



Comisiynydd y
Gymraeg
Welsh Language
Commissioner



Overseeing compliance

Good practice advice document

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The Commissioner's good practice advice documents offer practical ideas about how to comply with statutory duties, and promote use of the Welsh language.

The advice documents refer to the requirements of specific statutory duties, but please note:

- Organisations that aren't subject to the specific duties referred to can apply the principles and examples to their own situation
- The advice documents do not legally bind organisations. Organisations must depend on their own legal advice in interpreting and implementing language duties
- The advice documents are not standards codes of practice under section 68 of the Welsh Language Measure, so it is not required to refer to the advice documents when considering the interpretation of the Welsh language standards. [The Commissioner's codes of practice](#) for Welsh language standards regulations are on the website (see section 1 of the codes of practice for the legal status of the codes).

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Checklist

The ideas and practices within the advice are summarised in this checklist. Remember that some of the points below are requirements in the standards, and others are good practice.

Step	In action?
Responsibility and accountability	
Strategic leadership – ensure that a member of the senior management team has a strategic responsibility for the Welsh language	
Operational specialist – appoint an officer or team of officers to be responsible for supporting the implementation of the standards	
Welsh language champions or coordinators – establish a network of officers across the organisation to support the implementation of the standards	
Peer accountability – set up an internal forum or group, bringing together key staff to report on compliance with the standards	
Independent or elected accountability – establish a sub-committee or a group of external representatives to scrutinise matters relating to the Welsh language.	
Performance management	
Self-evaluation – establish a process that requires departments (or heads of departments) to self-evaluate and report on their compliance on a regular basis	
Action plan – produce an action plan to implement the standards and report on progress against the targets set out in it	
Audit – scrutiny of the organisation’s arrangements in relation to Welsh language standards	
Risk-based approach – maintain a risk register to identify priority areas.	
Record keeping – keep records of required data and statistics to facilitate compliance with standards	


Direct verification

Verification surveys – arrangements in place to check compliance	
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Understanding the experiences of service users

Gathering the views of service users – undertake exercises to gather information on the views of service users on their experiences of using the organisation's Welsh language service	
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Data on take-up – use data on service use as part of processes to monitor quality and compliance with the standards	
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1 Background

Why do organisations need to self-regulate and understand their own performance?

- 1.1 In [Rights in Use, the 2018-19 assurance report](#), the Welsh Language Commissioner stated:

“Imagine the transformation if organisations put themselves in users’ shoes, and understand their experiences of trying to use Welsh. The report offers a number of examples of organisations checking services at random and ensuring that the results lead to improvement, using performance management arrangements effectively, and encouraging users to submit complaints and share feedback. It’s time for other organisations to replicate this, and ensure that they comply with the relevant requirements – almost half of organisations have not published a complaints procedure.

I want to see key roles in organisations filled by committed and qualified people. We see the performance of organisations improve when a leader takes strategic responsibility for the Welsh language, and when an effective individual or team offers operational support. Good quality Welsh language services cannot be provided without systematic advance planning, and without including the Welsh language in service development projects.”

Welsh Language Commissioner, Rights in Use

- 1.2 The quality of the service provided by organisations is highly dependent on the organisations' awareness and understanding of its own performance.
- 1.3 The advent of Welsh language standards ("the standards") has created momentum within organisations and has encouraged them to consider and review their processes for checking and ensuring compliance with their language duties. The Commissioner's monitoring work has found that organisations perform better if robust procedures are in place to monitor the implementation of the standards regularly and systematically. The best performing organisations have processes in place to achieve a sound understanding of compliance with standards and service users' experience.

- 1.4 Organisations have a range of arrangements for monitoring quality and improving performance. These include internal audits, risk registers, reporting on progress of action plans etc. They are often well established procedures within organisational systems and if implemented well, they are effective methods of capturing information on performance, ensuring accountability and addressing failure.
- 1.5 In order to ensure that scrutiny of Welsh language services is afforded the same status and attention, organisations can ensure that the Welsh language is a core part of their monitoring and self-regulation procedures.
- 1.6 Where this is not possible, or where there is a need to focus more closely on Welsh, you can put in place separate, similar arrangements for Welsh.

The purpose of this document

- 1.7 The standards require organisations to publish a document outlining the arrangements for 'overseeing' compliance with the standards.
- 1.8 This advice document offers possible methods for overseeing compliance. Once you have decided which methods to use in your organisation, the arrangements will need to be recorded in the document outlining the arrangements. A combination of the methods proposed in this document can be used, rather than just one or two. The documents can identify which methods you intend using, and how they will tie together. It can make clear who will be responsible for implementing and maintaining an overview of the arrangements.
- 1.9 The standards refer to arrangements for overseeing implementation with each class of standards, so when referring to the Welsh language 'provision' of organisations, we include services to the public, the provision for staff, and considerations under the policy-making standards.
- 1.10 The standards also require some other things to be done relating to overseeing compliance:
 - keeping a record of a number of different compliance issues. We list the required records in this document, and in some cases (e.g. policy-making) we have a separate advice document which goes into more detail about those records
 - publishing an annual report setting out how you complied with the standards over the year, which includes statistics based on specific records. We have a separate advice document on annual reports, however effective oversight arrangements can facilitate the reporting process
 - publishing a complaints procedure which provides assurance to service users what action you will take to deal with complaints in relation to compliance.
- 1.11 The standard that requires overseeing arrangements for service delivery standards also requires arrangements for facilitating and promoting use of services. We have a separate advice document about promoting the use of services.

2 Responsibility and accountability

- 2.1 It is crucial that managers and staff across the organisation know exactly what they need to do in order to comply, and that the organisation has arrangements in place for ensuring that it happens.
- 2.2 This section proposes methods for ensuring internal responsibility and accountability for the implementation of the standards, with particular attention given to overseeing compliance. These are the sorts of activities that can be included in a document about overseeing compliance with the standards.
- 2.3 Where a member of staff has specific responsibility with regard to the Welsh language, the requirements need to be clear to the staff member, and others within the organisation should also understand what the role entails.

Strategic leadership

- 2.4 Firstly, in order to oversee compliance effectively, an individual at a strategic level needs to have oversight.
- 2.5 We see a difference when an individual at the highest level within an organisation – a principal or director – takes ownership of the Welsh language and offers strategic leadership on this. Within those organisations that have managed to secure top level ownership, the following is observed:
 - a culture of support for the Welsh language, with the whole organisation committing itself to improving Welsh language provision
 - adequate investment of funding and resources in the Welsh language
 - long-term strategic planning for the Welsh language
 - internal accountability structures which mean that Welsh language provision is taken seriously.
- 2.6 It is therefore important that the Welsh language is the responsibility of an individual at the highest levels. This lead role may include:
 - internal communications work
 - raising relevant issues at the organisation's senior executive team
 - acting as a link between the operational staff and the head or board
 - strategic decision making, e.g. in terms of finance and staffing.
- 2.7 In addition, the role of the strategic lead is key to overseeing compliance. This may include:
 - chairing meetings or committees established to implement and monitor compliance with Welsh language standards
 - receiving progress reports on the implementation of action plans or targets relating to Welsh language standards
 - reporting to senior colleagues on the implementation of the standards
 - leading individuals or a team of staff responsible for implementing Welsh language standards within the organisation
 - representing the organisation in reporting to the public and in terms of user engagement.

The Chief Executive and the Welsh Language Officer hold one to one meetings with each Head of Service. A scoring template is used for Heads of Service to review their compliance with the standards and the findings are discussed when comparing the current year's scores with those of the previous year. During this process, there is an opportunity to identify any further support needed by the individual services. There is an ongoing effort in place to increase compliance scores against all aspects of the standards.

Betsi Cadwaladr UHB's Director of Public Health chairs the Welsh Language Strategic Forum which includes senior executive leaders.

South Wales Police's Deputy Chief Constable oversees all complaints made in relation to matters relating to the Welsh language as part of the organisation's monitoring process.

Operational specialists (language officers)

2.8 As well as ensuring ownership at the highest level, sufficient time and resources for the role of operational specialists, or language officers, is likely to be beneficial. These are the individuals or team who take day-to-day operational responsibility for supporting the implementation of Welsh language standards. The role of the operational specialists varies from organisation to organisation, but may include:

- raising the awareness of the organisation's staff about the Welsh language
- advising staff and managers within the organisation on how to adapt projects and procedures in order to consider the Welsh language and compliance
- planning future Welsh language provision
- coordinating Welsh language awareness or skills training for staff
- coordinating or commissioning translation services
- maintaining links with external organisations, and undertaking research, in order to learn about new approaches
- scrutiny of assessments undertaken by other staff, e.g. job skills needs, consideration of Welsh when making policy decisions.

2.9 Overseeing compliance is also an important part of the role. Activities to achieve this may include:

- requiring managers and staff to monitor and report on the implementation of the standards within their departments
- holding managers and staff to account if performance is not adequate, and ensuring that action is taken promptly
- formulating and implementing a monitoring programme including verification surveys, conducting focus groups and coordinating opinion surveys

- raising staff awareness of monitoring procedures and coordinating any associated training
- ensuring that the organisation deals appropriately with complaints relating to the Welsh language
- gathering information in order to report on performance against the requirements of Welsh language standards.

The Language Officer at The College Merthyr Tydfil is responsible for the implementation of the standards within the College. The Language Officer conducts formal monitoring exercises and meets with departmental heads on an annual basis to discuss compliance. The officer is a member of the Welsh language Coordinators Group and the steering group across the University of South Wales Group. The officer is also a member of the Merthyr Council WESP Board and the Post-16 Education Board. She is also responsible for coordinating the ambassadors scheme.

“Until recently, I was responsible for the Welsh language as part of my wider role as a communications team leader. As this was a very busy role, it was challenging for me to give sufficient time to do the job properly.

During 2018, the Council approved a request for funding to appoint a language officer. The creation of this role has enabled us to focus much more on Welsh language provision. I now feel that we have a better grasp of our performance, and are able to plan the develop the provision more effectively. The Council's staff are pleased to have an expert to turn to for advice whenever they have a question about how to comply or consider the Welsh language.”

Communications team leader, Denbighshire County Council

Welsh language champions or coordinators

- 2.10 Several organisations have developed a network of departmental champions or language coordinators. These do not necessarily need to be managers and could be regular staff conducting the day-to-day work. The role often includes:
- offering support to colleagues on the use of Welsh internally or with service users
 - raising awareness of requirements with colleagues
 - reporting back to the operational specialists on performance and any problems.
- 2.11 Operational specialists often mention language champions as their 'eyes and ears' in departments, which enables them to identify which departments need more support.

Dyfed Powys Police's Iaith ar Work/Language at Work group sets the direction for developing Welsh language services and scrutinises compliance with the standards. The members of the group are a cross-section of civilian staff members and police officers, including higher ranked members. The membership of the group represents each directorate across the force. Part of the members' role is to conduct mystery shopper surveys and report back to the group. When problems are highlighted, the language officers will address them to ensure resolution.

Peer accountability

- 2.12 A number of organisations have established an internal forum or group, which brings together key staff in order to report on compliance. Group membership tends to involve staff and managers who are responsible for implementing some aspect of the standards within their own department, e.g. it can include those who lead on customer engagement within each department, and people who are responsible for the implementation of the standards in specific areas such as human resources or policy. In other organisations, the group convenes language champions in order to provide the organisation with a picture of the situation on the ground.
- 2.13 These groups tend to work best if they focus on a set of concrete action points, e.g. an action plan for compliance, with attendees reporting on the implementation of those points.
- 2.14 These groups are often chaired by the strategic lead to ensure that the meetings are taken seriously, and to enable reporting back to the senior management team or to raise any issues with senior management.
- 2.15 It is important that there is a system in place to ensure that any actions not yet implemented are put in place, including escalating matters if necessary. For example, it can be ensured that action points are allocated to a particular person by a specific date, and it can be arranged that the group reports directly to a head or senior management team.

Estyn has piloted and developed a process of self-assessment and peer assessment within different corporate teams in order to analyse the organisation's compliance with the language standards and how they might improve the delivery of their Welsh language services. The process involves a discussion with colleagues on compliance, and preparing a subsequent analysis. The findings are discussed in the Welsh language working group. The lead member of staff with responsibility for specific standards is required to discuss their interpretation of the standard in the context of their particular roles. This was seen as an opportunity to scrutinise performance and interpret the standards collaboratively. It was reported that the process had been successful in ensuring ownership of compliance and that departments throughout the organisation is aware of the relevant requirements.

Coleg y Cymoedd has cross-college groups that meet to discuss compliance with the standards and the Welsh Language Strategic Development Plan which sets out the College's direction in relation to the Welsh language until 2023.

The CALL Group (UK wide Government Departments) is made up of language / liaison officers from central government departments and agencies. They meet up to twice a year to discuss barriers to the implementation of their language schemes as well as sharing good practice. The success of the group is evident as the number of members has steadily increased.

- 2.16 Managers can also be encouraged to discuss compliance with each other at a one-to-one level.

Independent or democratic accountability

- 2.17 Semi-external accountability is part of the governance arrangements of most organisations. In some organisations, e.g. local authorities, this will be in the form of councils and committees of elected members. In other organisations, a non-executive Board will be responsible for holding officers to account.
- 2.18 A number of organisations are using these arrangements as a means of overseeing their compliance. This can be done in different ways, e.g.:
- reporting on issues relating to the Welsh language at the organisation's main accountability forum, e.g. full council, cabinet, or board meeting. This has the advantage of ensuring that the Welsh language is considered at the highest level, but it can mean that there is insufficient time for proper scrutiny
 - establishing a sub-committee or sub-group of external representatives to scrutinise matters relating to the Welsh language in more detail. As with

internal groups, it may be advantageous to keep reporting to a specific set of action points in order to maintain control of the discussion, but such groups may also be useful in order to provide a long-term external perspective.

- 2.19 In many cases county councils have established county language forums, which bring together a number of organisations and bodies that promote the Welsh language locally. The contribution of the language forum is often very valuable, particularly in terms of user engagement, recognising the impact of the organisation on the use of the Welsh language in the community, and issues relating to language planning.

The Anglesey Language Forum exists at county level to provide strategic focus for the Welsh language on the Island. The role and responsibility of the Forum is as follows:

- To contribute to the Welsh Government's target in its strategy 'Cymraeg 2050: a million Welsh speakers' through the local vision of ensuring an increase in the number of people who speak and use Welsh (that this percentage increases to at least 60.1% by the 2021 Census, as it was in 2001);
- To increase opportunities for people to use the Welsh language.
- To increase people's awareness of the value of the Welsh language as part of our heritage and as a skill in modern Wales.
- Co-operate at a partnership level by discussing, sharing ideas and by ensuring that the work of the organisations is not duplicated;
- Work collaboratively at a partnership level to identify gaps in provision by formulating activities to meet the need;
- Recognise opportunities to share good practice
- To work together to address the challenges and opportunities that large developments present to the Welsh language;
- To create opportunities to promote the Welsh language in the local economy in general, and in public services - in local government, health, education, leisure etc.
- To persuade the owners of the new industries coming here to use and take ownership of the Welsh language;
- To emphasise the cultural-economic value of the language in the tourism industry;
- To highlight the importance of the language to the authorities responsible for regeneration schemes.
- Recognise opportunities to promote the work of the Forum in various ways to the public.

3 Performance management

- 3.1 As the Welsh language is the responsibility of a large number of people within the organisation, and the requirements of the standards are substantial and varied, it is important that organisations are able to draw together information in order to manage the implementation of the standards throughout the organisation. This section proposes methods for doing so.
- 3.2 Organisations typically have a comprehensive system of performance management arrangements in their various departments. The methods proposed in this section reflect a number of the most common arrangements. Organisations can either:
 - include the Welsh language as one element of their corporate arrangements, or
 - establish separate arrangements for the Welsh language.
- 3.3 Whichever method is used, it is important to ensure that:
 - managers and staff in departments and teams across the organisation take responsibility for compliance
 - you have an understanding of compliance across the organisation
 - performance reporting is proportionate – i.e the creation of an excessive burden for the provision of information and evidence can be counterproductive.

Self-evaluation

- 3.4 This approach involves requiring all heads or managers of a department or team to report regularly on compliance with those standards relevant to their area of work.
- 3.5 Many organisations do this by using self-monitoring forms where each department is required to report on how they ensure compliance against each standard or group of standards as well as identifying any gaps or failures.
- 3.6 Several organisations have reported that this practice is an effective method of ensuring that all departments understand the requirements of the standards. Managers also appear to appreciate that there is a definite process in place to follow.
- 3.7 As can be seen in the example below, Swansea University has introduced the requirements of the standards in a way that is practical and understandable to staff. These forms are sent to the language officers and/or the strategic lead for consideration. They report back to departments using a traffic light system, bringing the results to life. Depending on the results of these self-evaluations, actions can be set out.

Example self-evaluation form – correspondence

Do you:	Yes/ No / Sometimes / Not relevant	
<ul style="list-style-type: none"> answer any Welsh correspondence in Welsh (unless the person says otherwise)? 		
<ul style="list-style-type: none"> check the user record before sending any correspondence, to confirm the user's language choice?* or (anyone without access to user records): <ul style="list-style-type: none"> ask all registered users if they wish to receive correspondence in Welsh?* keep a record of each registered user's language of choice? communicate bilingually if you do not know the language of choice? *please note that the question is asked as users register, so the information should be available on every user record		
<ul style="list-style-type: none"> correspond in Welsh with all enrolled users who wish this? 		
<ul style="list-style-type: none"> send Welsh language forms / documents to all persons wishing to receive correspondence in Welsh? 		
<ul style="list-style-type: none"> send Welsh and English versions together when you correspond with a number of people at the same time, or when you do not know the language of choice? 		
<ul style="list-style-type: none"> Treat Welsh and English equally in all relevant correspondence (same format, details, timing etc) ? 		
<ul style="list-style-type: none"> state that you welcome correspondence in Welsh? 		
<ul style="list-style-type: none"> state that you will respond in Welsh to correspondence sent in Welsh? 		
<ul style="list-style-type: none"> state that correspondence in Welsh will not lead to a delay? 		
Please provide up to three examples of bilingual (Welsh and English) correspondence with a number of people at the same time (sent during the above period).		
	No.	%
How many of your staff include messages at the end of e-mails / letters indicating that the organisation welcomes correspondence in Welsh, that you will reply in Welsh and that correspondence through the medium of Welsh will not result in any delay?		

Coleg y Cymoedd monitors compliance with the standards through a procedure which is a specific performance management process for complying with Welsh language standards.

Each Head of School and Functional Area Director completes a compliance form at the end of each term, indicating whether there has been compliance, partial compliance or non-compliance with the relevant standards during the term. The forms are then submitted to the Welsh Language Officer, and discussed during termly meetings with the Vice-Principal. Feedback is given to all heads and directors in order to discuss and resolve any compliance issues.

The College also operates an overall quality monitoring programme through "quality weeks" which is a series of weeks where the College conducts self-inspection exercises. One line of inquiry during these weeks focuses on the Welsh language. The exercises include learning observations, focus groups and 'learner walks' which use a set of specific questions for staff and learners. An action plan was drawn up based on the findings of one of these weeks, which focuses specifically on the Welsh language.

Action plan

- 3.8 A number of organisations are drawing up action plans to implement the standards. This means working out what practical steps need to be taken in order to be able to comply with the standards, and then allocating the action points to specific staff or teams.
- 3.9 This is particularly useful in the initial phase, in terms of putting arrangements in place to comply with the standards for the first time, but even after that there are likely to be a number of actions that will need to be taken, either to ensure continuous improvement or to deal with shortcomings arising from the implementation of the standards.
- 3.10 Reporting progress against the action plan, either in writing or at a meeting of an executive group or similar group, is an effective means of ensuring that necessary action is taken.

Example action plan – apps

Action	Responsibility	Completion date	Achieved?
Provide a list of all the organisation's apps	IT	01/04/2020	Yes./ No
Check the app's current compliance	Welsh Language Team	14/04/2020	Yes./ No
Identify necessary technical changes in order to comply	IT	30/04/2020	Yes./ No
Provide Welsh texts for the apps	Welsh Language Team	30/04/2020	Yes./ No
Technical work and addition of Welsh text	IT	30/05/2020	Yes./ No
Testing and further changes	Welsh Language Team / IT	14/06/2020	Yes./ No
Release the apps	IT	30/06/2020	Yes./ No
Promote the apps	Welsh Language Team	07/07/2020 a pharhaus	Yes./ No

Amgueddfa Cymru – National Museum Wales produces an action plan for the implementation of the standards and its Welsh language policy. The first plan spanned 3 years and future plans will vary in length to complement organisational developments. Responsibilities are allocated to relevant staff in the plan and in the language policy, e.g. actions in relation to staffing have been delegated to the Head of HR. The Co-ordinator keeps an overview of the implementation of the action plan and reports to the Director. The Director chairs a Monitoring Group which maintains an overview of the implementation of the action plan.

Audit

- 3.11 A number of organisations have internal audit teams within their finance departments, or procure audit services from an external company. These teams use a variety of methods to scrutinise the organisation's arrangements in different areas. Usually, the audit gathers a considerable amount of evidence in a short period of time, and a report is then produced setting out a level of assurance in terms of appropriate or effective implementation, and proposes recommendations for improvement.
- 3.12 Organisations can use the expertise and authority of auditors in order to gain an assessment of how they operate in relation to the Welsh language. Doing this means that shortcomings and good practice are identified in an effective way, and the results have credibility, ensuring that organisations are more likely to take action.

Rhondda Cynon Taf County Borough Council has established the role of Compliance Officer within the Council's Welsh Language Services, which carries the same status as an officer from the audit department, and implements other processes used by the Audit Department. This creates an opportunity to measure compliance, and senior officers would be given an opportunity, during the course of a formal week, to develop an understanding of the standards and the political context, whether that is on an internal or national level. It also provides an opportunity to raise concerns and discuss any barriers. As a result, there is a closer relationship between the Welsh language unit and other services. The Compliance Officer wears two hats; initially, the officer conducts formal, black and white interviews in order to capture the essence of the service being audited, identifying what is required in terms of the standards, and providing a detailed, rigorous and clear picture of the current situation. Secondly, they offer advice and support in terms of ensuring progress.

The Welsh language team in Wrexham County Borough Council has an arrangement with the internal audit team which means that at least one audit per year is conducted into compliance with the standards.

Risk

- 3.13 Organisations maintain risk registers in order to keep track of issues that might cause them problems, and identify the actions that need to be taken to mitigate the risk.
- 3.14 Including issues relating to the Welsh language on the organisation's risk register, or having a specific risk register for the Welsh language, can be an effective way of highlighting problems that may arise, and of ensuring that action is taken.

Example risk register – Welsh language

Risk	Probability before action (1-5)	Action to be take	Probability after action (1-5)
If staff with Welsh language skills leave for other posts, there will be insufficient capacity to continue to comply with the telephone services standards	4	<p>Application for funding to appoint additional staff with Welsh language skills</p> <p>Need for Welsh language skills to be assessed for all vacant and new posts</p> <p>Audit of the skills of existing staff in order to identify opportunities to improve skills</p>	2
Llwyth gwaith cyfieithydd mewnol yn gallu creu oedi wrth gyhoeddi dogfennau gan na ellir cyhoeddi yn Saesneg heb gyhoeddi yn Gymraeg yr un pryd	3	<p>Procurement of a machine translation/translation memory system to automate more work</p> <p>Establish arrangements with external translators who can take on surplus work</p> <p>Implement a publications management system that prevents publication of documents if the Welsh version is not ready</p>	1

Gwent Police has set out a specific plan for each department to implement. A traffic light system is used when checking performance and compliance against the plans as an effective means of assessing and identifying areas of risk and priority.

During the period of preparation for the standards several health boards undertook assessments to assess the level of compliance and identify risks of failure. An action plan was devised based on the risk assessments. In addition several health boards had included the most significant deficiencies in the organisation's risk register. Hywel Dda UHB reported that the inclusion of non-compliance with certain standards on the organisation's risk register meant that the strategic director responsible is called before the risk panel if there was no assurance that the action had been undertaken and that this has elevated the status of compliance with Welsh language duties within the organisation.

Swansea University's language officers collate the data gathered from a questionnaire provided to each director to enquire about the compliance of departments with the standards. A traffic light system is used in order to identify areas of risk and those where action is required. The Language Officers meet with individual departments to discuss the risks and agree on actions.

Record keeping

- 3.15 The standards require organisations to keep certain records, and in some cases to include the records or statistics in annual reports. The records that organisations are required to keep include:
- persons wishing to receive correspondence and telephone calls in Welsh
 - the number of complaints regarding compliance with the standards
 - copies of complaints regarding compliance with the standards, and complaints relating to the Welsh language
 - steps taken to comply with policy making standards
 - number of employees with Welsh language skills
 - the number and percentage of staff members who have attended specific training courses (e.g. health and safety, induction) in Welsh
 - assessments of the need for Welsh language skills for new and vacant posts
 - the number of vacant and new posts placed in different categories (e.g. essential, desirable) in terms of the need for Welsh language skills.
- 3.16 You could identify other records and statistics to be kept that would help you to oversee, and report on, your compliance. For example, you may choose to keep a record of:
- the number and percentage of your social media web pages/documents/messages available in Welsh
 - the number and percentage of your staff who have received Welsh lessons
 - the number and percentage of teams who have self-evaluated their compliance with the standards
 - the number and percentage of service users who use the Welsh language service.
- 3.17 You can adopt some of these records/statistics as corporate performance indicators, tracking their performance from year to year.

4 Direct verification

- 4.1 The previous section discussed methods that organisations can use in order to gather information from staff and managers on what they have done to ensure compliance. But it can also be useful to have arrangements in place to check that those actions are working, indicating that the experience of service users is as it should be.
- 4.2 In order to do this there you can verify services as experienced by users. We want to see organisations develop an understanding of the likely experience of people who use (or seek to use) their Welsh language services. This will enable organisations to adapt arrangements in order to improve compliance. The most obvious method for obtaining this information is to conduct random verification surveys according to each service.
- 4.3 As part of the Commissioner's regulatory work, verification surveys are conducted annually with a sample of establishments. These surveys are intended to enable the Commissioner to have a genuine snapshot of the performance of organisations as they operate in accordance with Welsh language standards. The Commissioner's surveys cannot be relied upon as a sole source of information on performance, as only a sample of organisations is used in the Commissioner's work.
- 4.4 There are three steps to follow when carrying out verification surveys:
 - Step 1: Draw up criteria based on the requirements of the standards
 - Step 2: Access the service as an average service user
 - Step 3: Consider and record the extent to which the organisation is performing in accordance with the requirements of the standards
- 4.5 In this section we show how organisations could go about conducting a verification survey themselves, using a website as an example.

Website monitoring – example procedure

Step 1: Draw up criteria based on the requirements of the standards

Consider the requirements of the standards as they appear in the organisation's compliance notice.

Set out criteria for verification and recording.

Broadly, the standards regarding websites and online services provided by organisations include the following requirements:

- Ensure that the text of each page of your website is available in Welsh
- Ensure that the text of the homepage of your website is available in Welsh
- Ensure that any new, published or amended pages are available in Welsh
- Ensure that the Welsh pages are fully functional
- Ensure that the Welsh language is treated no less favourably than the English language.
- Ensure that English pages clearly state that the page is also available in Welsh and provide a direct link
- Ensure that the interface and menus on all pages are in Welsh

You can then formulate a series of questions to answer when visiting the website. The type of questions that could be asked may follow this pattern:

- Is the home page available in Welsh?
- How many pages checked were available in Welsh?
- Were the Welsh pages fully functional?
- Was the Welsh language treated less favourably than the English language?
- Is there a clear statement noting that the English pages are available in Welsh?

You could then put these questions in a spreadsheet to enable an answer to each question to be recorded for each page.

Step 2: Accessing the service as an average service user

If it is not practical to carry out the survey on an ongoing basis when visiting the website, you could visit the website on a seasonal basis and check at least 10 Web pages on each visit.

For each page you visit, you would need to record an answer to the questions above.

In order to answer the questions it would be necessary to consider things like:

- Is the page available in Welsh?
- Is the Welsh language information equally accessible as the English equivalent?
- Does the text on both pages correspond?
- Do the graphics of both pages match?
- Does the design of both pages correspond?
- Are the Welsh pages fully functional?
- Do the links provided on the Welsh pages lead to Welsh language information?
- Does the English page make it clear that the information is available in Welsh?

Step 3: Consider and record the extent to which the organisation is performing in accordance with the requirements of the standards

Following the surveys, collate all the information gathered in order to reach a view on the standard of service against the requirements of the standards.

The information gathered could be used to report in quantitative form, e.g.:

- Number and percentage of pages available in Welsh
- Number and percentage of fully functioning Welsh pages

You could also report qualitatively, i.e. discuss the quality of the service user experience and indicate the extent to which the Welsh language service was equally accessible and equivalent to the standard of the English service. Was the Welsh language service offered proactively?

After conducting the survey, the organisation could produce a report for internal discussion, either with the relevant departments or in one of the forums identified in the previous section. That report could include:

- A summary of the survey arrangements
- The outcomes of the survey
- A conclusion or opinion on the organisation's performance
- Good practice seen
- Areas where failure, or risk of failure, has been identified
- A timetable or action plan setting out the action to be taken in light of the findings of the survey.

The findings of the surveys could also be considered as organisations formulate and implement any other policies and strategies relating to the Welsh language.

The findings can be referred to when reporting annually on compliance.

A number of organisations are establishing partnerships to verify their services whilst keeping costs down. For example:

- Pembrokeshire Coast National Park Authority and Pembrokeshire County Council have carried out a verification exercise of the telephone services of both organisations.
- Organisations such as Caerphilly CBC, VAMT, Gwent Police and Denbighshire County Council have commissioned reviews of their services from the local Menter Iaith. Caerphilly CBC noted that the work had helped them identify gaps and celebrate successes, and was tied to the implementation of the Council's strategy to promote the Welsh language.
- Organisations have sourced groups of real services users to test services on their behalf – secondary school students on work experience in the case of Merthyr Tydfil CBC, and a group of local Welsh learners in the case of Pembrokeshire County Council. Merthyr Tydfil CBC is working with the Coleg Cymraeg Cenedlaethol to identify further opportunities for similar work.

5 Understanding the experiences of service users

- 5.1 Talking to service users can provide valuable insights into how your provision affects those who access it. It can enable you to make changes to make it easier to access a Welsh language service or improve the quality of the service.
- 5.2 Complaints are one way of learning about the experiences of service users. Although complaints occur when something goes wrong, they can be seen as a positive opportunity to better understand performance, and make changes. We have a separate advice document dealing with the requirement for a complaints procedure to give service users confidence in the organisation's arrangements.
- 5.3 This section provides ways of gaining insight into the views and experiences of service users with regard to Welsh language services.

Service user opinion – methods of collection

- 5.4 Discussion groups – groups of around 6 to 12 service users can be convened to learn about their experience as they seek to access Welsh language services from the organisation. This can be done by open invitation or targeting specific groups of users. The responsible member of staff can facilitate the discussion through a structured informal conversation enquiring about their experiences, opinions and recommendations for improvement. Prompts or resources can be used to encourage discussion.
- 5.5 Observation – some organisations conduct observation exercises by shadowing service users. This enables the organisation to access real-life situations e.g. listening to telephone calls or visits to a reception. As well as learning about the performance of the organisation, such observations also offer the opportunity to learn about the behaviour of its service users in terms of language choice and what factors affect that. It is also an opportunity to consider the quality of the Welsh language service provided.
- 5.6 Direct questions – Another method of gathering opinions is to use direct questions when dealing with service users. Frontline staff can be encouraged to ask specific questions of customers following their dealings with the organisation e.g. by adding questions to scripts. For example, service users who call the Welsh language phonenumber can be asked what they think of the quality of the service, and compare this with the responses of people using the English line.
- 5.7 Service user survey – A number of organisations ask for the views of service users through user surveys. Existing groups or forums (such as a residents panel/user panel/student council) can be used to gather views on Welsh language services. We also saw several examples of organisations gathering views through an online survey seeking the views of users as they visit the organisation's website.

5.8 These exercises can be used to gather information on people's views and experiences of Welsh language services. Questions can be used as the following examples:

- "Do you contact us in Welsh? If not, why?"
- "What would make you more likely to use Welsh language services?"
- "Are you satisfied with the quality of the Welsh language services? What can we do to improve them?"
- "Is the quality of our Welsh language service as good as our English language services?"

HMRC employs a Welsh language service user researcher to work with a group of Welsh speaking customers in order to gather their views and learn about their experiences as they seek to use the department's online Welsh language services. The findings of this work are used to develop and tailor the department's Welsh language services.

Glyndwr University has created an informal and voluntary advisory group, 'Cymuned Gymraeg y Brifysgol' (University Welsh Community), consisting of friends and colleagues of the University. This group looks at how and what the University is doing to enhance their understanding and improve practises in the use of the Welsh language.

The College Merthyr Tydfil has a student ambassador scheme which is a group of Welsh language students who contribute to the College's open events in order to welcome prospective students in Welsh. The language officer meets with the group on a regular basis in order to learn about their experiences as students at the College and to discuss ideas about how to promote the Welsh language within the College.

Usage data

5.9 Quantitative data on the use of services can be a useful source of evidence. If the take-up of Welsh language services increases, that can be an indication that it is a good quality service. It suggests that the service is being provided as it should, because consumers are increasingly trusting of the service and don't feel that it is more advantageous for them to use the English language service.

5.10 Similarly, if the use of a Welsh language service decreases, this may indicate that the quality of the service has deteriorated or that the service is less accessible.

5.11 There is more information on measuring the take-up of services in our advice document on promoting the use of Welsh language services.

NHS Direct Wales and the 111 service publish Welsh language service user data on a quarterly basis. The data compares the number of service users who choose a Welsh language service with the number who are successful in obtaining a Welsh language service as a means of measuring compliance and quality of performance.

Annex 1: relevant standards

Standard number (regulations)	Standard wording
1: 157 2: 151 4: 151 5: 154 6:165	You must – (a) ensure that you have arrangements for— (i) overseeing the way you comply with the service delivery standards with which you are under a duty to comply, (ii) promoting the services that you offer in accordance with those standards, and (iii) facilitating the use of those services, (b) publish a document that records those arrangements on your website, and (c) ensure that a copy of that document is available in each of your offices that are open to the public.
1: 163 2: 157 4: 157 5: 160 6: 171	You must – (a) ensure that you have arrangements for overseeing the way you comply with the policy making standards with which you are under a duty to comply (b) publish a document that records those arrangements on your website, and (c) ensure that a copy of that document is available in each of your offices that are open to the public.
1: 169 2: 163 4: 163 5: 166 6: 177	You must – (a) ensure that you have arrangements for— (i) overseeing the way you comply with the operational standards with which you are under a duty to comply, (ii) promoting the services that you offer in accordance with those standards, and (iii) facilitating the use of those services, (b) publish a document that records that procedure on your intranet.



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