribunal for Wales (VTW)
- Information Commissioner's Office (ICO)
- The Mental Health Review Tribunal for Wales (MHRTW)
- The Special Educational Needs Tribunal for Wales (SENTW)
- Residential Property Tribunal Wales (RPTW)
- Agricultural Land Tribunal for Wales (ALTW)
- Data Unit Wales
- The Electoral Commission

An exploration notice was presented for the attention of the relevant persons on 31 October 2014. An exploration notice is a written notice stating the Welsh Language Commissioner's intention to carry out a standards investigation, and which specifies the subject matter of the standards investigation. The Commissioner may not carry out a standards investigation unless she has given an exploration notice to each relevant person (organization), at least 14 days before beginning the investigation.

The subject matter of this standards investigation was to determine which standards (if any) should be specifically applicable to each relevant person (whether or not the standards are already specified by the Welsh Ministers under section 26(1)).

The standards investigation period began on 17 November 2014. It ended on 6 February 2015.

As part of this standards investigation, information was collected from each relevant person identified in this section. This was done by means of a completed questionnaire (or written letter). Alongside the process of collecting evidence from all relevant persons, evidence was collected from the Advisory Panel and the public.

A public questionnaire was placed on the Welsh Language Commissioner's website. The purpose of this questionnaire was to give members of the public an opportunity to identify what they felt was reasonable for the relevant persons to undertake and provide in Welsh, in considering the requirements related to the standards published on 7 November 2014.

## Welsh Language Commissioner's Standards Report – Public Bodies: General (4) – Section 64 Welsh Language (Wales) Measure 2011

Notices were placed in the national press during the period of the standards investigation in order to make the public aware of this questionnaire.

Furthermore, a video was posted on the Commissioner's website in order to provide an introduction to the process, and to provide guidance to the public on how to respond to the standards investigation.

### 3 Reasonableness and proportionality

In accordance with section 63(1) of the Welsh Language (Wales) Measure 2011, the Commissioner must have regard to the need to secure that requirements for persons to comply with standards by virtue of section 25(1) are not unreasonable or disproportionate.

In carrying out a standards investigation, the Commissioner must consider the following:

- (a) whether, in respect of each of the activities specified in Schedule 9 which a person carries out, it is reasonable and proportionate for service delivery standards to be specifically applicable to a person, and
- (b) as respects each such activity, if it is reasonable and proportionate for service delivery standards to be specifically applicable to a person, conclude that service delivery standards should be specifically applicable to a person in relation to that activity.

In considering the question of reasonableness and proportionality, it should be noted that the Measure places a duty upon Welsh Ministers to secure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to a person if, and to the extent that, the person carries out those activities.

But Welsh Ministers need not secure that regulations provide for service delivery standards to be specifically applicable to a person in relation to an activity specified in Schedule 9 if, or to the extent that:

- (a) a standards report under section 64 indicates that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity, or
- (b) the Welsh Ministers think it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity.

This does not prevent regulations from providing for other service delivery standards to be specifically applicable to a person.

By making regulations under this Measure exercisable by statutory instrument, the Welsh Language Commissioner is authorized to give a compliance notice to a person.

A compliance notice is a notice given to a person by the Commissioner that-

- (a) sets out, or refers to, one or more standards specified by the Welsh Ministers under section 26 (1), and
- (b) requires a person to comply with the standard or standards set out or referred to.

## Welsh Language Commissioner's Standards Report – Public Bodies: General (4) – Section 64 Welsh Language (Wales) Measure 2011

The Welsh Language Commissioner will consider the evidence provided in reaching a decision on the content of a compliance notice given to a person.

The fact that a standard is made specifically applicable to a person does not mean that there is a duty to comply with that standard. A duty to comply with a standard will only be in force if the Commissioner issues a compliance notice to the person, and that notice makes it a requirement to comply with the standard on an imposition day.

The Welsh Language Commissioner will consult with the person before giving the person a compliance notice. The failure of a person to participate in a consultation will not prevent the Commissioner from giving that person a compliance notice.

After the Welsh Language Commissioner has given a compliance notice to a person, that person may apply to the Commissioner asking her to determine whether or not the requirement to comply with that standard, or to comply with the standard in that respect, is unreasonable or disproportionate. Should the Commissioner inform the person that the requirement to comply with the standard is not unreasonable or disproportionate, they have the right under the Measure to appeal to the Tribunal for determination.

### The Welsh Language Commissioner's criteria

In reaching a decision on the subject of this standards investigation, in accordance with the requirements outlined in Part 4, Chapter 8 of the Measure, the following criteria were considered alongside the evidence received as part of the standards investigation. Each criterion need not be considered in each case, and each criterion is of equal importance..

- Is the relevant person liable to be required to comply with standards – does the relevant person come within Schedule 5 and also within Schedule 6, or within Schedule 7 and also within Schedule 8?
- Is the class of standards (service delivery; policy making; operational; record keeping; promotion) applicable to the relevant person?
- Does the relevant person carry out the activity in question? <sup>4</sup>
- Has the relevant person already undertaken to provide the activity or action in question, in part or in full, via their Welsh language scheme?
- Does the person already provide the service in Welsh (whether this corresponds exactly to the requirements included in the standard or not), or carrying out the activity in accordance with the standard?
- Does the majority of other relevant persons within the same sector provide services in Welsh, or carry out the activity?
- Are there any other reasons, for or against, making the standard specifically applicable to the relevant person?

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<sup>4</sup> This criterion will be considered in respect of service delivery standards only.

## 4 Evidence received from relevant persons

Evidence was received from all relevant persons identified in section 2 of this standards report. This evidence included responses to 190 questions within a questionnaire, and also further evidence provided following further enquiries.<sup>5</sup>

Each response was read individually and software was also used to record and analyze the evidence and identify general themes. Regular meetings were held amongst the officers of the Welsh Language Commissioner to analyze the evidence received from relevant persons involved in the standards investigation, along with the current Welsh language schemes commitments of the relevant persons concerned.

In this section an average percentage is given of the relevant persons' Welsh language scheme commitments corresponding to the standards, whether they correspond entirely or partly to the requirements, for each activity.

When analysing current Welsh language schemes' commitments against the standards, it should be noted that it was not possible to match many of the standards in relation to service delivery activities, due to the detailed nature of the regulations published by the Welsh Government. In some circumstances, it is possible that the relevant persons in question are committed to, or comply with the requirement, but that it is not stated explicitly in their Welsh language schemes.

A summary of the evidence received from each relevant person from within the groups of persons noted is provided in section 4 of this report. The evidence submitted included information regarding which activities are carried out by the persons in question, which activities they carry out through the medium of Welsh and to what extent they can comply with the standards.

On 31 October 2014, the following relevant persons did not have a Welsh language scheme approved under section 14(1) of the Welsh Language Act 1993.

- The Residential Property Tribunal Wales
- Agricultural Land Tribunal (Wales)

Where there are any references to standards within this report, these refer to the standards specified in the draft regulations published by Welsh Government on 7 November 2014.

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<sup>5</sup> Evidence was received by letter, rather than the Welsh language Commissioner's questionnaire, by [The Residential Property Tribunal Wales](#) and [The Mental Health Review Tribunal for Wales](#).



## The Auditor General for Wales (AGW)

The 'Wales Audit Office' (WAO) Welsh language scheme was approved under Section 14 of the Welsh Language Act by the Welsh Language Board on 28 May 2009. In his response to this standards investigation, the AGW stated that this was a scheme for the Auditor agreed in 2009. The AGW and WAO are now separate legal entities with specific statutory duties. The AGW was identified in Schedule 6 of the Welsh Language (Wales) Measure 2011, but the WAO is not identified.

A response was provided on behalf of both entities and although there were many similarities in terms of practices and administration, there are differences which Welsh Ministers should consider in specifying standards in regulations.

Welsh Ministers should consider the extent in which the Wales Audit Office should be added as a relevant person within Schedule 6 of the Welsh Language (Wales) Measure 2011 when specifying standards in regulations.

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 86% of commitments corresponded to the standards for correspondence sent by a body.<sup>6</sup>

In relation to the AGW and the WAO, it was confirmed that the standards were operational or attainable fairly easily. They did not consider standard 3 to be relevant as they responded to correspondence, rather than initiating it.

The AGW considered that making the standards for correspondence sent by a body specifically applicable to them was reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 60% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>7</sup>

In relation to the AGW and the WAO, it was confirmed that the majority of standards were operational, attainable fairly easily, or attainable with financial implications. It was explained that they mainly contact audited bodies over the phone. Compliance with standard 18 was not considered practical for the WAO due to a shortage of qualified staff with Welsh language skills. It was explained that standards 15 and 22 were not considered

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<sup>6</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>7</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

relevant, as they do not have performance indicators for handling phone calls, nor automated systems.

The AGW considered that making the standards for telephone calls made and received by a body specifically applicable to them was reasonable and proportionate.

**Activity 3: Meetings arranged by a body that aren't open to the general public  
Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 44% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>8</sup>

It was confirmed that the standards were already operational or in the pipeline as a result of the implementation of the language skills strategy. Such meetings mainly take place with representatives of audited bodies and not members of the public. However, it was noted that standards 23, 25, 27D and 28 would be difficult to achieve in the short term. In relation to standard 27, it was considered that 27C would be the most reasonable and proportionate in terms of progressing from current practice.

The AGW considered that making the standards for meetings arranged by a body that aren't open to the general public specifically applicable to them was reasonable and proportionate.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>9</sup>

It was noted that meetings that are open to the public are very rarely arranged by the AGW. It was added that the WAO do not arrange meetings that are open to the public and is unlikely to do so. It was explained that relevant sections of the WAO's Welsh language scheme were aligned to the requirements of standards 30-34, so only a small amount of work would be needed to comply with the standards in full.

The AGW considered that making the standards for meetings arranged by a body that are open to the public specifically applicable to them was reasonable and proportionate.

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<sup>8</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>9</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>10</sup>

The number of public events involving the AGW's functions is very limited, and even then they are aimed at stakeholders rather than the general public. There are no examples of public events involving the WAO's functions. The AGW is unable to fund events, and the WAO have never done so, nor are they likely to do so.

In relation to the stakeholder meetings, it was explained that the activities described in the standards are current practice. Therefore, the AGW considered that making the standards for public events organised or funded in their entirety by a body specifically applicable to them was reasonable and proportionate.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>11</sup>

Publicity and advertising materials are produced by the AGW and the WAO, although the WAO is mainly responsible. The standard is already operational due to the implementation of the Welsh language scheme.

The AGW considered that making the standard for a body's publicity and advertising specifically applicable to them was reasonable and proportionate.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments responded to the standards for displaying material in public.<sup>12</sup>

Publicity and advertising materials are displayed by the AGW and the WAO, although the WAO is mainly responsible. The WAO routinely attends and displays material in events arranged by others. All the material, in whichever medium, is available bilingually.

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<sup>10</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>11</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>12</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The AGW considered that making the standard for displaying material specifically applicable to them was reasonable and proportionate.

**Activity 8: A body producing and publishing documents  
Standards for a body producing and publishing documents [40-49]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for a body producing and publishing documents.<sup>13</sup>

It was confirmed that the AGW and the WAO produce and publish documents, which is aligned to the Welsh language scheme, which is in turn aligned to the standards.

The AGW considered that making the standards for a body producing and publishing documents specifically applicable to them was reasonable and proportionate.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>14</sup>

All forms produced by the WAO are bilingual, including online forms. Standard 51 could be achieved, although it is not current practice.

It was noted that the only forms prepared by the AGW were service user questionnaires.

The AGW considered that making the standards for a body producing and publishing forms specifically applicable to them was reasonable and proportionate.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh. Nevertheless, it was noted that only the WAO have a website.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>15</sup>

Standards 52-56 are current practice for the WAO. No apps had been designed yet, only a micro site separate from the main website for conducting surveys. This is done bilingually.

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<sup>13</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>14</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>15</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The AGW considered that making the standards for a body's websites and online services specifically applicable to them was reasonable and proportionate.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 68% of commitments corresponded to the standards for signs displayed by a body.<sup>16</sup>

It was explained that property holding responsibility lies with the WAO, not the AGW.

Standards 58-60 are already operational, or are in the pipeline - a rolling programme is in place for changing English-only signs into bilingual versions.

The AGW considered that making the standards for signs displayed by a body specifically applicable to them was reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 43% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>17</sup>

The AGW receives visitors, although they do not have property at which to receive them.

The WAO receives visitors, and the process varies across their locations in Wales. However, the standards were considered attainable, with planning and time to implement.

The AGW considered that making the standards for receiving visitors to a body's buildings specifically applicable to them was reasonable and proportionate.

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<sup>16</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>17</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>18</sup>

Both the AGW and the WAO make official notices.

Standards 67-68 are already current practice, although it was noted that advertisements are produced as separate Welsh and English versions.

The AGW considered that making the standards for official notices made by a body specifically applicable to them was reasonable and proportionate.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The AGW stated that he did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding grants.<sup>19</sup>

The AGW did not consider that making the standards for a body awarding grants specifically applicable to them was reasonable and proportionate. According to the law, the Auditor may not award grants. The WAO could do so, but on a practical level that would be unlikely.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding contracts.<sup>20</sup>

According to the law, it was noted the AGW may not award contracts. This is undertaken by the WAO. There is already compliance with the majority of the standards, apart from when invitations to tender are published on the OJEU website. On a practical level, they do not consider that standard 76 is attainable as there is a shortage of qualified Welsh speakers in other areas to conduct such interviews without the need for simultaneous translation.

The AGW considered that making the standards for a body awarding contracts specifically applicable to them was reasonable and proportionate.

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<sup>18</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>19</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>20</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body**  
**[79-80]**

The AGW stated that he did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>21</sup>

Neither the AGW nor the WAO raise awareness about Welsh language services provided. They do not raise awareness about services in general. The audited bodies are statutorily bound to use the services provided by the AGW and the WAO. It was noted that there were cases of surveys of public interest being discussed bilingually, through interviews or publications.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The AGW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>22</sup>

The standard is already current practice by the AGW and the WAO.

The AGW considered that making the standard for a body's corporate identity specifically applicable to them was reasonable and proportionate.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The AGW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for courses offered by a body.<sup>23</sup>

Confirmation was received that neither the AGW nor the WAO offer courses to the public.

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<sup>21</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>22</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>23</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The AGW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for public address systems used by a body.<sup>24</sup>

Confirmation was received that neither the AGW nor the WAO use public address systems.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

It was noted that the WAO could comply with these standards as the majority were already in place. It was noted that the remainder are also attainable.

The AGW considered that making the standards which deal with supplementary matters in relation to the service delivery standards specifically applicable to them was reasonable and proportionate.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 60% of commitments corresponded to the policy making standards.<sup>25</sup>

Both the AGW and the WAO are responsible for policy making. The Auditor is responsible for policy decisions in relation to his functions. The Auditor and WAO Board take policy decisions in relation to the WAO's functions. These standards are considered attainable for the AGW and the WAO, and making them specifically applicable to the AGW is considered reasonable and proportionate, apart from standard 92. As reported, the WAO do not award grants, and the AGW may not award grants.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

Compliance with the standards which deal with supplementary matters in relation to the policy making standards could be achieved, and it was noted that the AGW considered that making them specifically applicable to them was reasonable and proportionate. However, standards 164 and 168 were considered unreasonable as they increased the reporting burden which already exists. A longer timetable, 30 September for example, was also proposed as being more proportionate for standard 167.

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<sup>24</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>25</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.



### **Operational standards [96-142]**

In their response, the WAO stated that the activities covered under operational standards were their responsibility, not the AGW.

#### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 7% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>26</sup>

The WAO do not operate a policy on the internal use of Welsh, but they did show a willingness and capacity to do so and to publish it on the organization's intranet.

Standards 97-101 were considered reasonable and attainable. In terms of the documentation and policies related to standards 102-109, The WAO do not consider it proportionate after considering the cost against the number of Welsh speakers within the organization.

#### **Standards for complaints made by a member of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 20% of commitments corresponded to the standards for complaints by a member of a body's staff.<sup>27</sup>

The WAO allows staff members to make complaints to the organization in Welsh, and respond to complaints made against them in Welsh. The WAO do not inform staff of this. The WAO do not offer nor conduct meetings relating to complaints in Welsh nor with the support of translation. The standards were considered reasonable and attainable, apart from standards 111 and 112, as the HR department does not have a Welsh-speaking member of staff as well as the view that conducting meetings relating to complaints with the support of translation would be complex and impractical.

#### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 20% of commitments corresponded to the standards for a body disciplining staff.<sup>28</sup>

The WAO allows staff members to respond in Welsh to allegations made against them via an internal disciplinary process, but they do not inform staff of this. The WAO do not offer nor conduct meetings relating to disciplinary procedures in Welsh nor with the support of translation. The standards were considered reasonable and attainable, apart from standards 115 and 116, as the HR department does not have a Welsh-speaking member of staff and to conduct meetings relating to complaints with the support of translation is judged to be complex and impractical.

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<sup>26</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>27</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>28</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

**Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet <sup>29</sup>

The WAO stated that they already provided Welsh spell check and grammar computer software for their staff members. Similarly, it was confirmed that it operates an intranet system, but the homepage, interfaces and menus are not available in Welsh.

The WAO do not consider that making standards 119 and 121 specifically applicable is reasonable and proportionate, due to the cost and relatively small number of staff who can speak Welsh. Not implementing these standards would also make standard 122 irrelevant.

**Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 56% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>30</sup>

The WAO confirmed that they already assess the Welsh language skills of employees. It was noted that Welsh language skills training is available and that some other training is currently being considered. However, the WAO did not believe that providing induction, health and safety and performance management training through the medium of Welsh was reasonable.

Welsh language awareness training is provided to employees and new recruits, as well as training to increase understanding of the WAO's duty to implement a Welsh language scheme. Wording or a logo is available for staff emails so that they can identify themselves as Welsh speakers or learners.

**Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 43% of commitments corresponded to the standards for recruiting by a body.<sup>31</sup>

The WAO do not currently implement a language skills strategy therefore linguistic requirements are determined on a case-by-case basis. It is anticipated that the methodology used will be reinforced on introducing a linguistic skills strategy.

Job applications and all supplementary documentation are provided in Welsh, but The WAO do not ask applicants whether they wish to be interviewed or assessed in Welsh. Candidates are advised of the WAO's decision in Welsh.

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<sup>29</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>30</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>31</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>32</sup>

The WAO confirmed that their internal signage is not in Welsh.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The WAO confirmed that they do not make audio announcements in Welsh in the workplace.

The AGW did not believe that making the operational standards specifically applicable to them was reasonable and proportionate.

### **Standards that deal with supplementary matters in relation to the operational standards [170-175]**

Compliance with the standards which deal with supplementary matters in relation to the operational standards could be achieved, and it was noted that the AGW considered that making them specifically applicable to them was reasonable and proportionate.

### **Promotion standards [143-144]**

The AGW did not wish to consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 85% of commitments corresponded to the record keeping standards.<sup>33</sup>

Many of the requirements attached to the record keeping standards are already being implemented by the AGW and the WAO, or they are attainable.

The AGW considered that making the record keeping standards specifically applicable to them was reasonable and proportionate.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

Compliance with the standards which deal with supplementary matters in relation to the record keeping standards could be achieved, and it was noted that the AGW considered that making them specifically applicable to them was reasonable and proportionate.

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<sup>32</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>33</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Professional Standards Authority for Health and Social Care (PSA)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The PSA stated that they carried out the activity in question, but did not do so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for correspondence sent by a body.<sup>34</sup>

The PSA did not believe that making the standards in relation to correspondence specifically applicable was reasonable and proportionate. It was explained that standard 1 was already aligned with the PSA's Welsh language scheme, but that the rest were unreasonable and disproportionate for a small organization based in London which was not a service provider.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The PSA stated that they carried out the activity in question, but did not do so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for telephone calls made and received by a body.

The PSA is based in London and operates across the UK. It was noted that they received fewer than ten phone calls a day on average. For these reasons, the PSA did not believe that making the standards in relation to telephone calls made and received by a body specifically applicable to them was reasonable and proportionate.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The PSA stated that they carried out the activity in question, but did not do so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.

The PSA did not believe that making the standards in relation to meetings arranged by a body that aren't open to the general public specifically applicable to them was reasonable and proportionate. The PSA reported that they do not invite persons (i.e. members of the public, as defined by the Welsh Government) to meetings; therefore they did not believe that these standards were relevant.

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<sup>34</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>35</sup>

The PSA did not consider that making standards in relation to meetings arranged by a body that are open to the public specifically applicable to them was reasonable and proportionate as they do not carry out this activity in Wales. It was explained that the PSA's approach to public engagement had changed since agreeing on a Welsh language scheme. Authority Board meetings, open to the public, are the only similar meetings arranged by the PSA. Board meetings were not held in Wales.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>36</sup>

The PSA did not consider that making standards in relation to public events organised or funded in their entirety by a body specifically applicable to them was reasonable and proportionate as they do not carry out this activity, nor anticipate doing so in future.

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>37</sup>

The PSA did not consider that making the standard in relation to a body's publicity and advertising specifically applicable to them was reasonable and proportionate as they do not carry out this activity, nor anticipate doing so in future.

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<sup>35</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>36</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>37</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>38</sup>

The PSA did not consider that making standards in relation to displaying material in public specifically applicable to them was reasonable and proportionate as they do not carry out this activity, nor anticipate doing so in future.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The PSA stated that they carried out the activity in question, and did so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>39</sup>

The PSA did not believe that making the standards in relation to a body producing and publishing documents specifically applicable to them was reasonable and proportionate. The PSA stated that they considered standards 41-44 to be disproportionate, without evidence of demand for all documents which could be of public interest. They currently operate on a case-by-case basis.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body producing and publishing forms.<sup>40</sup>

The PSA did not consider that making standards in relation to a body producing and publishing forms specifically applicable to them was reasonable and proportionate as they do not carry out this activity, nor anticipate doing so in future.

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<sup>38</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>39</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>40</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

The PSA stated that they carried out the activity in question, and did so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>41</sup>

The PSA did not believe that making standards in relation to a body's websites and online services specifically applicable to them was reasonable and proportionate. The PSA explained that their current practice was to translate public-facing pages only. They believed that translating the whole website would be costly and that the cost would have to be passed on to registrars when there have been no calls to translate any part of the website currently not available in Welsh.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for signs displayed by a body.

The PSA did not consider that making standards in relation to signs displayed by a body specifically applicable to them was reasonable and proportionate as they are a London-based tenant and their landlord was responsible for signage.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

The PSA stated that they carried out the activity in question, but did not do so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body receiving visitors at their buildings.

The PSA did not believe that making standards in relation to receiving visitors at a body's buildings specifically applicable to them was reasonable and proportionate. The PSA noted that the activity was not relevant to them as they did not have any premises in Wales.

**Activity 13: Official notices made by a body  
Standards for official notices made by a body [67-68]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>42</sup>

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<sup>41</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>42</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The PSA did not believe that making standards in relation to official notices made by a body specifically applicable to them was reasonable and proportionate. The PSA noted that the activity was not relevant to them as they did not have any premises in Wales.

**Activity 14: A body awarding grants  
Standards for a body awarding grants [69-73]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 33% of commitments corresponded to the standards for a body awarding grants.<sup>43</sup>

The PSA did not consider that making standards in relation to a body awarding grants specifically applicable to them was reasonable and proportionate, as they did not consider the standards to be relevant to them as they do not carry out the activity.

**Activity 15: A body awarding contracts  
Standards for a body awarding contracts [74-78]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 33% of commitments corresponded to the standards for a body awarding contracts.<sup>44</sup>

The PSA did not believe that making standards in relation to a body awarding contracts specifically applicable to them was reasonable and proportionate. The PSA stated that the standards were not relevant to it as they had no budget to award contracts which require the publication of invitations to tender.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79-80]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>45</sup>

The PSA did not believe that making standards in relation to raising awareness about Welsh language services provided by a body specifically applicable to them was reasonable and proportionate. The PSA stated that they were a UK-wide independent body and added that their corporate identity should reflect their UK-wide role.

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<sup>43</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>44</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>45</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The PSA stated that they carried out the activity in question, but did not do so in Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>46</sup>

The PSA did not believe that making the standard in relation to a body's corporate identity specifically applicable to them was reasonable and proportionate. The PSA stated that they were a UK-wide independent body and added that their corporate identity should reflect their UK-wide role.

**Activity 18: Courses offered by a body  
Standards for courses offered by a body [82-84]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

The PSA did not believe that making standards in relation to courses offered by a body specifically applicable to them was reasonable and proportionate, as they did not carry out the activity.

**Activity 19: Public address systems used by a body  
Standards for public address systems used by a body [85]**

The PSA stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

The PSA did not believe that making the standard in relation to public address systems used by a body specifically applicable to them was reasonable and proportionate, as they did not carry out the activity.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The PSA explained that they already had a complaints procedure in place and would be able to publish standards specifically applicable to them. However, they did not agree that making the standards for dealing with supplementary matters in relation to the service delivery standards specifically applicable to them was reasonable and proportionate.

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<sup>46</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

## **Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the PSA, on average, 30% of commitments corresponded to the standards for policy making.<sup>47</sup>

The PSA do not examine or assess the impact of policies produced, revised or amended on other persons' opportunities to use the Welsh language, nor in terms of not treating the Welsh language less favourably than the English language in a formal capacity. The PSA consider the requirements of their Welsh language scheme in producing internal policies and highlights language issues should there be any external requirements.

The PSA confirmed that they consult on policy decisions. The PSA do not seek views on the impact of policies on opportunities to use the Welsh language nor in terms of not treating the Welsh language less favourably than the English language, and it was noted that the PSA mainly consult with other organizations.

The PSA do not have a grant awarding policy.

In commissioning or researching policy-related matters, the PSA do not routinely consider the Welsh language, but they do consider the requirements of their Welsh language scheme.

The PSA did not consider that making policy making standards specifically applicable to them was reasonable and proportionate, as they do not see opportunities to achieve what is required under these standards, and also as it is a UK-wide organization.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The PSA did not consider that making standards for dealing with supplementary matters in relation to policy making standards specifically applicable to them was reasonable and proportionate. They did not see the relevance of these standards to them as an organization, and find their implementation disproportionate.

## **Operational standards [96-142]**

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the PSA, on average, 7% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>48</sup>

The PSA do not have a policy on the internal use of Welsh. They did not consider that such a policy would be proportionate for an organization with one office, based in London.

In terms of standards 97-102, and 103-109, The PSA do not offer this range of documents and policies in Welsh, nor do they ask employees or workers whether they wish to receive documents in Welsh. Doing so would incur significant costs and would be disproportionate, in the PSA's opinion, as they do not have Welsh speakers in the workplace and as their office is situated outside Wales.

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<sup>47</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>48</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the PSA, none of the commitments corresponded to standards for complaints made by members of a body's staff.

The PSA do not allow their staff to make complaints or respond to complaints made against them in Welsh. Staff members are not offered the opportunity to use the Welsh language in any way during complaint-related meetings and staff members are not informed of the outcome of a complaint in Welsh. The PSA believed that compliance with these standards would incur significant and disproportionate expenditure considering the location of their office.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the PSA, none of the commitments corresponded to standards for a body disciplining staff.

The PSA do not implement any aspect of the standards for a body disciplining staff. It added it found responding to the standards difficult for a UK-wide organization.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the PSA, none of the commitments corresponded to the standards for a body's information technology and about support material provided by a body, and in relation to the intranet.

The PSA do not provide Welsh spell check and grammar computer software, a Welsh language interface for software, nor do they operate a Welsh language intranet system. The PSA did not believe that the standards were relevant as they do not have an intranet nor Welsh-speaking members of staff.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the PSA, on average, 33% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>49</sup>

The PSA do not assess the Welsh language skills of employees, nor do they provide training as identified under standards 126-129 for their employees. It was explained that this was due to the fact that they are an organization based outside Wales and that they do not have any Welsh speakers amongst their workforce.

In terms of raising awareness of the Welsh language amongst the workforce, the Welsh language scheme was discussed during new recruits' induction sessions and a copy was provided in the electronic induction pack.

The PSA do not include any wording or information on emails regarding the Welsh language nor in Welsh.

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<sup>49</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the PSA, on average, 43% of commitments corresponded to the standards for recruiting by a body.<sup>50</sup>

The PSA do not include Welsh language skill requirements when advertising a vacancy or a new post. They do not implement any aspects of these standards.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the PSA, none of the commitments corresponded to standards for signs displayed in a body's workplace.

The PSA do not display Welsh language signs inside the organization's buildings.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the PSA, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The PSA confirmed that they make audio announcements in the organization's workplace, but not in Welsh.

The PSA did not consider that making operational standards specifically applicable to them was reasonable and proportionate.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The PSA stated that they do not carry out the activities in question in Welsh. They did not consider that making the standards for dealing with supplementary matters in relation to operational standards specifically applicable as reasonable and proportionate as it is a UK-wide organization.

### **Promotion standards [143-144]**

The PSA did not wish to consent for promotion standards to be potentially applicable to them.

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<sup>50</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the PSA, none of the commitments corresponded to the record keeping standards.

The PSA reported that it had a translation procedure in place; that staff received information on the Welsh language scheme during their induction; and that implementation of the Welsh language scheme was reviewed on an annual basis. The Authority believed that this is sufficient; they do not see the need for an additional record keeping process. As a result, they did not consider that making the record keeping standards specifically applicable is reasonable and proportionate.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The PSA did not consider that making standards for dealing with supplementary matters in relation to record keeping standards specifically applicable to them was reasonable and proportionate. It was explained that the PSA could comply with these standards, apart from 178B, as they do not have an office open to the public.

## The Youth Justice Board for England and Wales (YJB)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The YJB stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for correspondence sent by a body.<sup>51</sup>

The YJB did not believe that making the standards in relation to correspondence specifically applicable to them was reasonable and proportionate. It was agreed that standard 1 was proportionate, as was responding to Welsh language correspondence in Welsh. Due to the small number of staff based in Wales (13) and the YJB's perceived lack of demand, they considered that the remaining requirements were disproportionate.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The YJB stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 20% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>52</sup>

The YJB explained that they attempted to recruit staff with necessary knowledge of the youth justice system, as well as Welsh language skills. In their opinion, three members of staff would be needed in order to undertake the YJB's functions in Welsh, and they only had one at present. As a result, the YJB did not believe that making the standards in relation to telephone calls made and received by a body specifically applicable to them was reasonable and proportionate.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The YJB stated that they carried out the activity in question, and did so partly through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 89% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>53</sup>

The YJB did not believe that making the standards for meetings arranged by a body that aren't open to the general public specifically applicable to them was reasonable and proportionate. The YJB agrees that standards 25B, 26A and 26B are proportionate to

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<sup>51</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>52</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>53</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

them, but not the remainder due to the size of the organization and historical demand for the service.

**Activity 4: Meetings arranged by a body that are open to the public**  
**Standards for meetings arranged by a body that are open to the public [30-34]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>54</sup>

The YJB did not believe that making the standards for meetings arranged by a body that are open to the public specifically applicable to them was reasonable and proportionate.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for public events organised or funded in their entirety by a body.

The YJB did not believe that making the standards for public events organised or funded in their entirety by a body that are open to the public specifically applicable to them was reasonable and proportionate.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>55</sup>

The YJB did not believe that making the standard for a body's publicity and advertising specifically applicable to them was reasonable and proportionate.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for displaying material in public.

The YJB referred to some events which had been held where a decision was taken to display material in Welsh. However, the YJB did not believe that making the standards for displaying material in public specifically applicable to them was reasonable and proportionate.

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<sup>54</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>55</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The YJB stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>56</sup>

The YJB did not believe that making the standards for a body producing and publishing documents specifically applicable to them was reasonable and proportionate. Rather, the YJB favour giving consideration to documentation on a case-by-case basis.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>57</sup>

The YJB did not believe that making the standards for a body producing and publishing forms specifically applicable to them was reasonable and proportionate as they do not produce forms.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and online services [52-57]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body's websites and online services.<sup>58</sup>

The YJB did not believe that making the standards for a body's websites and online services specifically applicable to them was reasonable and proportionate as their website is now part of Gov.uk, which is in the care of the Cabinet Office. However, it is important to note that the Welsh Language Commissioner understands that it is the responsibility of individual organizations to provide content for the Gov.uk website.

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<sup>56</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>57</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>58</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

The YJB stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>59</sup>

The YJB considered that making the standards for signs displayed by a body specifically applicable to them was reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

The YJB stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 29% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>60</sup>

The YJB did not believe that making the standards for receiving visitors at a body's buildings specifically applicable to them was reasonable and proportionate as they only received visitors through appointments.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>61</sup>

The YJB did not believe that making the standards for official notices made by a body specifically applicable to them was reasonable and proportionate as they do not carry out this activity.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body awarding grants.<sup>62</sup>

The YJB did not believe that making the standards for a body awarding grant specifically applicable to them was reasonable and proportionate. It was noted that it is Local

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<sup>59</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>60</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>61</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>62</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

Authorities that receive grants for youth justice work, and that they have their own Welsh language schemes.

**Activity 15: A body awarding contracts  
Standards for a body awarding contracts [74-78]**

The YJB stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 68% of commitments corresponded to the standards for a body awarding contracts.<sup>63</sup>

The YJB did not believe that making the standards for a body awarding contracts specifically applicable to them was reasonable and proportionate. The YJB reviews all contracts on a case-by-case basis and favours the same approach to consideration of the Welsh language within contracts.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79-80]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>64</sup>

The YJB did not believe that making the standards for raising awareness about Welsh language services provided by a body specifically applicable to them was reasonable and proportionate. It was noted that it would be disproportionate to comply with these standards in terms of all of the YJB's services and that it should be left to managers to determine when the standards should be applied.

**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The YJB stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>65</sup>

The YJB considered that making the standard for a body's corporate identity specifically applicable to them was reasonable and proportionate.

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<sup>63</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>64</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>65</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The YJB stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

The YJB did not believe that making the standards for courses offered by a body specifically applicable to them was reasonable and proportionate, due to the disproportionate costs of adapting technology systems.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The YJB stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

The YJB did not believe that making the standard for public address systems used by a body specifically applicable to them was reasonable and proportionate.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The YJB did not believe that making the standards for dealing with supplementary matters in relation to the service delivery standards specifically applicable to them was reasonable and proportionate. It was noted that the cost of compliance would be disproportionate to a small organization with limited contact with the public.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the YJB, on average, 100% of commitments corresponded to the standards for policy making.<sup>66</sup>

The YJB stated that they do not make policies as their powers do not allow them to do so. Therefore, they do not believe that making the policy making standards specifically applicable to them is reasonable and proportionate. The Board explained that they produce strategic documents and guidance in alignment with the YJB's Welsh language scheme.

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<sup>66</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The YJB stated that they do not make policies; therefore they do not believe that making the standards for dealing with supplementary matters in relation to policy making standards specifically applicable to them is reasonable and proportionate.

## Operational standards [96-142]

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the YJB, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

The YJB referred to their Welsh language scheme, which is on their intranet, as an example of a policy on internal use of Welsh. The Board explained that a minimum amount of documentation was available to employees or workers on request, but that no policies were currently available in Welsh. It was noted that more could be provided on request.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the YJB, none of the commitments corresponded to the standards for complaints made by members of a body's staff.

The YJB allow staff members to make complaints or respond to complaints in Welsh. In terms of the remaining standards, they explained that this was a new area for the YJB and therefore they did not have a policy for complaints made by members of a body's staff. Ad hoc arrangements would be put in place should there be a requirement to correspond in Welsh.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the YJB, none of the commitments corresponded to the standards for a body disciplining staff.

The YJB do not have a policy on the use of Welsh within the disciplinary process. Ad hoc arrangements would be put in place should there be a requirement to correspond in Welsh.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the YJB, none of the commitments corresponded to the standards for a body's information technology and about support material provided by a body, and in relation to the intranet.

Welsh spell check and grammar computer software, along with Welsh language interfaces for software (where an interface is available), are provided. The YJB's intranet is not available in Welsh. It was noted that providing a Welsh language intranet would involve the creation of an entirely new site for staff members.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the YJB, on average, 44% of commitments corresponded to the standards for developing Welsh language skills through workforce planning and development.<sup>67</sup>

These standards are not currently in force, apart from standards 131-133 in relation to staff based in Wales only.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the YJB, on average, 29% of commitments corresponded to the standards for recruiting by a body.<sup>68</sup>

Positions at the YJB are advertised as being Welsh desirable, therefore 100% of the YJB's posts in Wales are advertised with a Welsh language requirement. The YJB do not undertake any aspect of the recruitment process, as covered in the standards, through the medium of Welsh.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the YJB, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>69</sup>

Signage at the YJB's office in Wales is bilingual, with the Welsh given prominence.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the YJB, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

Audio announcements are made at the YJB's main office in London.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The YJB did not consider that making the standards for dealing with supplementary matters in relation to operational standards specifically applicable to them was reasonable and proportionate, due to cost.

### **Promotion standards [143-144]**

The YJB did not consent for promotion standards to be potentially applicable to them.

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<sup>67</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>68</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>69</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the YJB, on average, 92% of commitments corresponded to the record keeping standards.<sup>70</sup>

The YJB stated that they keep records which are proportionate to the organization's business needs and size. It was reported that the number of transactions with the organization are low. The YJB did not believe that making the record keeping standards specifically applicable to them was reasonable and proportionate.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The YJB did not believe that making the standards for dealing with supplementary matters in relation to record keeping standards specifically applicable to them was reasonable and proportionate. The Board believes that the data currently kept by them is proportionate to the organization's business needs and size.

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<sup>70</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body**

##### **Standards for correspondence sent by a body [1-7]**

RCAHMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 86% of commitments corresponded to the standards for correspondence sent by a body.<sup>71</sup>

The Commission considered that making the standards for correspondence sent by a body specifically applicable to them was reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body**

##### **Standards for telephone calls made and received by a body [8-22]**

RCAHMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 87% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>72</sup>

RCAHMW did not believe that making standards for telephone calls made and received by a body specifically applicable to them was reasonable and proportionate. The Commission considered that the requirements of standard 9 were disproportionate. In addition, due to the organization's specialist nature, the Commission did not believe that standards 18-19 and 21 were reasonable. It noted that they did not consider that standards 15 and 22 are relevant.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public**

##### **Standards for meetings arranged by a body that aren't open to the general public [23-29]**

RCAHMW stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>73</sup>

RCAHMW did not believe that making standards for meetings arranged by a body that aren't open to the general public specifically applicable to them was reasonable and proportionate.

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<sup>71</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>72</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>73</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The Commission stated that they agreed with the standards in principle, but did not consider that making them specifically applicable to them was reasonable and proportionate. This was due to the size of the organization and the specialist nature of their work.

**Activity 4: Meetings arranged by a body that are open to the public**  
**Standards for meetings arranged by a body that are open to the public [30-34]**

RCAHMMW do not currently carry out the activity in question but there is an intention to start doing so during 2015-16.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>74</sup>

The Commission considered that making the standards for meetings arranged by a body that are open to the public specifically applicable to them was reasonable and proportionate.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>75</sup>

The Commission considered that making the standards for public events organised or funded in their entirety by a body specifically applicable to them was reasonable and proportionate, although they did state that some events had to be led by non-Welsh speaking experts.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>76</sup>

The Commission considered that making the standard for a body's publicity and advertising specifically applicable to them was reasonable and proportionate.

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<sup>74</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>75</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>76</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>77</sup>

The Commission considered that making the standards for displaying material in public specifically applicable to them was reasonable and proportionate.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>78</sup>

RCAHMMW did not believe that making the standards for a body producing and publishing documents specifically applicable to them was reasonable and proportionate. The Commission anticipated difficulties in producing bilingual versions of all presentations or documents for conferences and seminars, considering the amount of papers and their technical/specialist nature.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>79</sup>

The Commission considered that making the standards for a body producing and publishing forms specifically applicable to them was reasonable and proportionate. Compliance with standard 50A would require more time.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and online services [52-57]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body's websites and online services.<sup>80</sup>

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<sup>77</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>78</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>79</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The Commission considered that making the standards for a body's websites and online services specifically applicable to them was reasonable and proportionate. Some specific examples were given, such as Coflein (an online archive) and blogs, where the Commission did not consider it proportionate to provide them bilingually.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for signs displayed by a body.<sup>81</sup>

The Commission considered that making the standards for signs displayed by a body specifically applicable to them was reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>82</sup>

The Commission did not consider that making the standards for receiving visitors at a body's buildings specifically applicable to them was reasonable and proportionate, due to standard 62. The Commission explained that they routinely provided a bilingual reception service but that they saw an additional, disproportionate, requirement in relation to this standard.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>83</sup>

The Commission considered that making the standards for official notices made by a body specifically applicable to them was reasonable and proportionate.

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<sup>80</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>81</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>82</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>83</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

RCAHMMW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body awarding grants.<sup>84</sup>

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

RCAHMMW stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body awarding contracts.<sup>85</sup>

The Commission did not consider that making the standards for a body awarding contracts specifically applicable to them was reasonable and proportionate, due to standards 76 and 77 in particular. They anticipated difficulties in terms of compliance due to the size of the organization and their resources.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79-80]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>86</sup>

The Commission considered that making the standards for raising awareness about Welsh language services provided by a body specifically applicable to them was reasonable and proportionate.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

RCAHMMW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>87</sup>

The Commission considered that making the standard for a body's corporate identity specifically applicable to them was reasonable and proportionate.

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<sup>84</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>85</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>86</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>87</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

RCAHMMW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for courses offered by a body.<sup>88</sup>

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

RCAHMMW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for public address systems used by a body.<sup>89</sup>

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

RCAHMMW did not believe that making the standards for dealing with supplementary matters in relation to the service delivery standards specifically applicable to them was reasonable and proportionate. The Commission stated that they could comply with the standards in full, apart from standard 161, where they anticipated only partial compliance.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of RCAHMMW, on average, 100% of commitments corresponded to the policy making standards.<sup>90</sup>

The Commission do not award grants; therefore they do not have a policy on the topic. The Commission do not routinely conduct external consultations on policy decisions - with some exceptions, such as the Welsh language scheme - nor do they conduct or commission research in order to support the policy making process.

The Commission considered that making the policy making standards specifically applicable to them was reasonable and proportionate.

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<sup>88</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>89</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>90</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

RCAHMMW do not comply with all the standards for dealing with supplementary matters in relation to policy making standards, but they did consider that making the standards specifically applicable to them was reasonable and proportionate.

## Operational standards [96-142]

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of RCAHMMW, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

The Commission do not have a policy on the internal use of Welsh, but they did state that it could prepare one. The Commission do not offer the full range of documents (standards 98-102) to employees in Welsh, but they do provide them on request. They stated that full compliance would require additional resources. The Commission are reliant on the Welsh Government for policies and procedures, as listed under standards 103-109, and they currently only receive them in English.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of RCAHMMW, none of the commitments corresponded to the standards for complaints made by members of a body's staff.

The Commission do not inform staff that they may make complaints or respond to complaints in Welsh, although they would allow staff to do so. Standards 111 and 112 are not in force, and although the Commission could comply with standard 112 with additional resources, it was noted that they could not comply with standard 111 due to the number of Welsh speakers within the Commission.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of RCAHMMW, none of the commitments corresponded to the standards for a body disciplining staff.

The Commission do not inform staff that they may respond to allegations made against them through an internal disciplinary process in Welsh, although they would allow staff to do so. The Commission could comply with standards 116 and 117 with additional resources, but standards 114 and 115 were considered impractical as they do not have enough Welsh speakers to comply.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of RCAMHW, on average, 14% of commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet<sup>91</sup>

Welsh spell check and grammar software, along with Welsh language interfaces (where available), are provided to RCAMHW staff. The Commission do not currently have an

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<sup>91</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

intranet but they are considering developing one. If that happened, the Commission considers that it would be disproportionate to operate a fully bilingual intranet.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of RCAMHW, on average, 78% of commitments corresponded to the standards for developing Welsh language skills through workforce planning and development.<sup>92</sup> RCAMHW do assess their employees' Welsh language skills. The Commission do not provide training through the medium of Welsh, with the obvious exception of Welsh language skills training. Language awareness training is offered, along with awareness of the organization's Welsh language scheme, and language awareness to new recruits. Welsh language details appear at the bottom of staff emails, with the exception of wording identifying Welsh speakers or learners.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of RCAHMMW, on average, 43% of commitments corresponded to the standards for recruiting by a body.<sup>93</sup>

RCAHMMW stated that they operate in accordance with the standards for recruiting by a body.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of RCAHMMW, on average, 25% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>94</sup>

Welsh signs are displayed in the Commission's workplace, with the Welsh given prominence.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of RCAHMMW, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The Commission do not make audio announcements in the workplace.

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<sup>92</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>93</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>94</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The RCAHMW stated that they do not currently undertake everything outlined in the standards for dealing with supplementary matters in relation to operational standards, but they could do so, should resources allow. The Commission considered that making the standards for dealing with supplementary matters in relation to operational standards specifically applicable to them was reasonable and proportionate.

### **Promotion standards [143-144]**

RCAHMW did not wish to consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of RCAHMW, on average, 69% of commitments corresponded to the record keeping standards.<sup>95</sup>

The Commission stated that a significant amount of records were already kept, but in terms of telephone enquiries, they explained that only calls to the enquiry service were recorded and that it would be difficult to extend that practice across the Commission. As a result, the Commission did not believe that making the record keeping standards specifically applicable to them was reasonable and proportionate.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The RCAHMW did not believe that making the standards for dealing with supplementary matters in relation to record keeping standards specifically applicable to them was reasonable and proportionate, although they did state that they could comply with standards 178-179.

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<sup>95</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## Independent Police Complaints Commission

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for correspondence sent by a body.<sup>96</sup>

The IPCC stated that a number of these requirements were already current practice. However, they believed that asking a person's language choice would be inappropriate under certain circumstances, stating that they worked across England and Wales. Furthermore, they did not believe that it would be appropriate to provide bilingual correspondence or offer to do so in all cases. In light of that, they did not consider that making these standards specifically applicable would be reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 60% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>97</sup>

The IPCC stated that a number of these requirements were current practice. The Commission stated that their main phone number offered a language choice to callers and that the call was handled in Welsh if that was chosen.

However, they did not consider that making all the standards specifically applicable to them would be reasonable and proportionate. Standards 16 and 22 were mentioned specifically, stating that telephony system restrictions stopped them from making changes to it at present. However, they did state that they would make enquiries in order to see if this would be possible in future.

Concerns were also raised about the need for all members of staff to answer their direct lines bilingually, as many were based in England.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The IPCC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

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<sup>96</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>97</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>98</sup>

The IPCC stated that they did not consider that conducting all such meetings in Welsh was reasonable and proportionate. However, they would consider doing so on a case-by-case basis, depending on the type of meeting and their attendees. They also stated that they would ensure that those invited to a meeting were aware that they could use the Welsh language in the meeting, should they wish to do so, and that they needed to inform them of that in advance.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The IPCC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>99</sup>

The IPCC stated that the majority of their public meetings took place in London and, as a result, they did not consider that making these standards specifically applicable to all of their public meetings would be reasonable and proportionate. However they would consider these standards on a case-by-case basis, should a meeting of this kind take place in Wales, or if someone attending a meeting in London wished to use the Welsh language.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The IPCC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>100</sup>

The IPCC stated that they considered that making these standards specifically applicable to them would be reasonable and proportionate and that they would comply with them when a meeting of this kind was held in Wales.

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The IPCC stated that they did not carry out the activity in question. However, they had a public information leaflet explaining the complaints procedure and that the leaflet was available in Welsh.

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<sup>98</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>99</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>100</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>101</sup>

**Activity 7: Displaying material in public  
Standards for displaying material in public [38-39]**

The IPCC stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>102</sup>

The IPCC explained that they do not display material in public in general but that Welsh forces could request a hard copy of the complaints leaflet to display in police stations.

**Activity 8: A body producing and publishing documents  
Standards for a body producing and publishing documents [40-49]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 90% of commitments corresponded to the standards for a body producing and publishing documents.<sup>103</sup>

The IPCC confirmed that a number of the documents listed in standard 44 were already available in Welsh. However, they believed that the requirements placed upon them in terms of cost and staff time in order to produce all of these documents in Welsh would be disproportionate. Such a demand was questioned, stating that requests for Welsh language documents would be considered on a case-by-case basis.

In terms of press releases, they did not consider that making each one bilingual would be suitable considering that some would only be relevant to England. Concerns were also raised about the potential delay in procuring an external translation service to translate such press releases, highlighting the fact that they were often required at short notice. The Commission was also concerned about confidentiality should a confidential document have to be shared with an outside agency.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 75% of commitments corresponded to the standards for a body producing and publishing forms.<sup>104</sup>

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<sup>101</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>102</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>103</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>104</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The IPCC stated that they produced online forms and forms in Word and PDF format and that the latter two were available in Welsh. They did not consider that making standard 50 specifically applicable to them in relation to online forms would be reasonable and proportionate, referring specifically to the resources that would be needed. They believed that significant costs would be incurred in making the necessary changes. The Commission confirmed that they could comply with standard 51 immediately.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and on-line services [52-57]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body's websites and online services.<sup>105</sup>

The IPCC confirmed that the main sections of their website were already available in Welsh. However, they did not consider that providing the entire website in Welsh would be reasonable and proportionate, stating that there would be significant resource implications to that, in their opinion. The Commission confirmed that they do not currently design apps.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>106</sup>

The IPCC stated that the only permanent sign they have is already available in Welsh. They considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for a body receiving visitors at their buildings [61-66]**

The IPCC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>107</sup>

The IPCC stated that they do not have a specific reception and that they are aware of the majority of their visitors in advance. As a result, they believed that they could deal with a request for a service through the medium of Welsh. Although they do not usually receive unexpected visitors, they would strive to provide the service through the medium of Welsh should that happen and that the service is requested. However, they did not consider that

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<sup>105</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>106</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>107</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 13: Official notices made by a body  
Standards for official notices made by a body [67-68]**

The IPCC stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>108</sup>

**Activity 14: A body awarding grants  
Standards for a body awarding grants [69 - 73]**

The IPCC stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 33% of commitments corresponded to the standards for a body awarding grants.<sup>109</sup>

**Activity 15: A body awarding contracts  
Standards for a body awarding contracts [74-78]**

The IPCC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body awarding contracts.<sup>110</sup>

The IPCC stated that they did not consider that making these standards specifically applicable to them would be reasonable and proportionate. They believed that there would be significant resource implications. They believed that a specific team would be needed in order to secure compliance, which was not proportionate considering that they only had a small procurement team at present, which was mainly based in London.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79 - 80]**

The IPCC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.

The IPCC stated that they considered that making these standards specifically applicable to them would be reasonable and proportionate.

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<sup>108</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>109</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>110</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The IPCC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>111</sup>

The IPCC confirmed that they already had a Welsh language logo. In light of that, they considered that making this standard specifically applicable to them would be reasonable and proportionate.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The IPCC stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The IPCC stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

The IPCC confirmed that they do not use public address systems at their office in Wales.

**Standards that deal with supplementary matters in relation to the service delivery standards [158-163]**

The IPCC stated that these standards appeared to be attainable and realistic in general. However, concerns were raised about aspects of standard 161, with specific reference to the fact that the Commission operated across England and Wales and that their headquarters was in London and their contact centre was in Manchester. They stated that they could produce an annual report but would need to examine whether their systems and services could provide the necessary information.

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<sup>111</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

### **Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the policy making standards.<sup>112</sup>

The IPCC stated that they already conducted equality impact assessments in relation to new and revised policies, which included impacts on the Welsh language. They do not award grants but they considered that making each one of the standards, apart from standard 92, specifically applicable to them would be reasonable and proportionate.

### **Standards that deal with supplementary matters in relation to the service delivery standards [164-169]**

The IPCC believed that these standards were attainable and that they could comply with them.

### **Operational standards [96-142]**

#### **Standards for the use of the Welsh language within a body's internal administration [96 - 109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

The IPCC stated that they do not have a formal policy in place for promoting and facilitating the use of Welsh within the organization, but they had taken steps to encourage staff to learn Welsh.

It was noted that the documents referred to in these standards are only produced in English at present and that there had never been a request for a Welsh language version to date. The Commission did not believe that asking all members of staff whether they wished to receive this information in Welsh was reasonable, but they would consider staff requests from Welsh speakers on a case-by-case basis. Concerns were raised about the cost attached to providing all the relevant documents in Welsh, although they did state that they would be willing to consider that on a case-by-case basis.

The Commission stated that they used an online system for recording leave and absences which is only available in English. They did not believe that they could make the necessary changes to that system as it was provided by a third party.

#### **Standards for complaints made by a member of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

The IPCC confirmed that these requirements are not current practice. They believed that the related cost would be unreasonable and disproportionate.

#### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

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<sup>112</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The IPCC confirmed that these requirements are not current practice. They believed that the related cost would be unreasonable and disproportionate.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

The IPCC stated that these requirements are not current practice. They did not consider that making these standards specifically applicable to them would be reasonable and proportionate as their provision was based in London and served the entire organization. The Commission believed that the cost attached to implementing this was unreasonable and likely to cause delay in publishing the information. However, they stated that they were developing a page for their intranet focusing on Welsh language issues.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>113</sup>

The IPCC confirmed that they already assessed their employees' Welsh language skills. They also stated that it gave staff opportunities to attend Welsh lessons. However, the other requirements were not current practice. They stated that not all the training referred to was provided by the Commission and that a vast amount of training took place in London and was provided by a third party. They did not consider that providing these courses or providing a simultaneous translation service for them would be reasonable and proportionate.

They did not consider that providing the training referred to in standard 130 would be reasonable and proportionate for staff based in England.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for recruiting by a body.<sup>114</sup>

The IPCC stated that these requirements are not current practice. However, they believed that making standards 134 and 135 specifically applicable to them would be reasonable and proportionate. It was not of the same opinion in relation to the other standards, stating that significant costs would be attached to them.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>115</sup>

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<sup>113</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>114</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>115</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The IPCC confirmed that it displayed signs internally in Welsh and that the Welsh language was given prominence.

#### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The IPCC stated that they do not make audio announcements in their office in Wales.

#### **Standards that deal with supplementary matters in relation to the operational standards [170-175]**

The IPCC believed that these standards were attainable and that they could comply with them. However, the Commission stated that they would not be able to comply in full with standard 173 as it had already raised concerns about the expectations referred to in this standard.

#### **Promotion standards [143-144]**

The IPCC did not wish to consent for promotion standards to be potentially applicable to them.

#### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 77% of commitments corresponded to the record keeping standards.<sup>116</sup>

The IPCC stated that they already kept a record of compliance in terms of their Welsh language scheme. They believed that making a selection of these standards specifically applicable to them would be reasonable and proportionate.

However, in terms of the remainder of the standards in question, they stated that they would be very difficult to collate the relevant data. They also believed that standard 157 would be disproportionate.

#### **Standards that deal with supplementary matters in relation to the record keeping standards [178-179]**

The IPCC believed that these standards were attainable and that they could comply with them.

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<sup>116</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.



## Equality and Human Rights Commission (EHRC)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for correspondence sent by a body.<sup>117</sup>

The Commission considered that making the standards for correspondence sent by a body specifically applicable to them was reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>118</sup>

The Commission considered that making the standards for telephone calls made and received by a body specifically applicable to them was reasonable and proportionate. They stated that the majority of standards were already being implemented in their office in Wales, but they did not consider that standards 15, 18 and 22 were relevant.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>119</sup>

The Commission considered that making the standards for meetings arranged by a body that aren't open to the general public specifically applicable to them was reasonable and proportionate.

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<sup>117</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>118</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>119</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 4: Meetings arranged by a body that are open to the public**  
**Standards for meetings arranged by a body that are open to the public [30-34]**

The EHRC stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>120</sup>

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>121</sup>

The Commission considered that making the standards for public events organised or funded in their entirety by a body specifically applicable to them was reasonable and proportionate.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>122</sup>

The Commission considered that making the standard for a body's publicity and advertising specifically applicable to them was reasonable and proportionate.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>123</sup>

The Commission considered that making the standards for displaying material in public specifically applicable to them was reasonable and proportionate.

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<sup>120</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>121</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>122</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>123</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>124</sup>

The Commission referred to some instances where research reports produced for a specific audience are prepared in one language usually. The Commission considered that making the standards for a body producing and publishing documents specifically applicable to them was reasonable and proportionate.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>125</sup>

The Commission considered that making the standards for a body producing and publishing forms specifically applicable to them was reasonable and proportionate.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and online services [52-57]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>126</sup>

The Wales section of the Commission's UK-wide website is bilingual, with over 75% of the entire website bilingual. The Commission considered that making the standards for a body's websites and online services specifically applicable to them was reasonable and proportionate.

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<sup>124</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>125</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>126</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>127</sup>

The Commission considered that making the standards for signs displayed by a body specifically applicable to them was reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>128</sup>

The Commission considered that making the standards for receiving visitors at a body's buildings specifically applicable to them was reasonable and proportionate.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The EHRC stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>129</sup>

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The EHRC stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding grants.<sup>130</sup>

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<sup>127</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>128</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>129</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>130</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 15: A body awarding contracts  
Standards for a body awarding contracts [74-78]**

The EHRC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding contracts.<sup>131</sup>

The Commission did not believe that making the standards for a body awarding contracts specifically applicable to them was reasonable and proportionate as they advertised contracts on a UK-basis.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79-80]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>132</sup>

The Commission considered that making the standards for raising awareness about Welsh language services provided by a body specifically applicable to them was reasonable and proportionate.

**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The EHRC stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>133</sup>

The Commission considered that making the standard for a body's corporate identity specifically applicable to them was reasonable and proportionate.

**Activity 18: Courses offered by a body  
Standards for courses offered by a body [82-84]**

The EHRC stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

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<sup>131</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>132</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>133</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The courses provided by the EHRC (provided by an external third party) are not open to the public. The EHRC did not believe that making the standards for courses offered by a body specifically applicable to them was reasonable and proportionate.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The EHRC stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for public address systems used by a body.<sup>134</sup>

The EHRC considered that making the standard for public address systems used by a body specifically applicable to them was reasonable and proportionate.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The EHRC explained that they do not have offices open to the public.

The Commission considered that making the standards for dealing with supplementary matters in relation to the service delivery standards specifically applicable to them was reasonable and proportionate.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 100% of commitments corresponded to the policy making standards.<sup>135</sup>

The EHRC already operates in accordance with their Welsh language scheme commitments, considering the Welsh language as part of their policy making. The EHRC consults on policy decisions but they do not have a grant awarding policy as they do not award grants.

The Commission considered that making the policy making standards specifically applicable to them was reasonable and proportionate.

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<sup>134</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>135</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The EHRC considered that making the standards for dealing with supplementary matters in relation to policy making standards specifically applicable to them was reasonable and proportionate.

## Operational standards [96-142]

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of EHRC, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

The EHRC do not implement a policy on the internal use of Welsh. The EHRC considers that compliance with standard 96, and implementation of such a policy, would be reasonable whilst bearing in mind that they operate on a UK-wide level.

In terms of the documentation and policies listed under standards 97-109, the EHRC neither provide nor offer these in Welsh. It was noted that the EHRC have 13 members of staff in Wales, out of a 200-strong workforce. The organization is administered out of England, so the standards were considered disproportionate.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of EHRC, none of the commitments corresponded to the standards for complaints made by members of a body's staff.

The EHRC neither inform nor allow staff to complain or respond to a complaint in Welsh. The EHRC do not allow the use of Welsh in meetings dealing with complaints made by members of staff. Staff members are not informed of the outcomes of complaints in Welsh.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of EHRC, none of the commitments corresponded to the standards for a body disciplining staff.

The EHRC neither inform nor allow staff to use the Welsh language during the internal disciplinary process. The EHRC do not allow the use of Welsh in meetings dealing with disciplinary procedures. Staff members are not informed of the outcomes of disciplinary procedures in Welsh.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 14% of commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet <sup>136</sup>

Welsh spell check and grammar computer software is provided, but there are no Welsh interfaces for software. The EHRC's intranet is not available in Welsh and such provision is

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<sup>136</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

not considered proportionate due to resources and the number of Welsh speakers at the EHRC.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 89% of commitments corresponded to the standards in relation to a body developing Welsh language skills through planning and training their workforce.<sup>137</sup>

The EHRC assess the Welsh language skills of their employees. No Welsh language training is provided to EHRC staff members, but Welsh language training was offered to staff on a business case basis following a staff appraisal process. Language awareness training is provided along with training on an understanding of the EHRC's Welsh language scheme commitments and an understanding of the way in which the Welsh language can be used in the workplace. New recruits are given information on raising awareness of the Welsh language.

The EHRC's emails contain wording or a logo denoting Welsh language ability; contact details in Welsh; and a message that they are not available in Welsh.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 57% of commitments corresponded to the standards for recruiting by a body.<sup>138</sup>

The EHRC have a methodology in place for reaching decisions on the inclusion of Welsh language skills in job advertisements. The EHRC offer application forms, job descriptions and explanatory material regarding the application process in Welsh, but no information on interviews. The EHRC do not offer to conduct interviews nor assessments in Welsh. Candidates are informed of the outcome in Welsh, if they applied in Welsh.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 100% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>139</sup>

The EHRC's office signage is bilingual, with the Welsh language given prominence.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 100% of commitments corresponded to the standard for audio announcements in a body's workplace.<sup>140</sup>

The EHRC stated that they do not make announcements.

The EHRC considered that making the operational standards specifically applicable to them was reasonable and proportionate.

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<sup>137</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>138</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>139</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>140</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.



## Supplementary matters

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The EHRC considered that making the standards for dealing with supplementary matters in relation to operational standards specifically applicable to them was reasonable and proportionate.

### **Promotion standards [143-144]**

The EHRC did not consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of EHRC, on average, 77% of commitments corresponded to the record keeping standards.<sup>141</sup>

The EHRC already have arrangements in place for monitoring the implementation of their Welsh language scheme and keeping relevant information. The EHRC considered that making the record keeping standards specifically applicable to them was reasonable and proportionate.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The EHRC considered that making the standards for dealing with supplementary matters in relation to record keeping standards specifically applicable to them was reasonable and proportionate.

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<sup>141</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## Local Democracy and Boundary Commission for Wales (LDBCW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body**

##### **Standards for correspondence sent by a body [1-7]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for correspondence sent by a body.<sup>142</sup>

The LDBCW stated that they favoured the current practice under their Welsh language scheme where all Welsh language correspondence is answered in Welsh and if the chosen language is unknown, correspondence is sent out bilingually.

Specific concerns were raised about standard 7 as they believed that the requirement to include statements in all correspondence and publications inviting correspondence was unreasonable and disproportionate.

#### **Activity 2: Telephone calls made and received by a body**

##### **Standards for telephone calls made and received by a body [8-22]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 47% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>143</sup>

The LDBCW stated that they did not have a switchboard as such as they were a small organization and that calls were answered with a bilingual greeting by all members of staff. They confirmed that a number of the other requirements were current practice and that making a selection of these standards specifically applicable to them would be reasonable and proportionate.

However, concerns were raised about standards 9 and 21. In terms of standard 9, the Commission believed that providing a caller with a bilingual greeting and providing a bilingual voicemail message was sufficient in letting others know that a Welsh language service was available. In terms of standard 21, they stated that they tended to call persons to discuss matters where contact had already been made.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public**

##### **Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

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<sup>142</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>143</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>144</sup>

The LDBCW stated that they were experienced in arranging meetings where the use of Welsh was likely.

However, they did not believe that implementing standard 23 would be reasonable and proportionate under every circumstance as a non-Welsh speaking member of staff with the appropriate specialist or technical knowledge could be required to attend that meeting. Similar concerns were raised about standards 25, 27D and 28 as it was possible that non-Welsh speaking members of staff could possess the appropriate specialist knowledge and, therefore, that it would not be appropriate to conduct the meeting without the support of a translation service.

However, concerns were raised about the need for a simultaneous translation service in meetings, stating that it could be difficult to find a translator with the appropriate specialist phraseology, especially for meetings arranged at short notice. The Commission also believed that the requirement to ask about the language choice of all those attending meetings could be difficult at times, stating that it would be onerous and place a disproportionate burden on their shoulders, in their opinion.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>145</sup>

The LDBCW confirmed that a number of these requirements were already current practice and they considered that making the standards specifically applicable to them was reasonable and proportionate.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The LDBCW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>146</sup>

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<sup>144</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>145</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>146</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>147</sup>

The LDBCW confirmed that they published publicity material bilingually at all times and ensured that the Welsh language is treated no less favourably than the English language in doing so. In light of that, they considered that making this standard specifically applicable to them would be reasonable and proportionate.

**Activity 7: Displaying material in public  
Standards for displaying material in public [38-39]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for displaying material in public.

The LDBCW explained that bilingual templates are used in order to produce material for displaying in public, which ensured that material was not produced in English only. With that in mind, they considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 8: A body producing and publishing documents  
Standards for a body producing and publishing documents [40-49]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for a body producing and publishing documents.<sup>148</sup>

The LDBCW stated that they already published everything bilingually and ensured that the Welsh language is treated no less favourably than the English language in doing so. They also stated that their Twitter account is updated bilingually. They believed that a standard wording could be included for all documents explaining that a Welsh version was available. With that in mind, they considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

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<sup>147</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>148</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

When analysing the current Welsh language scheme commitments of the person in question, on average, 25% of commitments corresponded to the standards for a body producing and publishing forms.<sup>149</sup>

The LDBCW stated that very few forms for public use were currently published by the organization but that those which were available were bilingual. They anticipated publishing more forms in the future and believed that they could be bilingual too. With that in mind, they considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and on-line services [52-57]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body's websites and online services.<sup>150</sup>

The LDBCW confirmed that their website was already fully bilingual and that visitors were offered a language choice from the outset. It was noted that both languages were easily interchangeable through the 'Cymraeg' and 'English' buttons in the top right-hand corner of the page. With that in mind, they did not believe that the requirement in standard 55 to clearly state on each English language web page that a Welsh language version was available was reasonable and proportionate. It was confirmed that they do not currently design apps and had no plans to do so in the future either.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 33% of commitments corresponded to the standards for signs displayed by a body.<sup>151</sup>

The LDBCW confirmed that all of their signs were already bilingual, with the Welsh language given prominence. With that in mind, they considered that making these standards specifically applicable would be reasonable and proportionate.

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<sup>149</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>150</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>151</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for a body receiving visitors at their buildings [61-66]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>152</sup>

The LDBCW stated that they do not have a reception as such as they are a small organization working in an open-plan office. They also stated that they are aware of the majority of their visitors in advance and that Welsh-speaking members of staff were on hand to greet them, whether they were expected or unexpected visitors.

They did not consider that displaying a sign in accordance with standard 65 would be appropriate as they did not have a designated reception area. Neither did they believe that it should be necessary for their staff to wear badges to show that they could speak Welsh as their building was not open to the public.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>153</sup>

The LDBCW stated that they published official notices informing the public of surveys which were available bilingually. With that in mind, they considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69 - 73]**

The LDBCW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding grants.<sup>154</sup>

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding contracts.<sup>155</sup>

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<sup>152</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>153</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>154</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The LDBCW confirmed that they already published invitations to tender bilingually and considered that making a selection of these standards specifically applicable to them would be reasonable and proportionate. However, concerns were raised about standard 76, stating that they did not consider that offering to conduct an interview in Welsh was practical without the support of a translation service, due to a shortage of Welsh-speaking staff.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79 - 80]**

The LDBCW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>156</sup>

The LDBCW stated that they were not entirely clear what was meant by these standards. However, they believed that having to include statements on their homepage would detract from their current welcoming simplicity. When specifying standards in regulations, Welsh Ministers should ensure that they outline the requirement clearly.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The LDBCW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>157</sup>

The LDBCW stated that their name was incorporated in legislation and that it had no control over it. However, it confirmed that the Welsh version was widely used and they considered that making this standard specifically applicable to them would be reasonable and proportionate.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The LDBCW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 33% of commitments corresponded to the standards for courses offered by a body.<sup>158</sup>

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<sup>155</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>156</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>157</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>158</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 19: Public address systems used by a body  
Standards for public address systems used by a body [85]**

The LDBCW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

**Standards that deal with supplementary matters in relation to the service delivery standards [158-163]**

The LDBCW stated that they considered that complying with a selection of these standards would be reasonable and proportionate. However, concerns were raised about aspects of standard 161. Specific reference was made to the requirement to record the number of persons who responded to say that they would wish to receive correspondence in Welsh, stating that they believed that doing so would be challenging considering the size and nature of the organization. They were also concerned about standard 163, as the timescale for providing information was not given.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the policy making standards.<sup>159</sup>

The LDBCW stated that they did not currently assess the impact of new and revised policies on the Welsh language but that it was considering doing so in future. They confirmed that they do not award grants or commission research. They stated that they did not anticipate commissioning research in the future either although they did use research undertaken by other agencies. They did not consider that making these standards specifically applicable to them was reasonable and proportionate, explaining that they did not believe that they could make any comments until they had given due regard to the policy impact assessments.

**Standards that deal with supplementary matters in relation to the service delivery standards [164-169]**

The LDBCW stated that they considered that complying with a selection of these standards would be reasonable and proportionate. However, they raised concerns about standard 169, as the timescale for providing information was not given.

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<sup>159</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.



## **Operational standards [96-142]**

### **Standards for the use of the Welsh language within a body's internal administration [96 - 109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 7% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>160</sup>

The LDBCW stated that they did not have an official policy in place for promoting and facilitating the internal use of Welsh but that this did happen in other ways.

They also confirmed that the documents mentioned in these standards were only produced in English at present and that there had never been a request for a Welsh language version. It was noted that employees' pension documents were provided by Civil Service Pensions and therefore they were beyond their control.

### **Standards for complaints made by a member of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

The LDBCW stated that it allowed staff to make complaints and respond to complaints against them in Welsh but they are not informed of this. If they received a request to conduct a meeting in Welsh in this respect, then they would provide a simultaneous translation service to that end, if it was not possible to conduct the meeting without it.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

The LDBCW stated that they allow all members of staff to respond in Welsh to allegations made against them via an internal disciplinary process but they are not informed of this. It was also noted that they could provide a simultaneous translation service in such meetings, if it was not possible to conduct them without it.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

The LDBCW stated that they already provided Welsh spell check and grammar computer software to staff along with Welsh language interfaces for software. It was noted that they operate an intranet system but that this was only available in English at present.

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<sup>160</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

**Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 56% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>161</sup>

The LDBCW confirmed that they already assess the Welsh language skills of employees. It also noted that they provided employees with training to improve their understanding of the requirements upon them to implement a Welsh language scheme. In addition, employees' contact details along with out-of-office emails are in Welsh. However, the remaining requirements are not currently being implemented.

**Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 86% of commitments corresponded to the standards for recruiting by a body.<sup>162</sup>

The LDBCW stated that they already followed a recognised procedure for deciding whether Welsh language skills should be desirable or essential for vacancies or new posts. Furthermore, it was noted that job descriptions along with explanatory material on the application process were already available in Welsh. It was noted that a candidate who has applied for a job in Welsh is also informed of the outcome in Welsh. The remaining requirements are not currently being implemented.

**Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 25% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>163</sup>

The LDBCW confirmed that they already display signs within their organization in Welsh and that the Welsh language is given prominence.

**Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The LDBCW stated that they do not make audio announcements in their workplace.

**Standards that deal with supplementary matters in relation to the operational standards [170-175]**

The LDBCW stated that they considered that complying with a selection of these standards would be reasonable and proportionate. However, they raised concerns about standard 175, as the timescale for providing information was not given.

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<sup>161</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>162</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>163</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Promotion standards [143-144]**

The LDBCW did not consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 69% of commitments corresponded to the record keeping standards.<sup>164</sup>

The LDBCW stated that they already kept records in accordance with a number of these standards and they considered that making each one, apart from standard 155, specifically applicable to them would be reasonable and proportionate. In terms of standard 155, they did not feel that conducting official assessments of staff's language skills would be commensurate due to the size of the organization.

### **Standards that deal with supplementary matters in relation to the record keeping standards [178-179]**

The LDBCW stated that it could comply with these standards. However, they did not feel that complying with standard 179 would be reasonable and proportionate, as the timescale for providing that information had not been given.

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<sup>164</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The UK Commission for Employment and Skills (UKCES)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The UKCES stated that they carried out the activity in question, and did so partly through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 86% of commitments corresponded to the standards for correspondence sent by a body.<sup>165</sup>

The UKCES considered that making the standards for correspondence sent by a body specifically applicable to them was reasonable and proportionate. They explained that they had reached this conclusion, in relation to standards 2-7, based on correspondence with members of the public only, not in terms of their engagement with stakeholders such as employers, trade unions and a variety of other organizations.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 20% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>166</sup>

The UKCES did not believe that making the standards in relation to telephone calls made and received by a body specifically applicable to them was reasonable and proportionate. It was noted that they do not carry out the activities described in standards 15 and 22. For the remainder, it was noted that they did not have any offices in Wales or any Welsh speakers in their workforce.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>167</sup>

The UKCES do not routinely conduct meetings that aren't open to the public. They found the standards to be disproportionate due to the nature of the organization's work and the

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<sup>165</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>166</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>167</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

practical implications to an organization without a presence in Wales or Welsh speakers. Therefore, the EHRC did not consider that making the standards specifically applicable to them was reasonable and proportionate.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>168</sup>

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>169</sup>

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>170</sup>

It was explained that the UKCES is subject to the marketing freeze introduced by the UK Government. Even where there is no such freeze, their publicity and advertising activities are limited in terms of targeting the public in particular. They asked for clarification regarding whether the standard involved stakeholders or only related to public engagement in Wales.

**Activity 7: Displaying material in public  
Standards for displaying material in public [38-39]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body's publicity and advertising.<sup>171</sup>

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<sup>168</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>169</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>170</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>171</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body's publicity and advertising.<sup>172</sup>

The majority of standards are already current practice, but the UKCES did not believe that making the standards relating to a body producing and publishing documents specifically applicable to them was reasonable and proportionate. It was explained that they considered standards 41A, 44A and 46 to be disproportionate due to the demand for and specialist nature of their work. It was noted that the UKCES do not carry out the activity as described in standards 41B, 42 and 45.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>173</sup>

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and online services [52-57]**

The UKCES stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>174</sup>

The UKCES' web pages are located on the gov.uk platform. This was considered relevant in relation to standards 52B, 53B, 54B and 56. The UKCES is preparing a programme to increase the amount of Welsh found on their website, but they did believe that translating the entire provision on the website would be a significant challenge. However, the UKCES did consider that making the standards for a body's websites and online services specifically applicable to them was reasonable and proportionate.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>175</sup>

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<sup>172</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>173</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>174</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The UKCES did not believe that making the standards for signs displayed by a body specifically applicable to them was reasonable and proportionate. Signage found on the UKCES' estate is the only example and the offices are not based in Wales. A willingness to comply was expressed should they open an office in Wales or be based in Wales temporarily.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 29% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>176</sup>

The UKCES did not consider that making the standards for receiving visitors at a body's buildings specifically applicable to them was reasonable and proportionate, as they only had a small number of reception staff, outside Wales, who did not have Welsh language skills.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>177</sup>

The UKCES did not believe that making the standards for official notices made by a body specifically applicable to them was reasonable and proportionate.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding grants.<sup>178</sup>

The UKCES did not believe that making the standards for a body awarding grants specifically applicable to them was reasonable and proportionate. They asked for clarification regarding whether or not the standards would be relevant to grants awarded to organizations, rather than individuals. In addition, they anticipated difficulties in seeking to comply with standard 71 due to a lack of Welsh-speaking members of staff.

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<sup>175</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>176</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>177</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>178</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The UKCES stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body awarding contracts.<sup>179</sup>

The UKCES did not believe that making the standards for a body awarding contracts specifically applicable to them was reasonable and proportionate. The UKCES anticipates publishing over 100 invitations to tender in a financial year and believes that to publish them all bilingually would be disproportionate. They identified difficulties in complying with standard 76 due to a lack of staff with Welsh language skills.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79-80]**

The UKCES stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>180</sup>

The UKCES considered that making the standards for raising awareness about Welsh language services provided by a body specifically applicable to them was reasonable and proportionate.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The UKCES stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>181</sup>

The UKCES considered that making this standard specifically applicable to them would be reasonable and proportionate.

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<sup>179</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>180</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>181</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The UKCES stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

### Supplementary matters

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The UKCES stated that they would be able to comply with the standards with some revision to their current processes. The UKCES also considered that making the standards relating to supplementary matters in relation to the service delivery standards specifically applicable to them would be reasonable and proportionate.

### Policy making standards [86-95]

When analysing the current Welsh language scheme commitments of the UKCES, on average, 100% of commitments corresponded to the policy making standards.<sup>182</sup>

The UKCES have a formal project management process. The related work of starting and managing a project provides an opportunity to manage risk and maintain an overview of policy impacts. The UKCES also have a grant awarding policy. They stated that they were currently revising the policy and welcomed the opportunity, through the standards, to re-examine their approach to contributing to the Welsh language agenda.

The UKCES considered that making the policy making standards specifically applicable to them would be reasonable and proportionate.

### Supplementary matters

**Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The UKCES stated that they were confident it would be able to comply with the standards with some revision to their current processes. The UKCES also considered that making the standards relating to supplementary matters in relation to the service delivery standards specifically applicable to them would be reasonable and proportionate.

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<sup>182</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## **Operational standards [96-142]**

### **Standards for the use of the Welsh language within a body's internal administration [96 - 109]**

When analysing the current Welsh language scheme commitments of the UKCES, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

The UKCES stated that a policy on the internal use of Welsh could be prepared and published as part of their routine policy review. Of those documents and policies identified under standards 97-109, The UKCES do not currently provide Welsh language versions, as they do not have an office in Wales or any Welsh speakers. They showed a willingness to provide Welsh language documentation and policies on request. The Commission stated that standard 102 would be challenging as their HR system did not operate through the medium of Welsh.

### **Standards for complaints made by a member of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the UKCES, none of the commitments corresponded to standards for complaints made by members of a body's staff.

The UKCES stated that they do not currently comply with any aspect of the standards for complaints made by a member of a body's staff, as they do not have an office in Wales and there are no Welsh speakers in the workforce. It showed a willingness to provide simultaneous translation in meetings and Welsh language documentation should a member of staff request that in the future.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the UKCES, none of the commitments corresponded to the standards for a body disciplining staff.

The UKCES stated that they do not currently comply with any aspect of the standards for a body disciplining staff, as they do not have an office in Wales and there are no Welsh speakers in the workforce. They showed a willingness to provide simultaneous translation in meetings and Welsh language documentation should a member of staff request that in the future.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the UKCES, on average, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

The UKCES stated that they do not comply with any aspect of the standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet. As they do not have any Welsh speakers in the workforce there has never been a demand for the provision. There was a willingness to produce a programme to translate the intranet should any Welsh speakers be recruited.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the UKCES, on average, 78% of commitments corresponded to the standards in relation to a body developing Welsh language skills through planning and training their workforce.<sup>183</sup>

The UKCES do not assess the Welsh language skills of their employees. The UKCES stated that they do not comply with the standards for a body developing Welsh language skills through workforce planning and development, apart from providing training on Welsh language awareness; training on the organization's duty to implement a Welsh language scheme; and Welsh language awareness training for new recruits.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the UKCES, on average, 43% of commitments corresponded to the standards for recruiting by a body.<sup>184</sup> The UKCES explained that there is an arrangement in place to identify any shortcomings in terms of the workforce's general skills; otherwise, the standards for recruiting by a body are not in operation.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the UKCES, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>185</sup>

The UKCES confirmed that they do not display Welsh language signs.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the UKCES, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The UKCES stated that they do not make audio announcements in their workplace.

The UKCES did not believe that making the operational standards specifically applicable to them was reasonable and proportionate. They explained that they believed that they were disproportionate for an organization like UKCES, in terms of responsibilities, and as they do not have a workforce based in Wales nor any Welsh-speaking members of staff.

### **Standards that deal with supplementary matters in relation to the operational standards [170-175]**

The UKCES stated that they would be able to comply with the standards with some revision to their current processes. The UKCES considered that making the standards that deal with supplementary matters in relation to the operational standards specifically applicable to them was reasonable and proportionate.

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<sup>183</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>184</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>185</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Promotion standards [143-144]**

The UKCES did not consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the UKCES, on average, 69% of commitments corresponded to the record keeping standards.<sup>186</sup>

The UKCES stated that they have a robust process in place for keeping and analysing records. The UKCES was confident that they could comply with the standards with some revision to their current processes. The UKCES considered that making the record keeping standards specifically applicable to them was reasonable and proportionate.

### **Standards that deal with supplementary matters in relation to the record keeping standards [178-179]**

The UKCES stated that they would be able to comply with the standards that deal with supplementary matters in relation to the record keeping standards with some revision to their current processes. The UKCES considered that making the standards that deal with supplementary matters in relation to the record keeping standards specifically applicable to them was reasonable and proportionate.

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<sup>186</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Welsh Local Government Association (WLGA)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body**

##### **Standards for correspondence sent by a body [1-7]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 86% of commitments corresponded to the standards for correspondence sent by a body.<sup>187</sup>

The WLGA stated that they already met a number of these requirements and considered that making the standards specifically applicable to them was reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body**

##### **Standards for telephone calls made and received by a body [8-22]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 73% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>188</sup>

The WLGA stated that they already greeted callers bilingually and dealt with any calls made in Welsh in that language. Despite stating that standard 21 was not in operation and that they believed that standard 22 was not relevant as they do not have an automated telephone system, they considered that making the standards specifically applicable to them was reasonable and proportionate.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public**

##### **Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 33% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>189</sup>

The WLGA confirmed that they conducted a number of meetings with invited individuals. However, they explained that the agendas for these meetings were published in English only and that they were also usually conducted in English. However, they do provide a translation service in some sessions/meetings where required. They did not believe that standards 25, 26, 28 and 29 were relevant as they do not conduct meetings involving personal benefit and wellbeing.

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<sup>187</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>188</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>189</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

They did not consider that making these standards specifically applicable to them would be reasonable and proportionate. It was noted that a number of their specialist staff do not currently speak Welsh; therefore they did not consider that it was reasonable to expect them to conduct meetings in Welsh. They also believed that it would be very challenging to provide translation services in such meetings, stating that they are under significant financial pressures as an organization.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>190</sup>

The WLGA confirmed that they were committed to providing a Welsh language service to the public in this respect. It was explained that the public do not address members in their meetings therefore they did not believe that standards 30 and 31 were relevant. It was noted that translation services are already provided in the organization's political meetings. With that in mind, they considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The WLGA stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>191</sup>

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>192</sup>

The WLGA stated that their publicity and advertising campaigns already took place bilingually and the Welsh language was treated equally to the English. They considered that making this standard specifically applicable to them would be reasonable and proportionate.

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<sup>190</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>191</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>192</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>193</sup>

The WLGA confirmed that all of their public material was available bilingually. Consideration is given to the most relevant format - be that a bilingual version within the same document or separate Welsh and English versions. They considered that making these standards specifically applicable to them was reasonable and proportionate.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>194</sup>

The WLGA stated that all of their public documents were already published in Welsh, be that as one document or separate documents. They did not believe that standard 42 was relevant as they do not currently publish certificates or licenses. Similarly, they did not believe that standard 45 was relevant as they do not publish any rules which currently apply to the public. However, they believed that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The WLGA stated that they do not carry out the activity in question in terms of the public.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>195</sup>

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<sup>193</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>194</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>195</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and on-line services [52-57]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>196</sup>

The WLGA stated that their website was currently being revised and that the newly-launched version would be completely bilingual. They confirmed that they do not currently design apps. They believed that making the standards specifically applicable to them would be reasonable and proportionate.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>197</sup>

The WLGA confirmed that their signs were already bilingual and they considered that making these standards specifically applicable to them was reasonable and proportionate as a result.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for a body receiving visitors at their buildings [61-66]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>198</sup>

The WLGA confirmed that staff greeted visitors bilingually at reception. It was noted that the permanent receptionist post would be a Welsh essential one. They also stated that staff, not fully bilingual, would be required to undertake reception duties occasionally and that training had been provided in order to ensure that everyone has basic Welsh language skills for the role. With that in mind, they considered that making these standards specifically applicable to them would be reasonable and proportionate.

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<sup>196</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>197</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>198</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The WLGA stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>199</sup>

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69 - 73]**

The WLGA stated they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body awarding grants.<sup>200</sup>

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The WLGA stated that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body awarding contracts.<sup>201</sup>

The WLGA stated that they rarely carried out this activity. However, they would ensure that invitations to tender were published in Welsh in the future and that the Welsh language is treated no less favourably than the English language. They considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79 - 80]**

The WLGA stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The WLGA stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>202</sup>

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<sup>199</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>200</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>201</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>202</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The WLGA confirmed that they already have a bilingual corporate identity and that they considered that making this standard specifically applicable to them was reasonable and proportionate.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The WLGA stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The WLGA stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

**Standards that deal with supplementary matters in relation to the service delivery standards [158-163]**

The WLGA did not consider that making these standards specifically applicable to them would be reasonable and proportionate as they believed that they were not subject to these standards.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 90% of commitments corresponded to the policy making standards.<sup>203</sup>

The WLGA stated that any new policies or initiatives would align with the requirements of their Welsh language scheme and promote and facilitate the use of Welsh wherever possible. It was noted that they do not consult on any policy decisions and do not award grants. They did not consider that making these standards specifically applicable to them was reasonable and proportionate.

**Standards that deal with supplementary matters in relation to the service delivery standards [164-169]**

The WLGA did not consider that making these standards specifically applicable to them would be reasonable and proportionate as they believed that they were not subject to these standards.

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<sup>203</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## **Operational standards [96-142]**

### **Standards for the use of the Welsh language within a body's internal administration [96 - 109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>204</sup>

The WLGA confirmed that they have a policy on the internal use of Welsh, with the aim of promoting and facilitating the use of Welsh, available on the intranet. It was also confirmed that all the documents identified in standards 97-102 are available in Welsh should an employee request that and be offered the provision.

However, it was noted that the policies identified in standards 103-109 are only available in English at present despite the fact that some members of staff have asked for these in Welsh. However, they did state that this is currently being examined.

### **Standards for complaints made by a member of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

The WLGA confirmed that all of the requirements relating to these standards, apart from the requirement to conduct meetings in Welsh without the support of a translation service as identified in standard 111, are current practice. Furthermore, it was noted that they would consider the language choice of each individual and make every effort to meet those requirements.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

The WLGA confirmed that all of the requirements relating to these standards, apart from the requirement to conduct meetings in Welsh without the support of a translation service as identified in standard 115, are current practice. Furthermore, they stated that they would recognise the language choice of staff members in this scenario.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 29% of commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.<sup>205</sup>

The WLGA stated that they already provided Welsh spell check and grammar computer software for their staff members. Similarly, it was confirmed that they operate an intranet system, but the homepage, interfaces and menus are not available in Welsh.

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<sup>204</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>205</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>206</sup>

The WLGA confirmed that they already assess the Welsh language skills of employees. It was noted that training for dealing with the public bilingually is available to staff but the remainder of the training, identified in standard 126, is only provided in English. It was also noted that they encourage and support staff who wish to learn Welsh or improve their Welsh language skills and that training needs are discussed with line managers. The majority of the training identified in standard 130 is already provided and standards 131 and 133 are already in operation.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for recruiting by a body.<sup>207</sup>

The WLGA stated that the linguistic requirements of posts are assessed as job descriptions are produced. It was noted that the assessment considers the nature of the work and the Welsh language will be identified as essential or desirable as a result. Job advertisements also state that the ability to speak Welsh is advantageous. It was confirmed that all these requirements, apart from the requirement to provide space on application forms for candidates to state that they wish to use the Welsh language in an interview or assessment, are already current practice.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>208</sup>

The WLGA confirmed that they already display internal signs in Welsh and that the Welsh language is given prominence.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The WLGA confirmed that they do not make audio announcements in the workplace.

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<sup>206</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>207</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>208</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

**Standards that deal with supplementary matters in relation to the operational standards [170-175]**

The WLGA did not consider that making these standards specifically applicable to them would be reasonable and proportionate as they did not believe that they were subject to these standards.

**Promotion standards [143-144]**

The WLGA did not consent for promotion standards to be potentially applicable to them.

**Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 46% of commitments corresponded to the record keeping standards.<sup>209</sup>

The WLGA stated that they possessed a fair amount of the core information but that a new formal procedure would need to be introduced for recording compliance with some of the standards. They considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Standards that deal with supplementary matters in relation to the record keeping standards [178-179]**

The WLGA stated that they could comply with these standards and that making them specifically applicable would be reasonable and proportionate

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<sup>209</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Valuation Tribunal Service for Wales (VTW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body** **Standards for correspondence sent by a body [1-7]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for correspondence sent by a body.<sup>210</sup>

Concerns were raised about compliance with standard 5 as they could not guarantee full compliance until their new IT systems were introduced in April 2017. They added that they could not ensure that correspondence in Welsh would not lead to a delay on every occasion, due to a shortage of staff with Welsh language skills.

The VTW confirmed that they could comply with the standards in time and considered that making the standards specifically applicable to them would be reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body** **Standards for telephone calls made and received by a body [8-22]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>211</sup>

They stated that they could comply with the majority of standards but they raised concerns about a selection of them. They were concerned that they would not be able to ensure that Welsh speakers were available to handle calls made in Welsh in accordance with the requirements of the standards at all times, considering current staffing levels and the need for staff to leave the office to attend tribunal hearings. Reference was made once again to the new IT system coming into force from April 2017 onwards.

They believed that a selection of the standards were disproportionate considering the fact that they were a small organization. They also stated that they did not have an automated telephone system or staff designated to handle telephone calls made in Welsh, therefore staff with various Welsh language skills needed to share responsibility for handling telephone calls made in Welsh.

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<sup>210</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>211</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 3: Meetings arranged by a body that aren't open to the general public  
Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>212</sup>

They stated that they could comply with the majority of standards but raised concerns about a selection of them. They did not believe that they could meet the requirements of standards 23, 25, 27D nor 28 now or in the near future. They explained that they could not guarantee a Welsh language service at all times where non-Welsh speaking members of staff, crucial to the meeting, needed to attend that meeting.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.

It was noted that the requirements attached to the standards along with the terminology currently used was impractical in terms of Tribunal hearings for invited parties.

They explained that they could not guarantee that members of staff with the skills to deal with the public in Welsh were available nor guarantee a simultaneous translation service at all hearings open to the public. It was confirmed that Welsh-language provision for the public relied upon provision for the invited parties. They added that it would also be difficult to guarantee a permanent simultaneous translation service as hearings were held outside the Tribunal's administrative offices.

However, they confirmed that they could comply with the standards in conducting general public meetings.

They also stated that they were unclear whether public notices identifying the public's right to attend a hearing came under the definition of an 'invitation'. Welsh Ministers should ensure clarification in relation to the above matters when specifying standards in regulations.

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<sup>212</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The VTM stated they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for public events organised or funded in their entirety by a body.

Despite the above, it was noted that making the standards specifically applicable to VTW would be reasonable and proportionate and that they would be able to comply with them in the future.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>213</sup>

It was confirmed that every general information leaflet for the public was bilingual and therefore it would be reasonable and proportionate to make the standards specifically applicable to them.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The VTM stated they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>214</sup>

Despite the above, it was noted that making the standards specifically applicable would be reasonable and proportionate and they would be able to comply with them in the future.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 90% of commitments corresponded to the standards for a body producing and publishing documents.<sup>215</sup>

They stated that they could comply with the majority of standards but raised concerns about a selection of them. VTW confirmed that they did not currently undertake the activities related to standards 41 and 46, but would be able to do so in Welsh in the future.

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<sup>213</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>214</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>215</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



In considering the requirements of standard 42, it was noted that it would be appropriate to produce certificates in the language in which that case took place.

It was noted that it would be unreasonable and disproportionate to provide Welsh language versions of decision documents relating to a case conducted in English. However, it was noted that it was current practice to produce Welsh language versions when a case was conducted in Welsh.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 25% of commitments corresponded to the standards for a body producing and publishing forms.<sup>216</sup>

It was noted that all the Tribunal's current forms were already bilingual therefore making the standards specifically applicable to them would be reasonable and proportionate.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>217</sup>

It was noted that it would be reasonable and proportionate for them to comply with the standards in question subject to the use of language choice on their web pages securing compliance with standard 55. They stated that the wording of standard 56 was too open-ended at present.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>218</sup>

They stated that making the standards specifically applicable would be reasonable and proportionate and they would be able to comply with them in the future.

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<sup>216</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>217</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>218</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>219</sup>

As they did not believe that they had a 'reception service' as identified in Section 3 (Appendix 1) of the Welsh Government's regulations document, it was noted that standards 62-64 and 66 were not relevant. They stated that they could not secure compliance with standard 61 at all times as they did not employ reception staff to greet visitors. Therefore, it was confirmed that the ability to provide a service through the medium of Welsh would depend on the language skills of staff members in the office at the time.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>220</sup>

They stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The VTW stated they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body awarding grants.<sup>221</sup>

They did not consider that it was reasonable or proportionate to make the standards specifically applicable to them as they did not believe that they were a grant awarding body.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The VTW stated that they carried out the activity in question, but did not do so through the medium of Welsh.

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<sup>219</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>220</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>221</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body awarding contracts.<sup>222</sup>

They stated that they could comply with the standards in the future therefore they considered that making the standards specifically applicable would be reasonable and proportionate.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79-80]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>223</sup>

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

They stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The VTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>224</sup>

They stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

**Activity 18: Courses offered by a body  
Standards for courses offered by a body [82-84]**

The VTW stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

They did not consider that it was reasonable or proportionate to make the standards specifically applicable to them as they did not provide educational courses to the public.

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<sup>222</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>223</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>224</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The VTM stated they did not carry out the activity in question

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

Despite the above, it was noted that making the standard specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

They stated that making the standards specifically applicable would be reasonable and proportionate and they would be able to comply with them in the future.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the policy making standards.<sup>225</sup>

The VTW considered that making the policy making standards specifically applicable to them would be reasonable and proportionate and they could comply with them in the future.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

VTW stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

**Operational standards [96-142]**

**Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 7% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>226</sup>

In considering the requirements of standard 96, the VTW confirmed that it did not currently implement a policy on the internal use of Welsh. However, it did state that it did not anticipate any difficulties in securing compliance with the requirements of this standard in the future.

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<sup>225</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>226</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The VTW stated that they did not currently provide the documents identified in standards 97-109. However, they confirmed that it would be reasonable to provide and publish the relevant material in Welsh in the future.

#### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

The VTM confirmed that they did allow all members of staff to complain to the organization, as well as respond to any complaints made against them, in Welsh. It was not current practice for them to conduct the meeting in Welsh. It was also confirmed that they did not routinely ask members of staff whether they wished to speak Welsh in the meeting.

However, they did state that they could comply with standards 110-113 on the whole, but that there would be some instances where a simultaneous translation service would have to be provided. They also stated that staff with the required language skills to deal with matters in Welsh would not always be available.

#### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

Despite stating that the requirements were not current practice, they did confirm that they could comply with the standards but that there would be some instances where a simultaneous translation service would have to be provided. They also stated that staff with the required language skills to deal with matters in Welsh would not always be available.

#### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

The VTW stated that they provided Welsh spell check and grammar computer software along with Welsh language interfaces for employee and worker software.

They stated that they did not currently operate an intranet system, but it would be reasonable and proportionate to comply with the standards should they develop an intranet in the future.

#### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 56% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>227</sup>

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<sup>227</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The VTM confirmed that the requirements relating to standards 125-133 were already current practice or they could comply with them in the future; therefore making the standards specifically applicable would be reasonable and proportionate.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 43% of commitments corresponded to the standards for recruiting by a body.<sup>228</sup>

The VTW confirmed that the requirements relating to standards 134-138 were already current practice or they could comply with them in the future, apart from standard 136. They explained that a simultaneous translation service would have to be provided sometimes. They also stated that staff with the required language skills to conduct an interview or assessment in Welsh would not always be available.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>229</sup>

The VTW confirmed that they already displayed Welsh language signs inside the organization's buildings and that the Welsh language was given prominence.

Therefore, they stated that it would be reasonable and proportionate to make the standards specifically applicable to them.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The VTW stated that they currently made audio announcements in the organization's workplace, but did not do so through the medium of Welsh. They confirmed that making these standards specifically applicable to them would not be reasonable and proportionate.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

They stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

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<sup>228</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>229</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Promotion standards [143-144]**

The VTW confirmed that they did not consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 77% of commitments corresponded to the record keeping standards.<sup>230</sup>

The VTW stated that their internal record keeping processes in relation to their Welsh language scheme had been inconsistent in the past but that they would be able to go further in complying with standards 145-157 in due course. As a result, it was noted that it would be reasonable and proportionate to make the standards specifically applicable.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

They stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

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<sup>230</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Information Commissioner's Office (ICO)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body** **Standards for correspondence sent by a body [1-7]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for correspondence sent by a body.<sup>231</sup>

In responding to the requirements relating to standards for correspondence sent by a body, the ICO confirmed that they could comply with a selection of the standards as some of the requirements were already current practice or corresponded to the commitments in their statutory language scheme. The ICO considered that making standards 1 and 6 specifically applicable to them would be reasonable and proportionate.

In responding to the requirements of standard 2, the ICO stated that it would be unreasonable and disproportionate to comply with this standard if applied to the whole organization, bearing in mind that they operated across the whole of the UK and had offices outside Wales. They confirmed that it would be reasonable for the office in Wales to comply with standard 2; although they did state that the ICO's current practice was to send bilingual correspondence if the individual's chosen language was unknown (in accordance with standard 5). They added that it would be reasonable to comply with standards 5 and 7 if applied to correspondence sent by their Wales office only.

The ICO did not believe that standard 3 was relevant as they do not send multiple copies of correspondence to any household as part of their duties.

The ICO stated that a great deal of their correspondence was now via email and that email addresses were not reliable in identifying a person's residence. Similarly, they did not believe that they could rely on postcodes which overlap England and Wales (e.g. SY) to identify addresses in Wales only. As a result, concerns were raised about compliance with the standards due to the difficulties in ensuring that bilingual (or Welsh) correspondence is sent to persons in Wales only.

#### **Activity 2: Telephone calls made and received by a body** **Standards for telephone calls made and received by a body [8-22]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 73% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>232</sup>

In responding to the requirements relating to the standards for telephone calls made and received by a body, the ICO confirmed that some of the requirements relating to the

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<sup>231</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>232</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



standards were already current practice within the organization or corresponded to the commitments found in their statutory Welsh language scheme.

Concerns were raised about the number of standards should they also be applied to telephone calls made and received at their main office in Wilmslow. However, it was recognised that many of the requirements were reasonable should they only be applied to their office and phone lines in Wales. In general, they believed that it would be inappropriate, unreasonable and disproportionate to require staff based in their main office to offer and provide services through the medium of Welsh, considering that they were not Welsh speakers and were based outside Wales and as they handled calls from across the UK.

The ICO stated that it would be inappropriate to inform those calling the office in Wales that they could receive a service through the medium of Welsh in accordance with standard 9. They explained that they believed that a bilingual greeting would suffice in order to show that such a service was available, without having to explicitly state that to callers. They also stated that informing callers that they could receive a service through the medium of Welsh would raise expectations too high at times when the service was not available.

The ICO considered that it would be challenging to comply with standard 10 as providing a service through the medium of Welsh would be subject to the availability of Welsh-speaking staff with the expertise to handle the topic concerned. They stated that it would be unreasonable to expect Welsh-speaking staff to specialise in all areas of information rights in order to comply with the standard, considering the range of issues discussed over the phone.

It was confirmed that the ICO do not currently allow a person to leave an answer phone message on their main lines; therefore they did not believe that standard 16 was relevant.

In considering the requirements of standard 17, the ICO stated that it would be unreasonable to compel staff to inform callers when a service through the medium of Welsh was available, due to the small number of Welsh-speaking staff confident to do so as well as the difficulties in knowing when Welsh-speaking staff were available to provide such a service.

The ICO explained that standard 21 was disproportionate to all of their offices as it would prevent staff from undertaking their duties to the best of their abilities. They stated that they would not be able to conduct effective investigations if they had to conduct every telephone call in Welsh in accordance with a person's wishes.

In responding to the requirements of standard 22, it was confirmed that the Wales office did not currently have an automated telephone system. This was reinforced by stating that it would be unreasonable to apply this standard to the main helpline. They stated that it would be difficult to ensure a Welsh language recording of the changing information on the main helpline in their Wilmslow office.

**Activity 3: Meetings arranged by a body that aren't open to the general public  
Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>233</sup>

In responding to the requirements relating to the standards for meetings arranged by a body that aren't open to the general public, the ICO confirmed that some requirements were already current practice within the organization or corresponded to the commitments found in their Welsh language scheme. The ICO stated that their current practice was to provide simultaneous translation services in public meetings, unless advance notice was given that all the participants wished to use the one language. It was confirmed that papers and information for public meetings were provided in English and Welsh as well as arranging for any follow-up documentation to be available bilingually.

The ICO explained that they did not conduct meetings involving personal benefit or wellbeing as part of their duties at present. Therefore, they did not believe that the requirements relating to these standards involving such meetings were relevant. They also added that it would be impossible to conduct the majority of meetings without the use of translation services due to a shortage of Welsh-speaking members of staff and the high level of expertise required.

They believed that securing compliance with these standards would deter it from conducting such meetings and arranging for stakeholders to seek their own legal advice. They stated that another outcome of the standards would be the need to limit meetings to the main office only. It was noted that these arrangements would lead to stakeholders in Wales receiving a second-rate service compared to other parts of the UK.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>234</sup>

No evidence was provided in relation to this activity, as the ICO did not believe that they carried out the activity. However, it should be noted that the ICO provided evidence in response to standards 35-36 which appear to come within the scope of these standards. More specifically, it was noted that public meetings are held with the public and private organizations in order to promote and raise awareness of information rights.

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<sup>233</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>234</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>235</sup>

The ICO stated that the requirements relating to standards 35-36 corresponded to the commitments found in their statutory language scheme and that they would be able to comply on the whole.

However, it was noted that it would be more reasonable for the ICO to confirm in advance the need for simultaneous translation in public meetings, rather than providing this in every event as a matter of course. The ICO states that this approach would be more cost-effective.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>236</sup>

The ICO stated that it was already current practice to produce bilingual publicity and advertising material for public use in Wales, apart from those instances where smaller expert groups were targeted. The ICO did not believe that it would be proportionate to produce a Welsh version of material with limited relevance to a Wales audience.

It was explained that the ICO would aim to produce Welsh versions of publicity and advertising material aimed at the whole of the UK. However, they did not believe that they could commit to producing a Welsh version at all times due to the organization's limited resources as well as the additional cost of doing so.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>237</sup>

The ICO confirmed that the requirements relating to standards 38-39 were already current practice on the whole. However, they did not believe that it would be proportionate to have

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<sup>235</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>236</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>237</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

to commit to displaying all of their display material in Welsh or bilingually at all times as a matter of course. It was confirmed that a scoring system is used to decide whether display material should be provided in Welsh.

It was noted that a number of events in which the ICO displays material are aimed at specialist audiences and that displaying bilingual material in such events would prevent those audiences from accessing the relevant information easily.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>238</sup>

The ICO confirmed that a selection of the requirements relating to standards 40-49 corresponded to the commitments found in their statutory language scheme and that they would be able to comply with them in the future. However, the ICO stated that a number of the requirements relating to the standards were unreasonable and disproportionate should they be forced to produce Welsh language versions of all of the organization's material. They stated that this would lead to considerable cost and resource implications for the organization.

It was explained that it would be more reasonable for the ICO to translate and publish Welsh language versions of material if aimed specifically at the public or private organizations based in Wales. In addition to that, it was noted that the remainder of the material should be translated into Welsh in accordance with a scoring system similar to that used already. They stated that the length of the publication, the technical or specialist nature of the text and the nature of the target audience should be considered in deciding whether or not to publish documents in Welsh.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>239</sup>

The ICO confirmed that every form produced for public use in Wales is currently available in Welsh, apart from their registration forms. As a result, it was noted that they already complies with standards 50 and 50B on the whole.

They stated that a Welsh language version of the registration form is currently only available in PDF format and that persons are asked to email the form or post it in order to complete registration. They stated that this approach could delay the registration process compared to their completion in English. The ICO explained that there would be significant

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<sup>238</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>239</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

cost implications in developing an automated registration form like the English language registration form.

In considering the requirements of standard 50A, the ICO believed that it would be inappropriate to declare that a Welsh language form was available on the English version, as forms were sent in the post in accordance with an individual's language choice as well as the fact that Welsh language versions were already prominent on the organization's web pages.

The ICO stated that they did not consider that standard 51 was relevant to them as they did not pre-populate any forms.

#### **Activity 10: A body's websites and online services Standards for a body's websites and online services [52-57]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 17% of commitments corresponded to the standards for a body's websites and online services.<sup>240</sup>

The ICO stated that it would be unreasonable and disproportionate to secure compliance with standard 52 as they believed that there would be significant cost and resource implications attached to that. They also added that standards 52 and 53 would be unreasonable and disproportionate due to the dynamic nature of the website as well as the extent to which they could translate any updates to Welsh language web pages at short notice.

In considering the requirements of standard 56, they stated that, as things stand, it would be disproportionate for the ICO to develop a technical solution to allow Welsh language versions of interfaces and menus on their website. However, they did state that the website was being redeveloped and that the new version may meet the requirements of the standard in the future.

Although the ICO did not currently publish apps, they believed that it would be reasonable and proportionate to produce a Welsh language version should they do so in future.

#### **Activity 11: Signs displayed by a body Standards for signs displayed by a body [58-60]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>241</sup>

The ICO confirmed that it would be reasonable and proportionate to comply with standards 58-60 should they only be applied to the Wales office.

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<sup>240</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>241</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

The ICO stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>242</sup>

The ICO stated that the standards were not relevant as they do not have a reception in their Wales office. They explained that they occasionally received unannounced visitors at their Wales office, but did not believe that the Welsh Government's definition of 'reception service' covered such visitors. Welsh Ministers should clarify the relevance of the standards to unannounced visitors when specifying standards in regulations.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The ICO stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>243</sup>

No evidence was provided in relation to this activity, as the ICO did not believe that they carried out the activity.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The ICO stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding grants.<sup>244</sup>

No evidence was provided in relation to this activity, as the ICO did not believe that they carried out the activity.

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<sup>242</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>243</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>244</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The ICO stated that they carried out the activity in question but did not do so through the medium of Welsh at present.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body awarding contracts.<sup>245</sup>

It was noted that the ICO's procurement processes was managed centrally from their main office in London, with limited contact and input from the Wales office when needed. As a result, they thought it unreasonable to compel the ICO to conduct tender processes in Welsh as they considered it to be a bureaucratic and onerous process.

Concerns were raised about the lack of differentiation in the standards between procured goods and services in Wales only and those procured from across the UK. They stated that should standards 74-78 be applied to the entire organization rather than the contracts presented specifically for the Wales office only, they believed that it would be an uneconomical use of scarce resources and would put disproportionate pressure on staff at the main office.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79-80]**

The ICO stated that they do not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>246</sup>

No evidence was provided in relation to this activity, as the ICO did not believe that they carried out the activity.

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The ICO stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>247</sup>

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<sup>245</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>246</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>247</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The ICO confirmed that it would be reasonable and proportionate to comply with standard 81 should it only be applied to the Wales office.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The ICO stated that they carried out the activity in question but did not currently do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

In considering the Welsh Government's definition of an 'education course', the ICO stated that they held workshops and seminars in Wales for specific groups of stakeholders in order to raise awareness of compliance with information rights' legislation. However, the ICO did not believe that those activities corresponded to an 'education course'. Welsh Ministers should ensure further clarity regarding the definition of 'education course' when specifying standards in regulations.

The ICO considered that providing the education courses identified above was unreasonable due to a shortage of Welsh-speaking staff able to conduct such events without the support of simultaneous translation services. It added that they believed that such a translation service would impair the directness and naturalism of participant interaction.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

The ICO stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

No evidence was provided in relation to this activity, as the ICO did not believe that they carried out the activity.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The ICO confirmed that the requirements relating to these standards were already current practice or it could comply with them in the future.

The ICO stated that they do not have an office in Wales which is open to the public, therefore they did not believe that standards 158(b), 159(c), 160(c) nor 161(5) (b) were relevant. However, the ICO did not anticipate any difficulties in complying with the requirements of standards 158-163 and considered them to be reasonable and proportionate.



## **Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 90% of commitments corresponded to the policy making standards.<sup>248</sup>

The ICO stated that they could comply with the majority of the standards on the whole, but they believed that it should be applied to policy decisions likely to impact Wales or the Welsh language only. It was noted that compliance with the standards without that restriction would be unreasonable and disproportionate to a body with a UK-wide remit.

It was noted that standard 92 was not relevant to the ICO as they do not award grants as part of their role.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The ICO confirmed that the requirements relating to these standards were already current practice or it could comply with them in the future.

It was noted that the ICO do not have an office in Wales which is open to the public. As a result, they did not believe that the aspect of the standards involving the availability of relevant documents in offices was relevant. However, the ICO did not anticipate any difficulties in complying with the requirements of standards 158-163 and considered them to be reasonable and proportionate.

## **Operational standards [96-142]**

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 7% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>249</sup>

In considering the requirements of standard 96, the ICO confirmed that they do not currently implement a policy on the internal use of Welsh but they could develop such a policy in the future. However, it was noted that developing such a policy would be disproportionate as it would have very limited relevance to the majority of their staff based in England.

The ICO stated that they do not currently publish any documents or policies identified in standards 97-109 in Welsh.

They did not believe that the requirements relating to standards 97-102 would be reasonable and proportionate, as all of their HR and training/development functions operated from their main office in England. They stated that completing documents in Welsh could hinder internal processes due to the need to translate them into English. Concerns were also raised about the practicality of translating live documents which are constantly being revised in production.

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<sup>248</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>249</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

It was confirmed that the IT system for authorising flexi-hours, leave and absences was operated and controlled centrally for the use of all ICO offices across the UK. Therefore, they did not believe that standard 102 could be applied to staff in Wales only and that it would be disproportionate to vary the current system or procure a new system in order to comply with the requirements of this standard in the Wales office only.

The ICO believed that it would be unreasonable and disproportionate to make standards 103-109 specifically applicable to them. It was noted that the majority of ICO staff were based outside Wales and that Welsh language versions of policies would not be relevant to them. In addition, concerns were raised about the significant cost of complying with these standards.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

In considering the requirements of standards 110-113, the ICO stated that they were not current practice, but that making a selection of those standards specifically applicable to them would be reasonable and proportionate.

The ICO confirmed that complying with standards 110-110A would be reasonable and proportionate in principle. However, concerns were raised about the costs and delay involved in translating relevant documents into Welsh. It added that some evidence documents used for award purposes were substantial. As a result, they did not believe that it would be proportionate to ensure that all such documents were translated into Welsh.

The ICO stated that they would not be able to comply with standard 111 due to a current shortage of staff and skills to undertake the complaints process in Welsh. The ICO considered that it could comply with standard 112, but they believed that the use of simultaneous translation services could place the persons concerned at a disadvantage. Furthermore, concerns were raised about the possibility that a lack of expertise amongst translators in relation to the organization's technical vocabulary could impact the correctness of the translation concerned.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

In considering the requirements of standards 114-117, the ICO stated that they were not current practice to comply with them, but that making a selection of those standards specifically applicable to them would be reasonable and proportionate.

The ICO confirmed that disciplinary hearings were currently managed by the central HR department in England on the whole. The ICO stated that complying with standards 114-114A would be reasonable and proportionate in principle. However, concerns were raised about the costs involved in translating any relevant documents into Welsh.

The ICO stated that they would not currently be able to conduct a meeting in Welsh in accordance with standard 115 without the use of translation facilities. The ICO considered that they could comply with standard 116, but they believed that the use of simultaneous

translation services could place the persons concerned at a disadvantage. Furthermore, concerns were raised about the possibility that a lack of expertise amongst translators in relation to the organization's technical vocabulary could impact the correctness of the translation concerned.

**Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 29% of commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.<sup>250</sup>

The ICO stated that they provided Welsh spell check and grammar computer software for employees and workers, but it did not currently provide Welsh language software interfaces.

The ICO confirmed that they did not currently operate a Welsh language intranet system. It was noted that it would be unreasonable and disproportionate to comply with standards 119-121 and 124 as the information on the intranet was updated constantly. It added that some of the information provided on the intranet was critical in nature. In considering that, they stated that the delay associated with translating the information on the intranet into Welsh would impact the organization's ability to provide important urgent information to staff.

The ICO stated that it would be reasonable to comply with standards 122-123 in principle but they raised concerns about the proportionality of these standards, considering the nature and location of the organization as well as the relevance of the Welsh language to the majority of staff.

**Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 89% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>251</sup>

The ICO confirmed that it was current practice to assess the Welsh language skills of their employees.

The ICO stated that they do not currently provide training to staff in the areas identified in standard 126. They considered that it would be unreasonable and disproportionate to comply with the standard as training was provided centrally from the main office in England. They stated that they did not currently provide training in accordance with standard 127, but they believed that it would be reasonable to allow staff to attend such training when required.

It was confirmed that the requirements relating to standards 128-131 were already current practice and corresponded to their current commitments to a large degree. They also stated that the use of Welsh was currently supported and encouraged via various activities across the organization.

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<sup>250</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>251</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

It was confirmed that compliance with standards 132-133 would be reasonable and proportionate if applied to staff in Wales only.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for recruiting by a body.<sup>252</sup>

The ICO stated that they weighed the need for the inclusion of language requirements in job advertisements with current demand within teams to provide those services through the medium of Welsh.

It was confirmed that they do not currently state that individuals are welcome to apply for a job in Welsh in job advertisements, neither do they provide space for the candidates to request an interview or assessment in Welsh on their job applications. However, it was noted that they do provide Welsh language versions of application forms and job descriptions to candidates in accordance with the requirements of standard 135A.

In considering the requirements of standard 138, it was explained that it was not current practice to inform candidates of the outcome of a job application in Welsh.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for signs displayed in a body's workplace.

They explained that neither Welsh nor English signs were currently displayed inside the organization buildings.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

It was confirmed that audio announcements were only made in the main office in England. Therefore, they did not believe that it would be reasonable and proportionate to comply with the standard as they did not currently have any Welsh speakers in the main office.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The ICO confirmed that the requirements relating to these standards were already current practice or it could comply with them in the future.

The ICO stated that they do not have an office in Wales which is open to the public, therefore they did not believe that standards 170(b) and 173(5) (b) were relevant. The ICO did not anticipate any difficulties in complying with the requirements of standards 170-175 and considered them to be reasonable and proportionate.

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<sup>252</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Promotion standards [143-144]**

The ICO confirmed that it did not consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 77% of commitments corresponded to the record keeping standards.<sup>253</sup>

The ICO stated that the vast majority of requirements relating to standards 145-157 were already current practice or they could comply with them in the future.

They explained that they were unclear whether standard 146 related to keeping records of the number of training courses provided by the ICO, as well as the training provided by outside agencies. Welsh Ministers should clarify the intention of this standard along with any related standards when specifying standards in regulations.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The ICO confirmed that the requirements relating to these standards were already current practice or they could comply with them in the future.

The ICO stated that they do not have an office in Wales which is open to the public; therefore they did not believe that standard 178(b) was relevant. Apart from this matter, the ICO did not anticipate any difficulties in complying with the requirements of standards 178-179 and considered them to be reasonable and proportionate.

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<sup>253</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Mental Health Review Tribunal for Wales (MHRTW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body**

##### **Standards for correspondence sent by a body [1-7]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for correspondence sent by a body.<sup>254</sup>

The MHRTW stated that their current Welsh language scheme ensured that all of their services were available in Welsh, including correspondence.

The MHRTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 2: Telephone calls made and received by a body**

##### **Standards for telephone calls made and received by a body [8-22]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>255</sup>

The MHRTW stated that their current Welsh language scheme ensured that all of their services were available in Welsh, including telephone calls.

The MHRTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Ministers' responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public**

##### **Standards for meetings arranged by a body that aren't open to the general public [23-29]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>256</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh, including conducting hearings in Welsh or through the use of translation services. However, they emphasised that any Welsh language facility in

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<sup>254</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>255</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>256</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

a hearing should only be available for the benefit of MHRTW applicants, and not for any other relevant person.

Furthermore, in considering the requirements of the standards in relation to MHRTW hearings, it was noted that their approach and processes were governed by the Mental Health Act 1983 (amended) along with the code of practice imposed by the Welsh Government.

Welsh Ministers should ensure clarification in relation to the above when specifying standards in regulations.

It was noted that MHRTW members do not come into contact with applicants, witnesses nor other parties involved in hearings beyond the direct contact which occurs during a hearing. The MHRTW confirmed that it is Welsh Government employees who provide all of their administrative functions, including contact with persons outside of hearings.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.

The MHRTW noted that they held hearings in private, and did so in accordance with statutory law.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for public events organised or funded in their entirety by a body.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>257</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for displaying material in public.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>258</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>257</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>258</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>259</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh, including ensuring that forms are available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>260</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for signs displayed by a body.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>261</sup>

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<sup>259</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>260</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>261</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>262</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body awarding grants.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body awarding contracts.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>262</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body**  
**[79-80]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>263</sup>

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>264</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>263</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>264</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 90% of commitments corresponded to the policy making standards.<sup>265</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>265</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## **Operational standards [96-142]**

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>266</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

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<sup>266</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 89% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>267</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 43% of commitments corresponded to the standards for recruiting by a body.<sup>268</sup>

In contrast to the other devolved Tribunals, it was confirmed that the MHRTW are not a Welsh Government agency. This was noted as they were established in 1959 before the Welsh Assembly Government came into existence. It was therefore noted that the Welsh Government had no role in appointing MHRTW members who have been selected by the Judicial Appointments Commission. As a result, they are appointed by the Lord Chancellor directly.

It should be noted that the Ministry of Justice's Welsh language scheme states that judicial appointments are one of their key responsibilities and the Judicial Appointments Commission is listed as a Ministry of Justice sponsored organization. We therefore conclude that the Commission are subject to the commitments found in the Ministry of Justice's Welsh language scheme.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for signs displayed in a body's workplace.

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<sup>267</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>268</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

They stated that making the standards specifically applicable to them would be reasonable and proportionate and they would be able to comply with them in the future.

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Promotion standards [143-144]**

The MHRTW did not provide any evidence to confirm that they consented for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 85% of commitments corresponded to the record keeping standards.<sup>269</sup>

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

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<sup>269</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The MHRTW confirmed that their current Welsh language scheme ensured that all of their services were available in Welsh. They added that it is Welsh Government employees who provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.



## The Special Educational Needs Tribunal for Wales (SENTW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The SENTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the standards for correspondence sent by a body.<sup>270</sup>

The SENTW stated that they corresponded with persons in accordance with the language choice of the Tribunal user.

The SENTW considered that making the standards specifically applicable to them would be reasonable and proportionate. However, the SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The SENTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 27% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>271</sup>

The SENTW stated that they made telephone calls in accordance with the language choice of the Tribunal user.

The SENTW considered that making the standards specifically applicable to them would be reasonable and proportionate. However, the SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>270</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>271</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 3: Meetings arranged by a body that aren't open to the general public  
Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The SENTW stated that they undertook the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>272</sup>

The SENTW confirmed that they conducted hearings in accordance with the language choice of the Tribunal user and used simultaneous translators in those hearings.

The SENTW did not consider that making the standards specifically applicable to them would be reasonable and proportionate, with concerns raised about compliance with the requirements of standard 25 in hearings at all times. They stated that there should be flexibility to conduct hearings with the use of translation services in order to meet their obligations to assemble a full panel, provide a balanced panel and conduct hearings within a satisfactory timeframe.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>272</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for public events organised or funded in their entirety by a body.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>273</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for public events organised or funded in their entirety by a body.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>273</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

The SENTW stated that they carried out the activity in question, and did so through the medium of Welsh

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for a body producing and publishing documents.<sup>274</sup>

It was confirmed that all of their documentation was published bilingually apart from SENTW decisions.

It was noted that SENTW decisions were published in accordance with the chosen language of the Tribunal user, therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

The SENTW stated that they carried out the activity in question, and did so through the medium of Welsh

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>275</sup>

The SENTW considered that it would be reasonable and proportionate to make the standards specifically applicable to them.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and online services [52-57]**

The SENTW stated that they carried out the activity in question, and did so through the medium of Welsh

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for a body's websites and online services.<sup>276</sup>

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<sup>274</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>275</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The SENTW considered that it would be reasonable and proportionate to make the standards specifically applicable to them.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>277</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

The SENTW stated they did not carry out the activity in question, therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for receiving visitors a body's buildings.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>276</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>277</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>278</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body awarding grants.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body awarding contracts.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>278</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79-80]**

The SENTW stated they did not carry out the activity in question, therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>279</sup>

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

The SENTW stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>280</sup>

The SENTW considered that it would be reasonable and proportionate to make the standard specifically applicable to them.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

The SENTW stated that they did not carry out the activity in question, therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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<sup>279</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>280</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 19: Public address systems used by a body  
Standards for public address systems used by a body [85]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standard specifically applicable to them would be reasonable and proportionate.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The SENTW stated that the requirements relating to standards 158, 159, 162 and 163 were already current practice in complying with the Welsh Government's Welsh language scheme.

The SENTW confirmed that they did not currently carry out the activity relating to standard 160.

In considering the requirements relating to standard 161, they noted that they already produced annual reports. However, they did not consider that it would be able to publish such reports by 30 June due to time constraints. As a result, they did not believe that it would be reasonable and proportionate to make these standards specifically applicable.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.



## **Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 90% of commitments corresponded to the policy making standards.<sup>281</sup>

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Operational standards [96-142]**

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

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<sup>281</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 22% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>282</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>282</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for recruiting by a body.<sup>283</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>284</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The SENTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The SENTW confirmed that Welsh Government employees provided all of their administrative functions.

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<sup>283</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>284</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Promotion standards [143-144]**

The SENTW did not provide any evidence to confirm that they consented for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 77% of commitments corresponded to the record keeping standards.<sup>285</sup>

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The SENTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>285</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Residential Property Tribunal Wales (RPTW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body**

##### **Standards for correspondence sent by a body [1-7]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 2: Telephone calls made and received by a body**

##### **Standards for telephone calls made and received by a body [8-22]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public**

##### **Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The RPTW stated that they carried out the activity in question.

They explained that they did not necessarily conduct meetings but instead conducted hearings as part of their functions. Welsh Ministers should ensure clarification in relation to the above when specifying standards in regulations.

#### **Activity 4: Meetings arranged by a body that are open to the public**

##### **Standards for meetings arranged by a body that are open to the public [30-34]**

The RPTW stated that they carried out the activity in question.

They explained that they did not necessarily conduct meetings but instead conducted hearings as part of their functions. Welsh Ministers should ensure clarification in relation to the above when specifying standards in regulations.

Although it was very rare for any other person to attend an RPTW hearing apart from the relevant parties, it was noted that these hearings were also open to the public. Welsh Ministers should ensure clarification regarding the extent to which tribunals should provide for them, when specifying standards in regulations.

The RPTW confirmed that they did correspond with case-related parties in Welsh if

requested to do so, but considering the amount of evidence in a case along with the small number of RPTW members who can speak Welsh, they stated that it would be disproportionate to translate the information.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The RPTW stated they did not carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 7: Displaying material in public  
Standards for displaying material in public [38-39]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 8: A body producing and publishing documents  
Standards for a body producing and publishing documents [40-49]**

The RPTW stated that they carried out the activity in question.

It was confirmed that RPTW leaflets were already bilingual. However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The RPTW stated that they carried out the activity in question.

It was confirmed that RPTW leaflets were already bilingual. However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

The RPTW stated that they carried out the activity in question.

It was confirmed that the RPTW website was part of the Welsh Government's website and currently bilingual. It was noted that decisions on the website are not currently translated. They stated that it would not be proportionate to do so in accordance with the standards, considering the amount of documents concerned.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under

section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

The RPTW stated that they did not carry out the activity in question.

The RPTW confirmed that the Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 15: A body awarding contracts**  
**Standards for a body awarding contracts [74-78]**

The RPTW stated they did not carry out the activity in question.

The RPTW confirmed that the Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 16: Raising awareness about Welsh language services provided by a body**  
**Standards for raising awareness about Welsh language services provided by a body [79-80]**

The RPTW stated they did not carry out the activity in question.

The RPTW confirmed that the Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.



**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The RPTW stated that they carried out the activity in question.

However, they confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 18: Courses offered by a body  
Standards for courses offered by a body [82-84]**

The RPTW stated they did not carry out the activity in question.

The RPTW confirmed that the Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 19: Public address systems used by a body  
Standards for public address systems used by a body [85]**

The RPTW stated they did not carry out the activity in question.

The RPTW confirmed that the Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Policy making standards [86-95]**

The RPTW stated that they were not responsible for policy making.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## **Operational standards [96-142]**

### **Standards for the use of Welsh within a body's internal administration [96-109]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for complaints made by members of a body's staff [110-113]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards for a body disciplining staff [114-117]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

The RPTW confirmed that the Welsh Government provided all of their administrative

functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Standards for developing Welsh language skills through workforce planning and development [125-133]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Standards for recruiting by a body [134-138]**

The RPTW stated that their only permanent employees were the President and Vice-President and they explained that it was not directly responsible for appointing members to the RPTW.

It was confirmed that RPTW lawyer chairpersons were appointed by the Judicial Appointments Commission and were approved by the Welsh Government. Furthermore, RPTW presidents, surveyors and lay members were appointed via the Welsh Government's public appointments process.

It should be noted that the Ministry of Justice's Welsh language scheme states that judicial appointments are one of their key responsibilities and the Judicial Appointments Commission are listed as a Ministry of Justice sponsored organization. We therefore conclude that the Commission are subject to the commitments found in the Ministry of Justice's Welsh language scheme.

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that the Welsh Government was mainly responsible for undertaking the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Standards for signs displayed in a body's workplace [139-141]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Standards for audio announcements in a body's workplace [142]**

The RPTW confirmed that the Welsh Government provided all of their administrative

functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that the Welsh Government were responsible for undertaking the activities in question and, as a result, the requirements relating to the standards in question would be met by making them specifically applicable to Welsh Ministers.

#### **Promotion standards [143-144]**

The RPTW did not provide any evidence to confirm that it consented for promotion standards to be potentially applicable to them.

#### **Record keeping standards [145-157]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The RPTW confirmed that the Welsh Government provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## Agricultural Land Tribunal Wales (ALTW)

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW stated that they corresponded with persons in accordance with the language choice of the Tribunal user.

The ALTW considered that making the standards specifically applicable to them would be reasonable and proportionate. However, the ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW stated that they made telephone calls in accordance with the language choice of the Tribunal user.

The ALTW considered that making the standards specifically applicable to them would be reasonable and proportionate. However, the ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW stated that they conducted hearings in accordance with the language choice of the Tribunal user and used external simultaneous translators in those hearings.

The ALTW did not consider that making the standards specifically applicable to them would be reasonable and proportionate, with concerns raised about compliance with the requirements of standard 25 in hearings at all times. They stated that there should be flexibility to conduct hearings with the use of translation services in order to meet their

obligations to assemble a full panel, provide a balanced panel and conduct hearings within an appropriate timeframe.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to concerns about compliance with the requirements of standards 30-33.

It was noted that not every person had the right to speak in a public hearing; therefore the exact wording of the standard was not relevant to them as hearings were held in accordance with the language choice of the Tribunal user. In relation to standard 31, they stated that invitations were given to Tribunal users only as a matter of course and that they were provided in accordance with their language choice. Welsh Ministers should ensure clarification regarding the relevance of the standards to members of the public who choose to attend hearings and the extent to which tribunals should provide for them, when specifying standards in regulations.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 5: Public events organised or funded in their entirety by a body  
Standards for public events organised or funded in their entirety by a body [35-36]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standard specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to carry out the activity in question.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 7: Displaying material in public  
Standards for displaying material in public [38-39]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 8: A body producing and publishing documents  
Standards for a body producing and publishing documents [40-49]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

It was confirmed that all of their documentation was published bilingually apart from ALTW decisions.

It was noted that ALTW decisions were published in accordance with the chosen language of the Tribunal user, therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW considered that it would be reasonable and proportionate to make the standards specifically applicable to them.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW considered that it would be reasonable and proportionate to make the standards specifically applicable to them.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The ALTW stated they did not carry out the activity in question, therefore they did not consider that making the standards specifically applicable would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.



Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 13: Official notices made by a body  
Standards for official notices made by a body [67-68]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 14: A body awarding grants  
Standards for a body awarding grants [69-73]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 15: A body awarding contracts  
Standards for a body awarding contracts [74-78]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79-80]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the

scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The ALTW stated that they carried out the activity in question, and did so through the medium of Welsh.

The ALTW considered that it would be reasonable and proportionate to make the standard specifically applicable to them.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 18: Courses offered by a body  
Standards for courses offered by a body [82-84]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Activity 19: Public address systems used by a body  
Standards for public address systems used by a body [85]**

The ALTW stated they did not carry out the activity in question, therefore they did not consider that making the standard specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standard in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The ALTW stated that the requirements relating to standards 158, 159, 162 and 163 were already current practice in complying with the commitments found in the Welsh Government's Welsh language scheme.

The ALTW confirmed that they did not currently carry out the activity relating to standard 160.

In considering standard 161, they noted that they already produced annual reports. However, they did not consider that it would be able to publish such reports by 30 June due to time constraints. As a result, they did not believe that it would be reasonable and proportionate to make these standards specifically applicable to them.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Policy making standards [86-95]**

The ALTW stated that they were not responsible for policy making; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The ALTW stated they did not carry out the activity in question; therefore they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Operational standards [96-142]**

The ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to secure compliance with them.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The ALTW confirmed that Welsh Government employees provided all of their administrative functions.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Promotion standards [143-144]**

The ALTW did not provide any evidence to confirm that it consented for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

The ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to secure compliance with them.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

### **Supplementary matters**

#### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The ALTW confirmed that Welsh Government employees provided all of their administrative functions. With that in mind, they considered that it was the Welsh Government's responsibility to secure compliance with them.

Welsh Ministers should clarify the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

## Data Unit Wales

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 57% of commitments corresponded to the standards for correspondence sent by a body.<sup>286</sup>

In responding to the requirements relating to the standards in terms of correspondence sent by a body, Data Unit Wales confirmed that the requirements relating to all of the standards, apart from standards 2-3, were already current practice and that they would be able to comply with them in due course. Data Unit Wales did not believe that standard 3 was relevant to them as they did not send correspondence to households.

Data Unit Wales considered that making the standards in relation to correspondence specifically applicable to them would be reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 53% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>287</sup>

Data Unit Wales confirmed that the vast majority of the standards were already current practice and they could comply with them in due course. Data Unit Wales did not believe that complying with standards 9 and 21 would be practical at present as their reception staff did not have sufficient language skills to offer a service in Welsh.

Data Unit Wales considered that making the standards in relation to telephone calls specifically applicable to them would be reasonable and proportionate. However, they did not believe that standards 15 and 22 were relevant to them.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

Data Unit Wales stated that they carried out the activity in question but did not do so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 39% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>288</sup>

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<sup>286</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>287</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

In responding to the requirements relating to the standards for meetings arranged by a body that aren't open to the general public, Data Unit Wales confirmed that the requirements relating to all of the standards, apart from those specifically involving meetings regarding personal benefit or wellbeing, were already current practice and that they could comply with them in the future.

Apart from standards 25, 26, 28 and 29, Data Unit Wales considered that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

**Activity 4: Meetings arranged by a body that are open to the public**  
**Standards for meetings arranged by a body that are open to the public [30-34]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standards were relevant to them.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>289</sup>

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standards were relevant to them.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>290</sup>

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>291</sup>

Data Unit Wales confirmed that any advertising and marketing campaigns held were bilingual. It was noted that the majority of the requirements were already current practice or they could comply with them in the future, therefore they considered that making the standard relating to this activity specifically applicable to them would be reasonable and proportionate.

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<sup>288</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>289</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>290</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>291</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>292</sup>

Data Unit Wales confirmed that all of the material displayed in public was bilingual. It was noted that the majority of the requirements were already current practice or they could comply with them, therefore they considered that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 80% of commitments corresponded to the standards for a body producing and publishing documents.<sup>293</sup>

Data Unit Wales confirmed that the requirements relating to all of the standards, apart from standard 45, were already current practice and that they could comply with them in the future. They explained that all of the publications and material available to the public were bilingual as a matter of course. Data Unit Wales did not consider that standard 45 was relevant to them as they did not publish rules relevant to the public.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standards were relevant to them.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>294</sup>

**Activity 10: A body's websites and online services**  
**Standards for a body's websites and online services [52-57]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>295</sup>

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<sup>292</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>293</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>294</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>295</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

Data Unit Wales confirmed that their public website, including links, imagery and generic content, was completely bilingual. Data Unit Wales stated that all of the requirements were already current practice or they could comply with them in the future, therefore they considered that making the standards specifically applicable to them would be reasonable and proportionate.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>296</sup>

Data Unit Wales confirmed that all of the information signs in and around their offices were already fully bilingual. They noted that all of the requirements relating to the standards were already current practice or they could comply with them in the future, therefore they considered that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings**  
**Standards for receiving visitors at a body's buildings [61-66]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>297</sup>

Data Unit Wales stated that their reception staff did not currently speak Welsh, but the organization would seek to employ Welsh speakers should a reception staff vacancy arise in the future.

Furthermore, they noted that all of the requirements relating to the standards were already current practice or they could comply with them in the future, therefore they considered that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>298</sup>

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<sup>296</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>297</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>298</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



It was noted that any sign in relation to their services were produced and published bilingually. It was confirmed that all of the requirements relating to the standards were already current practice or they could comply with them in the future, therefore they considered that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

**Activity 14: A body awarding grants  
Standards for a body awarding grants [69-73]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standards were relevant to them.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body awarding grants.<sup>299</sup>

**Activity 15: A body awarding contracts  
Standards for a body awarding contracts [74-78]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body awarding contracts.<sup>300</sup>

They stated that they rarely carried out this activity but would secure compliance with all of the requirements should the case arise. They therefore confirmed that they considered that making the standards regarding this activity specifically applicable to them would be reasonable and proportionate.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Standards for raising awareness about Welsh language services provided by a body [79-80]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standards were relevant to them.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>301</sup>

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

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<sup>299</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>300</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>301</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

**Activity 17: A body's corporate identity**  
**Standards for a body's corporate identity [81]**

Data Unit Wales stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>302</sup>

Data Unit Wales stated that they had already adopted a fully bilingual public image and corporate identity. They confirmed that all of the requirements were already current practice or they could comply with them in the future, therefore they considered that making the standard specifically applicable to them would be reasonable and proportionate.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standards were relevant to them.

However, when analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for courses offered by a body.<sup>303</sup>

**Activity 19: Public address systems used by a body**  
**Standards for public address systems used by a body [85]**

Data Unit Wales stated they did not carry out the activity in question and therefore did not believe that the standard was relevant to it.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

**Supplementary matters**

**Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

Data Unit Wales stated that they could comply with these standards; therefore they confirmed that making the standards regarding the supplementary matters specifically applicable to them would be reasonable and proportionate.

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<sup>302</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>303</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

## **Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the policy making standards.<sup>304</sup>

However, Data Unit Wales stated that they did not make policies; therefore they did not believe that the standards were relevant to them.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

Data Unit Wales stated that they did not make policies; therefore they did not believe that the standards were relevant to them.

## **Operational standards [96-142]**

### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 7% of commitments corresponded to the standards for the use of Welsh within a body's internal administration.<sup>305</sup>

Data Unit Wales confirmed that they did not currently implement an internal use of Welsh policy but they could develop such a policy in accordance with standard 96 in the future.

Data Unit Wales stated that they did not currently provide nor publish any documents/policies identified in standards 97-109 in Welsh. However, they noted that they did offer to provide Welsh language versions of the documents concerned to staff. Data Unit Wales explained that staff surveys had been conducted recently with all staff members stating that they wished to receive and use English language versions. As a result, Data Unit Wales did not believe that making these standards specifically applicable to them would be reasonable and proportionate.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

Data Unit Wales confirmed that it did allow all members of staff to complain to the organization, as well as respond to any complaints made against them, in Welsh. However, the Unit noted that it did not inform staff members of this.

Data Unit Wales stated that they did not currently comply with the exact requirements of standards 111-112, but they noted that they did consider the language choice of individuals and sought to respond to those needs appropriately. They believed that it would be impractical to offer to handle a complaint in Welsh if it is already known that the individual does not speak Welsh.

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<sup>304</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>305</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

**Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

In considering the requirements attached to standards 114-117, Data Unit Wales stated that they allowed members of staff to respond in Welsh to allegations made against them via the internal disciplinary process. However, it was noted that they did not inform staff members of this.

Data Unit Wales stated that they did not currently comply with the exact requirements of standards 115-116, but they noted that they did consider the language choice of individuals and sought to respond to those needs appropriately. They believed that it would be impractical to offer to handle a complaint in Welsh if it is already known that the individual does not speak Welsh.

It added that a staff survey had been held recently where every member of staff stated that they wished to deal with disciplinary meetings in English only. Therefore, they stated that making those standards specifically applicable to them would be unreasonable and disproportionate.

**Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet.

Data Unit Wales stated that they provided Welsh spell check and grammar computer software for employees and workers, but it did not currently provide Welsh language software interfaces.

Data Unit Wales confirmed that they did not currently operate a Welsh language intranet system. They stated that cost and time implications, along with a lack of Welsh language skills amongst staff, prevented them from complying with standards 119-121 and 124. Furthermore, they confirmed that they already complied with standard 123.

**Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 56% of commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and development.<sup>306</sup>

Data Unit Wales confirmed that it was current practice to assess the Welsh language skills of their employees.

Data Unit Wales stated that they did not currently provide training to staff in the areas identified in standard 126 in Welsh nor bilingually. In considering the requirements relating to standards 127-131, Data Unit Wales stated that they were committed to encouraging and supporting those members who wished to learn Welsh or improve their Welsh language skills. They explained that they provided training and resources in order to meet those objectives and that their current activities corresponded to the requirements of standards 127-131.

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<sup>306</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for recruiting by a body.<sup>307</sup>

Data Unit Wales stated that they assessed the need for Welsh language skills in relation to all new posts or vacancies advertised in accordance with their Welsh language scheme. In undertaking the assessment, the organization's business needs are examined along with the requirements found in the current Welsh language scheme in order to support the aim of providing a bilingual service.

Data Unit Wales explained that all of the documents outlined in standard 135A were available in Welsh and they stated that they welcomed job applications in Welsh in advertising posts.

Data Unit Wales confirmed that they provided a simultaneous translation service in interviews or recruitment assessments if it was not possible to conduct them in Welsh.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>308</sup>

Data Unit Wales confirmed that they display Welsh language signs in the organization's buildings, and that the Welsh language is given prominence.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

Data Unit Wales confirmed that they did not make audio announcements in the workplace. Therefore, they did not believe that the standard in question was relevant.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

Data Unit Wales stated that they could comply with these standards; therefore they confirmed that making the standards regarding the supplementary matters specifically applicable to them would be reasonable and proportionate

### **Promotion standards [143-144]**

Data Unit Wales confirmed that they did not consent for promotion standards to be potentially applicable to them.

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<sup>307</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>308</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 62% of commitments corresponded to the record keeping standards.<sup>309</sup>

Data Unit Wales stated that the requirements relating to standards 145-157 were already current practice or they could comply with them in the future. It was noted that the vast majority of relevant data was already being recorded but the organization will need to formalise their approach to record keeping in order to ensure full compliance with the standards.

## **Supplementary matters**

### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

Data Unit Wales stated that they could comply with these standards; therefore they confirmed that making the standards regarding the supplementary matters specifically applicable to them would be reasonable and proportionate

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<sup>309</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## The Electoral Commission

### Service delivery standards

#### **Activity 1: Correspondence sent by a body Standards for correspondence sent by a body [1-7]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 86% of commitments corresponded to the standards for correspondence sent by a body.<sup>310</sup>

The Electoral Commission confirmed that the requirements were already current practice and corresponded to the commitments found in their statutory language scheme.

The Electoral Commission considered that making the standards in relation to correspondence specifically applicable to them would be reasonable and proportionate.

#### **Activity 2: Telephone calls made and received by a body Standards for telephone calls made and received by a body [8-22]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 60% of commitments corresponded to the standards for telephone calls made and received by a body.<sup>311</sup>

The Electoral Commission confirmed that the requirements were already current practice and corresponded to the commitments found in their statutory language scheme. However, they noted that only their staff in Wales made bilingual greetings when answering telephone calls at present.

The Electoral Commission considered that making the standards in relation to telephone calls made and received by a body specifically applicable to them would be reasonable and proportionate.

#### **Activity 3: Meetings arranged by a body that aren't open to the general public Standards for meetings arranged by a body that aren't open to the general public [23-29]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 94% of commitments corresponded to the standards for meetings arranged by a body that aren't open to the general public.<sup>312</sup>

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<sup>310</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>311</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>312</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The Electoral Commission confirmed that the requirements were already current practice and corresponded to the commitments found in their statutory language scheme. The Electoral Commission stated that they would be able to conduct meetings in Welsh when every attendee spoke Welsh. They added that current practice was to conduct meetings in English when not all attendees could speak Welsh, but that they did provide a simultaneous translation service in meetings where it was identified that individuals or groups wished to use the Welsh language.

The Electoral Commission considered that making the standards in relation to meetings arranged by a body that aren't open to the public specifically applicable to them would be reasonable and proportionate.

**Activity 4: Meetings arranged by a body that are open to the public**  
**Standards for meetings arranged by a body that are open to the public [30-34]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for meetings arranged by a body that are open to the public.<sup>313</sup>

The Electoral Commission confirmed that the requirements were already current practice and corresponded to the commitments found in their statutory language scheme. The Electoral Commission stated that the only meetings arranged by them that were open to the public in Wales were fringe meetings at party conferences. They stated that they were held bilingually and that simultaneous translation was provided. They added that all of the material in such public meetings was bilingual.

The Electoral Commission considered that making the standards in relation to meetings arranged by a body that are open to the public specifically applicable to them would be reasonable and proportionate.

**Activity 5: Public events organised or funded in their entirety by a body**  
**Standards for public events organised or funded in their entirety by a body [35-36]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for public events organised or funded in their entirety by a body.<sup>314</sup>

The Electoral Commission stated that they were already committed to the requirements relating to the standards for public events organised in Wales.

The Electoral Commission considered that making the standards in relation to public events organised or funded in their entirety by a body specifically applicable to them would be reasonable and proportionate.

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<sup>313</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>314</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.



**Activity 6: A body's publicity and advertising  
Standards for a body's publicity and advertising [37]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's publicity and advertising.<sup>315</sup>

The Electoral Commission confirmed that they already operated in accordance with the standards in Wales and would be able to continue doing so in the future. They stated that publicity and advertising material in Wales was always bilingual.

The Electoral Commission considered that making the standard in relation a body's publicity and advertising specifically applicable to them would be reasonable and proportionate.

**Activity 7: Displaying material in public  
Standards for displaying material in public [38-39]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for displaying material in public.<sup>316</sup>

The Electoral Commission confirmed that they already operated in accordance with the standards in Wales and would be able to continue doing so in the future. They stated that they displayed material in public from time to time, as part of their publicity activities.

The Electoral Commission considered that making the standards in relation to displaying material in public specifically applicable to them would be reasonable and proportionate.

**Activity 8: A body producing and publishing documents  
Standards for a body producing and publishing documents [40-49]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing documents.<sup>317</sup>

The Electoral Commission confirmed that they already operated in accordance with the standards in Wales and would be able to continue doing so in the future. The Electoral Commission stated that they produced and published a large number of documents for the use of stakeholders in Wales and that they were all published in English and Welsh.

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<sup>315</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>316</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>317</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The Electoral Commission considered that making the standards for a body producing and publishing documents specifically applicable to them would be reasonable and proportionate.

**Activity 9: A body producing and publishing forms  
Standards for a body producing and publishing forms [50-51]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body producing and publishing forms.<sup>318</sup>

The Electoral Commission confirmed that they already operated in accordance with the standards in Wales and would be able to continue doing so in the future. The Electoral Commission stated that they produced and published a large number of forms for the use of persons in Wales and that they were available bilingually.

The Electoral Commission considered that making the standards for a body producing and publishing forms specifically applicable to them would be reasonable and proportionate.

**Activity 10: A body's websites and online services  
Standards for a body's websites and online services [52-57]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 83% of commitments corresponded to the standards for a body's websites and online services.<sup>319</sup>

They stated that a number of the requirements relating to the standards were current practice. They confirmed that their websites were available bilingually, apart from pages specifically related to places outside Wales. Furthermore, they stated that not all of their PEF Online website was available bilingually. However, they confirmed that the website was being redesigned and that it would be bilingual as long as the navigation and general content were relevant.

The Electoral Commission considered that making the standards for a body's websites and on-line services specifically applicable to them would be reasonable and proportionate.

**Activity 11: Signs displayed by a body  
Standards for signs displayed by a body [58-60]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 67% of commitments corresponded to the standards for signs displayed by a body.<sup>320</sup>

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<sup>318</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>319</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

The Electoral Commission confirmed that all signage displayed in Wales was bilingual. As a result, it is considered that making the standards for signs displayed by a body specifically applicable to them would be reasonable and proportionate.

**Activity 12: A body receiving visitors at their buildings  
Standards for receiving visitors at a body's buildings [61-66]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 14% of commitments corresponded to the standards for receiving visitors a body's buildings.<sup>321</sup>

The Electoral Commission did not consider that it would be reasonable and proportionate to make the standards specifically applicable to them. They explained that their Wales office was currently based in Companies House. They confirmed that the Electoral Commission in Wales did not have their own reception, therefore it was noted that current practice was for Companies House staff to greet visitors.

In light of the above, and the fact that they do not have control over the services provided by Companies House, the Electoral Commission stated that they would not be able to comply with the standards unless they were also applied to Companies House.

**Activity 13: Official notices made by a body  
Standards for official notices made by a body [67-68]**

The Electoral Commission stated they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for a body making official notices.<sup>322</sup>

Despite stating that they did not produce official notices they confirmed that, should they do so in the future, that it would be reasonable and proportionate for that to happen through the medium of Welsh in Wales.

**Activity 14: A body awarding grants  
Standards for a body awarding grants [69-73]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body awarding grants.<sup>323</sup>

As part of their remit, the Electoral Commission stated that legislation allowed them to award Policy Development Grants to political parties and that said parties were required to submit an application to the Commission in order to receive the grants concerned. The

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<sup>320</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>321</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>322</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>323</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

Electoral Commission confirmed that they already complied with the standards in relation to the above.

Furthermore, the Electoral Commission confirmed that they awarded grants to designated lead organizations in a referendum falling under the rules contained in the Political Parties, Elections and Referendums Act 2000.<sup>324</sup> It was confirmed that, should such a referendum occur in Wales, the Electoral Commission could ensure that all aspects of grant provision were available in English and Welsh.

It should be noted that evidence provided by the Electoral Commission states that their grant award functions are in line with the act.

The Electoral Commission considered that making the standards for a body awarding grants specifically applicable to them would be reasonable and proportionate.

#### **Activity 15: A body awarding contracts Standards for a body awarding contracts [74-78]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standards for a body awarding contracts.<sup>325</sup>

The Electoral Commission confirmed that it was not current practice to publish tender invitations in Welsh. However, they explained that tenderers were welcome to submit tenders in Welsh in accordance with the requirements relating to standards 75 and 75a.

The Electoral Commission considered that making the standards for a body awarding contracts specifically applicable to them would be reasonable and proportionate.

#### **Activity 16: Raising awareness about Welsh language services provided by a body Standards for raising awareness about Welsh language services provided by a body [79-80]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 50% of commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.<sup>326</sup>

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

The Electoral Commission stated that it was already current practice to include a disclaimer on English-only documents stating that material was also available in Welsh. The Electoral Commission confirmed that they would be willing to examine other

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<sup>324</sup> <http://www.legislation.gov.uk/ukpga/2000/41>

<sup>325</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

<sup>326</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

reasonable ways of raising awareness of Welsh language services offered by the Commission as and when appropriate.

The Electoral Commission considered that making the standards for raising awareness about Welsh language services provided by a body specifically applicable to them was reasonable and proportionate.

**Activity 17: A body's corporate identity  
Standards for a body's corporate identity [81]**

The Electoral Commission stated that they carried out the activity in question, and did so through the medium of Welsh.

When analysing the current Welsh language scheme commitments of the person in question, on average, 100% of commitments corresponded to the standard for a body's corporate identity.<sup>327</sup>

The Electoral Commission confirmed that they have a fully bilingual corporate identity and currently operates in accordance with the standards.

The Electoral Commission considered that making the standard for a body's corporate identity specifically applicable to them would be reasonable and proportionate.

**Activity 18: Courses offered by a body  
Standards for courses offered by a body [82-84]**

The Electoral Commission stated that they carried out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for courses offered by a body.

The Electoral Commission stated that they made educational presentations during party conferences as part of their remit. They confirmed that it was current practice to undertake these bilingually - either by those taking the session or via simultaneous translation.

Furthermore, it was confirmed that Electoral Commission staff participated in briefing sessions for candidates and agents during the pre-election period. They confirmed that these teaching sessions were conducted bilingually if there was demand for that.

**Activity 19: Public address systems used by a body  
Standards for public address systems used by a body [85]**

The Electoral Commission stated that they did not carry out the activity in question.

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.

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<sup>327</sup> For each activity, the average percentage of commitments found in the Welsh language scheme of the person in question, which correspond to the standards, be that partially or fully.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to the service delivery standards [158-163]**

The Electoral Commission confirmed that the requirements relating to these standards were already current practice or they could comply with them in the future.

### **Policy making standards [86-95]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 60% of commitments corresponded to the policy making standards.  
<sup>328</sup>

The Electoral Commission stated that they assessed and monitored the impact of policies on the Welsh language via equality impact assessments as a matter of course. They confirmed that it consulted on any policy decisions in a variety of ways and that they could comply with all of the requirements relating to standards 89-91 in terms of any future consultation.

In relation to the requirements of standard 92, the Electoral Commission explained that they did have grant awarding policies. However, the Electoral Commission stated that due to the nature of the grants given to parties that they did not currently assess the impact of these grants on the Welsh language.

The Electoral Commission confirmed that they did undertake research to assist them in making policy decisions as part of their remit, using questionnaires and focus groups with the public in Wales. All of those activities took place bilingually in Wales as a matter of course.

With that in mind, the Electoral Commission considered that making the standards in relation to policy making specifically applicable to them would be reasonable and proportionate.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to policy making standards [164-169]**

The Electoral Commission confirmed that the requirements relating to these standards were already current practice or they could comply with them in the future.

### **Operational standards [96-142]**

#### **Standards for the use of Welsh within a body's internal administration [96-109]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for the use of Welsh within a body's internal administration.

In considering the requirements of standard 96, the Electoral Commission confirmed that they did not currently implement a policy on the internal use of Welsh. However, they confirmed that they promoted the internal use of Welsh informally in a variety of ways such as providing information on the Welsh language in their weekly circular.

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<sup>328</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

The Electoral Commission did not currently provide the documents identified in standards 97-102. However, they confirmed that it would be reasonable to provide correspondence regarding employment and employment contracts in Welsh, as and when required. Furthermore, they recognised that it would be reasonable and easy to provide the Excel sheet, which records and authorises flexi working hours in Welsh in the future. However, it was noted that it would be costly to provide the online system, which records and authorises leave and absences, in Welsh.

In terms of the requirements relating to standards 103-109, they confirmed that all of the policies in question were currently published in English only. However, they did state that they would consider providing them in Welsh on an individual basis.

### **Standards for complaints made by members of a body's staff [110-113]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for complaints by a member of a body's staff.

The Electoral Commission confirmed that they did not comply with the requirements as a matter of course. However, they stated that they could conduct meetings in Welsh, either directly or via a simultaneous translation service.

### **Standards for a body disciplining staff [114-117]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for a body disciplining staff.

The Electoral Commission stated that when arranging a meeting with a staff member regarding a disciplinary case against them, that it was not current practice to conduct the meeting in Welsh. However, they stated that they could conduct meetings in Welsh, either directly or via a simultaneous translation service.

### **Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standards for information technology and support material provided by a body, and in relation to the intranet

The Electoral Commission stated that it provided Welsh spell check and grammar computer software along with Welsh language interfaces for employee and worker software. However, they stated that they only operated an English language intranet system at present.

### **Standards for developing Welsh language skills through workforce planning and development [125-133]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 56% of commitments corresponded to the standards in relation to a body developing Welsh language skills through planning and training their workforce.<sup>329</sup>

The Electoral Commission confirmed that they did not currently assess their employees' Welsh language skills in accordance with standard 125.

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<sup>329</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

In responding to the requirements relating to standard 126, they stated that the only training provided bilingually at present was in recruitment and interviewing as well as dealing with the public.

In considering the requirements of standard 127, they stated that such training was not currently provided internally by the organization and that they did not provide this in Welsh as a rule. However, they confirmed that this training could be provided in Welsh at the request of a staff member.

### **Standards for recruiting by a body [134-138]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 71% of commitments corresponded to the Standards for recruiting by a body.<sup>330</sup>

The Electoral Commission stated that they assessed the need for Welsh language skills in relation to all new posts or vacancies advertised. In conducting the assessment, the requirements of the post concerned were examined with the line manager and HR department.

The Electoral Commission confirmed that the only documents currently provided in Welsh were job descriptions.

They explained that they already provided space on application forms for a candidate to state that they wished to have an interview or assessment in Welsh, and made provision for that. They also confirmed that they informed the candidate of the outcome of their application in Welsh as a matter of course.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 75% of commitments corresponded to the standards for signs displayed in a body's workplace.<sup>331</sup>

The Electoral Commission confirmed that it displayed signs inside the organization's buildings in Welsh but that Welsh was not given prominence.

### **Standards for audio announcements in a body's workplace [142]**

When analysing the current Welsh language scheme commitments of the person in question, none of the commitments corresponded to the standard for audio announcements in a body's workplace.

The Electoral Commission stated that they made audio announcements in the workplace but did not do so in Welsh at present. However, they confirmed that they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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<sup>330</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

<sup>331</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.



## Supplementary matters

### **Standards for dealing with supplementary matters in relation to operational standards [170-175]**

The Electoral Commission confirmed that the requirements relating to these standards were already current practice or they could comply with them in the future.

### **Promotion standards [143-144]**

The Electoral Commission confirmed that they did not consent for promotion standards to be potentially applicable to them.

### **Record keeping standards [145-157]**

When analysing the current Welsh language scheme commitments of the person in question, on average, 77% of commitments corresponded to the record keeping standards.<sup>332</sup>

In providing information on the organization's current corporate arrangements, the Electoral Commission stated that the Welsh language consultant secured compliance with the current language scheme. They stated that they would be able to take additional steps to comply with standards 145-157 in the future. As a result, it was noted that it would be reasonable and proportionate to make the standards specifically applicable to them.

## Supplementary matters

### **Standards for dealing with supplementary matters in relation to record keeping standards [178-179]**

The Electoral Commission confirmed that the requirements relating to these standards were already current practice or it could comply with them in the future.

The Electoral Commission did not anticipate any difficulties in ensuring compliance with the requirements relating to standards 178-179 and they considered that making the supplementary standards in question specifically applicable to them would be reasonable and proportionate.

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<sup>332</sup> Average percentage of commitments within the Welsh language scheme of the person in question, which correspond to the standards in question, be that partially or fully.

## 5 Evidence received from members of the public

### Public Bodies: General (4)

A total of 291 responses from members of the public were received during the standards investigations carried out by the Welsh Language Commissioner in relation to persons within the Public Bodies: General (4) report. A total of 155 responses to the standards investigation were received from individuals who chose to complete the questionnaire provided for them by the Welsh Language Commissioner on the website.

A further 136 responses were received based on a standards response template published by Cymdeithas yr Iaith Gymraeg; in this case all responses were the same. In 14 cases, responses were received from individuals twice. This happened because individuals responded via the Commissioner's consultation as well as completing the template supplied by Cymdeithas yr Iaith Gymraeg. 4 responses were received from other organizations or movements.<sup>333</sup> The Commissioner has noted every response received.

A full list of respondents who were willing for their responses to be published can be seen in Appendix B.

Figure 1 indicates from where the respondents came from according to their group and geographical location.

**Figure 1 Number of responses to the standards investigation by location<sup>334</sup>**

Locations	Number	Percentage (%)
Blaenau Gwent	1	0%
Bridgend	3	1%
Caerphilly	5	2%
Cardiff	32	11%
Carmarthenshire	21	7%
Ceredigion	30	10%
Conwy	9	3%
Denbighshire	22	8%
Flintshire	10	3%
Gwynedd	72	25%
Isle of Anglesey	19	7%
Merthyr Tydfil	3	1%
Monmouthshire	2	1%
Neath Port Talbot	2	1%

<sup>333</sup> A list of those movements/organizations has been included within Appendix B of this standards report.

<sup>334</sup> These statistics include all the responses to the questionnaire, along with Cymdeithas yr Iaith's template.

Newport	0	0%
Pembrokeshire	4	1%
Powys	9	3%
Rhondda Cynon Taf	13	4%
Swansea	16	5%
Torfaen	1	0%
Vale of Glamorgan	7	2%
Wrexham	4	1%
Outside Wales	6	2%
No information	0	0%
<b>Total</b>	<b>291</b>	<b>100%</b>

## The public's response to the standards investigation carried out in relation to Public Bodies: General (4)

### Service delivery standards

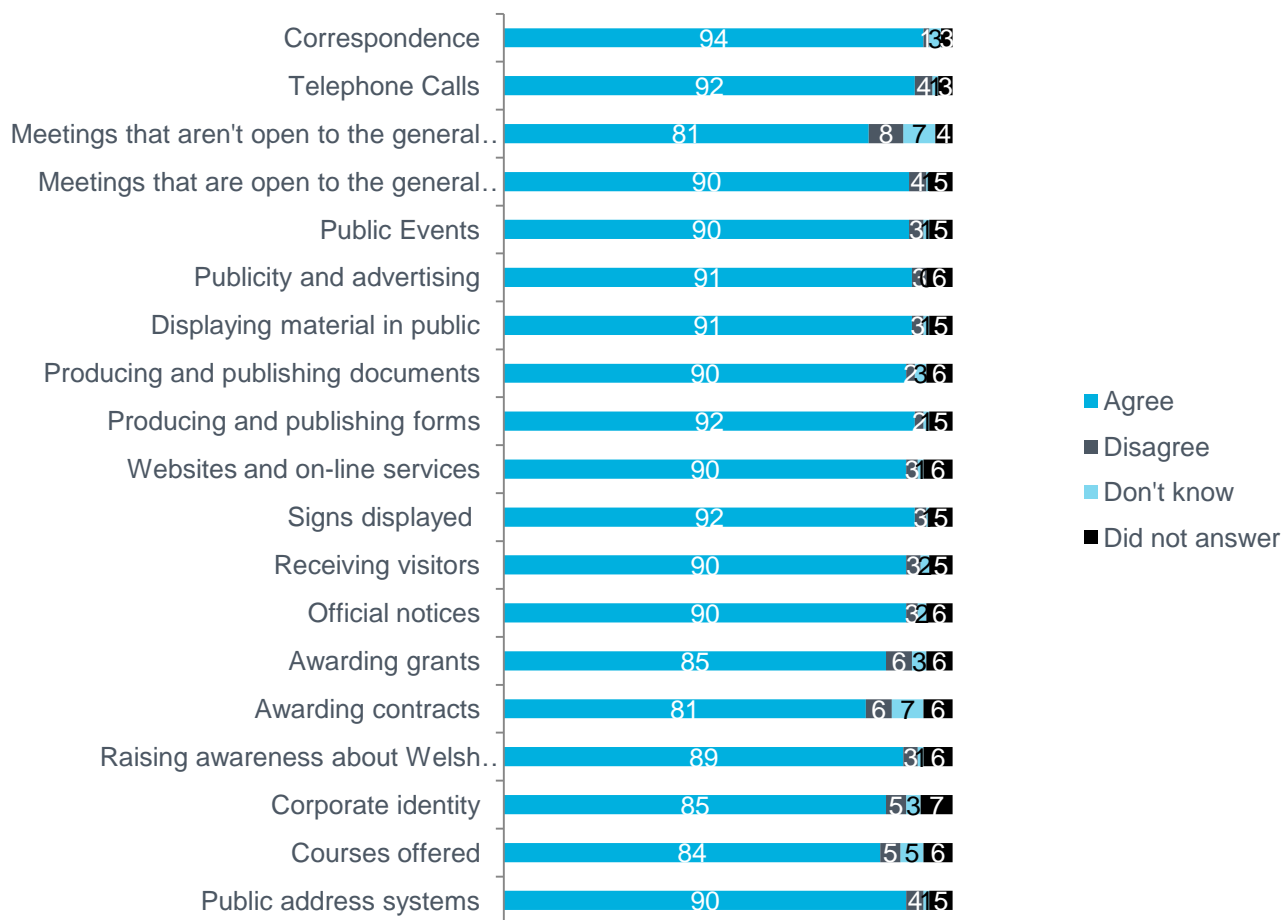
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the service delivery standards, they were asked to respond to the following question for each activity in the questionnaire:

Do you agree or disagree that the organizations in question should carry out the service delivery standards activities in the Welsh language, in order to enable you as a member of the public to use the Welsh language in the following situations?

In answering this question as part of the questionnaire, the public were given the opportunity to respond per activity within the scope of the service delivery standards.

Figure 2 indicates the various responses received.

**Figure 2 Response to question 1 of the questionnaire - Service delivery standards**



## Policy making standards

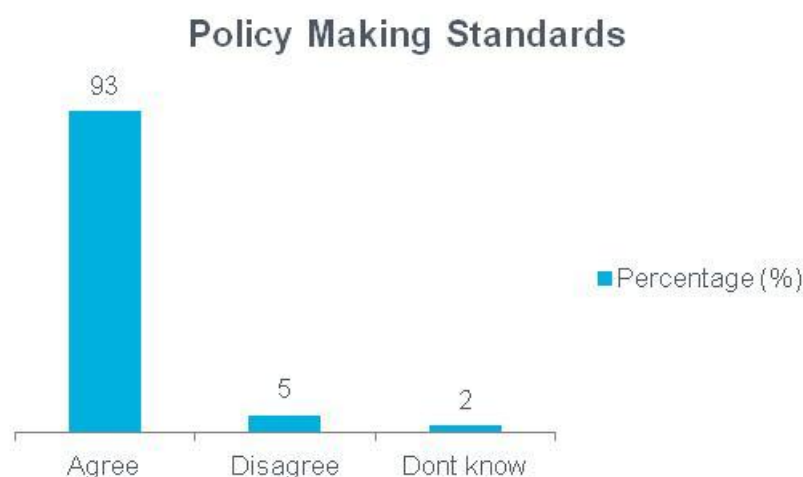
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the policy making standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the policy decisions of the organizations in question should improve the opportunities for you to use the Welsh language and ensure better treatment for the Welsh language?

Of the 155 that responded via the questionnaire on the Welsh Language Commissioner's website, 94% (146) had answered this question. Of the 146 that responded, 93% (136) agreed that the relevant persons in question should have to consider their policy decisions, and ensure, or contribute to ensuring improved opportunities for persons to be able to use the Welsh language as well as better treatment for the Welsh language.

The figure below indicates how members of the public responded to this question:

Figure 3 Response to question 3 of the questionnaire - Policy making standards<sup>335</sup>



### Operational standards

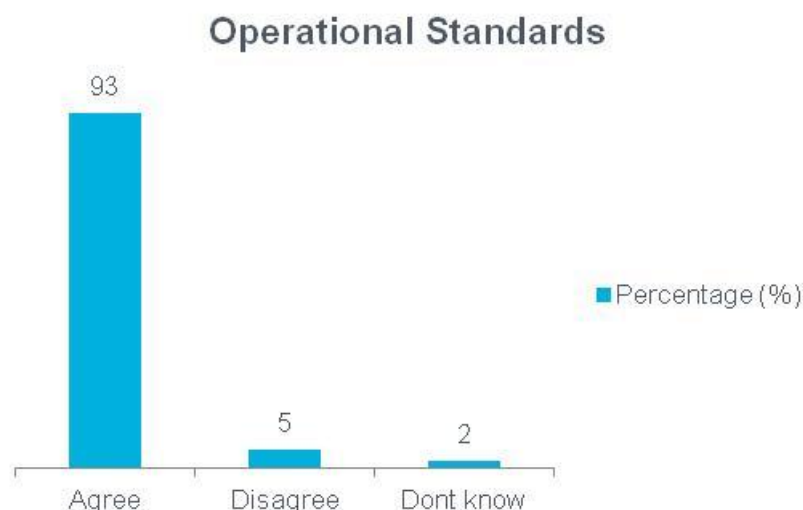
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the operational standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the organizations in question should have to facilitate the use of the Welsh language in accordance with the operational standards?

Of the 155 that responded via the questionnaire on the Commissioner's website, 94% (146) had answered this question. Of the 146 that responded, 93% (136) agreed that the relevant persons in question should have to facilitate and use the Welsh language in accordance with the definition of the operational standards in the Welsh Language (Wales) Measure 2011.

The figure below indicates how members of the public responded to this question:

Figure 4 Response to question 4 of the questionnaire – Operational standards<sup>336</sup>



<sup>335</sup> It is noted that these statistics involve respondents who had answered this question

<sup>336</sup> It is noted that these statistics involve respondents who had answered this question

## Record keeping standards

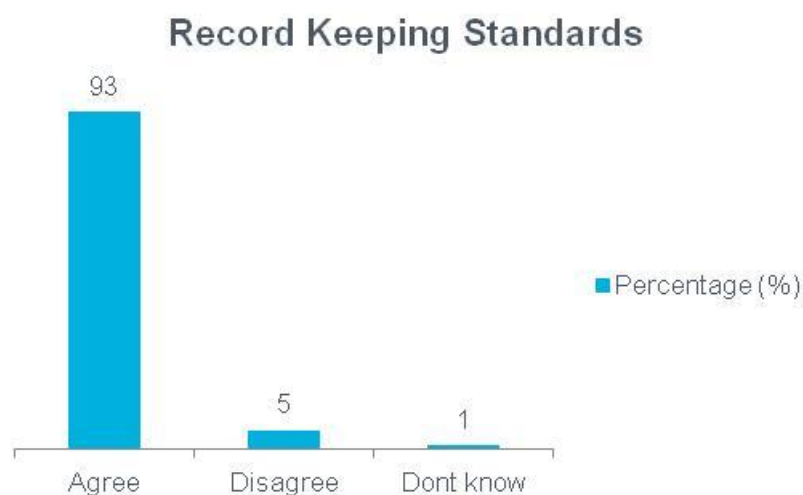
In seeking the public's opinion regarding the reasonableness of the requirements attached to the record keeping standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the organizations in question should keep a record of how they adhere to the Welsh language standards and keep a record of complaints?

Of the 155 that responded via the questionnaire on the Welsh Language Commissioner's website, 95% (148) had answered this question. Of the 148 that responded, 93% (138) agreed that this duty should be imposed on the persons in question.

The figure below indicates how members of the public responded to this question:

**Figure 5** Response to question 5 of the questionnaire – Record keeping standards<sup>337</sup>



## Further comments

As well as providing responses to specific questions on the subject of the standards investigation, the public were given the opportunity to note any additional standards they believed should be specified and made specifically applicable to the relevant persons, together with any further comments relevant to this standards investigation.

Of the 155 that responded via the questionnaire on the Commissioner's website, 49% (76) provided additional comments to be considered by the Welsh Language Commissioner as part of the standards investigation.

<sup>337</sup> It is noted that these statistics involve respondents who had answered this question. The rounding of figures may result in percentages which do not add up to 100% exactly.

Figure 6 Further comments provided by members of the public



The responses received were generally supportive of the concept of specifying standards, to ensure that Welsh speakers have clear rights in relation to the Welsh languages services provided by all organizations in round 2.

### Policy making standards

One respondent referred to the importance of imposing the above standards on each body in round 2, bearing in mind that these policies form the bases of all their activities. Another respondent referred specifically to organizations such as Police and Crime Commissioners, Sport Wales, the Millennium Centre and the Commission for Human Rights, noting that they should give more consideration to the Welsh language in making policy decisions.

### Operational standards

In their comments on the Local Democracy and Boundary Commission for Wales, one respondent said that a standard should be specified which would ensure that a proportion of those appointed to the Commission can speak Welsh, in order to reflect what was expressed in revising relevant legislation.

Some comments were received, expressing the view that organization offices outside Wales should be exempt from operational standards.

## 6 Evidence received by the Welsh Language Commissioner's Advisory Panel

Evidence was received from the Advisory Panel in accordance with the requirements outlined in section 63 (3) Welsh Language (Wales) Measure 2011.

The responses received by the Panel indicated supported for the purpose of the regulations, namely to realise the basic objectives of the Welsh Language (Wales) Measure 2011: that the Welsh language is an official language in Wales and that it should not be treated less favourably than English.

Similarly to what was noted in relation to the persons in respect of which standards investigations were carried out in round 1, the Panel was of the opinion that the reasonableness and proportionality of making the standards specifically applicable to the relevant persons should be considered alongside the context. In their opinion, this included the purpose of the legislation and the wish of the legislature in terms of the legal status of the Welsh language; the size of the organizations in question; their public engagement; and the difference between setting standards and the timetable for complying with those standards.

This was supported by saying that reasonableness and proportionality may be considered in one of two ways. Different standards could be set for persons in different areas of Wales, reflecting the linguistic nature of the relevant areas, or common standards could be set across Wales, specifying different imposition days when they will be required to comply with the standard(s). For example, where an element of staff training is required to comply with the standard, a person could be given more time to comply with the standard than a person where appropriate staff resources are already available. The Panel was once again of the strong opinion that the second method was the most suitable for the Welsh Language Commissioner to implement in most cases, bearing in mind that ensuring consistency between persons as regards providing Welsh language services is one of the main objectives of the Welsh Language (Wales) Measure 2011.

However, comments were received from the Panel regarding the reasonableness and proportionality of making the standards specifically applicable to persons whose headquarters are outside Wales; requiring them to comply with them across the UK. It was emphasized that any requirements imposed on similar persons note those circumstances where they are expected to comply with the standard(s).



## **Public Bodies: General (4)**

### **Service delivery standards**

The Panel believed that service delivery standards relating to each one of the activities should be specifically applicable to persons falling within the Public Bodies: General (4) report, allowing members of the public to use the Welsh language in the situations in question.

In reaching that conclusion, the Panel stated that they did not find any reason why persons falling within the Public Bodies: General (4) report should not undertake and comply with the majority of the activities in question, and in doing so increasingly engage with the public in Welsh. However, the Panel was of the opinion that some flexibility should be allowed in relation to some activities, drawing particular attention to producing and publishing documents, grant applications as well as courses. It was emphasized that flexibility in exceptional circumstances would be required, drawing particular attention to documents which would be limited in terms of the subject or supposed target audience.

Similarly, the Panel was of the opinion that more consideration should be given to the location of the headquarters or offices of the persons in question, when issuing compliance notices. This was reinforced by noting that there would be a need to consider whether it would be reasonable for such persons to comply with a selection of such standards where they had no presence in Wales. The relevant clauses in section 44(3) of the Measure were highlighted as a means for the Commissioner to being able to overcome such situations.

### **Policy making standards**

The Panel welcomed the policy making standards. It was added that these standards should be imposed on every person in respect of whom a standards investigation will be conducted in round 2, emphasising the importance of compliance on all levels.

The Panel agreed that the policy decisions of those persons falling within the Public Bodies: General (4) report should enhance opportunities for persons to use the Welsh language and secure better treatment of the Welsh language, and that policy making standards should be specifically applicable to them.

### **Operational standards**

The Panel agreed that those persons falling within the Public Bodies: General (4) report should be forced to facilitate the use of Welsh in accordance with the operational standards, and that standards should be made specifically applicable to them.

### **Record keeping standards**

The Panel was unanimous that making record keeping standards specifically applicable to persons within round 2 is completely necessary in order to ensure compliance with the remainder of the standards with which they will be required to comply.

The Panel agreed that those persons falling within the Public Bodies: General (4) report should keep a record of how they adhere to the other designated standards, and keep records of complaints. The conclusion reached was that record keeping standards should be made specifically applicable to them.

## 7 Conclusions of the standards investigation

### General comments

The following conclusions were reached on the basis of the evidence received by all relevant persons, the public and the Advisory Panel on the subject matter of the standards investigation, in addition to independent evidence collected by the Welsh Language Commissioner in relation to the relevant persons' Welsh language schemes.

The Explanatory Memorandum accompanying the Welsh Language (Wales) Measure 2011 states that one of the main objectives of the legislation is to modernize and build on the system of Welsh language schemes created under the 1993 Act. Similarly, it is noted that the aim of the Welsh Government in legislating was to secure improved consistency between persons, especially those within the same sector, in terms of providing Welsh language services.

Similarly, it was noted that section 42 of the Measure imposes a duty on Welsh Ministers to ensure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to the relevant persons if, and to the extent that, the persons carries out those activities.

However, it should be noted that they do not have to do so if the Commissioner indicates in a standards report, or if the Welsh Ministers are of the opinion that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a relevant person in relation to that activity. It should be noted that this section in the Measure does not prevent regulations under section 39 from providing for other service delivery standards to be specifically applicable to a person.

In line with the above, if the standards investigation found that a person undertook the activity, be that to a greater or lesser degree, the Welsh Language Commissioner comes to the conclusion that all the standards in relation to that activity should be made specifically applicable to them.<sup>338</sup> These conclusions were reached due to the fact that the standards introduced by the Welsh Government are interdependent on each other within the scope of the activity.

It is also noted that the way in which a person delivers a service under an activity can change in the future and that it would be necessary to adapt to reflect this by varying the compliance notice, rather than going back to regulations.

However, where evidence exists that a person does not carry out an activity at all, whether by means of evidence acquired as part of the standards investigation, or by other means, the Welsh Language Commissioner will conclude that standards in relation to that activity should not be specifically applicable to them, unless there are valid reasons for doing so.

The Welsh Language Commissioner will consider the evidence provided in order to reach a decision on the content of compliance notices issued to relevant persons under section 44 of the Welsh Language (Wales) Measure 2011.

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<sup>338</sup> [Service delivery activity as defined in section 28 Welsh Language \(Wales\) Measure 2011](#)

It was explained earlier that the Auditor General for Wales and the Wales Audit Office are separate legal entities. The Auditor General for Wales was named in Schedule 6 of the Welsh language (Wales) Measure 2011, but the Wales Audit Office was not named. Relevant comments were provided for the Auditor General for Wales and the Wales Audit Office as contributions to the standards investigation, if Welsh Ministers were to include the Wales Audit Office under Schedule 6 of the Measure in the future. Conclusions in relation to the Auditor General for Wales are also relevant to the Wales Audit Office, unless reference is made in particular to any difference between them.

The Welsh language Commissioner asks for clarity by the Welsh Ministers on the status of the Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales.

The aforementioned tribunals are independent judicial bodies; however, they are administered by Welsh Government civil servants. This raises the question whether these tribunals should be subject to the standards that are specifically applicable to Welsh Ministers, and the Welsh Ministers will be required to comply with them in due course.

These tribunals were named as individual persons in Schedule 6 of the measure. If it is concluded that the legal status of The Mental Health Review Tribunal for Wales, the Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales means that they are separate legal persons to the Welsh Ministers, the Welsh language Commissioner comes to the following conclusions in relation to making standards specifically applicable to them.

## Standards which should be made specifically applicable to Public Bodies: General (4)

### Service delivery standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that the persons falling within the Public Bodies: General (4) report should be able to deliver services in relation to the relevant activities.

Once again, the Commissioner wishes to note the importance of clearly differentiating between the commitments of the person (what is expected of them) and performance (the extent to which they currently comply with those expectations). Every Welsh language scheme has the full authority of the person in the agreement of their contents. Not specifying standards that are equal, and making them specifically applicable to the persons in question, would be a step backwards and contravene the intention of the Welsh Language (Wales) Measure 2011.

It is noted that performance, along with the extent to which a person can comply with a standard within a particular period of time, is a practical matter. That extent may improve, deteriorate or remain the same. The Welsh Language Commissioner is of the opinion that commitments should comply with the needs of Welsh-speaking users that they serve, with a reasonable timescale specified for dealing with any existing obstacles. The Welsh Language Commissioner will consider those obstacles when determining the contents of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

It is acknowledged that the persons had identified potential challenges and obstacles in terms of ensuring full compliance with some of the service delivery standards. However, the matters raised on the whole were not relevant to all the standards associated with a specific activity. The Commissioner is of the view that commitments proportional to the needs of Welsh-speaking users could be achieved with a reasonable timescale for action and dealing with any challenges.

It should be noted that section 12(2) (b) of the Welsh Language Act 1993 notes that Welsh language schemes should specify the ways in which organizations will ensure that the scheme is publicised. The Commissioner emphasises that this measure is not an optional element within the legislation.

**Conclusion 1:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report:

- correspondence sent by a body
- telephone calls made and received by a body
- meetings arranged by a body that aren't open to the general public
- a body producing and publishing documents
- a body's websites and on-line services
- raising awareness about Welsh language services provided by a body
- a body's corporate identity

7 relevant persons (Professional Standards Authority for Health and Social Care, Youth Justice Board for England and Wales, Equality and Human Rights Commission, UK Commission for Employment and Skills, the Information Commissioner's Office, The Special Educational Needs Tribunal for Wales and Data Unit Wales) noted that they did not hold meetings that are open to the public. Evidence was not received by The Mental Health Review Tribunal for Wales that noted whether they undertook the activity in question or not.

However, there is evidence that a number of hearings held by tribunals are open to the public. Welsh Ministers should ensure clarity in relation to cases conducted by tribunals, ensuring that they come within the scope of one or more of the current activities within the service delivery standards. Evidence was presented as part of the standards investigation that brought to light that some hearings are held in private, in accordance with statutory requirements.

Furthermore, commitments can be found within the Welsh language schemes of all the persons mentioned above, excluding The Mental Health Review Tribunal for Wales and The Special Educational Needs Tribunal for Wales, which suggests that they carry out this activity.

Similarly, the Professional Standards Authority for Health and Social Care confirmed that they held Authority Board meetings and that these meetings are open to the public. It had not held a meeting in Wales at the time of submitting the evidence.

Due regard will be given to such individual matters when deciding on the content of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 2: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:**

**○ meetings arranged by a body that are open to the public**

10 relevant persons stated that they do not arrange or fund public events. The Auditor General for Wales, the Royal Commission on the Ancient and Historical Monuments of Wales, the Equality and Human Rights Commission, the Information Commissioner's Office and The Electoral Commission indicated that they carry out this activity.

There were commitments in the Welsh language schemes of all the other persons, which corresponded to the standards in question, whether in part or in full, except for The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales, the Residential Property Tribunal Wales, the Agricultural Land Tribunal for Wales, the Valuation Tribunal for Wales and the Youth Justice Board of England and Wales.

However, the Valuation Tribunal for Wales confirmed that it would be reasonable and proportionate to make the standards in relation to public events specifically applicable to them.

The Auditor General for Wales is not allowed to fund events, which is a difference between the Auditor General and the Wales Audit Office that should be considered when specifying standards in regulations.

Furthermore, evidence was highlighted, through the work of the Commissioner's independent research that conventions and conferences are already being carried out by the Youth Justice Board for England and Wales.

Due regard will be given to individual matters when deciding on the content of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 3:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report, except for The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales:

- **public events organised or funded in their entirety by a body**

6 persons reported that they do not carry out publicity or advertising activities (Professional Standards Authority for Health and Social Care, Youth Justice Board for England and Wales, the Independent Police Complaints Commission, the UK Commission for Employment and Skills, The Special Educational Needs Tribunal for Wales and the Agricultural Land Tribunal for Wales).

However, the Independent Police Complaints Commission explained that it only produces one kind of leaflet that could be regarded as a publicity or advertising activity. The UK Commission for Employment and Skills noted that their marketing activities are currently subject to an advertising freeze, which was implemented by the UK Government. It was asked that clarity be given in regards to the scope of the standards, and if they would apply to publicity and advertising aimed at all stakeholders, or only to those activities aimed at the general public (in Wales).

Commitments can be found in the Welsh language schemes of many of the persons that stated they did not carry out this activity, which suggests that they do undertake such an activity. Due regard will be given to individual matters when deciding on the content of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 4:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:

- **A body's publicity and advertising**

In relation to the displaying material in public, the following noted that they did not do carry out this activity: Professional Standards Authority for Health and Social Care, Youth Justice Board for England and Wales, the Independent Police Complaints Commission, the UK Commission for Employment and Skills, the Valuation Tribunal for Wales, The Special Educational Needs Tribunal for Wales and the Agricultural Land Tribunal for Wales. Evidence was not received from the Mental Health Review Tribunal for Wales stating whether they undertook the activity in question. The Youth Justice Board referred to some events held in the past, in which a decision was taken to display Welsh material.

There were no commitments in the Welsh language schemes of the Youth Justice Board for England and Wales, The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales and the Agricultural Land Tribunal for Wales, which corresponded, in part or in full, to the standards in relation to displaying material in public. However, it was highlighted in the evidence from the Youth Justice Board for England and Wales, The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales and the Agricultural Land Tribunal for Wales that they undertake service delivery activities in which displaying material in public would be connected e.g. producing and publishing documents. The Welsh language Commissioner comes to the same conclusion in relation to the rest of the persons.

Due regard will be given to individual matters when deciding on the content of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 5: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:**

○ **A body displaying material in public**

When considering the production and publishing of forms, the Professional Standards Authority for Health and Social Care, the Youth Justice Board for England and Wales, the UK Commission for Employment and Skills, Welsh Local Government Association and Data Unit Wales noted that they do not carry out this activity. Despite the above, full or partial commitments can be found within the Welsh language schemes of each of these persons, which suggests that they undertake such an activity.

**Conclusion 6: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:**

○ **A body producing and publishing forms**

The Professional Standards Authority for Health and Social Care, the Special Educational Needs Tribunal for Wales and the Agricultural Land Tribunal for Wales noted that they did not display signs. Evidence was not received by The Mental Health Review Tribunal for Wales stating that they undertook the activity in question. The Professional Standards Authority for Health and Social Care explained that they were tenants in a building in London, and it is understood that both tribunals are based in the Welsh Government buildings.

Commitments can be found in The Special Educational Needs Tribunal for Wales' Welsh language scheme, which correspond, in part or in full, to the relevant standards relating to the display of signs. Furthermore, it appears that the references relate to the signs that come within the scope of the operational standards, rather than the signs displayed whilst delivering services.

The Commissioner notes that the evidence received from the Professional Standards Authority for Health and Social Care, The Mental Health Review Tribunal for Wales and the Agricultural Land Tribunal for Wales suggests that they undertake service delivery activities in which displaying signs in public would be connected. The Welsh language Commissioner comes to the same conclusion in relation to the rest of the persons.

**Conclusion 7:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:

○ **signs displayed by a body**

The Information Commissioner's Office, the Special Educational Needs Tribunal for Wales and the Agricultural Land Tribunal for Wales noted that they did not receive visitors at their buildings. However, commitments can be found in the Information Commissioner's Office's Welsh language scheme in relation to this activity.

The Tribunals noted that Welsh Government employees deliver services on their behalf. However, the Welsh language Commissioner considers the activity to be applicable to Tribunals, as that arrangement may change in the future. Due regard will be given to these circumstances when deciding on the content of the compliance notices issued under section 44 of the Welsh language (Wales) measure 2011.

**Conclusion 8:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:

○ **A body receiving visitors at their buildings**

The Auditor General for Wales, the Royal Commission on the Ancient and Historical Monuments of Wales, the Local Democracy and Boundary Commission for Wales, the Valuation Tribunal for Wales, Residential Property Tribunal Wales and Data Unit Wales noted that they make official notices.



Commitments can be found in the Welsh language schemes of all other persons in this report, except for the Agricultural Land Tribunal for Wales. An official notice is defined in the draft regulations as:

*“...any notice that a body publishes to inform persons about service delivery activities or changes to service delivery activities, but it does not include official notices prescribed by an enactment.”*

Bearing the definition above in mind, the Welsh Language Commissioner concludes that this activity could be relevant to all persons within this standards report. Due regard will be given to these circumstances when deciding on the content of the compliance notices issued under section 44 of the Welsh language (Wales) measure 2011.

**Conclusion 9:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:

○ Official notices made by a body

When considering the activity of awarding grant applications, the UK Commission for Employment and Skills and The Electoral Commission confirmed that they carried out this activity. However, partial or full commitments can be found, which correspond to the standards relating to a body awarding grants, in the Welsh language schemes of all other persons in this standards report, except for The Mental Health Review Tribunal for Wales, the Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales.

The Auditor General for Wales explained that it was not legally possible to award a grant application; while the Welsh Audit Office states that it is capable of awarding an application for a grant, although they do not currently do so. Welsh Ministers should pay attention to the differences here when specifying standards in regulations. Due regard will be given to these circumstances when deciding on the content of the compliance notices issued under section 44 of the Welsh language (Wales) measure 2011.

**Conclusion 10:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report, to the extent in which the persons have the power and function:

○ A body awarding grants

In relation to awarding contracts, all persons stated that they carried out this activity, except for the Professional Standards Authority for Health and Social Care, The Mental Health Review Tribunal for Wales, the Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales. Commitments in the Professional Standards Authority for Health and Social Care's Welsh Language Scheme suggest that it possibly partakes in awarding contracts.

Despite the above, it is reasonable for the Welsh language Commissioner to conclude that agreements and contracts are in place by persons, in order to assist in their administration.

Due regard will be given to these circumstances when deciding on the content of the compliance notices issued under section 44 of the Welsh language (Wales) measure 2011.

**Conclusion 11:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:

○ A body awarding contracts

The Youth Justice Board for England and Wales, the Equality and Human Rights Commission, the Information Commissioner's Office and The Electoral Commission noted that they carry out the activity in regards to offering courses. In addition to these persons, there were commitments in the Welsh language schemes of the Auditor General for Wales, the Royal Commission on the Ancient and Historical Monuments of Wales, the Local Democracy and Boundary Commission for Wales and Data Unit Wales, which corresponded, in part or in full, to the standards relating to offering courses.

It should be noted that Part 3 (Schedule 1) of the Welsh Language Standards Regulations document refers to education courses and interprets them as:

*“...any seminar, training, workshop or similar provision which is provided in order to educate members of the public or to improve the skills of members of the public...”*

Bearing the above definition in mind, a wide range of persons' activities could be relevant. A question regarding the status of tribunal lay members also arose and the extent for which sessions held for them meet the definition. In consideration of the above, the Welsh language Commissioner concludes that this activity could be relevant to all persons within this report.

**Conclusion 12:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report, to the extent in which they consider that the persons carry out the activity in accordance with the above definition:

○ courses offered by a body

In considering public address systems used by a body, all persons within this standards report noted that they did not carry out this activity. On verification, it appeared that there were commitments that corresponded, in part or in full, to the standards in the Welsh language schemes of the Auditor General for Wales, the Royal Commission on the Ancient and Historical Monuments of Wales and the Equality and Human Rights Commission. The Valuation Tribunal for Wales noted that it would be reasonable and proportionate to make the standards specifically applicable to them.

The Welsh Language Commissioner is of the view that persons could undertake other service delivery activities in which public address systems are likely to be associated with; For example, meetings that are open to the public or public events. As a result, the Welsh Language Commissioner concludes that this activity could be relevant to all the persons within this report.

**Conclusion 13:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to every relevant person falling within this standards report:

- public address systems used by a body

### Policy making standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that policy decisions made by persons falling within the Public Bodies: General (4) report should enhance opportunities for persons to use the Welsh language and ensure that the Welsh language is not treated less favourably than the English language.

The Commissioner's reasons for reaching this conclusion are that persons are already expected to assess the linguistic implications of new policies and initiatives during the process of creating them and reviewing them. All of this was confirmed in the evidence received from them as part of this standards investigation.

The required measures which form the basis of Welsh language schemes can be found in the form of statutory guidance approved before the House of Commons (Guidance on the Form and Content of Language Schemes was passed by the UK Parliament on 19 July 1995). That guidance states that organizations should have to determine their proposed measures for assessing the impact of new policies, strategies and initiatives and their implementation.

Furthermore, the vast majority of persons within this standards report stated that it would be reasonable and proportionate to make the policy making standards specifically applicable to them. Certain considerations were highlighted by individual persons: the ICO believed that the standards were reasonable and proportionate in relation to policy decisions impacting on Wales or the Welsh language.

A number of persons stated that they did not award grants, therefore they did not consider that standard 92 was relevant. Data Unit Wales reported that they did not have policy making responsibilities; however, commitments within their Welsh language scheme suggest otherwise. The Welsh Language Commissioner will consider similar issues when determining the contents of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

In their responses, The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales stated that they were not responsible for any policy making and that Welsh Government employees provided all of their administrative functions. Therefore, clarification is needed regarding the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 14:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that the regulations provide for making policy making standards specifically applicable to all relevant persons falling within this standards report.

### Operational standards

Section 30 of the Welsh Language (Wales) Measure 2011 states that the meaning of operational standards is:

a standard that is intended to promote or facilitate the use of the Welsh language

- (i) by A in carrying out A's relevant activities,
- (ii) by A and another person in dealings between them in connection with A's relevant activities, or
- (iii) by a person other than A in carrying out activities for the purposes of or in connection with, A's relevant activities.

That means that the purpose of the operational standards is to ensure that members of staff can use the Welsh language when carrying out their relevant activities with others. This could include the public in Wales, or another relevant person. Through these standards, sufficient language skills of staff are ensured in order that an individual who wishes to use the language with that person can do so. It should be emphasized that this aim is as appropriate for persons who are located in other parts of the UK, but who deliver services in Wales, as it is to persons located in Wales. This is supported by the fact that Schedule 6 of the Welsh Language (Wales) Measure 2011 states that operational standards are potentially applicable to all persons.

The Welsh Language Commissioner notes that some persons of this nature (i.e. not located in Wales) are included within this standards report, namely

- Professional Standards Authority for Health and Social Care
- UK Commission for Employment and Skills

On 24 March 2015, the Welsh Language Standards (No.1) Regulations 2015 were passed in the National Assembly for Wales' Plenary Meeting. These regulations were developed to impose duties on county borough councils and county councils in Wales, national park authorities and Welsh Ministers. All of these persons are located in Wales. Welsh Ministers should ensure that operational standards specified in regulations for round 2 achieves the same objectives noted above, whilst acknowledging that some persons are not located in Wales at present.

The Welsh Language Commissioner recognizes that some elements attached to the operational standards are new to many of the relevant persons which are included within this standards report. Similarly, some examples were received where arrangements are not in place in order to ensure full compliance with the requirements at present. The Welsh Language Commissioner will consider this further when deciding on the content of a compliance notice given under section 44 of the Welsh Language (Wales) Measure 2011.

However, it should be noted that a number of the requirements are expected from a number of persons under current Welsh language schemes. These include specifying measures to ensure that workplaces which have contact with the public in Wales seek access to sufficient and appropriately skilled Welsh speakers; measures to identify those posts where the ability to speak Welsh is considered to be essential and those where it is considered to be desirable together with measures to assess the need for training and to provide it for employees.

To that end, and based on the evidence received, the Commissioner concludes that it is reasonable and proportionate for these persons to allow their employees to undertake their relevant activities through the medium of Welsh.

In terms of those aspects not rooted in their Welsh language scheme, or not currently in operation, the Welsh Language Commissioner concludes that allowing sufficient time for them to reach this new policy aim, as well as including other mitigating measures in compliance notices, where appropriate, is reasonable and proportionate.

The Commissioner comes to the same conclusions for those persons who have indicated that they do not have staff who can speak Welsh at the moment, in order to enable them to implement the other classes of standards.

In their responses, The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal for Wales stated that Welsh Government employees provided all of their administrative functions. Therefore, clarification is needed regarding the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

Persons that are not located in Wales at present:

**Conclusion 15:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for operational standards in relation to the matters below to be specifically applicable to the Professional Standards Authority for Health and Social Care and the UK Commission for Employment and Skills:

- standards in relation to a body developing Welsh language skills through planning and training their workforce
- standards in relation to a body recruiting staff.

**Conclusion 16:** The Welsh Language Commissioner concludes that Welsh Ministers should consider specifying other standards in relation to the matters below for the the Professional Standards Authority for Health and Social Care and the UK Commission for Employment and Skills:

- standards relating to the use of the Welsh language within a body's internal administration
- standards in relation to complaints made by a member of a body's staff.
- standards in relation to a body disciplining staff
- standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet

- standards in relation to signs displayed in a body's workplace
- standard in relation to audio announcements and messages in a body's workplace.

Persons who are located in Wales:

**Conclusion 17:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for operational standards in relation to the matters below to be specifically applicable to all other relevant persons within this standards report:

- standards relating to the use of the Welsh language within a body's internal administration.
- standards in relation to complaints made by a member of a body's staff.
- standards in relation to a body disciplining staff.
- standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet.
- standards in relation to a body developing Welsh language skills through planning and training their workforce.
- standards in relation to a body recruiting staff.
- standards in relation to signs displayed in a body's workplace.
- standard in relation to audio announcements and messages in a body's workplace.

### Record keeping standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that the persons falling within the Public Bodies: General (4) report should identify how they uphold the standards with which they are expected to comply, as well as complaints.

Welsh language schemes require the organizations in question to identify the action required to publish information on the organisation's performance against the statutory requirements. This was confirmed in the evidence which was provided, with every relevant person, on the whole, stating that the record keeping standards, in principle, were operational to a large extent and was current practice. This was reinforced by the vast majority of relevant persons confirming that it would be reasonable and proportionate to make all of the standards, or a selection of them, specifically applicable to them.

In their responses, The Mental Health Review Tribunal for Wales, The Special Educational Needs Tribunal for Wales, Residential Property Tribunal Wales and the Agricultural Land Tribunal stated that they were not responsible for any record keeping and that Welsh Government employees provided all of their administrative functions. Therefore, clarification is needed regarding the extent to which the requirements relating to the standards in question are met via a compliance notice provided to Welsh Ministers under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 18:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that the regulations provide for making record keeping standards specifically applicable to all relevant persons falling within this standards report.

### Promotion standards

The relevant persons within this standards report did not consent for promotion standards to be potentially applicable to them.

### Standards which deal with supplementary matters

There are provisions in the Welsh Language (Wales) Measure 2011 regarding monitoring arrangements and reporting requirements for the standards system (Section 27 - Supplementary Provisions). Following the approval of the Welsh Language Standards Regulations (No.1) 2015<sup>339</sup> in the National Assembly for Wales' Plenary Meeting, standards which deal with supplementary matters were specified under section 26 of the Measure.

The Commissioner notes that it is a requirement under Welsh language schemes to determine actions to be taken to publish information on the organization's performance against the statutory requirements.

The Welsh Government policy document 'Inspection, Audit and Regulation'<sup>340</sup>, explains that the role of inspectors is to "investigate independently using professional expertise and legal powers". This is supplemented by the Crerar Report on inspection in Scotland which notes that the role of external inspectors is to provide independent assurance that services are being managed well and are fit for purpose. According to Crerar, the five main principles are public focus, independence, proportionality, transparency and accountability. Crerar's proposals are consistent with the principles of Hampton which note that inspection should take place on the basis of risk; that inspections should not be carried out for no reason and that regulators should be able to provide authoritative and accessible advice.

Similarly, it is also acknowledged that it is not possible for inspection bodies to supervise everything undertaken by service providers, i.e. there is an increasing expectation for service providers to ensure that they have strong internal scrutiny and auditing procedures. In addition, self-assessment is playing an increasingly important role within external inspection procedures.

**Conclusion 19:** As a result of carrying out this standards investigation, and in consideration of the above, the Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for standards which deal with supplementary matters to be specifically applicable to all relevant persons within this standards report.

<sup>339</sup> <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

<sup>340</sup> <http://gov.wales/docs/dpsp/publications/inspectionpolicystatement/090930inspstatementen.pdf>

## Additional standards which should be made specifically applicable to persons falling within the Public Bodies: General (4) report

The following is noted in section 64 (3) of the Welsh Language Measure (Wales) 2011:

If -

- (a) the conclusions of the investigation are (in whole or in part) that any standards should be specifically applicable to a person, and
- (b) any or all of those standards are not specified by the Welsh Ministers under section 26(1), the report must set out the standards that are not specified.

The Welsh Language Commissioner concludes that standards should be added to those published by the Welsh Government on 7 November 2014. This opinion is based on evidence received from the public and relevant persons as part of the standards investigation.

### Activities: a body's use of social media; self-service machines

Since the conclusion of the standards investigation, a draft version of the Welsh Language Standards Regulations (No. 1) (Wales) 2015 was tabled on 3 March 2015. The National Assembly for Wales received these Regulations in a Plenary Meeting on 24 March 2015. Service delivery standards regarding a body's use of social media, as well as self-service machines, were added to the range of activities subject to this standards investigation. These standards are 58, 59 and 60 from 'The Welsh Language Standards (No. 1) Regulations (Wales) 2015'.<sup>341</sup>

**Conclusion 20:** The Welsh Language Commissioner concludes that Welsh ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report, should Welsh Ministers believe that the activities below are ones which the persons could currently undertake, or do so in future:

- a body's use of social media
- self-service machines.

### Activity: Tribunal hearings

On presenting evidence in relation to holding meetings, the tribunals referred to public and private hearings that they conduct as part of their functions. The Commissioner believes that the above functions come within the scope of the current service delivery standards' activities. If Welsh Ministers do not come to the same conclusion, provision should be made for establishing additional standards for the relevant tribunals.

<sup>341</sup> [http://www.assembly.wales/laid%20documents/sub-ld10115%20-%20the%20welsh%20language%20standards%20%20\(no.%201\)%20regulations%202015%20rheoliadau%20safonau%e2%80%99r%20gymraeg%20\(rhif%201\)%202015/sub-ld10115-e.pdf](http://www.assembly.wales/laid%20documents/sub-ld10115%20-%20the%20welsh%20language%20standards%20%20(no.%201)%20regulations%202015%20rheoliadau%20safonau%e2%80%99r%20gymraeg%20(rhif%201)%202015/sub-ld10115-e.pdf)



**Conclusion 21:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that standards are specified in relation to the matters below, to the extent that they are not of the opinion that those functions fall within the scope of one or more of the activities within the current service delivery standards:

- hold hearings

## 8 The next steps

In preparing this standards report, the Welsh Language Commissioner has considered all the responses submitted to the standards investigation. This report will be submitted to the following in accordance with section 64(4) of the Welsh Language (Wales) Measure 2011:

- all relevant persons
- the Welsh Language Commissioner's Advisory Panel
- all persons who participated in the Commissioner's consultation in accordance with section 63
- Welsh Ministers.

Alongside the standards investigations of the Welsh Language Commissioner, Welsh Ministers are expected to carry out regulatory impact assessments in respect of relevant secondary legislation they intend to create, using their own secondary legislation powers.

The Government of Wales Act 2006 notes that a regulatory impact assessment is as follows:

'A regulatory impact assessment is an assessment as to the likely costs and benefits of complying with relevant Welsh subordinate legislation'.<sup>342</sup>

In this respect, a regulatory impact assessment may be considered:

- a process to help Welsh Ministers to consider the effect of the proposed regulation on the interests of individuals, groups, organizations etc.
- a means of enabling Welsh Ministers to weigh up the costs and benefits of all the options available to them before implementing a policy; and
- a means of submitting the relevant evidence on the positive and negative effects of such interventions for the purposes of scrutinizing that evidence.<sup>343</sup>

Welsh Ministers will be expected to consider the evidence they collected for the purposes of the regulatory impact assessment, alongside the Welsh Language Commissioner's conclusions in a standards report in deciding whether or not to exercise the powers granted to them under Part 4 of the Welsh Language (Wales) Measure 2011.

The Rt Hon. Carwyn Jones AM, First Minister of Wales confirmed in a statement on 24 March 2015 that it is currently foreseen that the process of introducing regulations for all relevant persons included within this report will begin by the end of 2015, with a debate and vote on approval of regulations at a Plenary Meeting of the National Assembly for Wales.

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<sup>342</sup> Section 76 (2) (a) The Government of Wales Act 2006.

<sup>343</sup> <http://wales.gov.uk/docs/legislation/guidance/091020riacodecy.doc>

## Appendix A – General comments received from members of the public in relation to round 2 of the standards investigations

The responses received were generally supportive of the concept of specifying standards, to ensure that Welsh speakers have clear rights in relation to the Welsh language services provided by all persons in round 2.

The public once again expressed considerable desire to ensure that the specified standards are clear, robust and coherent for ordinary people. It was added that the rights of Welsh speakers will only be secured in this way,

Outlined below are the main themes of the responses received in favour of making the standards specifically applicable:

- the need to ensure that the standards specified fully reflect the recommendations of the Welsh Language Commissioner's Health Inquiry.
- the need to ensure that the standards ensure Welsh language services provision by default, ensuring that the concept of active offer is consistent overall.
- ensure that the process of awarding or dealing with tenders or contracts is not beyond the need to specify Welsh language conditions on the grants/contracts awarded by organizations included in round 2.
- the need to ensure that standards in relation to a face-to-face service goes beyond the main reception areas and personal meetings arranged in advance
- the need to ensure clarity that the definition of personal meetings includes all face-to-face meetings
- the need to specify a standard which sets clear requirements on persons' recruitment policies

Some responses were received from members of the public, expressing general objection to the language duties.

Outlined below are the main themes of the responses received against making the standards specifically applicable:

- the need to consider the current economic climate, and how public money is spent on the Welsh language
- prioritising other policy areas over the Welsh language
- the relevance of the Welsh language in Wales
- disagreement with the requirement that the Welsh should appear or be published first

### Service delivery standards

Comments were received from members of the public calling for the need to ensure that specific standards are identified for health bodies which reflect the findings of the Welsh Language Commissioner's report 'My Language, My Health: the Welsh Language Commissioner's Inquiry into the Welsh Language in Primary Care'. This was supported by stating that standards relating to national GP and primary care provider contracts should be specified.

Comments were received that noted that there were inadvertent weaknesses in the draft regulations, because the standards in relation to receiving a Welsh language service face-to-face did not go beyond personal meetings organized beforehand and services in the main reception areas. Similarly, it was noted that it is essential for regulations concerning health bodies to specify standards for personal meetings which involve appointments, consultations and all other face-to-face contact.

The importance of personal meetings in health, education and justice was emphasized, and attention was drawn to the fact that they were not of the opinion that the draft regulations would secure a face-to-face Welsh language provision beyond personal meetings and in reception areas. It was added that the definition should be extended to other various contexts.

A number of responses were received which supported the standards relating to meetings that aren't open to the general public, keeping in mind that a number of organizations in the field of justice had included them in round 2. Although the standards referred to personal interest or wellbeing, some were concerned that it was not entirely clear whether that would include a person's right to be interviewed in Welsh in the aforementioned context.

In the context of signs, some respondents were of the view that electronic signs and audio exhibitions in places such as museums should be encompassed within the definition of this activity. Similarly, it was noted that surtitles and subtitles in plays and performances should also fall under the definition of signs, with a view to placing standards on persons such as National Theatre Wales and Welsh National Opera.

In relation to the standards regarding courses, many respondents emphasized the importance of professional training in health as well as the other sectors, and the need to specify standards that would guarantee Welsh medium professional development courses. Also, concern was expressed regarding the clarity of the definition of courses, with a risk that courses that are open to the public could be seen only as those for members of the bodies or that are managed by the bodies. One respondent highlighted the importance of these standards in relation to the WCVA.

In responding to the standards in relation to awarding grants, many individuals referred to the importance of specifying standards that would ensure that Welsh language conditions are specified for the grants allocated by the persons in round 2. Emphasis was placed on bodies such as Sport Wales, Arts Council and Big Lottery Fund, noting that they were organizations where the awarding of grants is crucial in terms of increasing the use and provision of the Welsh language.

To that same end, some respondents said that an additional standard should be specified in relation to awarding contracts, with a view to ensuring that independent production companies who are responsible for supplying services on behalf of S4C also fall under the duty to move towards internal use of Welsh as part of their contracted activities with the channel.

Many members of the public expressed concern that a standard hadn't been specified in the draft regulations for public appointments. It was added that the former Local Government Minister had stated that standards would relate to public appointments in order to set thresholds for the number of Welsh speakers.

In considering the standards in relation to official notices, many respondents noted that it should be ensured that those standards are made specifically applicable to every person included in this round. One respondent noted that prescriptions should be encompassed within the definition of this activity. However, some comments were received which questioned the propriety of issuing notices on specialist subjects in both languages, going on to question the need to publish an official notice at all in those cases.

One respondent noted that the standards in relation to education corporations (further and higher) should require them to commit to an educational provision, in Welsh and bilingually, using their own resources, as well as the resources received via external streams. It was added that the bodies in question should also stimulate student demand, as well as respond to it. The 'Welsh Language Regulations 2015'<sup>344</sup> state:

For the purposes of standards 84, 85 and 86 (courses), an “education course” means any seminar, training, workshop or similar provision which is provided in order to educate members of the public or to improve the skills of members of the public; but does not include activities or courses provided as part of the curriculum in accordance with any enactment.

Welsh Ministers should ensure clarity regarding the above when specifying standards, and make them specifically applicable in regulations to higher and further education corporations.

### **Policy making standards**

One respondent referred to the importance of imposing the above standards on each body in round 2, bearing in mind that these policies form the bases of all their activities. Another respondent referred specifically to persons such as Police and Crime Commissioners, Sport Wales, the Millennium Centre and the Equality and Human Rights Commission, noting that they should give more consideration to the Welsh language in making policy decisions.

To the same end, one respondent referred to the importance of making the policy making standards specifically applicable to the Commissioners identified in round 2, saying that they had a number of reports which do not mention the Welsh language at all, in areas where language rights are constantly ignored.

Specific comments were received in relation to Ofcom, noting that they had a crucial role in awarding radio and TV licences. With that in mind, the respondents in question believed that a standard should be set making licences subject to language conditions under the policy making standards or the contract awarding standards.

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<sup>344</sup> Paragraph 37, Part 3, Schedule 1, Welsh Language Standards (Welsh Ministers, County and County Borough Councils, and National Park Authorities) Regulations 2015

Based on evidence received from the public, references were made to a number of profession regulators in round 2, noting that action should be taken to ensure that standards were set for them leading to better workforce planning for a bilingual Wales.

One respondent expressed concern regarding the constriction of the effectiveness of the proposed policy making standards. It was added that not many policies exist on a local level only, and that they should be part of a wider context, often on a national level.

### **Operational standards**

One respondent emphasized the important role played by persons such as the National Museum, Wales Millennium Centre, S4C, Natural Resources Wales, National Library of Wales and the Welsh Books Council in terms of contributing to the Welsh language as a working language. They noted that the persons in question, amongst others, should work towards undertaking their internal administration in Welsh. As a result, they were of the opinion that operational standards should be specified in addition to those in the draft regulations, that would allow persons to work towards that goal.

Similarly, many were of the opinion that higher tier standards should be specified in relation to recruitment, requiring Welsh administration organizations to recruit Welsh speaking staff only.

A number of responses were received from the public asking for standards which would place duties on universities to provide opportunities for students in Welsh (and for non-Welsh speakers to become fluent), as well as a standard which would ensure that they had a duty to train the future workforce.

In their comments on the Local Democracy and Boundary Commission for Wales, one respondent said that a standard should be specified which would ensure that a proportion of those appointed to the Commission can speak Welsh, in order to reflect what was expressed in revising relevant legislation. A number of comments were received which highlighted the importance of specifying such a standard across the organizations in question, in order to ensure that organizations can operate and comply with the requirements in full. Similarly, one respondent stated that it should be ensured that a standard is specified to impose a duty on organizations to offer intense Welsh learning programmes.

Some comments were received, which expressed the view that organization offices outside Wales should be exempt from operational standards.

### **Record keeping standards**

Many responses were received which were of the strong opinion that persons should have to keep records, to ensure public accountability and transparency in relation to compliance with the requirements.

However, some respondents emphasized that the record keeping duty should be proportional, and improving the range and quality of their Welsh medium services would be a better investment for organizations. It was added that it was the Welsh Language Commissioner's responsibility to determine that appropriate balance.

**Students' unions of higher and further education corporations**

In responding to the standards investigation carried out in relation to higher and further education corporations, many comments were received which noted the need to make the standards potentially applicable and specifically applicable to the students' unions. One respondent emphasized the essential part of the students' union in providing services to the students along with the corporations in question, and referred specifically to the support and academic representation as well as protecting the welfare and interests of the students.

The respondent in question referred to the direct and far-reaching influence the unions have on student experience, together with the fact that they receive substantial amounts of money from the corporations in question. It was also added that the current Welsh language scheme of one corporation acknowledges the relationship between it and the union, and the responsibility it has to that end.

Many examples were submitted of students' unions operating bilingually during the past academic year. However, bearing in mind the requirements associated with the draft regulations, one respondent emphasized that it was fragmented, and often following pressure from students. With this in view, concern was expressed regarding the lack of strategic and central planning for developing the Welsh language within students' union, causing the unions to treat the Welsh language less favourably than the English.

In this respect, the respondent was of the opinion that Welsh Ministers should ensure that specific standards are set out and made specifically applicable to education corporations, to acknowledge the all important relationship with the unions, together with the range of services provided by them to students on behalf of the corporations in question. The respondent went on to note that he was of the opinion that not setting out these types of standards would mean that the linguistic rights of students in Wales will not be protected, and from the viewpoint of those students, any attempt to set out standards on a corporate level would be in vain.

## Appendix B - List of respondents to the standards investigation

Below is a list of the relevant persons in respect of which a standards investigation was carried out, the Advisory Panel, together with the members of the public who were willing for us to publish their comments.

### Relevant persons

- Auditor General for Wales (AGW)
- Professional Standards Authority for Health and Social Care (PSA)
- Youth Justice Board for England and Wales (YJB)
- Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)
- Independent Police Complaints Commission
- Equality and Human Rights Commission (EHRC)
- Local Democracy and Boundary Commission for Wales (LDBCW)
- UK Commission For Employment and Skills (UKCES)
- Welsh Local Government Association (WLGA)
- Valuation Tribunal for Wales (VTW)
- Information Commissioner's Office (ICO)
- The Mental Health Review Tribunal for Wales (MHRTW)
- The Special Educational Needs Tribunal for Wales (SENTW)
- Residential Property Tribunal Wales (RPTW)
- Agricultural Land Tribunal for Wales (ALTW)
- Data Unit Wales
- The Electoral Commission

### Members of the public

- Alun Jones
- Alun Ceri Jones
- Eifion Jones
- Elin Walker Jones
- Eiliw Alwyn
- Selwyn Lloyd-Jones
- Hywel Wyn Jones
- John Arwel Griffiths
- Lloyd Evans
- Anthony Barry
- Sharon Roberts
- Sion Jobbins
- Owen Saer
- Einir Sion
- Siân Gwenllian
- Lisbeth McLean
- Amanda Evans
- Rhys Glyn
- Anthony Barnard
- Anthony Caradog Evans
- Tim Jones
- Yasmin Morris



- Llinos Jones
- Aled Jones
- Dewi Snelson
- Emrys Wynne
- Curon Wyn Davies
- Bethan Harvey
- Mair Edwards
- Kathryn
- Helen Thomas
- Geraint Brython Edwards
- Rhodri Williams
- Ruth Evans
- Penri Williams
- Huw Jones
- Emyr Tomos
- Bethan Williams
- Llyr ap Gruffydd
- Robin Farrar
- Robert Jones
- Iago ap Steffan
- Sophie Hughes
- Huw Alun Roberts
- Chris Andrew
- Heledd Gwyndaf
- John Wynn Jones
- Manon James
- Gill Stephen
- Gwyn Williams
- Daron Pierce
- Sian Wyn Jones
- Emma Lloyd
- Neville Evans
- Diane Jones
- Jane Aaron
- Emyr Puw
- Harri Bryn Jones
- Liz Saville Roberts
- Craig ab Iago
- Rhian Davies
- Gwyn Sion Ifan
- Anna Williams
- Dyfan Jones
- Dai Hawkins
- Trefor Jones-Morris
- Dilwyn Morgan
- Rev. Emyr Wyn Thomas
- Bryn Davies
- Dr Ceridwen Lloyd Morgan
- Howard Thomas
- Connor
- Lydia Jones
- Rhodri Jones

- Bob Gaffey
- Angharad
- Ruth Williams
- Nic Daniels
- Jeffrey Jones
- Pablo Dubois
- Gareth Wood
- Llinos Roberts
- Bethan Jones
- Sian Mererid Jones
- Duncan Brown
- B Griffiths
- Awen M G Schiavone
- Osian Wyn Owen
- Robin Owain
- Judith Griffith
- Richard John Griffith
- Clive James
- Sion Williams
- Mathew Rees
- Thomas John Davies
- Ben Screen
- Mari Williams
- Enfys Jones
- Thomas Shaw
- Dafydd Thomas
- Angharad Brown
- John Jones
- Iago Sion
- Dafydd Williams
- Ieuan Parry
- Huw Thomas
- William Schleising
- Huw Roberts

#### **Organizations/Movements**

- Cymdeithas yr Iaith
- Dyfodol i'r Iaith
- Mentrau Iaith Cymru
- Welsh Language Officer, Cardiff University Students Union and the Welsh Society Committee, Cardiff University
- Coleg Cymraeg Cenedlaethol

#### **Welsh Language Commissioner's Advisory Panel**

- Dr Ian Rees
- Gareth Jones
- Professor Gwynedd Parry
- Bethan Jones Parry
- Carl Cooper