



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 (5)**

### **(Royal Mail plc)**

[Ref: 20151130ASCCC(5)]

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# 1 Background and context

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011 ('the Measure'), 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 24 March 2015, the Welsh Language Standards (No.1) Regulations 2015<sup>1</sup> were approved in the National Assembly for Wales' Plenary Meeting. These standards were developed to impose duties upon county councils and county borough councils in Wales, national park authorities and Welsh Ministers. All references to standards in this standards report refer to the standards specified in the above regulations.

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

This is a landmark piece of legislation that will put the language on a firm footing within the organisations required to comply with them. It will encourage more use of Welsh in everyday situations, be it in receiving public services or as an employee of one of the organisations.<sup>2</sup>

The Welsh Language Commissioner's standards investigations and the Welsh Government's evidence gathering exercise for composing their regulatory impact assessment are based upon the regulations that were approved on 24 March 2015.

The Welsh Language Standards (No. 1) Regulations 2015 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://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

<sup>2</sup> <http://gov.wales/about/cabinet/cabinetstatements/2015/welshlangstandards/?skip=1&lang=en>

## 2 Standards investigation in relation to Royal Mail plc

In accordance with section 62 of the Measure, an exploration notice was presented on 5 May 2015 for the attention of persons whom appear to the Commissioner to be members of the following groups of persons:

- Public Bodies: General (5)

The relevant person who falls within the group specified above in this standards report is:

- Royal Mail plc

An exploration notice is a notice in writing 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 the person (whether or not the standards are already specified by the Welsh Ministers under section 26(1)).

The period of this standards investigation began on 26 May 2015. It ended on 18 August 2015.

As part of this standards investigation, information was collected from Royal Mail plc. This was by means of a completed questionnaire. Evidence was also 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 specified in regulations on 24 March 2015. Advertisements 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 Measure, 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) 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 Commissioner is authorised to give a compliance notice to a person.

A compliance notice is a notice given to a person by the Commissioner, which:

- (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.

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

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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 gives 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 it 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 conclusion 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 no criterion is of more importance than any other.

- 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 do they come within Schedule 7 and also within Schedule 8?
- Is the class of standard (service delivery; policy making; operational; record keeping; promotion) potentially applicable to the relevant person?
- Does the relevant person carry out the activity<sup>3</sup> in question?
- 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 relevant person already provide the service in Welsh (whether this corresponds exactly to the requirements included in the standard or not), or carry out the activity in accordance with the standard?
- Do the vast majority of other relevant persons within the same sector provide the service 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>3</sup> This criterion will be considered in respect of service delivery standards only.

## 4 Evidence received from the relevant person

Evidence was received from the Royal Mail plc. This evidence included responses to 199 questions in a questionnaire as well as further evidence provided following subsequent inquiries.

As part of its response to the standards investigation, the person in question noted that its legal status had changed since the Welsh Language (Wales) Measure 2011 was approved. These changes mean that it is no longer responsible for Post Office Ltd, and therefore has fewer staff and operations serving the public in Wales than when the Measure was approved, together with its current language scheme, in 2011. It noted also that it was no longer a public body like the other bodies named in Schedule 6 of the Measure, following these changes. Also, it added that its functions in terms of providing services to the public had not been given to it or imposed upon it through enactment in accordance with Column 1 (4) Schedule 5 of the Measure. Rather, it noted that the postal services regulator Ofcom had imposed specific regulatory conditions upon it in 2012 under the Postal Services Act 2011.

Considering the above, the Welsh Language Commissioner has executed her functions on the basis of the evidence of the person in question and on the contents of Schedule 6 of the Measure, which was current when this standards investigation was being carried out.

The Welsh Language Commissioner's officers held regular meetings to analyse the evidence received from the Royal Mail plc as part of the standards investigation, together with the current commitments of their Welsh language scheme.

This section provides information regarding the commitments given in the Welsh language scheme of the relevant person, which correspond to the standards (whether they correspond exactly to the requirements attached to the standards or not) for all activities.

In analysing the current commitments in their Welsh language schemes against the standards, it should be noted that it was not possible to correspond a number of the standards in relation to service delivery, because of the detailed nature of the regulations published by the Welsh Government. In some circumstances, it's possible that the relevant person in question is committed to or complies with the requirement, but this has not been explicitly stated in their Welsh language scheme.

It should be noted that the scheme, approved by the Welsh Language Board in 2011, includes references and commitments that are also relevant to the Post Office Ltd, which is now a separate entity as noted above. However, as the scheme remains operational by the Royal Mail plc, and that it has not been amended as a result of the changes noted, consideration is given to the commitments as part of this standards report.

A summary of the evidence received from the Royal Mail plc is given in section 4 of this report. The evidence submitted included information regarding which activities are carried out by the person in question, which activities it carries out through the medium of Welsh and to what extent it can comply with the standards.



## Royal Mail plc

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

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

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to each one of the standards relating to correspondence sent by a body.

Royal Mail plc noted that it already complied either partially or fully with a number of the standards relating to correspondence and that making standard 1 specifically applicable to it would be reasonable and proportionate. It also noted what standards were specifically applicable (in the sense that they were relevant to it). It should be noted that the Welsh Language Commissioner's function is to reach conclusions regarding what standards should be made specifically applicable to a person.

Royal Mail plc noted that it considered that making standards 4, 5 and 6 specifically applicable to it would be reasonable and proportionate to the extent that it carried out those elements of correspondence in Wales. In relation to standard 7, it noted that it was only in response to Welsh language correspondence that it currently complied.

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

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

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language commitments of the person in question, on average, the commitments corresponded, whether partly or in full, to 53% of the standards regarding telephone calls made and received by a body.

Royal Mail plc noted that it complied either partially or fully with a number of the standards in relation to telephone calls, explaining that all calls to the specific contact centre for Welsh language calls received a greeting in Welsh. Also, calls to the other line hear a menu with the Welsh language being first and a specific option to continue with the call in Welsh when it is identified that the call comes via a landline from Wales. It was added that the Welsh language line was advertised on the person's website.

Royal Mail plc confirmed that it considered that making these standards specifically applicable to it was reasonable and proportionate to the extent it considers that a telephone service to Welsh speaking customers is relevant to support its Universal Service Obligation (USO) as described in the Postal Services Act 2011. The USO includes:

- At least one distribution of letters every day from Monday to Saturday to all addresses in the UK
- At least one collection of letters every day from Monday to Saturday from all access points in the UK used for the collection of letters and postal packets to be forwarded
- Postal services at an affordable, uniform tariff across the UK
- Registered items service on a public, affordable tariff
- Insured items service on a public, affordable tariff



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- Free postal service for blind or partially sighted people
- Delivery of petitions and legislative addresses free of charge
- Postal packages up to 20kg

### **Activity 3: A body holding meetings that are not open to the general public** **Standards relating a body holding meetings that are not open to the general public** **[23-29]**

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards relating to a body holding meetings that are not open to the general public.

Royal Mail plc noted that it considered that making these standards specifically applicable to it was unreasonable and disproportionate due to reasons relating to practicality. It noted, however, that it would always strive to realise a request for a meeting in Welsh and respect the chosen language of an individual or individuals.

Royal Mail plc noted that it was of the opinion that there should be no intervention in the arrangements for selecting the language for formal meetings. It should be noted that it is the operational standards that relate to internal meetings between workers only.

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

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, on average, the commitments corresponded, whether partly or in full, to 80% of the standards regarding meetings arranged by a body that are open to the public.

Royal Mail plc confirmed that it already complied with standards 30 - 34 in relation to its meetings in Wales and as a result considered that making them specifically applicable to it would be reasonable and proportionate.

### **Activity 5: Public events organized or funded by a body** **Standards relating to public events organized or funded by a body** **[35-36]**

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, on average, the commitments corresponded, whether partly or in full, to 50% of the standards regarding public events organized or funded by a body.

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### Activity 6: A body's publicity and advertising

#### Standard relating to a body's publicity and advertising [37]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to the standard relating to publicity and advertising by a body.

Royal Mail plc noted that it considered that making this standard specifically applicable to it was unreasonable and disproportionate as it does not currently create television adverts in Welsh.

### Activity 7: A body displaying material in public

#### Standards relating to a body displaying material in public [38-39]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to each one of the standards regarding a body displaying material in public.

Royal Mail plc confirmed that it considered that making these standards specifically applicable to it was reasonable and proportionate as it already complied with them in relation to its telephone boxes in Wales.

### Activity 8: A body producing and publishing documents

#### Standards relating to a body producing and publishing documents [40-49]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 40% of the standards relating to a body drawing up and publishing documents.

Royal Mail plc noted that it did not consider that making a selection of these standards specifically applicable to it would be reasonable or proportionate, namely standard 41(a) due to the nature and extent of its business; standard 42 as it was not relevant to it; and standard 47 as the duty is not clear in its view. No reason was given for considering standard 49 to be unreasonable and disproportionate.

Royal Mail plc stated that further standards were unreasonable and disproportionate but that was due either to this kind of document not being available to the public or that it was concerned that the duty to comply extended beyond the boundaries of Wales. Royal Mail plc also expressed concern regarding the appropriateness of these standards for persons operating across the UK, and indeed across Europe and the world.

### Activity 9: A body producing and publishing forms

#### Standards relating to a body producing and publishing forms [50-51]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

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In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 75% of the standards relating to a body drawing up and publishing documents.

Royal Mail plc noted that forms were available in Welsh on the Royal Mail website for customers wishing to arrange a redirection service and to claim for lost / undelivered items.

However, Royal Mail plc noted that it did not consider it reasonable or proportionate to make these standards specifically applicable to it.

### **Activity 10: A body's websites and on-line services Standards in relation to a body's websites and on-line services [52-57]**

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 67% of the standards relating to a body's websites and on-line services.

Royal Mail plc noted that it complied partially with these standards but considered that making all the standards specifically applicable to it would be unreasonable and disproportionate with the exception of standard 55.

Concern was expressed regarding proportionality and the investment to translate when there were 9,000 visits to Welsh versions of its websites during 2013-14, which it considers to be low usage.

Due to the perceived low demand, its app had not been developed to include a language choice facility, adding that it is not part of its USO anyway.

### **Activity 11: A body's use of social media Standards relating to a body's use of social media [58-59]**

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the relevant person in question, commitments did not correspond to the standards relating to a body's use of social media.

Royal Mail plc confirmed that it responded in Welsh to Welsh messages received via social media, if it was practically possible. It was concerned that a Welsh speaker would not always be available to respond in Welsh to such messages and was of the opinion that the demand to receive messages in Welsh was low. With this in mind, it did not consider that making these standards specifically applicable to it was reasonable and proportionate.

### **Activity 12: Self service machines Standards relating to self service machines [60]**

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to the standard relating to self-service machines.

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### Activity 13: Signs displayed by a body

#### Standards relating to signs displayed by a body [61-63]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 67% of the standards relating to signs displayed by a body.

Royal Mail plc confirmed that its public signs in Wales were already bilingual and that it already ensured that the meaning and expression of those signs was correct. With this in mind, it was of the opinion that continuing to implement the requirements associated with standards 61 and 63 in Wales was reasonable and proportionate.

Though noting that it gave equal prominence to the Welsh and English languages on signs, it did not consider that placing the Welsh first on signs in accordance with standard 62 would be reasonable and proportionate.

### Activity 14: A body receiving visitors at its buildings

#### Standards relating to a body receiving visitors at its buildings [64-68]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 33% of the standards relating to a body receiving visitors at its buildings.

Royal Mail plc noted that it provided a Welsh language reception service for visitors who so wished, and where this was practically possible. It stated that it could not guarantee that a Welsh speaker would always be available and so it did not consider that making standard 64 specifically applicable to it would be reasonable and proportionate.

However, it was of the opinion that it would be possible for it to implement standards 65 - 68 and that making them specifically applicable to it would be reasonable and proportionate.

### Activity 15: Official notices made by a body

#### Standards relating to official notices made by a body [69-70]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to all the standards relating to official notices made a body.

Royal Mail plc confirmed that it already carried out standard 69 to a large extent and that it considered that making it specifically applicable to it was reasonable and proportionate. However, it did not consider that making standard 70 specifically applicable to it would be reasonable and proportionate as it was of the opinion that placing the Welsh before the English would go beyond the requirement to provide equal treatment to both languages.

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### Activity 16: A body awarding grants

#### Standards relating to a body awarding grants [71-75]

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 17% of the standards relating to a body awarding grants.

### Activity 17: A body awarding contracts

#### Standards in relation to a body awarding contracts [76-80]

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 17% of the standards relating to a body awarding contracts.

### Activity 18: Raising awareness about Welsh language services provided by a body Standards for raising awareness about Welsh language services provided by a body [81-82]

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to each one of the standards relating to raising awareness regarding Welsh language services provided by a body.

Royal Mail plc noted that it did not specifically promote the availability of its Welsh language services, but that it happened naturally via the Welsh language provision itself. It explained that details of its Welsh language services were available on its website and that it offered a Welsh language telephone service to individuals phoning its main number and that this was a clear sign that service in Welsh was available.

It was of the opinion that there would be costs involved in proactively undertaking specific publicity campaigns and that this would not be proportionate to the perceived demand for receiving those services in Welsh. However, it believed that there was more it could do internally in order to inform visitors to its buildings that they were welcome to conduct their business in Welsh.

It should be noted that section 12(2)(b), Welsh Language Act 1993, notes that Welsh language schemes must specify how organizations will ensure publicity for the scheme. The Commissioner emphasizes that this measure is not an optional element within the legislation.

### Activity 19: A body's corporate identity

#### Standards relating to a body's corporate identity [83]

Royal Mail plc noted that it carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, commitments did not correspond to the standard relating to a body's corporate identity.

Royal Mail plc confirmed that it already maintained a bilingual corporate identity in Wales and that it considered that making this standard specifically applicable to it would be reasonable and proportionate.



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### Activity 20: Courses offered by a body

#### Standards relating to courses offered by a body [84-86]

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the relevant person in question, commitments did not correspond to the standards relating to courses offered by a body.

### Activity 21: Public address systems used by a body

#### Standards relating to public address systems used by a body [87]

Royal Mail plc noted that it did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to the standard relating to public address systems used by a body.

### Standards that deal with supplementary matters in relation to the service delivery standards [155-160]

Royal Mail plc noted that it considered that making a selection of these standards specifically applicable to it would be reasonable and proportionate. However, it had general concerns regarding those standards which required ensuring that copies of specific documents were available in all its offices that were open to the public. It noted that it was not of the opinion that its offices were suitable for doing so as they were areas to welcome customers which operated as a front desk or kiosk.

Also, Royal Mail plc did not consider that making standard 157 specifically applicable to it would be reasonable and proportionate as it was not of the opinion that it should have to outline and give publicity to how it would comply with the service delivery standards that are mandatory to it. It confirmed that it would be willing to publish those standards on the website but that doing more than that would not be reasonable and proportionate.

Neither did it consider that the requirement attached to standard 158(4) to provide publicity to the fact that it had published an annual report would be reasonable and proportionate, noting that it had not been doing so in the past. Similarly, it did not consider that making the publication of a further document explaining how it intends to comply with the service delivery standards in accordance with standard 159 specifically applicable to it would be reasonable and proportionate. No further reasons were provided.

## Policy making standards

In analysing the current Welsh language scheme commitments of Royal Mail plc, the commitments corresponded, whether partly or in full, to 30% of the policy making standards.

In relation to standards 88-93, Royal Mail plc listed the contents of its Universal Service Obligation and confirmed that opportunities to use the Welsh language or considerations relating to not treating the Welsh language less favourably than English were not central to this. Although it noted that it was committed to the principle of providing access to its services in the customer's chosen language, it emphasized that there were very few opportunities to create policies in which it was possible to differentiate between groups of customers on a language basis. That is, its policy decisions affected customers equally, in its view, whatever their language.

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Royal Mail plc confirmed that it did not award grants and neither did it carry out research with a view to assisting in making policy decisions. It noted further that it did not conduct public consultations regarding its policy decisions. It did note, however, an example of providing access to a Welsh-speaking customer services officer emphasizing that this would be a service decision rather than a policy one.

Royal Mail plc noted that it considered that making the policy making standards specifically applicable to it was unreasonable and disproportionate as, in its view, they were not relevant enough to it.

### **Standards that deal with supplementary matters in relation to the policy making standards [Reference should be made to standards 161-166]**

Similarly, Royal Mail plc noted that these standards were not relevant to it either and therefore it considered that making them specifically applicable to it would be unreasonable and disproportionate.

## **Operational standards [98-144]**

### **Standards relating to the use of the Welsh language within a body's internal administration [98-111]**

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 7% of the standards relating to the use of the Welsh language within a body's internal administration.

In general, Royal Mail plc was of the opinion that it facilitated discussion and solved any matter relating to an employee's time at work in Welsh, where practically possible. However, it noted that formalising these actions in the form of standards would be unreasonable and disproportionate.

It confirmed that it did not operate a policy of using the Welsh language internally at present; it went on to note that it was not of the opinion that doing so would be reasonable and proportionate.

It was noted that it was not current practice to provide the documents and forms noted in standards 99-104 in Welsh at present. It emphasized that it had a large number of employees, including a number of staff employed on a temporary basis, and that a low percentage of staff (~5%) was currently based in Wales. It was therefore of the opinion that it would not be reasonable and proportionate to ask all individuals whether they wished to receive the documents described by the standards in Welsh. However, it confirmed that it would be able to provide that documentation in Welsh if an application was made by a member of staff. It noted that providing documents in Welsh on an 'on demand' basis would be the most reasonable and proportionate method.

In further considering the requirements of standards 99-104, it noted that technical restrictions prevented it from fully complying with the requirements at present. It added that the cost implications associated with developing bilingual human resources systems to enable compliance would not be proportionate to the likely demand. It emphasized that forcing the organization to introduce changes to all its human resources administration processes would contribute towards placing it under substantial competitive disadvantage compared to its peers, and that disproportionate and unnecessary intervention in this area should not be considered.



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Royal Mail plc considered that it would be reasonable and proportionate to publish the documents noted in standards 105-11 in Welsh based on the demand from staff only.

### **Standards relating to complaints made by a member of a body's staff [112-115]**

In analysing the current Welsh language scheme commitments of the person in question, the commitments did not correspond to the standards relating to complaints made by a member of a body's staff.

The evidence showed that Royal Mail plc did not currently comply with the requirements of standards 112-115.

It did not consider that making the standards in question specifically applicable to it would be reasonable and proportionate. It was of the opinion that it would be unreasonable and disproportionate to intervene formally in the human resources processes of a private company such as Royal Mail plc, and that the most reasonable way of providing these services in Welsh would be on the basis of the demand from staff.

Despite the above, it noted that it facilitated discussion and solved any matter involving the Welsh language in the workplace, where practically possible. It also noted that should a Welsh-speaking employee wish to discuss a matter with a Welsh-speaking manager, it would be reasonable to assume that a meeting could be held in Welsh.

### **Standards relating to a body disciplining staff [116-119]**

In analysing the current Welsh language scheme commitments of the person in question, the commitments did not correspond to the standards relating to a body disciplining staff.

Evidence was provided that suggested that its current practice was to comply with the requirements of standard 116 only.

It did not consider that making the standards in question specifically applicable to it would be reasonable and proportionate. It was of the opinion that it should implement the requirements of the standards in question on the basis of the demand from staff, and so it did not believe it would be reasonable and proportionate to intervene in the company's human resources processes in this case. Despite the above, it noted that it would be reasonable and proportionate to hold meetings in Welsh if all staff associated with that meeting could speak the language.

### **Standards relating to a body's information technology and support materials provided by a body, and relating to the intranet [120-126]**

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

Royal Mail plc did not consider that making the standards in question specifically applicable to it would be reasonable and proportionate.

In considering the requirements of standard 120, Royal Mail plc noted that it currently provided the Cysgliad grammar and spellchecker for the staff of the Welsh language contact centre in Bangor. However, it noted that implementing the standard across the company would be unreasonable and disproportionate.

Considering standards 121-126, it confirmed that it did not currently operate an intranet system that was available in Welsh. It was of the opinion that translating intranet pages

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into Welsh would be unreasonable and disproportionate, as only a very small percentage of its workforce had Welsh language skills.

### **Standards relating to a body developing Welsh language skills through planning and training its workforce [127-135]**

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 56% of the standards relating to a body developing Welsh language skills through planning and training its workforce.

Royal Mail plc confirmed that it assessed the Welsh language skills of its employees, as part of the interview process for posts with Welsh language requirements e.g. Head of External Communications Wales.

In considering standard 128, it noted that the training in question could be held in Welsh if all employees taking part could speak Welsh. It was noted that the standard in question should be relevant for the staff of the customer service centre in Bangor only.

It was noted that training for roles facing customers in the contact centre in Bangor was held in Welsh. However, it confirmed that it did not provide training in Welsh in the areas noted in standard 129 for all its staff in Wales, and neither did it provide opportunities for them to learn or improve their Welsh language skills in accordance with standards 130-131 at present.

Also, it was noted that it complied partially with the requirements of standard 132, due to the fact that its language policy manager worked with internal stakeholders across the organization to raise awareness of its current Welsh language provision.

It did not consider that making the standards in question specifically applicable to it would be reasonable and proportionate as it did not believe there should be intervention of this kind in relation to its business operations.

### **Standards relating to a body recruiting and appointing [136-140]**

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 38% of the standards relating to recruiting and appointing.

Royal Mail plc did not consider that making the standards in question specifically applicable to it would be reasonable and proportionate.

It was not obvious from the evidence whether Royal Mail plc had any formal methodology in order to come to a decision regarding including requirements relating to Welsh language skills when advertising a vacant or new post. However, it confirmed that it designated the Welsh language as an essential skill in some posts. More specifically, it noted that Welsh language skills were required for posts in the Royal Mail Welsh language customer service centre in Bangor as well as for the post of Head of External Communications, West.

It noted that the Welsh language contact centre in Bangor had been recruiting through agencies in recent years, mostly for temporary posts. It noted that the adverts for these posts were not available in Welsh on the website of the agencies in question. Also, it was confirmed that Royal Mail plc already published adverts bilingually, in the jobcentre or in local newspapers, for full-time contract posts located at the contact centre in Bangor. It

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noted that all recruitment documents noted in standard 137A were currently published in Welsh in relation to all posts in Wales.

It was not current practice to ask applicants in an application form whether they would like to have an interview in Welsh. However, it confirmed that all interviews were held through the medium of Welsh in relation to posts for which the Welsh language was designated as an essential skill, in order to ensure that the prospective applicants had the appropriate linguistic skills to carry out their duties.

### **Standards relating to signs displayed in a body's workplace [141-143]**

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 67% of the standards relating to signs displayed in a body's workplace.

It was noted that all the signs displayed within the person's buildings in Wales were in Welsh. It was confirmed that all the signs in Wales were placed so that the Welsh language text was likely to be read first or so that the Welsh language was not treated less favourably than English.

### **Standards relating to audio announcements and messages in a body's workplace [144]**

In analysing the current Welsh language scheme commitments of the person in question, the commitments did not correspond to the standard relating to audio announcements and messages in a body's workplace.

Royal Mail plc did not consider that making the standards in question specifically applicable to it would be reasonable and proportionate, as it is of the opinion that it does not make audio announcements and messages in the workplace.

### **Standards that deal with supplementary matters in relation to the operational standards [167-172]**

Royal Mail plc considered that making a selection of the standards in question specifically applicable to it would be reasonable and proportionate.

It noted that it would not be appropriate to provide a copy of the document recording the operational standards with which it was duty-bound to comply, in all offices that are open to the public.

Also, it was of the opinion that standards 168-169 and standard 171 should not be made specifically applicable to it, as it did not believe the requirements of a number of the associated operational standards were reasonable and proportionate.

### **Promotion standards [145-146]**

Royal Mail plc did not wish to consent to promotion standards being potentially applicable to it.

### **Record keeping standards [147-154]**

In analysing the current Welsh language scheme commitments of the person in question, on average the commitments corresponded, whether partly or in full, to 88% of the standards relating to record keeping by a body.

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Royal Mail plc confirmed that it was already operating some of the requirements attached to the record keeping standards, such as keeping a record of complaints received, and that making a selection of these standards specifically applicable to it would be reasonable and proportionate.

However, concerns were expressed regarding the record keeping standards that were dependent on other standards. based on the fact that it did not consider that making those associated standards specifically applicable to it would be reasonable and proportionate. With this in mind, Royal Mail plc did not consider that making these standards specifically applicable to it was reasonable and proportionate either.

### **Standards that deal with supplementary matters in relation to the record keeping standards [175-176]**

Royal Mail plc noted that it complied with the majority of the requirements attached to these standards and that it considered that making them specifically applicable to it was reasonable and proportionate. However, it was not of the opinion that providing a copy of a document recording the record keeping standards with which it will be duty-bound to comply, in all its offices that are open to the public was reasonable and proportionate. No specific reasons for this were provided.

## 5 Evidence received from members of the public

172 responses were received from members of the public to the standards investigations carried out by the Welsh Language Commissioner in relation to persons within this standards report. 94 responses to the standards investigation were received by individuals who chose to complete the questionnaire provided for them by the Welsh Language Commissioner on the website.

A further 78 responses were received based on a template of a standard response published by Cymdeithas yr Iaith Gymraeg; in this case, all of the responses were the same. In six cases, responses were received from individuals twice. Two responses were received from other organizations or movements.<sup>4</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 where the respondents came from according to their group and geographical location.

**Figure 1** Number of responses to the standards investigation by location<sup>5</sup>

Locations	Number	Percentage (%)
Swansea	8	5%
Blaenau Gwent	0	0 %
Vale of Glamorgan	10	6%
Caerphilly	5	3%
Newport	1	1%
Neath Port Talbot	2	1%
Ceredigion	18	10%
Conwy	9	5%
Cardiff	17	10%
Gwynedd	35	20%
Merthyr Tydfil	2	1%
Bridgend	1	1%
Powys	5	3%
Rhondda Cynon Taf	3	2%
Pembrokeshire	4	2%

<sup>4</sup> A list of those movements/organizations has been included within Appendix B of the standards report.

<sup>5</sup> These statistics include all the responses received via the questionnaire, as well as Cymdeithas yr Iaith Gymraeg's template.

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Denbighshire	10	6%
Monmouthshire	2	1%
Carmarthenshire	4	2%
Flintshire	4	2%
Torfaen	2	1%
Wrexham	8	5%
Isle of Anglesey	13	8%
Outside Wales	5	3%
No information	4	2%
<b>Total</b>	<b>172</b>	<b>100%</b>

### The public's response to the standards investigation carried out in relation to Public Bodies: General (5)

#### Service delivery standards

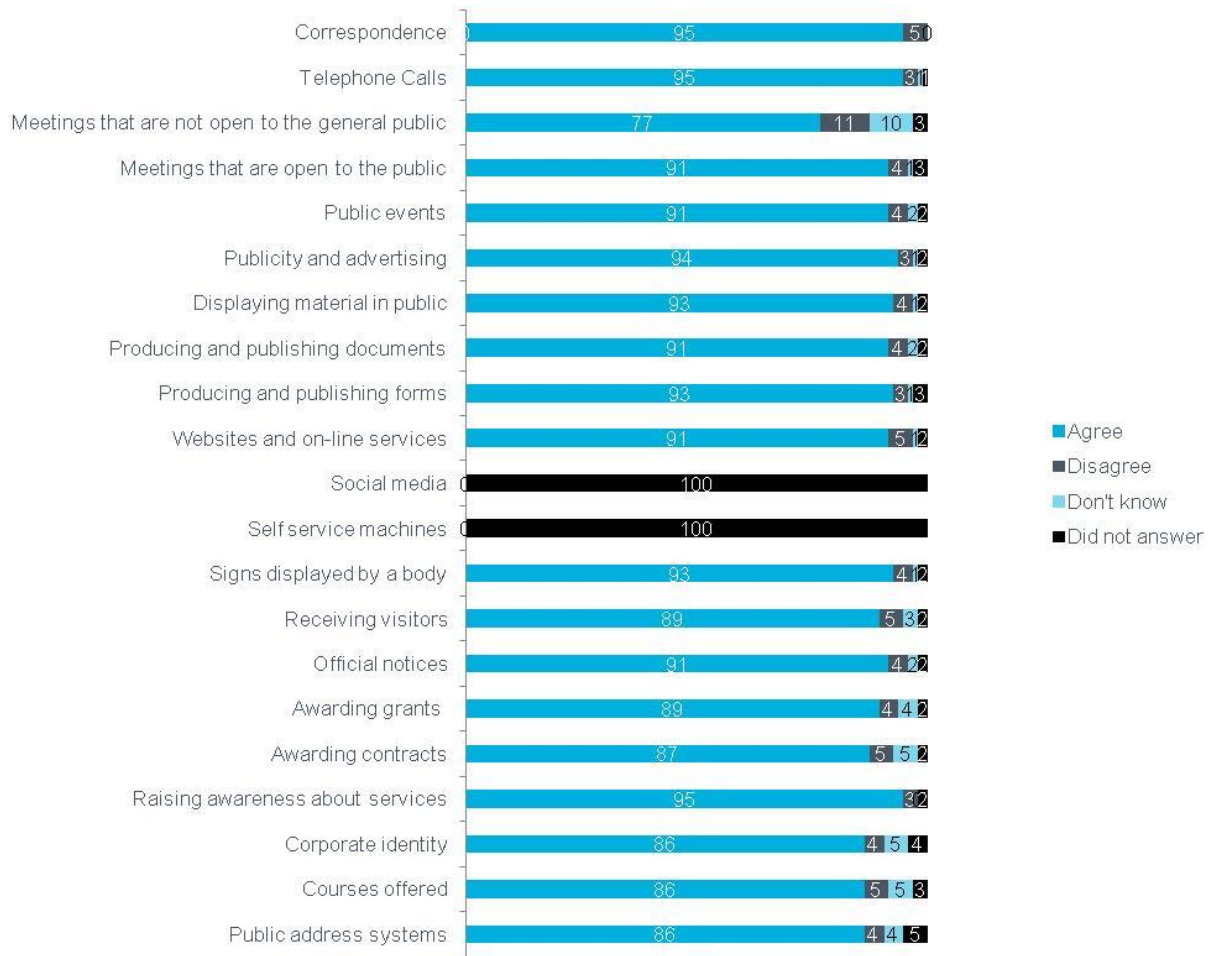
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the service delivery standards, they were asked to respond to the following question for each activity:

Do you agree or disagree that the organizations in question should carry out 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, the public were given the opportunity to respond per activity within the scope of the service delivery standards.

Figure 2 indicates the variety of the responses received.

Figure 2 Response to question 1 of the questionnaire – Service delivery standards<sup>6</sup>



### 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:

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?

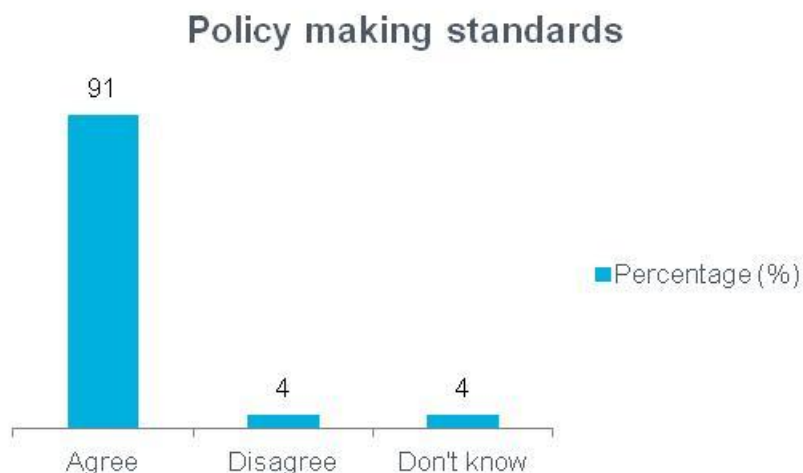
Of the 94 that responded via the questionnaire on the Welsh Language Commissioner's website, 97% (91) had answered this question. Of the 91 that responded, 91% (83) agreed with the above.

The figure below indicates how members of the public responded to this question:

<sup>6</sup> Questions were not asked in relation to social media nor self-service machines.



Figure 3 Response to question 3 of the questionnaire – Policy making standards<sup>7</sup>



### Operational standards

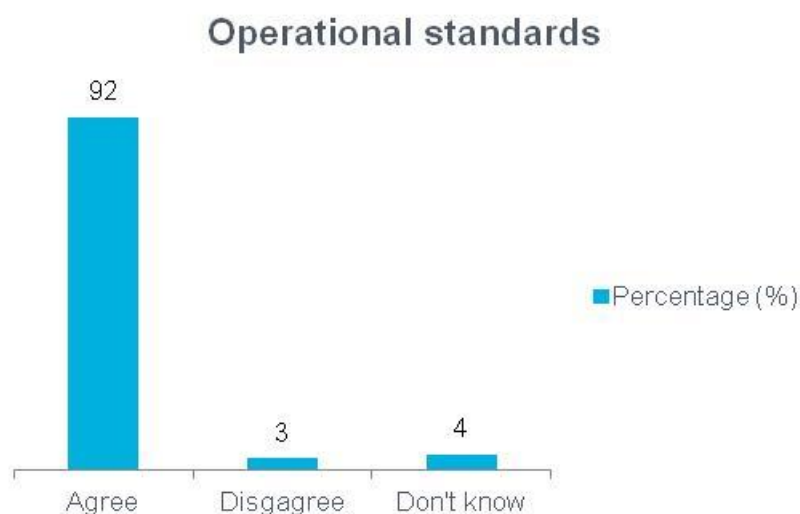
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the operational standards, they were asked to respond to the following question:

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 94 that responded via the questionnaire on the Commissioner's website, 98% (92) had answered this question. Of the 92 that responded, 92% (85) agreed with the above.

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>8</sup>



<sup>7</sup> Note that these statistics relate to the respondents who answered this question.

<sup>8</sup> Note that these statistics relate to the respondents who answered this question.

### Record keeping standards

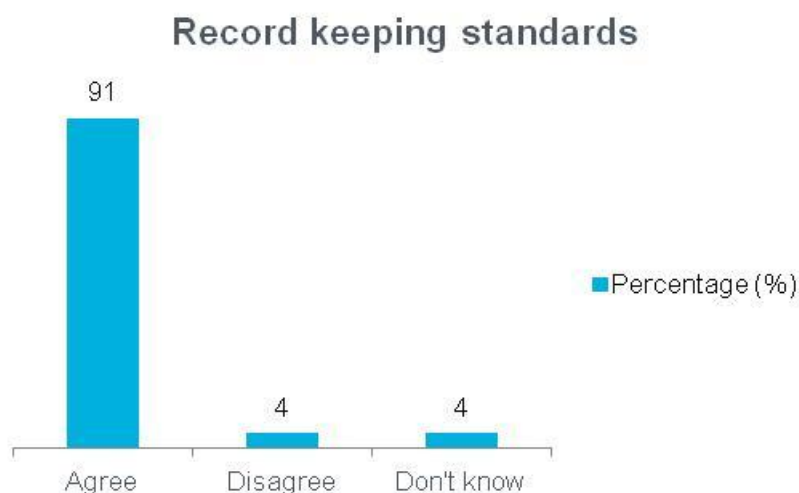
In seeking the public's opinion regarding the reasonableness of the requirements attached to the record keeping standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the organizations in question should have to keep a record of how they adhere to the Welsh language standards and keep a record of complaints?

Of the 94 that responded via the questionnaire on the Welsh Language Commissioner's website, 98% (92) had answered this question. Of the 92 that responded, 91 % (84) agreed with the above.

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>9</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 in question, together with any further comments relevant to this standards investigation.

Of the 94 that responded via the questionnaire on the Commissioner's website, 54% (51) provided additional comments to be considered by the Welsh Language Commissioner as part of the standards investigation.

<sup>9</sup> Note that these statistics relate to the respondents who answered this question.

Figure 6 Further comments provided by members of the public



As with the previous rounds, the responses received were generally supportive of the idea of introducing standards, in order to ensure clear rights for Welsh speakers in relation to the Welsh language services provided by all the organizations included in round 3.

Once again, the public expressed a great desire to ensure that the standards introduced are clear, robust and user-friendly. This was echoed by comments stating that this is the only way of ensuring that Welsh speakers' rights are protected.

Outlined below are the main themes of the responses received in favour of making the standards specifically applicable:

- The need to ensure that all organizations delivering services in Wales are subject to the requirements of the Welsh Language Measure (Wales) 2011, thereby avoiding possible inconsistencies created by implementing two statutory regimes.
- The need to ensure that standards ensure that Welsh language services are provided as default, ensuring that the notion of a proactive offer is consistent at all times.
- Ensure that the process of awarding or dealing with a tender or contract does not override the need to impose Welsh language conditions on the grants/contracts distributed by organizations included in round 3.
- The need to ensure that standards in relation to face to face services go beyond the main reception areas and pre-planned personal meetings.
- The need to ensure that the definition of personal meetings includes all face to face contact.
- The need to specify a standard that imposes clear requirements for organizations' recruitment policies.

Some responses were received from members of the public expressing general opposition to 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 in Wales.
- Prioritise other policy areas over the Welsh language.
- The relevance of the Welsh language in Wales.
- Disagreement with the requirement that Welsh should appear or be published first.
- The bureaucracy of the requirements.

### Service delivery standards

A number of responses were received stating that all of the organizations in round 3 should correspond with the public in Wales in Welsh. Some respondents went on to state the importance of ensuring that Welsh addresses and forms are used when corresponding with an individual in Welsh. They believed that this would be a significant step towards promoting the language and encouraging citizens to use the Welsh place names.

One respondent believes that housing associations' Welsh correspondence to tenants is patchy and that there is a need to impose clear duties on them in that regard. Likewise, some referred to the importance of imposing these duties on the postal services. However, one respondent believed that the standards as drafted were impractical in areas where Welsh is the majority language. Likewise, some comments were received stating that the Welsh service should only be provided on request, due to environmental and economic reasons.

When considering the standards relating to public meetings or events, a significant number of respondents felt that it should be ensured that Welsh speakers have the right to express themselves in Welsh and that it therefore should be ensured that there is a requirement to provide simultaneous translation services or conduct the meeting in Welsh. Others believed that such a service should be ensured when there was sufficient demand for it.

Concerns were expressed regarding the scope of the standards relating to meetings between a body and an individual, with regard to counter services provided in post offices. This respondent would like to see Welsh Ministers ensure that those services are included within the definition.

The importance of ensuring a complete reception service in Welsh was emphasised. Some expressed frustration with the service provided at present, with a number of reception areas providing greetings in Welsh but failing to deal fully with enquiries. Others believed that this requirement could pose a significant challenge to a number of organizations who operate a number of reception areas outside their main reception. These comments were echoed in relation to the phone service provided by a number of the organizations in round 3.

In the context of the standards relating to producing documents and forms, a number of respondents considered it to be more than reasonable to expect the organizations in round 3 to ensure that those publications are available in Welsh. One respondent went on to state that documents and forms may now be published as bilingual on-line documents only, thereby ensuring that production costs are significantly lower. However, others felt that strong emphasis should be placed on prioritisation here, based on the target audience, and others felt that these documents should only be produced in Welsh on request.

A number of responses were received from the public highlighting the importance of ensuring that the organizations in question provide bilingual signs at all times. Some of those respondents went on to state the importance of ensuring that the Welsh language was given priority, in order to ensure linguistic consistency across Wales. However, some comments were received against adopting such an approach, in order to avoid confusion for non-Welsh speakers and visitors to Wales.

With regard to websites and on-line services provided by round 3 organizations, there was broad support in general for bilingual websites, given the increase in services offered

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through this medium by now, with some cases where those services are only available through that medium.

Some went on to discuss the problems caused when organizations use the Royal Mail Group's address file, due to the lack of consistency in that database in terms of Welsh place names. This means that a number of forms or letters received by them have English only addresses meaning that they do not comply with the standards.

### Policy making standards

A number of respondents emphasised that the policies of the organizations in question should adhere to the principle of equality, ensuring that they employ sufficient Welsh speakers to be able to provide services in that language.

### Operational standards

Evidence was received from many who felt that it was entirely reasonable and proportionate for the highest level of operational standards to be imposed on those bodies in round 3, given that these bodies receive significant public money or are companies that should operate for the benefit of the public.

However, one respondent believed that the operational standards as drafted for the first round did not achieve the objective of ensuring that more organizations work internally in Welsh only.

### Record keeping standards

A number of comments were received supporting the need for organizations to keep records, in order to be able to monitor and examine compliance with the other standards. However, some believed that elements of the requirements were bureaucratic for organizations that are administrated internally through the medium of Welsh, whilst others felt that record keeping is not an effective way to improve the quality and range of Welsh medium services.

## 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) of the Welsh Language (Wales) Measure 2011.

The responses received from the Panel showed support for the purpose of the regulations, namely to realise the fundamental objectives of the Welsh Language (Wales) Measure 2011: that Welsh is an official language in Wales and that it should not be treated less favourably than English.

Recognising the concerns which will exist amongst those regulated by the Welsh Language Commissioner, emphasis was placed on ensuring that everyone understands the requirements of the Welsh Language (Wales) Measure 2011; the Legislation which gave rise to these standards.

Similar to that noted in relation to those persons subject to a standards investigation in round 2, the Panel believe that consideration should be given to how certain standards will be implemented in a 'reasonable and proportionate' manner when setting the requirements in compliance notices under section 44 of the Measure.

That was supported, noting that reasonableness and proportionality could be considered in one of two ways, namely: setting different standards for persons in different parts of Wales reflecting the linguistic nature of relevant areas or setting common standards across Wales, with different imposition dates for complying with a standard or standards e.g. when an element of staff training is needed in order to comply with a standard, allowing more time for compliance compared to those where appropriate staff resources are available.

Some Panel members believe that standards should be implemented in accordance with different areas' language patterns. UK Government bodies were mentioned specifically here. Once again, emphasis was placed on ensuring that any requirements imposed on similar persons should identify those circumstances where they will be expected to comply with a standard or standards.

In considering the activities related to service delivery standards, specific reference was made to education courses offered to the public, noting that they believe that there should be a needs assessment, examining any content-related gaps, before requiring a person to meet the requirement.

## 7 Conclusions of the standards investigation

### General comments

The following conclusions were reached on the basis of the evidence received by the relevant person, the public and the Advisory Panel on the standards investigation, in addition to independent evidence collected by the Welsh Language Commissioner in relation to the relevant person's Welsh language scheme.

It is noted in the Explanatory Memorandum of the Welsh Language (Wales) Measure 2011 that one of the main objectives of the Legislation is to build on and modernise the system of schemes created under the 1993 Act. Similarly, it is noted that the aim of the Welsh Government in Legislating was to ensure better consistency between persons, especially between those in the same sector, in terms of providing Welsh language services.

Similarly, we note 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 person if and to the extent that the person 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 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 accordance with the above, if the standards investigation identifies that a person carries out the activity<sup>10</sup>, be that to a lesser or a greater extent, the Welsh Language Commissioner will conclude that all standards relating to that activity should be made specifically applicable to them. 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.

We also note that the way in which a service is delivered under an activity can change in the future and that it would be necessary to adapt to reflect that by varying the compliance notice, rather than going back to regulations.

However, where evidence exists that a person does not undertake 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>10</sup> A service delivery activity as defined in section 28 of the Welsh Language (Wales) Measure 2011.



## **Standards which should be made specifically applicable to Public Bodies: General (5) (Royal Mail plc)**

As noted in section 4 of this standards report, as part of its response to the standards investigation the person in question noted that its legal status had changed since the Welsh Language (Wales) Measure 2011 was approved.

These changes mean that it is no longer responsible for Post Office Ltd, and therefore has fewer staff and operations serving the public in Wales than when the Measure was approved, together with its current language scheme, in 2011. It added that the name listed in Schedule 6 of the Measure (“Royal Mail Group plc”) had changed to “Royal Mail plc”, with “Royal Mail Group Limited” as that person's main commercial body.

It noted also that it is no longer a public body like the other bodies named in Schedule 6 of the Measure, following these changes. Also, it added that its functions in terms of providing services to the public had not been given to it or imposed upon it through enactment in accordance with Column 1 (4) Schedule 5 of the Measure. Rather, it noted that the postal services regulator Ofcom had imposed specific regulatory conditions upon it in 2012 under the Postal Services Act 2011.

Considering the change in the status of the person in question since the Welsh Language (Wales) Measure 2011 was approved, by formulating the conclusions below the Welsh Language Commissioner has executed her functions on the basis of the evidence of the person in question and on the contents of Schedule 6 of the Measure, which was current when this standards investigation was being carried out.

However, it should be noted that there is a category of person in Schedule 8 of the Measure which deals with qualifying persons providing postal services to the public. Also, it should be noted that the standards corresponding to some of the current statutory language scheme commitments of Royal Mail plc in relation to internal operations, such as dealing with linguistic matters in the areas of recruitment and appointment together with developing Welsh language skills through planning and training its workforce, would not be potentially applicable to it if considered as part of Schedule 8 of the Measure rather than as part of Schedule 6.

Should Welsh Ministers conclude that the person in question should be within Schedule 8 of the Measure, there is a risk that current commitments that correspond to the operational standards are lost as standards replace the person’s statutory language scheme. Should Royal Mail plc’s entry within the Measures change, consideration will need to be given as to how to deal with any such gaps.

In light of the information above, it is a matter for Welsh Ministers to consider whether Royal Mail plc should continue to be a person named within Schedule 6 of the Welsh Language (Wales) Measure 2011.

### **Service delivery standards**

Having undertaken this standards investigation, and on the basis of the evidence received, the Commissioner concludes that Royal Mail plc should be able to deliver services in respect of the relevant activities.

Once again, the Commissioner wishes to note the importance of clear differentiation between the commitments of the organization (what is expected of them) and performance (to what extent they currently comply with those expectations). All Welsh language schemes carry the full authority of the organization in agreeing upon their content. Not specifying equal standards, and making them specifically applicable to the persons in question would be a step back, and would be contrary to the intention of the Welsh Language (Wales) Measure 2011.

It is noted that performance, together with the degree to which an organization can comply with a standard at a specific period in time, are practical matters. Those degrees may improve, deteriorate or remain the same. The Welsh Language Commissioner is of the opinion that commitments should meet the needs of the Welsh language users they serve, with a reasonable timetable specified for dealing with any existing obstacles. The Welsh Language Commissioner will consider those obstacles when determining the content of a compliance notice issued under section 44, Welsh Language (Wales) Measure 2011.

Although some examples of lack of compliance, or concerns regarding some requirements attached to the service delivery standards were received, Royal Mail plc on the whole considered that it would be reasonable and proportionate to make the standards specifically applicable to it, or that it already carried out the relevant activity in Welsh.

**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 Royal Mail plc:**

- **correspondence sent by a body**
- **telephone calls made and received by a body**
- **a body holding meetings that are not open to the general public**
- **meetings arranged by a body that are open to the public**
- **a body's publicity and advertising**
- **a body displaying material in public**
- **a body producing and publishing documents**
- **a body producing and publishing forms**
- **a body's websites and on-line services**
- **a body's use of social media**
- **signs displayed by a body**
- **a body receiving visitors at its buildings**
- **official notices made by a body**
- **a body's corporate identity.**

Royal Mail plc noted that it does not hold public events. However, due to the nature and functions of the person, along with its aims and objectives, the Welsh Language Commissioner concludes that this may be a relevant activity to Royal Mail plc. Also, there are commitments in the language scheme of the person in question which correspond, whether partly or in full, to 50% of the standards that are relevant to the activity in question, to the extent that material is displayed publicly in bilingual form.

**Conclusion 2:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for the service delivery standards in relation to the activity below to be specifically applicable to Royal Mail plc, should Welsh Ministers be of the opinion that it is an activity which the person could undertake currently, or in the future:

- public events organized or funded by a body.

Royal Mail plc noted that it does not provide self service machines, and that it had no plans to introduce them at present. However, considering the nature and functions of the person, along with its aim and objectives, the Welsh Language Commissioner concludes that this may be a relevant activity to Royal Mail plc in the future.

It is also noted that the way in which a service is provided in relation to an activity may change in the future and that it would be possible to adjust to reflect that by varying the compliance notice, rather than going back to regulations.

**Conclusion 3:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for the service delivery standards in relation to the activity below to be specifically applicable to the Royal Mail plc, should Welsh Ministers be of the opinion that it is an activity which the person could undertake currently, or in the future:

- self service machines.

Royal Mail plc noted that it did not award grants. Due to the nature and functions of the person in question, as well as its aim and objectives, and the Commissioner's independent research, the Commissioner concludes that this may be an activity that is relevant to it. The Commissioner notes that Royal Mail operates an in house charity which awards grants to former employees, and also awards grants to staff to assist them with fundraising activities.

Also, there are commitments in the language scheme of the person in question which correspond, whether partly or in full, to 17% of the standards that are relevant to the activity in question.

The Commissioner will establish clarity on the nature of this activity when determining the content of a compliance notice under section 44, 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 Royal Mail plc:

- a body awarding grants.

Royal Mail plc noted that it did not award contracts. However, it is reasonable for the Welsh Language Commissioner to conclude that persons have agreements and contracts in place, in order to assist their administration. The Commissioner also notes that a person may procure external services in order to ensure compliance with other standards, for example in relation to translation services.

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Also, there are commitments in the language scheme of the person in question which correspond, whether partly or in full, to 17% of the standards that are relevant to the activity in question.

**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 the Royal Mail plc:

- a body awarding contracts.

Royal Mail plc noted that it does not raise awareness regarding the Welsh language services it provides. As already noted, one of the main objectives of the Welsh Language (Wales) Measure 2011 was to modernize and build on the system of language schemes created under the 1993 Act. It should be noted that the 1993 Act notes that Welsh language schemes must set down in what ways persons will ensure publicity for the scheme, and that this measure is not an optional element within the legislation. It would therefore be a backward step if the corresponding standard were not made specifically applicable to all persons that come under the standards system.

**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 Royal Mail plc:

- raising awareness about Welsh language services provided by a body.

Royal Mail plc noted that it does not provide courses. Due to the nature and functions of the person in question, as well as its aim and objectives, the Welsh Language Commissioner concludes that this activity is not relevant to it.

**Conclusion 7:** The Welsh Language Commissioner concludes that Welsh Ministers should not ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to Royal Mail plc:

- courses offered by a body.

Royal Mail plc noted that it did not use public address systems, adding that the activity was not relevant to it. The Welsh Language Commissioner is of the opinion that persons may undertake other service delivery activities that are likely to have public address systems associated with them: for example meetings that are open to the public or public events. Therefore, the Welsh Language Commissioner concludes that this may be a relevant activity for Royal Mail plc.

**Conclusion 8:** 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 Royal Mail plc:

- public address systems used by a body.

## **Policy making standards**

Royal Mail plc noted that it did not consider that it would be reasonable and proportionate to make these standards specifically applicable to it as it does not create policies like the kind of policies foreseen in the standards, and as the standards are not relevant to its remit. Similarly, Royal Mail plc noted that it does not possess a policy on awarding grants.

The Commissioner believes that organizations operating in Wales should consider the effect their policies may have on the Welsh language and how policies can be created that aspire towards the aim of ensuring one or more of the following outcomes noted in the Welsh Language (Wales) Measure 2011.

That the person making the policy decision considers what effects, if any, (whether positive or adverse) the policy decision would have on —

- (a) opportunities for other persons to use the Welsh language, or
- (b) treating the Welsh language no less favourably than the English language.

The second of those results is that the person making the policy decision considers how the decision could be made so that the decision has positive effects, or increased positive effects, on —

- (a) opportunities for other persons to use the Welsh language, or
- (b) treating the Welsh language no less favourably than the English language.

The third of those results is that the person making the policy decision considers how the decision could be made so that the decision does not have adverse effects, or has decreased adverse effects, on —

- (a) opportunities for other persons to use the Welsh language, or
- (b) treating the Welsh language no less favourably than the English language.

Having conducted this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that policy decisions of Royal Mail plc should enhance the opportunities available for persons to use the Welsh language and ensure that Welsh is not treated less favourably than English.

The Commissioner's reasons for reaching this conclusion are that organizations are already expected to assess the linguistic implications of new policies and initiatives during the process of creating and reviewing them. The required measures that are a basis for the content of Welsh language schemes can be seen in the form of statutory guidelines approved before the House of Commons (Guidelines for the Form and Content of Language Schemes were approved by the UK Parliament on 19 July 1995). Those guidelines note that organisations should be required to specify the measures they propose to take when assessing the impact of new policies, strategies and initiatives and their implementation.

The Commissioner emphasizes that a policy decision includes, amongst other things (and as appropriate to the body), decisions regarding –

- a) the content of legislation
- b) exercising statutory powers
- c) the content of policy statements
- ch) strategies or strategic plans



d) internal structures.

To this end, it is vital to consider the effect on the Welsh language in undertaking any one of these policy decisions.

It is acknowledged that matters have been highlighted regarding the relevant person's ability to comply with all the requirements of the policy making standards. The Welsh Language Commissioner will give further consideration to these circumstances when determining the content of a compliance notice under section 44, Welsh Language (Wales) Measure 2011.

**Conclusion 9: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for policy making standards to be specifically applicable to Royal Mail plc.**

### **Operational standards**

Section 30 Welsh Language (Wales) Measure 2011, notes that the meaning of operational standard is:

- a standard that is intended to promote or facilitate 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 a member of staff can use the Welsh language in carrying out relevant activities with others. This may mean with the public in Wales, or with another relevant person. Also, not making the operational standards specifically applicable to Royal Mail plc would mean that the Commissioner would not have power, by imposing standards, to ensure that members of staff could use the Welsh language in their day to day work.

Royal Mail plc was of the opinion that it would not be reasonable and proportionate to make seven of the eight relevant activities, which come under the operational standards, specifically applicable to it. One of the main reasons consistently provided for this was that its Welsh language provision should be based on the demand from staff. Evidence demonstrates that a complex variety of reasons affect the demand made for Welsh language services, including lack of access, prominence and the availability of current provision. It should be noted that the Welsh Government Explanatory Memorandum to the Welsh Language Standards Regulations (Number 1) Wales 2015 refers to evidence showing that it may be necessary to encourage users to use services in Welsh if they had previously used them in English. Also, it is noted that evidence suggests that more use is made of a service in a minority language if that service is offered, rather than the user having to request it. It is noted that the principle of the proactive offer also applies to an organization's staff through the operational standards.

The Welsh Language Commissioner acknowledges that some elements associated with the operational standards are new to Royal Mail plc. In the same vein, some examples were received where no arrangements currently exist to ensure full compliance with the requirements. The Welsh Language Commissioner will give further consideration to this when determining the content of a compliance notice under section 44, Welsh Language

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(Wales) Measure 2011. In considering this, it is possible that more time will be needed in order to ensure full compliance with the requirements.

Despite the above, it should be noted that a number of the requirements are things which Royal Mail plc is expected to undertake under its Welsh language scheme. In analysing its current commitments, it is evident that it is already committed, either partly or in full, to provide in accordance with four of the eight relevant activities that come under the operational standards. These include dealing with linguistic matters in the areas of recruiting and appointing as well as developing skills in the Welsh language by planning and training its workforce. It is therefore concluded that it is reasonable for it to have to comply with requirements that correspond to the present provision.

In relation to those elements that are not part of its Welsh language scheme, or that are not currently operational, the Welsh Language Commissioner concludes that allowing it sufficient time to achieve this new policy aim, as well as the contents of other mitigating measures in a compliance notice, where appropriate, would be reasonable and proportionate.

If Royal Mail plc carries out any relevant activity noted in the operational standards, be that in Welsh or in English only at present, it is concluded that the standards associated with those activities should be specifically applicable to it.

**Conclusion 10: 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 Royal Mail plc:**

- standards relating to the use of the Welsh language within a body's internal administration
- standards relating to complaints made by a member of a body's staff
- standards relating to a body disciplining staff
- standards relating to information technology and about support materials provided by a body, and relating to the intranet
- standards relating to a body developing Welsh language skills through planning and training its workforce
- standards relating to a body recruiting and appointing
- standards relating to signs displayed in a body's workplace

Royal Mail plc noted that it does not make any audio announcements and messages in the workplace at present. This was reinforced by analysing commitments in its current Welsh language scheme. It has already been noted that the way in which a service is provided in relation to an activity may change in the future and that adjusting to reflect that by varying the compliance notice would be a much easier method than going back to regulations.

Considering the above, together with the nature of the relevant activity in question, the Welsh Language Commissioner concludes that this may be a relevant activity which Royal Mail plc may undertake in the future. The Welsh Language Commissioner will consider the degrees to which it makes audio announcements and messages in the workplace, as well as to what degree it should make them in Welsh in deciding on the content of a compliance notice 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 the operational standard in relation to the matter below be specifically applicable to Royal Mail plc, should Welsh Ministers be of the opinion that it is an activity which the person could undertake currently or in the future:

- standards relating to audio announcements and messages in a body's workplace

### Promotion Standards

Royal Mail plc confirmed that it did not consent to promotion standards being potentially applicable to it.

### Record keeping standards

Having undertaken this standards investigation, and on the basis of the evidence received, the Welsh Language Commissioner concludes that Royal Mail plc should keep a record of how it adheres to the standards with which they are expected to comply, along with complaints. Under Welsh language schemes, the relevant person in question is required to stipulate the action to be taken in terms of publishing information on performance against statutory requirements. The evidence received confirmed this; the relevant person noted that the record keeping standards, in principle, and operational where relevant, were current practice.

**Conclusion 12:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for record keeping standards to be specifically applicable to Royal Mail plc.

### Standards that deal with supplementary matters

Other provisions in the Measure concern the monitoring arrangements and reporting requirements for the standards regime (Section 27 - Supplementary Provisions). Following approval of the 'Welsh Language Standards Regulations (Number 1) 2015' at a Plenary Session of the National Assembly for Wales on 24 March 2015, standards that deal with supplementary matters were specified under section 26 of the Measure.

The Welsh Language Commissioner notes that it is a requirement under Welsh language schemes to specify actions to be taken to publish information on the performance of the organization against the statutory requirements.

The Welsh Government's policy document, 'Inspection, Audit and Regulation'<sup>11</sup> explains that the role of inspectors is to 'independently verify, using professional expertise and legal power'. This is supported by the Crerar Report on inspection in Scotland which states that the role of external inspectors is to secure independent assurance that services are well managed and fit for purpose. According to Crerar, the five main principles of inspection are the need to focus on the public; independence; proportionality; transparency and accountability. Crerar's proposals are consistent with the Hampton principles which state that inspection should be based on risk; that inspections should not be conducted without reason and that regulators should be able to provide accessible and authoritative advice. Similarly, it is also recognized that inspection bodies cannot supervise everything service providers do. That is, service providers are increasingly expected to have robust internal

<sup>11</sup> <http://gov.wales/docs/dpsp/publications/inspectionpolicystatement/090930inspstatementen.pdf>

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audit and scrutiny arrangements in place. Furthermore, self-assessment is becoming an increasingly important part of external inspection arrangements.

**Conclusion 13:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for standards that deal with supplementary matters to be specifically applicable to Royal Mail ccc.

## 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 Measure:

- the relevant person
- Advisory Panel to the Welsh Language Commissioner
- 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>12</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>13</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 Measure.

The Rt Hon. Carwyn Jones AM, First Minister of Wales confirmed in a Plenary Meeting of the National Assembly for Wales on 20 October 2015 that it would not be possible to develop the third round of regulations before the end of this Assembly term, and therefore that would be a matter for the next Assembly.

As a result, there is no timetable for introducing regulations in relation to the person(s) that fall within this standards report.

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<sup>12</sup> Section 76(2)(a) Government of Wales Act 2006.

<sup>13</sup> <http://gov.wales/docs/legislation/guidance/091020riacodeen.doc>

## Appendix A – General comments received from members of the public in relation to round 3 of the standards investigations

As with the previous rounds, the responses received were generally supportive of the idea of introducing standards, in order to ensure clear rights for Welsh speakers in relation to the Welsh language services provided by all the organizations included in round 3.

Once again, the public expressed a great desire to ensure that the standards introduced are clear, robust and user-friendly. This was echoed by comments stating that this is the only way of ensuring that Welsh speakers' rights are protected.

Outlined below are the main themes of the responses received in favour of making the standards specifically applicable:

- The need to ensure that all organizations delivering services in Wales are subject to the requirements of the Welsh Language Measure (Wales) 2011, thereby avoiding possible inconsistencies created by implementing two statutory regimes.
- The need to ensure that standards ensure that Welsh language services are provided as default, ensuring that the notion of a proactive offer is consistent at all times.
- Ensure that the process of awarding or dealing with a tender or contract does not override the need to impose Welsh language conditions on the grants/contracts distributed by organizations included in round 3.
- The need to ensure that standards in relation to face to face services go beyond the main reception areas and pre-planned personal meetings.
- The need to ensure that the definition of personal meetings includes all face to face contact.
- The need to specify a standard that imposes clear requirements for organizations' recruitment policies.

Some responses were received from members of the public expressing general opposition to 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 in Wales.
- Prioritise other policy areas over the Welsh language.
- The relevance of the Welsh language in Wales.
- Disagreement with the requirement that Welsh should appear or be published first.
- The bureaucracy of the requirements.

### **Service delivery standards**

A number of responses were received stating that all of the organizations in round 3 should correspond with the public in Wales in Welsh. Some respondents went on to state the importance of ensuring that Welsh addresses and forms are used when corresponding with an individual in Welsh. They believed that this would be a significant step towards promoting the language and encouraging citizens to use the Welsh place names.

One respondent believes that housing associations' Welsh correspondence to tenants is patchy and that there is a need to impose clear duties on them in that regard. Likewise, some referred to the importance of imposing these duties on the postal services. However, one respondent believed that the standards as drafted were impractical in areas where Welsh is the majority language. Likewise, some comments were received stating that the Welsh service should only be provided on request, due to environmental and economic reasons.

When considering the standards relating to public meetings or events, a significant number of respondents felt that it should be ensured that Welsh speakers have the right to express themselves in Welsh and that it therefore should be ensured that there is a requirement to provide simultaneous translation services or conduct the meeting in Welsh. Others believed that such a service should be ensured when there was sufficient demand for it.

Concerns were expressed regarding the scope of the standards relating to meetings between a body and an individual, with regard to counter services provided in post offices. This respondent would like to see Welsh Ministers ensure that those services are included within the definition. Likewise, this respondent believed that services provided by water companies in customers' houses should fall within the scope of these standards.

The importance of ensuring a complete reception service in Welsh was emphasised. Some expressed frustration with the service provided at present, with a number of reception areas providing greetings in Welsh but failing to deal fully with enquiries. Others believed that this requirement could pose a significant challenge to a number of organizations who operate a number of reception areas outside their main reception. These comments were echoed in relation to the phone service provided by a number of the organizations in round 3.

In the context of the standards relating to producing documents and forms, a number of respondents considered it to be more than reasonable to expect the organizations in round 3 to ensure that those publications are available in Welsh. One respondent went on to state that documents and forms may now be published as bilingual on-line documents only, thereby ensuring that production costs are significantly lower. However, others felt that strong emphasis should be placed on prioritisation here, based on the target audience, and others felt that these documents should only be produced in Welsh on request.

A number of responses were received from the public highlighting the importance of ensuring that the organizations in question provide bilingual signs at all times. Some of those respondents went on to state the importance of ensuring that the Welsh language was given priority, in order to ensure linguistic consistency across Wales. However, some comments were received against adopting such an approach, in order to avoid confusion for non-Welsh speakers and visitors to Wales.

With regard to websites and on-line services provided by round 3 organizations, there was broad support in general for bilingual websites, given the increase in services offered

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through this medium by now, with some cases where those services are only available through that medium. Specific attention was drawn to the websites of organizations operating on a British level e.g. UK government departments operating within the gov.uk system.

This was reinforced by drawing attention to the fact that the Cabinet Office, a body which has responsibility for that system, cannot be required to comply with standards if Welsh Ministers have not received the consent of the Secretary of State. The respondents felt that this could cause major problems in the long run, with an individual's experience of a service dependent on which regime governs that organization. One respondent emphasised the importance of placing standards on non-devolved bodies and departments, in order to raise awareness of the status and importance of the Welsh language in service delivery.

Some went on to discuss the problems caused when organizations use the Royal Mail Group's address file, due to the lack of consistency in that database in terms of Welsh place names. This means that a number of forms or letters received by them have English only addresses meaning that they do not comply with the standards.

### Policy making standards

A number of respondents emphasised that the policies of the organizations in question should adhere to the principle of equality, ensuring that they employ sufficient Welsh speakers to be able to provide services in that language. One respondent referred specifically to housing associations, stating that they need to promote Welsh in the community.

### Operational standards

Evidence was received from many who felt that it was entirely reasonable and proportionate for the highest level of operational standards to be imposed on those bodies in round 3, given that these bodies receive significant public money or are companies that should operate for the benefit of the public.

However, one respondent believed that the operational standards as drafted for the first round did not achieve the objective of ensuring that more organizations work internally in Welsh only. Reference was made to Cartrefi Cymunedol Gwynedd Cyf as one prominent organization where that should happen automatically. The respondent went on to state that standard 136 should be revised to enable the Commissioner to impose a standard with an expectation that all posts advertised by them should be designated as Welsh essential posts, in order to uphold the current policy.

A similar comment was received from a member of the public regarding the need to ensure that the standards imposed on providers of social housing are the same as those imposed on local authorities. This would ensure the same level of service geographically.

### Record keeping standards

A number of comments were received supporting the need for organizations to keep records, in order to be able to monitor and examine compliance with the other standards. However, some believed that elements of the requirements were bureaucratic for organizations that are administrated internally through the medium of Welsh, whilst others felt that record keeping is not an effective way to improve the quality and range of Welsh medium services.

**Promotion standards**

Evidence was received stating the view that promotion standards should be made specifically applicable to Housing Associations, on the basis that they fulfil an important function for a large number of people, including many of the most vulnerable people in society. As a result, they believe that they had a prominent role in promoting and facilitating the use of Welsh in their communities.

Another respondent went on to state their surprise that not more bodies are subject to promotion standards, including providers of social housing; bodies who are in close contact with the community and who have a strong local influence.



## Appendix B – List of the respondents to the standards investigations

Below is a list of the relevant person 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 person

- Royal Mail plc

### Members of the public

- Aaron Jones
- Angharad Rhys
- Aled Cottle
- Aled Edwards
- Aled Lewis Evans
- Aled Powell
- Alfred S Nathan
- Alison Cummins
- Alwyn Gruffydd
- Andrew Shurey
- Anna Williams
- Annette Williams
- Anwen Evans
- Bedwyr Griffiths
- Ben Screen
- Bethan Rowlands
- Bethan Williams
- Bethan Wyn Jones
- Bob Gaffey
- Brian Dafis
- Bryn Moseley
- Carl Morris
- Carys Evans
- Catrin Stevens
- Cathryn Griffith
- Celt Roberts
- Cen Llwyd
- Ceri Owen
- Ciaran Spooner
- Colin Nosworthy
- Connor Keyes
- Curon Wyn Davies
- Cynghorydd Jeff Smith
- Dafydd Chilton
- Dafydd Frayling
- Dafydd Williams
- David Davies
- David Jones
- David Williams
- Delyth Wotherspoon
- Dorothy Williams
- Dr T H Thomas
- Eifion Glyn
- Eirian Conlon
- Elin Mair
- Enfys Jones
- Eurfyl Lewis
- Euros Jones
- Evie Wyn Jones
- Gareth Clubb
- Gareth Dobson
- Geraint Lovgreen
- Geraint Parri
- Gethin Kurtis Sugar
- Glenn Wall
- Goronwy Evans
- Gwen Bevan
- Gwydion Davies
- Gwyn Morris
- Huw Roberts
- Hynek Janoušek
- Iago ap Steffan
- Iago Sion
- Ifan Alun Puw
- Ifor Glyn Efans
- Iwan Standley
- Iwan Williams
- Jackie Owens
- James Merchant
- Jamie Bevan
- John Christopher Williams
- Jon Hicks

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- Jonathan Brown
- Judith Bartley
- Judith Griffith
- Julia Burns
- Kevin Williams
- Lauren Evans
- Lisabeth Miles
- Liz Saville Roberts
- Lleucu Roberts
- Llinos Parri
- Mair Nutting
- Manon Elin
- Manon James
- Manon Owen
- Mari Evans
- Mari Gwilym
- Mary Williams
- Meic Haines
- Meinir James
- Meirion Powell
- Menna Machreth
- Miriam Collard
- Mr K Jones
- Myrddin Williams
- Nest Efans
- Neville Evans
- Nia Lloyd
- Nia Wyn Jones
- Osian Rhys
- Paul Pritchard
- Petroc ap Seisyllt
- Randal Isaac
- Richard Vale
- Robat Idris
- Ruth Evans
- Ruth Williams
- Rhian Jones
- Rhiannon Mair
- Rhisiart Morgan
- Rhobet Williams
- Rhodri Glyn
- Rhys Llwyd
- Sandra McKenzie
- Sarah Parry
- Selwyn Lloyd - Jones
- Siân Cwper
- Siân Roberts
- Sion Morris
- Sion Pennant
- Siwan Evans
- Steffan Bryn
- Stephen Taylor
- Stephen Turner
- Stephen Vaughan Thomas
- Susan Jeffries
- Tegwyn Jones
- Tim Barrell
- Tudor Williams
- Thomas Gareth Jones
- Thomas Shaw
- Wendy Lewis
- William Schleising

### Organizations / Movements

- Cymdeithas yr Iaith Gymraeg
- Dyfodol i'r Iaith

### Welsh Language Commissioner's Advisory Panel

- Bethan Jones Parry
- Carl Cooper
- Dr Heledd Iago
- Meinir Davies
- Nick Speed