



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

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

Public Bodies: General (3)

[Ref: 20150529ASCCC(3) – 1]

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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, is to promote and facilitate the use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the Commissioner's work:

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

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

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

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

The Welsh Language Commissioner's standards investigations and the Welsh Government's evidence gathering exercise for composing their regulatory impact assessment are based upon draft regulations, published on 7 November 2014.

The Welsh Language Standards (No. 1) Regulations 2015³ came into force on 31 March 2015, following a debate and vote in a Plenary Meeting of the National Assembly for Wales.

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

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

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

2 Standards investigation in relation to Public Bodies: General (3)

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

- The Quality Assurance Agency for Higher Education
- Colleges Wales Ltd
- The Children's Commissioner for Wales
- The Commissioner for Older People in Wales
- The General Teaching Council for Wales
- The Higher Education Funding Council for Wales
- The Care Council for Wales
- Universities and Colleges Admission Service
- The National Institute of Adult Continuing Education
- The General Chiropractic Council
- The General Dental Council
- The General Medical Council
- The Nursing and Midwifery Council
- The General Optical Council
- The General Osteopathic Council
- The Health and Care Professions Council

An exploration notice was presented for the attention of the relevant persons on 31 October 2014. 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 each relevant person (whether or not the standards are already specified by the Welsh Ministers under section 26 (1)). The standards investigation period began on 17 November 2014. It ended on 6 February 2015.

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

A public questionnaire was placed on the Welsh Language Commissioner's website. The purpose of this questionnaire was to give members of the public an opportunity to identify what they felt was reasonable for the relevant persons to undertake and provide in Welsh, in considering the requirements related to the standards published on 7 November 2014. 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 Welsh Language (Wales) Measure 2011, the Commissioner must have regard to the need to secure that requirements for persons to comply with standards by virtue of section 25(1) are not unreasonable or disproportionate.

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

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

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

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

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

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

By making regulations under this Measure exercisable by statutory instrument, the Welsh Language Commissioner is 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.

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

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

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

The Welsh Language Commissioner's criteria

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

- Is the person liable to be required to comply with standards – does the relevant person come within Schedule 5 and also within Schedule 6, or within Schedule 7 and also within Schedule 8?
- Is the class of standards (service delivery; policy making; operational; record keeping; promotion) applicable to the relevant person?
- Does the person carry out the activity⁴ in question?
- Has the person already undertaken to provide the activity or action in question, in part or in full, through their Welsh language scheme?
- Does the person already provide the service in Welsh (whether this corresponds exactly to the requirements included in the standard or not), or carrying out the activity in accordance with the standard?
- Does the majority of other relevant persons within the same sector provide services in Welsh, or carry out the activity?
- Are there any other reasons for, or against, making the standard specifically applicable to the person?

⁴ This criterion will be considered in respect of service delivery standards only.

4 Evidence received from relevant persons

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

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

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

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

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

On 31 October 2014, the following relevant person did not have a Welsh language scheme that had been approved under section 14(1) of the 1993 Welsh Language Act:

- The General Chiropractic Council

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

The General Chiropractic Council

Service delivery standards

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They noted that it would be possible to comply with standards 1-7 in relation to members of the public in Wales. However, there was concern that specialist, legal or technical details would be lost in translating correspondence with members of the organization. It was also noted in relation to standards 6 and 7 that it would not be possible to ensure that Welsh and English copies of correspondence were delivered at the same time, and attention was drawn to circumstances in which it would not be possible to delay in order to translate an urgent document so as to carry out the function of protecting the public.

In general, they did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

It was stated that they did not have any members of staff who could speak Welsh. In addition, they noted that they had not received a call in Welsh for at least five years.

They acknowledged that it would be possible to comply with some of the standards in the context of telephone calls from members of the public from Wales, subject to the fact that there would be a delay whilst translation services were organised.

They noted that standards 15 and 22 would not be relevant as they did not have performance indicators in terms of dealing with telephone calls, or an automated telephone system.

In general, they did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

Activity 3: Meetings held by a body that are not open to the general public **Standards for meetings held by a body that are not open to the general public [23-29]**

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They were not of the opinion that the standards regarding meetings without the presence of an interpretation service would be reasonable or proportionate as they did not have any members of staff who could speak Welsh. However, it would be possible to comply with the standards where an interpretation service was present, as long as this involved meetings with members of the public in Wales, and that participants had stated beforehand that they wanted to speak Welsh. It was also noted that it would be possible to achieve standard 27C if the threshold were 60% rather than 30%.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

It was acknowledged that it would be possible for them to comply with standards 30-32 if they were relevant in Wales only and in the context of meetings with the public rather than specialist, legal or technical meetings.

They were of the opinion that holding meetings regarding these subjects in Welsh would make interpretation difficult. Also, evidence was received that the cost of interpretation services was difficult to justify if they had not been informed beforehand by attendees that they wished to speak Welsh at a meeting.

They noted that it would not be possible to comply with standard 34 as all the material was not available in Welsh. They went on to note that they already published two documents in Welsh, and that these documents were not downloaded from their website at all during 2014. This meant that they could not justify translating all their resources.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

Although they did not feel that making standards regarding this activity specifically applicable to them was reasonable and proportionate, there was a willingness to comply with the standards at meetings with members of the public in Wales only, and when participants had noted beforehand their choice to speak Welsh.

They also noted that it would be unreasonable and disproportionate for them to expect organisers of events to ensure that the Welsh language was not treated less favourably than English where they contributed less than 70% of the funding for an event.

Similarly, concern was expressed that some matters would be beyond their control, making compliance with standard 36 at all times impossible.

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

The General Chiropractic Council did not consider that making the standard in relation to this activity specifically applicable to them would be reasonable and proportionate as they were of the opinion that they did not carry out the activity.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They noted that they would be able to comply with standards 38 and 39 if they were restricted to materials targeted at members of the public in Wales. They noted that it would not be reasonable or proportionate for them to have to ensure that slides and other visual materials treated the Welsh and English languages equally. They noted that there was a risk of confusing participants, due to the complex and technical information often conveyed.

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, and did so in Welsh.

They considered that making standards relating to a body producing and publishing documents specifically applicable to them would not be reasonable and proportionate.

However, it was noted that they could meet some of the standards in relation to its interaction with the public in Wales. In considering standards relating to the translation of documents into Welsh, they felt that the cost of this work should be considered alongside other factors such as the present demand for documents in Welsh and the demand for example for Council papers to be as current as possible.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They considered that making the standards relating to a body producing and publishing forms specifically applicable to them would not be reasonable and proportionate.

However, it was noted that they could meet standard 50 in the context of forms targeted at the public in Wales. It was noted that it would not be possible to comply with standard 50B, due to the fact that there would be a delay in processing forms that needed to be translated. According to the evidence, this meant that it would be necessary to increase the time taken to process English forms in order to reflect this delay in relation to Welsh language forms. They stated that they would be able to satisfy standard 51.

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

The General Chiropractic Council noted that they carried out the activity in question, and did so in Welsh.

They did not publish apps, and so were of the opinion that standard 57 was unreasonable. It was noted that the financial demands and staff resources needed in order to make the necessary technical changes to their website, together with the low demand for the material already provided, made compliance with the other standards in their entirety

unreasonable and disproportionate. However, they were willing to comply partially with the majority of the other standards in relation to the material targeted at the public in Wales.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They were of the opinion that it would be unreasonable and disproportionate for them to display Welsh signs outside Wales. In terms of standard 59, they noted that it would be unreasonable and disproportionate to give priority to the Welsh language on signs displayed in Wales if the majority of people attending a meeting could not speak Welsh. However, they noted that it would be possible to comply with standards 58 (for signs displayed in Wales) and 60.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They noted that it would not be possible to comply with standards 61-66, due to the fact that they did not have the appropriate staff or facilities for receiving visitors, together with the fact that they did not receive visitors without an appointment.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

In general, they did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

The Council's observations in respect of this activity depended on the definition of official notices. However, it was acknowledged that it would be possible to comply with standard 67 for official notices relating to individuals or events in Wales.

In terms of standard 68, they noted that their policy was to put the English first on any official notices due to its public protection role. As a result, this standard was seen as unreasonable and disproportionate.

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

The General Chiropractic Council did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate as they were of the opinion that they did not carry out the activity.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They expressed concern regarding their ability to comply with the standards relating to this activity across the organization.

However, they acknowledged that it would be possible to comply with standards 74, 75 and 75A regarding tenders relating to Wales or Welsh matters specifically. They noted that a lack of Welsh speakers among their staff would make compliance with standard 76 impossible.

Similarly, they were of the opinion that satisfying standard 77 would be unreasonable and disproportionate as they did not have members who could speak Welsh, and also considering the associated costs of translation. They noted that any supplier applying for a contract would have to arrange their own translation service.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

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

They noted that it would be possible to comply with standards 79 and 80 in relation to services targeted at members of the public in Wales.

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

The General Chiropractic Council noted that they carried out the activity in question, but did not do so in Welsh.

They confirmed that it would be reasonable and proportionate for them to comply with this standard.

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

The General Chiropractic Council did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate as they were of the opinion that they did not carry out the activity.

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

The General Chiropractic Council did not consider that making the standard in relation to this activity specifically applicable to them would be reasonable and proportionate as they were of the opinion that they did not carry out the activity.

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

The Council noted that they did not carry out the activities in relation to standards 158, 159 (a) (ii) or 161. However, they acknowledged that it would be possible to comply with standards 159 (a) (i), (b) and (c) and 163.

Policy making standards [86-95]

The Council noted that the legislation specifying their remit required them to treat all UK countries with equality. In accordance with this, it would not be possible to favour Wales or Welsh speakers above others. They confirmed that they did not possess a policy for awarding grants, as they did not undertake the activity.

They noted that they did not commission or carry out research work on the effects of policy decisions on the Welsh language, as this would be outside their remit. They went on to note that policy making standards would conflict directly with the legislation that specifies their remit, and that making the standards in question specifically applicable to them would therefore be unreasonable and disproportionate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The General Chiropractic Council considered that making the standards dealing with supplementary matters in relation to the policy making standards specifically applicable to them would be unreasonable and disproportionate.

Operational standards [96-142]

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

In relation to standard 96, the General Chiropractic Council noted that it would be beyond their remit to implement such a policy. They did not provide documents or forms in relation to employment or performance management matters. However, they stated that they would be willing to comply with standards 97-102 as long as they related to members of staff who spent at least 80% of their time in Wales only, and when corresponding operational policies are created in English.

They noted that it would not be possible to publish the entire range of documents in question in standards 103-109 as it was only an absence from work policy that was being implemented. They went on to note that it would be unreasonable to expect this policy to be published in Welsh, as the organization did not employ any Welsh speakers when the

evidence was submitted.

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

The General Chiropractic Council noted that they did not at present implement the requirements of standards 110-113. They acknowledged that it would not be possible to comply with standard 111(b) as they did not employ any Welsh speakers.

However, they stated that it would be possible to comply with the other standards regarding complaints from staff as long as they related to members of staff who spend at least 80% of their time in Wales only.

Standards regarding a body disciplining staff [114-117]

They that it would not be possible to comply with standard 115(b) as they did not employ any Welsh speakers. However, they stated that it would be possible to comply with the other standards regarding a body disciplining staff as long as they related to members of staff who spend at least 80% of their time in Wales only.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

The General Chiropractic Council noted that they provided computer software for checking Welsh spelling and grammar to employees and workers. Welsh language interfaces were not provided due to cost. They also noted that there was a lack of demand for the materials in question as they had no employees who could speak Welsh. They noted that standards 119-124 were not relevant as the organization did not have an intranet.

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

The General Chiropractic Council did not assess the Welsh language skills of their employees. No official training was provided for all their staff in the areas specified by the relevant standards, with the exception of health and safety. Training is provided in other areas for individual members of staff as necessary, and this was provided through the medium of English. They confirmed that training on the Welsh language, or through the medium of Welsh would be provided if members of staff were required to speak Welsh as part of their role.

Standards regarding recruiting by a body [134-138]

The General Chiropractic Council noted that they conducted an assessment of the range of necessary skills when advertising new or vacant posts, and this included linguistic skills. Documents regarding the recruitment process are not provided in Welsh. When the evidence was submitted, there were no application forms which provided space for the applicant to note a desire to be interviewed or assessed through the medium of Welsh, or which noted that an application in Welsh would not be treated less favourably than an application in English.

Standards regarding signs displayed in a body's workplace [139-141]

The General Chiropractic Council confirmed that the signs displayed within the organization's buildings were not in Welsh.

Standards regarding audio announcements and messages in a body's workplace [142]

The General Chiropractic Council noted that it would be unreasonable and disproportionate to make standard 143 specifically applicable to them, as they did not make audio announcements in the workplace.

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

The General Chiropractic Council noted that they did not publish operational standards, and that it would therefore be unreasonable and disproportionate to impose these standards on the organization. However, they noted that it would be possible to comply with standards 170-175 as long as they were limited to their activities in the Welsh language.

Promotion standards [143-144]

The General Chiropractic Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

The General Chiropractic Council confirmed that they could comply with standards 145-157 and that making the record keeping standards specifically applicable to them would be reasonable and proportionate.

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

The General Chiropractic Council confirmed that they could comply with standards 178-179, and that making the supplementary matters specifically applicable to them would be reasonable and proportionate.

The General Dental Council

Service delivery standards

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language schemes of the person in question, an average of 43% of the commitments corresponded to the standards for correspondence sent by a body.⁵

On the whole, they considered that it would be unreasonable and disproportionate to make the standards relating to this activity specifically applicable to them. As they were a regulator across the UK, as well as due to reasons of cost, they were of the opinion that it would be disproportionate for them to have to comply fully with standards 3, 4 and 5. They noted that they could continue to provide correspondence in Welsh upon request, in accordance with their existing Welsh language scheme.

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for telephone calls made and received by a body.⁶

As a body located in London which operated across the UK, the General Dental Council considered that it would be unreasonable and disproportionate to make standards in relation to telephone calls specifically applicable to them. Also, they expressed concern regarding their ability to comply entirely with the requirements of standards 8, 10, 11, 16-20 and 22. They confirmed that it would be possible for them to continue to provide telephone services upon request.

Activity 3: Meetings held by a body that are not open to the general public **Standards for meetings held by a body that are not open to the general public [23-29]**

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.⁷

As a body located in London which operates across the UK, the General Dental Council considered that it would be unreasonable and disproportionate to make standards in

⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

relation to meetings held by a body that are not open to the general public specifically applicable to them.

In relation to standards 23 and 35b, they were not of the opinion that it was proportionate to expect them to provide services in Welsh without using translation services. In relation to standards 24 and 27, they considered that it was reasonable to provide services upon request. They did not believe it would be proportionate to expect them to hold meetings entirely through the medium of Welsh, or for them to have to recruit the necessary Welsh speakers to comply with this standard.

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 20% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.⁸

For meetings of their Council, for example, (which included both private and public items on the agenda), they would be willing to promote and provide Welsh language services upon request. They noted that it was very rare for the organization to receive requests for Welsh language services at present, and so it would be unreasonable to expect them to spend money on them unless a request had been received beforehand.

Activity 5: Public events organised or funded entirely by a body
Standards for public events organised or funded entirely by a body [35-36]

The General Dental Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public events organised or funded entirely by a body.⁹

The General Dental Council noted that they very rarely organised or funded public events. As with activity 4, a question was raised regarding the definition of 'public event', and it was inquired whether occasional consultation events with members or patients would come under the activity. However, they confirmed that they would offer the opportunity for attendees to speak Welsh upon request in any event, especially events arranged in Wales or for a Welsh speaking audience.

They did not consider that making the standards regarding this activity specifically applicable to them would be reasonable and proportionate.

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

The General Dental Council noted that they carried out the activity in question, and did so in Welsh.

⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.¹⁰

They noted that they rarely advertised their services, and they communicated mainly via their website, in correspondence and in publications such as the 'Smile' leaflet for patients. They confirmed that they would ensure that advertising and publicity activities in Wales were bilingual, in a manner that would treat the Welsh and English languages on the basis of equality.

They went on to note that they saw the standard as being unreasonable in its entirety, when considering press releases. Evidence was received that these were issued daily or weekly depending on the occasion, and that producing all these in Welsh would be disproportionate as only 5% of the 103,000 registered members were located in Wales.

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

The General Dental Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.¹¹

They were not of the opinion that making standards regarding this activity specifically applicable to them was reasonable or proportionate, due to the fact that material was sometimes targeted at a very specific audience which could be registered members or patients outside Wales. They noted that it would be unreasonable to go to the expense of providing Welsh material in such events, where there was unlikely to be a demand for it.

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

The General Dental Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 80% of the commitments corresponded to the standards for a body producing and publishing documents.¹²

They noted that they provided corporate documentation such as annual reports and accounts bilingually and that guidelines and technical and specialist material aimed at professional dental workers were available in English only. They added that it would be unreasonable and disproportionate to expect an organization to translate all documents they produced due to the cost implications for registered members, the number of documents published and the time that translating documents would add to processes such as issuing papers for meetings.

¹⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body producing and publishing forms.¹³

They were of the opinion that it would be unreasonable and disproportionate to make the standards regarding this activity specifically applicable to them, referring specifically to registration forms. They noted that they produced a limited number of forms, and that these dealt specifically with people who submitted complaints and/or for registered members who were involved with their processes. However, they acknowledged that some forms could be provided bilingually.

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

The General Dental Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body's websites and on-line services.¹⁴

They stated that they had a dedicated page in Welsh in order to outline their services and to provide access to Welsh language documents. Due to the low number of visitors to this page historically, they were of the opinion that imposing standards 52a, 53, 54 and 56 would be unreasonable. They went on to state that the necessary resources to implement all the standards in their entirety would make them disproportionate, considering the fact that they were an organization operating across the UK.

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

The General Dental Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for signs displayed by a body.¹⁵

They stated that imposing standards relating to this activity would be unreasonable and disproportionate, as they did not have offices in Wales. However, they confirmed that they would provide bilingual signs and banners if it organised any events in Wales in the future.

¹³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body receiving visitors at its buildings.¹⁶

They felt that imposing standards regarding this activity would be unreasonable and disproportionate, due to the fact that they did not have an office in Wales or any Welsh-speaking staff. They added that they would be able to use an external translation service should a visitor to their office in London wish to speak Welsh.

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for official notices made by a body.¹⁷

In responding to this question they noted that more information was needed regarding the definition of 'official notice'. They noted that they prepared notices such as reminder notices for the payment of annual fees, in accordance with internal standards.

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

The General Dental Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 17% of the commitments corresponded to the standards for a body awarding grants.¹⁸

No further evidence was provided regarding this activity.

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

The General Dental Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 17% of the commitments corresponded to the standards for a body awarding contracts.¹⁹

¹⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They were of the opinion that it would be unreasonable and disproportionate to make the standards regarding this activity specifically applicable to them. However, they believed that it was reasonable to provide information about current tenders or contracts in Welsh upon request. This was reinforced by noting that they would translate any tenders received in Welsh.

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

The General Dental Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.²⁰

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

They considered that it would be reasonable and proportionate to make the standards relating to this activity specifically applicable to them.

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

The General Dental Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.²¹

They considered that it would be reasonable and proportionate to make the standards relating to this activity specifically applicable to them.

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

The General Dental Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.²²

No further evidence was provided regarding this activity.

²⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Dental Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.²³

They added that they believed that making the standards in relation to this activity specifically applicable to them would be unreasonable and disproportionate, as their office was in London, and as they did not use a public address system.

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

The General Dental Council considered that it would be reasonable and proportionate to make the standards relating to supplementary matters in relation to the service delivery standards specifically applicable to them. They noted that the level of information necessary in order to satisfy standard 161(2a-c) was not currently being collected but that it could be collected in the future.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards relating to policy making.²⁴

The General Dental Council provided evidence regarding their policy activities and partnerships in Wales, and noted that they would take steps to ensure that participants in the policy making process could do so through the medium of Welsh. They confirmed that they consulted on policy decisions. They also noted that any proposals for new policies would be assessed in terms of equality and diversity. This assessment would include the effect of the proposed policy on the organization's language policy. They confirmed that they did not possess a policy for awarding grants, as they did not undertake the activity. On the whole, they considered that it would be reasonable and proportionate to make the policy making standards specifically applicable to them.

Standards in the draft regulations that deal with supplementary matters in relation to the policy making standards [164-169]

The General Dental Council did not consider that making the standards in connection with supplementary matters relating to policy making standards specifically applicable to them would be reasonable or proportionate, due to the fact that procedures already existed which collected the necessary information. They also noted that further details would be needed regarding the requirements of standard 169 and how the Commissioner would detail what information would need to be reported in accordance with the standard.

²³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Operational standards

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.²⁵

Bearing in mind the requirements of standard 96, the General Dental Council confirmed that they implemented a policy on the use of the Welsh language internally, and that this policy had been published on the intranet. This was reinforced by noting that bilingual provision was important to the organization in terms of the quality of their service, and not just as a legal requirement.

They confirmed that they provided all the documents noted in standards 97-102 in Welsh. They went on to note that the organization did not ask employees if they would wish to receive these documents in Welsh, but that they were available upon request. They acknowledged that the relevant material should state clearly that the option of receiving documentation in Welsh was available. In relation to the requirements attached to standards 103-109, they confirmed that all policies in question were available in English only.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for complaints from members of a body's staff.²⁶

The General Dental Council confirmed that they allowed members of staff to submit complaints, and responded to any complaints relating to them, in Welsh. They noted that it was not possible to hold a meeting regarding a complaint in Welsh. However, they acknowledged that they would be able to partially comply with these standards in the future.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding a body disciplining staff.²⁷

Considering the requirements attached to standards 114-117, the General Dental Council noted that they allowed members of staff to respond in Welsh to allegations made against them through the internal disciplinary process, and that they informed staff regarding their ability to do so. When a meeting was arranged to discuss a disciplinary matter, they noted that they would provide a simultaneous translation service upon request, in accordance with its current commitment. They felt it was proportionate to respond to requests for relevant services rather than to offer the service at all times, considering that they were based in England. They went on to note that this was common practice among other regulators in the health sector.

²⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding information technology and support materials provided by a body, and regarding the intranet.²⁸

The General Dental Council noted that they did not provide computer software for checking Welsh spelling and grammar to employees and workers, and that they did not provide Welsh interfaces. However, Microsoft Office software on all computers included a Welsh dictionary. They confirmed that they operated an intranet system, but that elements such as the homepage, the interface and menus were not available in Welsh. As an organization that operates across the UK, coupled with the present demand for Welsh services internally, they were of the opinion that it would be unreasonable and disproportionate to expect them to comply with these standards considering the financial and administrative demands.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 11% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.²⁹

The General Dental Council confirmed that they did not assess the Welsh language skills of their employees, and that the only training provided related to the obligation to act in accordance with their Welsh language scheme.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding recruiting by a body.³⁰

The General Dental Council noted that they conducted an assessment of the need for Welsh language skills as job descriptions were developed, and they confirmed that they would comply with standard 134 for roles for which Welsh language skills were needed. They confirmed that application forms and other relevant material would be provided in Welsh on request, but that the need to translate any applications received in Welsh would possibly cause delay on occasions. They also confirmed that an applicant who had applied for a job in Welsh would be informed of the organization's decision in Welsh.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding signs displayed in a body's workplace.³¹

The General Dental Council did not display Welsh signs in the body's workplace.

²⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.³²

The General Dental Council noted that no announcements were made in the workplace using audio equipment.

They did not consider that making operational standards specifically applicable to them would be reasonable or proportionate.

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

The General Dental Council noted that they would report on progress regarding implementing and monitoring Welsh language standards in their annual report. They considered that making standards regarding supplementary matters in relation to operational matters specifically applicable to them would be unreasonable and disproportionate. This was reinforced by requesting more details regarding the expectations of standard 175 and what information organizations would be expected to record.

Promotion standards [143-144]

The General Dental Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 31% of the commitments corresponded to the standards regarding record keeping.³³

As part of complying with the standards in the future, the General Dental Council confirmed that they would review and update arrangements under the supervision of the operational management team, including how the organization monitors and collects information relevant to standards 145-157.

On the whole, they considered that making the standards in relation to record keeping specifically applicable to them would be reasonable and proportionate.

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

In considering the requirements of standards 178 and 179, the General Dental Council noted that the requirements of standard 178 are satisfied both externally and internally. They asked for more detail regarding the implications of standard 179, and the kind of information they would be expected to record.

They did not consider that it would be reasonable and proportionate to make the standards relating to supplementary matters in relation to record keeping standards specifically applicable to them.

³² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The General Medical Council

Service delivery standards

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

The General Medical Council noted that they carried out the activity in question and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 71% of the commitments corresponded to the standards for correspondence sent by a body.³⁴

They noted that they responded in Welsh to all correspondence received in Welsh, and that they sent circulars to patients and to the public bilingually, treating the Welsh version like the English version.

They did not consider that making the standards relating to correspondence specifically applicable to them would be reasonable and proportionate, due to the fact that it would not be possible for them to fully comply with all standards.

They acknowledged that it would be possible to comply with standard 4. However, they noted that it would be unreasonable and disproportionate to send detailed correspondence that was legal in nature and tailored for individuals without knowing their chosen language beforehand, bearing in mind that they operated across the UK. An example was given in which over 37,000 tailored letters were sent by one of their directorates to addresses in Wales in 2015.

In their opinion this standard should be relevant to information sent to the public and patients in Wales, and to individual correspondence tailored for individuals who have asked to receive it in Welsh. It was also noted that there could be delays due to the need for external translators in relation to standard 7.

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

The General Medical Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 47% of the commitments corresponded to the standards for telephone calls made and received by a body.³⁵

They considered that it would not be reasonable or proportionate to make the standards for this activity specifically applicable to them, due to the cost implications of providing a corresponding service to what is already provided for English calls, coupled with the low demand for Welsh language telephone services at present. They noted that they had explored alternative methods of providing a Welsh language telephone service through an external provider at a more reasonable and proportionate cost.

³⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They therefore proposed that standard 15 should not be made specifically applicable to them, and that they would hope to move towards implementing the standards in their office in Wales and their contact centre by using external services in the meantime.

**Activity 3: Meetings held by a body that are not open to the general public
Standards for meetings held by a body that are not open to the general public [23-29]**

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.³⁶

They noted that they provided translation services upon request for meetings held in Wales with doctors or patients wishing to speak Welsh. They acknowledged that it would be possible to improve the prominence of the text which specified that.

The organization considered that it would be unreasonable and disproportionate for the standards to be made specifically applicable to them. They noted that it would be impossible for them to comply with standards 23, 25, 27D and 28, which require meetings to be held without the aid of a translation service. This was reinforced by noting that some meetings had to be held in the presence of a relevant specialist from outside Wales, and that this would not be possible without the aid of a translator.

They acknowledged that the threshold of 30% noted in standard 27c would be acceptable. However, they stated that neither standards 27a nor 27b should be made specifically applicable to them.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.³⁷

They noted that they already complied with most of the standards. However, in relation to standard 33 they noted that a reasonable and proportionate attendance threshold should be specified for requests for translation services at public meetings. For this reason, they considered that making the standards in relation to this activity specifically applicable to them would be unreasonable and disproportionate.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

³⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.³⁸

They noted that they already promoted public events in Wales on the basis of equality for the Welsh and English languages. In relation to standard 36, they confirmed that they would not treat the Welsh language less favourably than English in terms of publicity and signs. However, they noted that it would possibly prove unreasonable and disproportionate to provide translation and audio announcements, subject to attendees noting their needs beforehand or not. Once again, they were of the opinion that a reasonable and proportionate attendance threshold should be included for translation services and audio announcements at public events.

They did not consider that making the standards regarding this activity specifically applicable to them would be reasonable and proportionate.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.³⁹

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.⁴⁰

They considered that making the standards regarding this activity specifically applicable to them would be reasonable and proportionate.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 80% of the commitments corresponded to the standards for a body producing and publishing documents.⁴¹

³⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They noted that they already translated a range of documents for the attention of patients and the public in Wales including corporate strategies, consultation papers, codes of practice, guidance and some press releases. From 2015 onwards, annual reports and business plans will also be translated.

However, in general they noted that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate. This was because they felt that the requirements of standards 41 and 44 would be inappropriate due to cost and the demands on time, given that they hold a low number of relevant meetings in Wales. In their view the relevant papers should be available in Welsh on request, and this should be made clear on the English versions.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body producing and publishing forms.⁴²

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body's websites and on-line services.⁴³

They noted that they would undertake to improve the accessibility of their website in order to facilitate access to Welsh material including guidelines, on-line complaint forms and a support toolkit.

However, in general they noted that making the standards relating to this activity specifically applicable to them would not be reasonable or proportionate. This was because they felt that the requirements of standards 52 and 56 would be unreasonable in terms of cost for an organization that does not operate solely in Wales. They estimated that the cost of translating their entire website and all of their mobile resources would be over £500,000. In their opinion, only those sections of the website that are relevant to Wales should be provided in Welsh, and standard 57 should only be applicable to apps targeted at the public.

⁴¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for signs displayed by a body.⁴⁴

They noted that they displayed bilingual signs in their buildings where both languages are treated on the basis of equality, and that those signs have been checked in relation to meaning and expression. However, they did not consider that it would be reasonable or proportionate for the standards to be made specifically applicable to them.

In terms of standard 59, they noted that having to change signs so that the Welsh language appeared first would be an unnecessary cost. They also felt that it was unreasonable and disproportionate to specify that the Welsh should appear before the English, considering that the majority of visitors to their office in Wales did not speak Welsh.

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

The General Medical Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body receiving visitors at its buildings.⁴⁵

They confirmed that they could comply with standard 64 by ensuring that an individual arriving for a meeting would be welcomed by a member of staff who could speak Welsh, or by a translator.

However, they considered that making all the standards relating to this activity specifically applicable to them would be unreasonable and disproportionate, due to the fact that they would not be able to comply with standards 61-63, 65 and 66, as they did not have a formal reception area in their office in Wales.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for official notices made by a body.⁴⁶

⁴⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They noted that they already ensured that notices by the General Practitioners' Tribunals Service relevant to the ability of doctors to practice in Wales were translated. However, they considered that making all the standards in relation to this activity specifically applicable to them would be unreasonable and disproportionate, due to the fact that standard 68 required the Welsh language to appear first. They noted that this would be an inconvenience to the majority of readers who do not understand Welsh.

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

The General Medical Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding grants.⁴⁷

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

The General Medical Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding contracts.⁴⁸

The General Medical Council noted that the tendering process was being co-ordinated by a central team located outside Wales and that any tenders received in Welsh would have to be translated. They went on to note that any translation errors in these technical and legal documents could cause far-reaching financial and operational consequences. For these reasons, they felt that it would be unreasonable and disproportionate for the standards to be made specifically applicable to them.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.⁴⁹

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

The General Medical Council considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

⁴⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Medical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.⁵⁰

The General Medical Council considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Medical Council noted that they did not carry out the activity in question. No further evidence was provided regarding this activity.

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

The General Medical Council noted that they did not carry out the activity in question. No further evidence was provided regarding this activity.

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

The General Medical Council noted that they could comply with standards 158 (a), 159 (a&b), 160 (a&b), 161 (1, 2, 3, 4,5a), 162 and 163. However, they did not consider that making the standards relating to the supplementary matters in relation to the service delivery standards specifically applicable to them would be reasonable and proportionate, due to the need to provide documentation in all offices open to the public. They felt that these standards should be applicable only to their office in Wales.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 30% of the commitments corresponded to the standards relating to policy making.⁵¹

The General Medical Council noted that all new policies and publications were subject to an equality assessment in relation to all parts of the UK (including the use of Welsh). In preparing papers for Council meetings and internal committees, consideration is given to the Welsh language. These requirements as well as translation practices are part of the induction process for all new staff.

In terms of seeking opinions regarding the effects of policies on the use and treatment of the Welsh language, the organization noted that it would not be possible to comply on all occasions as consultations could involve irrelevant technical matters, or they could be consultations dealing with the UK in its entirety.

It was confirmed that the organization did not possess a policy for awarding grants, as they did not undertake the activity.

⁵⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁵¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The organization stated that they would elaborate upon existing questions asked in the context of research work in making policy decisions, in order consider the effects on the Welsh language.

On the whole, they considered that making the policy making standards specifically applicable to them would be unreasonable and disproportionate, due to their concern that the wording of the standards regarding commissioning research could lead to unexpected results.

They agreed that the effects on Welsh speakers should be considered in drawing up policy and commissioning research. However, they suggested that the wording of the standards could be more flexible.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The General Medical Council noted that they could comply with standards 164 (a), 165 (a&b), 166 (a&b), 167, 168 and 169. However, according to the organization, standards 164(b), 165(c), 166(c) and 167(5b) should be applicable to their office in Wales only. As a result, they did not consider that making the standards dealing with supplementary matters in relation to the policy making standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.⁵²

Considering the requirements of standard 96, the General Medical Council confirmed that they did not implement a policy of using the Welsh language internally, with the intention of promoting and facilitating the Welsh language. They noted that they provided the majority of the documents noted in standards 97-102 bilingually, and that they offered employees or workers the opportunity to receive these documents in Welsh. They stated that these standards should be relevant to employees in Wales only, and that documents should be provided as hard copies only considering the cost of updating on-line systems across the organization. In relation to standards 103-109, they noted that all policies in question were not published bilingually. In their opinion, the wording of these standards should be amended to replace 'must' with 'on request'.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 60% of the commitments corresponded to the standards regarding complaints by members of a body's staff.⁵³

The General Medical Council confirmed that they allowed all members of staff to submit complaints, and also respond to any complaint regarding them, in Welsh. They noted that it would be possible to hold a meeting regarding a complaint in Welsh with the aid of a

⁵² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁵³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

translation service, and that members of staff in the Wales office were aware of these arrangements.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 60% of the commitments corresponded to the standards regarding a body disciplining staff.⁵⁴

Considering the requirements of standards 114-117, the General Medical Council noted that they allowed members of staff to respond in Welsh to allegations made against them through the internal disciplinary process. They confirmed that they offered to hold any meeting arranged in relation to the allegations through the medium of Welsh, with the aid of a translation service. They noted that they would be able to comply with all the standards in question except 115b, as the human resources staff were located outside Wales. Translation facilities would be needed so that they could contribute to any relevant meeting.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards regarding information technology and support material provided by a body, and regarding the intranet.⁵⁵

They noted that they provided spell checking and grammar checking computer software for employees and workers in the form of free on-line services. They added that staff were willing to use these services for documents received or unofficial documents. Any official documents were translated by professional translators and proof-read by Welsh-speaking members of staff. They noted that it would be unreasonable and disproportionate for them to comply with standards 119-124 as they had not received a request to provide the intranet in Welsh, and also considering that 0.01% of staff were located in Wales. However, they confirmed that they would ensure that any policies that had been translated were available on the intranet.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 44% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.⁵⁶

The organization noted that they did not assess the language skills of their employees, nor did they provide training in the areas specified in standard 126 through the medium of Welsh. They confirmed that they would provide the training noted in standards 127-129 for staff where a need had been highlighted through the internal process of drawing up personal development plans. They noted that all new members of staff received training on the work of the Wales office, together with the requirements of the language scheme. They noted that they complied with some of the requirements of the standards regarding staff e-mails but that they did not provide wording or a logo for e-mail messages.

⁵⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁵⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁵⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of the commitments corresponded to the standards regarding recruiting by a body.⁵⁷

The General Medical Council noted that all jobs in Wales included Welsh language skills as a desirable element. They added that they complied with all other aspects of standards 134-138, except that they did not hold interviews or assessments in Welsh without the aid of a translation service.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 75% of the commitments corresponded to the standards regarding signs displayed in a body's workplace.⁵⁸

They confirmed that signs displayed within the organization's buildings were in Welsh but that the Welsh text is not placed so that it is likely to be read first.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.⁵⁹

They noted that no announcements were made over an audio system within their workplace.

They did not consider that making the operational standards specifically applicable to them was reasonable and proportionate. An example was given in relation to the standards regarding signs by a body, referring to its response to activity 11. They noted that it would be unreasonable and disproportionate to have to alter signs that were already bilingual so that the Welsh language appeared first.

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

The General Medical Council considered that making the standards that deal with supplementary matters in relation to operational standards specifically applicable to them would be reasonable and proportionate. However, they noted that standards 170(b) and 173(5a) should be applicable to their Wales office only.

Promotion standards [143-144]

The General Medical Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

⁵⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁵⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁵⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 38% of the commitments corresponded to the standards regarding record keeping.⁶⁰

The General Medical Council considered that making the record keeping standards specifically applicable to them would be reasonable and proportionate, and that they would be able to comply with standards 145-157.

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

The General Medical Council considered that making the standards that deal with supplementary matters in relation to record keeping standards specifically applicable to them would be reasonable and proportionate, and that they would be able to comply with standards 178 and 179.

⁶⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The Nursing and Midwifery Council

Service delivery standards

Activity 1: Correspondence sent by a body

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 43% of the commitments corresponded to the standards for correspondence sent by a body.⁶¹

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

Activity 2: Telephone calls made and received by a body

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

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for telephone calls made and received by a body.⁶²

Due to the present lack of demand for the relevant services provided by the Council, their level of resources and their locations (there is only one hearing centre in Wales⁶³), they did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

This was reinforced by noting that they would not be able to offer these services without making a substantial financial investment. In terms of staff resources, they noted that it would be difficult to ensure that Welsh speakers were available to deal with matters that were often technical in nature.

Activity 3: Meetings held by a body that are not open to the general public

Standards for meetings held by a body that are not open to the general public [23-29]

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 78% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.⁶⁴

They confirmed that they had already undertaken to ensure that persons could speak Welsh at hearings, by using qualified translators.

⁶¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁶² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁶³ <http://www.nmc.org.uk/contact-us/how-to-find-us/temple-court/>

⁶⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

However, on the whole they considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate, due to the fact that they would only be able to comply with the standards in specific types of meetings such as those involving an individual's fitness to practice. They went on to note that offering translation facilities in all meetings would be a substantial cost to the organization.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 60% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.⁶⁵

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

Activity 5: Public events organised or funded entirely by a body
Standards for public events organised or funded entirely by a body [35-36]

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for public events organised or funded entirely by a body.⁶⁶

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.⁶⁷

They considered that making the standard in relation to this activity specifically applicable to them would be reasonable and proportionate, as long as it was in relation to activities in Wales only.

⁶⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁶⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁶⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for displaying material in public.⁶⁸

They noted that more clarity would be needed in terms of the kind of material in question, differentiating between the standards for publicity and advertising.

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the standards for a body producing and publishing documents.⁶⁹

They noted that they had already undertaken to provide publications targeted at members of the public and patients in Welsh. Some other documents such as standards of conduct, guidelines and materials for specialists are translated on request. They went on to note that they had not received any such requests during the last reporting period. Some other kinds of publications were being reviewed to improve their accessibility for Welsh speakers.

They noted that press releases are provided bilingually in Wales when they are relevant specifically to Wales, and that translation facilities are provided on request in press conferences. However, they acknowledged that there would be some situations in which it would not be possible to arrange translation for urgent press releases. In such situations they confirmed that a Welsh version would be available within 24 hours during working weeks.

They considered that standards 40 to 49 were not reasonable and proportionate. Although key documents were translated, they went on to state that they did not have the resources to translate all documents produced except those specifically targeted at a Welsh-speaking audience. In some cases, the organization noted that some technical documents would have to be excluded.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

⁶⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁶⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body producing and publishing forms.⁷⁰

They noted that they could provide Welsh copies of their forms on request, but that costs would increase substantially if forms were provided bilingually as standard practice. For this reason, they felt that making the standards relating to this activity specifically applicable to them would not be proportionate.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for a body's websites and on-line services.⁷¹

In submitting evidence in relation to this activity, they noted that a section on their website included information for the public in Welsh, together with digital versions of its Welsh publications.

They considered that it would be reasonable and proportionate to comply partially with these standards, noting the present practice of prioritising those pages that are most popular. They went on to note that it would be impossible to translate all website pages with their existing resources.

They added that they were in the process of developing a new website by the end of March 2015 which would be more accessible to the public in general. As with the existing website, information about the organization and its main functions would be available in Welsh along with Welsh publications.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for signs displayed by a body.⁷²

They noted that they did not have any members of staff based in Wales. Should an office be opened in Wales, they confirmed that Welsh signs would be displayed. As they did not have an office in Wales when evidence was submitted, they considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate.

⁷⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body receiving visitors at its buildings.⁷³

They considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate.

They noted that they were not able to receive visitors in Welsh to their offices in London and in Scotland, as staff did not have the necessary linguistic skills and due to the likelihood that the demand for service in Welsh in these locations was likely to be low. They went on to note that it was not always possible for them to find out beforehand if it was necessary to greet a visitor in Welsh.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for official notices made by a body.⁷⁴

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate, and that it would be possible to arrange provision in accordance with the requirements of the standards and as necessary.

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

The Nursing and Midwifery Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding grants.⁷⁵

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, but did not do so in Welsh.

⁷³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding contracts.⁷⁶

They stated that they did not believe there was a demand or adequate need for the services outlined in standards 74-78, considering the nature of the organization and the lack of Welsh speakers in the workforce. However, they acknowledged that any relevant needs regarding the Welsh language would be noted in tender documents where appropriate.

They added that dealing with Welsh tenders for contracts including technical or legal elements would be a risk in their view, considering the reasons above. They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.⁷⁷

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

Although their present practice did not reflect the requirements of the standards, they considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate. However, they considered their existing methods of advertising their Welsh language services to be adequate.

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

The Nursing and Midwifery Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.⁷⁸

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

⁷⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁷⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Nursing and Midwifery Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.⁷⁹

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

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

The Nursing and Midwifery Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.⁸⁰

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

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

The Nursing and Midwifery Council considered that making the standards dealing with supplementary matters in relation to the service delivery standards specifically applicable to them would not be reasonable or proportionate, due to the fact that they did not feel there was a need to revisit current processes in the way specified in the standards in question.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 30% of the commitments corresponded to the standards relating to policy making.⁸¹

The Nursing and Midwifery Council noted that the policy making standards, in principle, were current practice and that they operated in accordance with them, to varying degrees, through their Welsh language scheme. They also noted that the requirements of the policy making standards in relation to research work were already current practice under their Welsh language scheme.

They confirmed that they did not possess a policy for awarding grants, as they did not undertake the activity.

⁷⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁸⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁸¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

However, they considered that making the policy making standards specifically applicable to them would not be reasonable and proportionate, but no further observations were provided to support this opinion.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The Nursing and Midwifery Council stated that the activities outlined in the standards was not current practice, but noted how the Welsh language is considered in drawing up policies as part of their annual monitoring reports. They considered that making the standards that deal with supplementary matters in relation to the policy making standards specifically applicable to them would not be reasonable and proportionate.

They questioned the benefit of changing their current arrangements in order to act in accordance with the standards. This was reinforced by drawing attention to the European 'Mutual Recognition of Professional Qualifications Directive (MRPQ)', which stated that all member states can introduce linguistic requirements in relation to one language only. They went on to note that the UK Government had stated that English would be that language. As a result, the linguistic requirements requiring nurses and midwives to possess adequate English language skills.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of all the persons in question, none of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.⁸²

In considering the requirements of standard 96, the Nursing and Midwifery Council noted that it was current practice under the Welsh language scheme to develop internal guidelines on the arrangements to translate documents and correspondence into Welsh.

They went on to state that the induction programme for staff and contractors referred to the Welsh language scheme, and that circulars and briefing sessions for staff also did this. They confirmed that they did not provide the documents and policies noted in standards 97-109, but that the material noted in standards 97-102 could be provided on request.

On the whole, they considered that making these standards specifically applicable to them would be unreasonable and disproportionate, due to the fact that they did not employ staff in Wales or any Welsh speakers when the evidence was submitted.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding complaints by members of a body's staff.⁸³

The Nursing and Midwifery Council noted that they did not offer the services noted in standards 110-113 in Welsh. In considering the requirements of the standards, they

⁸² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁸³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

suggested that the current linguistic skills of the workforce should be considered before imposing these standards on a body.

They noted that, as such, making these standards specifically applicable to them would not be reasonable and proportionate due to the nature of the workforce, adding that the associated cost would possibly be unnecessary.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding a body disciplining staff.⁸⁴

The Nursing and Midwifery Council confirmed that they did not offer the services noted in standards 114-117 in Welsh, and that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate, considering the profile of the workforce.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding information technology and support material provided by a body, and regarding the intranet.⁸⁵

The Nursing and Midwifery Council confirmed that they did not comply with standards 118-124. They did not feel that it would be realistic for them to do so, considering the Welsh language skills of the workforce. Similarly, the organization noted that translating around 878 pages of their intranet would be impossible considering the resources they had.

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

When analysing current commitments in the Welsh language schemes of the person in question, an average of 44% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.⁸⁶

The Nursing and Midwifery Council confirmed that they did not assess the Welsh language skills of its workforce or provide training in Welsh in accordance with standards 126 and 127. Although they did not feel that operating through the medium of Welsh in areas specified in standards 128 and 129 would be useful, they acknowledged that it would be possible to provide specific courses as necessary. It was noted that staff were offered links to 'BBC - Learning Welsh' and 'Surface languages - Learn Welsh' websites so that they could learn simple phrases in order to build relationships with Welsh speaking stakeholders.

They confirmed that they already complied with standards 130 and 131 regarding staff awareness of the Welsh language and the Welsh language scheme, by means of a dedicated page on the intranet. They did not comply with standards 132 and 133 when the evidence was submitted.

⁸⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁸⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁸⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards regarding recruiting by a body.⁸⁷

They noted that a large number of posts which included Welsh language skills as an essential element had not been advertised in the past. They did not comply with the other requirements of standards 134-138.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding signs displayed in a body's workplace.⁸⁸

The Nursing and Midwifery Council confirmed that the signs displayed inside their buildings were not in Welsh.

They did not consider that making the standards relating to signs displayed in a body's workplace applicable would be reasonable and proportionate.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.⁸⁹

The Nursing and Midwifery Council confirmed that no announcements were made over audio equipment within the workplace.

On the whole, they did not consider that making the operational standards specifically applicable to them would be reasonable and proportionate, drawing specific attention to the standards regarding signs and audio announcements.

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

The Nursing and Midwifery Council did not consider that imposing the standards that deal with supplementary matters in relation to operational standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not see any benefit in revisiting current processes in terms of their treatment of the Welsh language.

Promotion standards [143-144]

The Nursing and Midwifery Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 8% of the commitments corresponded to the standards regarding record keeping.⁹⁰

⁸⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁸⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁸⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

In submitting evidence in relation to the proposed record keeping standards, the Nursing and Midwifery Council noted that the current process of submitting monitoring reports meant that the majority of the necessary information was already being collected. They considered that making the record keeping standards specifically applicable to them would be reasonable and proportionate.

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

The Nursing and Midwifery Council did not consider that imposing the standards that deal with supplementary matters in relation to record keeping standards specifically applicable to them would be reasonable and proportionate, as they did not see any benefit in revisiting current processes in terms of their treatment of the Welsh language.

⁹⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The General Optical Council

Service delivery standards

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of the commitments corresponded to the standards for correspondence sent by a body.⁹¹

They noted that they would be able to comply with the standards in question in corresponding with the public in Wales. Reference was made to an apparent contradiction between standards 2 and 5, noting that it was not clear whether individuals should be asked whether they wish to receive correspondence in Welsh in corresponding with them for the first time in accordance with standard 2, or be written to bilingually from the outset in accordance with standard 5. In their view, standard 2 would be the most proportionate option of the two in communicating over the telephone or by e-mail.

In relation to standard 7, they noted that it would not be practical to correspond bilingually as this would cause delays and costs in translating responses. Also, concern was expressed that it would not always be possible to identify whether the correspondent was a Welsh speaker or not, if contact was made via electronic means. They went on to note that it would be impractical to ask this question of all correspondents, especially on social networks.

They considered that, on the whole, making the standards in question specifically applicable to them would be reasonable and proportionate, subject to it being possible to address the concerns noted above.

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

The General Optical Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for telephone calls made and received by a body.⁹²

They did not consider that making the standards in question specifically applicable to them would be reasonable and proportionate due to the lack of demand, the fact that they did not employ any Welsh speakers and that they were based in London. In their view it would be more proportionate for them to subscribe to a language line service or arrange a conference call with a translator should an individual wish to speak Welsh over the telephone.

⁹¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁹² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Activity 3: Meetings held by a body that are not open to the general public
Standards for meetings held by a body that are not open to the general public [23-29]

The General Optical Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 6% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.⁹³

They noted that they would be willing to offer translation services in the kinds of meetings in question, although they had not received such a request when evidence was submitted. They went on to note that they met mostly with stakeholders who conducted their business through the medium of English rather than members of the public.

They considered that making all standards in question specifically applicable to them would be likely to be reasonable and proportionate on condition that they were relevant to meetings in Wales only, with the exception of standard 23. They noted that making this standard specifically applicable to them would mean that all the staff and members of the Council would have to be able to speak Welsh.

Concern was also expressed regarding the availability of consecutive translators which was the most appropriate service in their view for meetings and for subjects that were complex and legal or medical nature.

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 80% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.⁹⁴

They confirmed that they asked those attending meetings beforehand whether they required a translation service, and provided one if any requests were received.

On the whole, they considered that making the standards in question specifically applicable to them would be reasonable and proportionate in relation to meetings held in Wales.

They considered standard 33 to be disproportionate in terms of the requirement to provide a translation service where no request had been made for it beforehand, in the context of ensuring value of money for registered members.

⁹³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁹⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Optical Council noted that they did not carry out the activity in question, but evidence was received that it occasionally arranged events in Wales jointly with other regulators.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public events organised or funded entirely by a body.⁹⁵

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body's publicity and advertising.

They considered that making the standard in question specifically applicable to them would be reasonable and proportionate, as long as it was relevant to activities held in Wales only.

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

The General Optical Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for displaying material in public.⁹⁶

Although they noted that they did not carry out the activity in question, they considered that making the standards in question specifically applicable to them would be reasonable and proportionate, although they foresaw that there would be some situations in which it would be more practical and cost-effective to offer hard copies in one of the two languages.

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 30% of the commitments corresponded to the standards for a body producing and publishing documents.⁹⁷

⁹⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁹⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standards in question specifically applicable to them would be reasonable and proportionate. Noting that their existing language scheme was based on providing information to the public bilingually, they did not consider that providing information targeted at its members bilingually too would be proportionate.

However, they noted that the standards in question would be reasonable and proportionate on the whole in relation to documents in Wales. Because the majority of meetings were held in London, for examples, they considered that the requirements of standard 41 would be too prescriptive. They confirmed, however, that it would be sensible to translate papers for meetings in Wales, and that it would be possible to translate any other papers upon request.

Similarly, they noted that some consultations were legal and technical in nature and of interest to a limited number of stakeholders and solicitors. In terms of standard 46, they noted that only press releases aimed at the Welsh press should be translated, and that this could lead to delays in urgent circumstances.

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 25% of the commitments corresponded to the standards for a body producing and publishing forms.⁹⁸

They confirmed that complaint forms targeted at the public were already available in Welsh, and that making the standards in question specifically applicable to them would be reasonable and proportionate. However, the forms targeted at registered members were not available in Welsh.

Similarly, they noted that they had an on-line registration system, and that making this system together with forms targeted at registered members bilingual would be disproportionate in terms of the associated financial implications.

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 17% of the commitments corresponded to the standards for a body's websites and on-line services.⁹⁹

They noted that they provided a section of its website in Welsh, which included key information regarding their regulatory functions and enabled individuals to browse the register of opticians in Welsh.

They did not consider that it would be reasonable and proportionate to make the standards relating to this activity specifically applicable to them, and drew attention to their principle

⁹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁹⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

of providing information in Welsh for the public, but not for members of the profession. Reasons of cost were mentioned too; they noted that they had received a quote from their supplier noting that providing the entire website in Welsh would cost £50,000 initially, together with additional operational costs.

They did not provide apps when the evidence was submitted, and it was noted that any apps published in the future would be available bilingually if they were aimed at the public.

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

The General Optical Council noted that they did not carry out the activity in question.

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

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate. In relation to standard 59, they noted that they did not see the need to note which language was placed first, as long as both languages were accessible.

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

The General Optical Council noted that they carried out the activity in question, but did not do so in Welsh.

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

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate, as they were based in London and did not have any staff who could speak Welsh. They added that any visitors from Wales would be expected to provide notice beforehand so that it would be possible to arrange for a translation service to be available where appropriate.

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

The General Optical Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.¹⁰⁰

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Optical Council noted that they did not carry out the activity in question.

¹⁰⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding grants.¹⁰¹

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Optical Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding contracts.¹⁰²

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate. Although they did not carry out this activity in Welsh when the evidence was submitted, they confirmed that it would be reasonable for them to start doing so.

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

The General Optical Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.¹⁰³

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

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Optical Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.¹⁰⁴

¹⁰¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁰² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁰³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁰⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standard in question specifically applicable to them would be reasonable and proportionate, if it was relevant to activities aimed at the public in Wales only.

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

The General Optical Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.¹⁰⁵

They considered that making the standards in question specifically applicable to them would be reasonable and proportionate, as long as it was relevant to courses provided in Wales only.

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

The General Optical Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.¹⁰⁶

They considered that making the standard in question specifically applicable to them would be reasonable and proportionate, as long as it was relevant to the use of public address systems in Wales only.

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

The General Optical Council considered that making the standards that deal with supplementary matters in relation to service delivery standards specifically applicable to them would be reasonable and proportionate.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 70% of the commitments corresponded to the standards relating to policy making.¹⁰⁷

The General Optical Council confirmed that they carried out impact assessments in terms of diversity and equality as part of its policy development process, and that this included consideration of the Welsh language. They also noted that they would deal with the effect on the Welsh language in consultations where appropriate. However, they confirmed that they did not have a policy on awarding grants, due to the fact that they did not undertake the activity.

They considered that the standards would be reasonable and proportionate as long as they were expected to comply in areas relevant to the organization only.

¹⁰⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁰⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁰⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The General Optical Council considered that making the standards that deal with supplementary matters in relation to policy making standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 7% of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.¹⁰⁸

The General Optical Council noted that they did not comply with the requirements of standards 96-109 when the evidence was submitted, due to the fact that they conducted their internal business in English only as they were based in London. However, they confirmed that it would be possible to comply with the standards should they open an office in Wales.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding complaints by members of a body's staff.¹⁰⁹

The General Optical Council noted that they did not comply with the requirements of standards 110-113 when the evidence was submitted, due to the fact that they conducted their internal business in English only as they were based in London. However, they confirmed that it would be possible to comply with the standards should they open an office in Wales.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding a body disciplining staff.¹¹⁰

The General Optical Council noted that it did not comply with the requirements of standards 114-117 when the evidence was submitted, due to the fact that they conducted their internal business in English only as they were based in London. However, they confirmed that it would be possible to comply with the standards should they open an office in Wales.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

¹⁰⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁰⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹¹⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding information technology and support material provided by a body, and regarding the intranet.¹¹¹

The General Optical Council noted that they did not comply with the requirements of standards 118-124 when the evidence was submitted, due to the fact that they conducted its internal business in English only as it was based in London.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 44% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.¹¹²

The General Optical Council did not assess the Welsh language skills of its employees. They did not provide training in all areas in question, but in the areas in which training was provided, that training was provided in English. As an organization based in London, the General Optical Council did not consider that it would be proportionate to provide Welsh language lessons for all their employees. However, they noted that they considered standard 130 to be good practice, and that relevant staff were briefed on the organization's responsibilities in terms of its language scheme. They also confirmed that they would support any Welsh member of staff wishing to improve their Welsh language skills.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards regarding recruiting by a body.¹¹³

They confirmed that they did not comply with the standards regarding recruitment by a body when the evidence was submitted, due to the fact that they implemented a recruitment process through the medium of English as a body based in London. They noted that the cost of duplicating the on-line recruitment system in Welsh was disproportionate.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding signs displayed in a body's workplace.¹¹⁴

The General Optical Council confirmed that the signs displayed inside their buildings were not in Welsh.

Standards regarding audio announcements and messages in a body's workplace [142]

¹¹¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹¹² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹¹³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹¹⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.¹¹⁵

They noted that no announcements were made over an audio system within their workplace.

The General Optical Council did not consider that making the standards in question specifically applicable to them would be proportionate and there would be no advantages to their staff, to stakeholders or to the public considering the fact that they were located outside Wales, and the fact that their registered members would have to contribute towards the additional costs. However, they noted that they would consider the implications of cost and proportionality should they open an office in Wales in the future.

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

The General Optical Council considered that making the standards that deal with supplementary matters in relation to operational standards specifically applicable to them would be reasonable and proportionate.

Promotion standards [143-144]

The General Medical Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 38% of the commitments corresponded to the standards regarding record keeping.¹¹⁶

The General Optical Council considered that making the record keeping standards specifically applicable to them would be reasonable and proportionate.

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

The General Optical Council considered that making the standards that deal with supplementary matters in relation to record keeping standards specifically applicable to them would be reasonable and proportionate.

The General Osteopathic Council

¹¹⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹¹⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Service delivery standards

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.¹¹⁷

They noted that they had the same internal standards for correspondence in Welsh and in English. They added that they would use a translation service in order to meet those standards in relation to correspondence in Welsh. According to them, these internal standards would enable them to comply with standards 1, 6 and 7 if standard 7 was applicable to correspondence with the public in Wales only. They confirmed that they could also comply with standards 2 and 5, although it should be noted that they did not correspond with the public in any part of the UK (including Wales) as a matter of course.

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

They noted that they did not contact registered members in Welsh as a matter of course due to the fact that the ability to communicate in English was a condition of registration for osteopaths.

They also noted that associated additional costs would be funded through registration fees, and that it would not be reasonable and proportionate for registered members across the UK to bear the burden of these additional costs considering the percentage of their membership located in Wales (121 out of 4976). Attention was drawn to the fact that the UK Government had asked health care regulators to reduce their registration fees in recent years.

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

The General Osteopathic Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for telephone calls made and received by a body.¹¹⁸

The General Osteopathic Council confirmed that they did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate for the same reasons as noted in relation to activity 1.

Activity 3: Meetings held by a body that are not open to the general public

¹¹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹¹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Standards for meetings held by a body that are not open to the general public [23-29]

The General Osteopathic Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.¹¹⁹

Although they noted that they did not usually carry out this activity, they confirmed that a translation service would be provided should a relevant situation arise, such as a meeting with a member of the public in Wales as part of a fitness to practice hearing. To this extent, they confirmed that it would be possible for them to comply with standards 23-26.

They considered that making standards 27-29 specifically applicable to them would not be reasonable and proportionate. They noted that they did not hold such meetings in Wales. Those meetings were held mostly in London, and tended to be held with workers in health or other such areas. In their opinion it would be disproportionate to expect organizations that operated across the UK to hold meetings of this kind in Welsh, and it was added that they did not have the budget to provide translation services in order to do so.

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 60% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.¹²⁰

They confirmed that they could comply with these standards if they held a public meeting in Wales, as they had already undertaken to provide these services. However, they considered that expecting them to comply across the UK would be unreasonable and disproportionate, and they did not have the resources in terms of cost and budget to do so.

Activity 5: Public events organised or funded entirely by a body Standards for public events organised or funded entirely by a body [35-36]

The General Osteopathic Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for public events organised or funded entirely by a body.¹²¹

Activity 6: A body's publicity and advertising

¹¹⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹²⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹²¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Standards for a body's publicity and advertising [37]

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.¹²²

They confirmed that they would be able to comply with this standard as long as it was applicable to publicity and advertising for use in Wales only. They noted further that expecting them to comply across the UK would be unreasonable and disproportionate, and that they did not have the staff resources or the funding to do so.

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

The General Osteopathic Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for displaying material in public.¹²³

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the standards for a body producing and publishing documents.

They confirmed that the documents they produce which are targeted at the public are translated into Welsh as a matter of course. They added that they welcomed requests to translate other documents where possible. To this extent, they confirmed that it would be possible for them to comply with standards 40, 43, 46 and 48.

In relation to standard 49 they noted that they stated on their website and within their freedom of information scheme rather than on the face of documents themselves, that they offered Welsh and English versions of documents. This was reinforced by stating that the possibility of including this information on the documents themselves would be considered.

They confirmed that they could comply with standard 42 to the extent that they could ask registered members if they would like to receive their certificates in Welsh. They did not carry out the activity noted in standard 45.

They considered that making some of the standards specifically applicable to them would not be reasonable and proportionate. They noted that it would not be possible to comply fully with standards 41 and 44 due to the size of some documents together with the costs and resources needed to provide them bilingually. As a body that operated across the UK and which did not have an office in Wales, they noted that they would provide such documents upon request.

¹²² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹²³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 75% of the commitments corresponded to the standards for a body producing and publishing forms.

They confirmed that they would be able to comply with standards 50 and 50B, and that they could satisfy standard 50A to the extent that they would state on their website that forms were available in Welsh in those sections of the website where the English versions are kept. This was reinforced by confirming that a statement would be added to any new forms for the use of the public.

In considering the requirements of standard 51, they noted that the only circumstance in which it was foreseen that the standard would be relevant was in relation to a deposition form to be signed by a complainant. They confirmed that such a declaration could be made in Welsh if desired.

On the whole, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body's websites and on-line services.¹²⁴

They confirmed that they already provided the most popular and key information to the public and patients in Welsh on its website. This was reinforced by noting that it would be possible to explain on the corresponding English pages that the information in question is also available in Welsh, and that there would be a possibility of adding further information in Welsh if analysis of the website suggested that this would be useful.

However, on the whole, they considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate, as they did not have the infrastructure or the finance to provide its entire website in Welsh.

This was reinforced by noting that the current cost of their website for 2014-15 and 2015-16 was £16,000 per year.

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

The General Osteopathic Council noted that they did not carry out the activity in question. When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for signs displayed by a body.¹²⁵

¹²⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Osteopathic Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body receiving visitors at its buildings.¹²⁶

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate, as they did not have any members of staff who could speak Welsh. They noted that they did not have adequate resources to provide staff in order to provide a reception service and that they did not receive many visitors to their office.

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

The General Osteopathic Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.¹²⁷

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

The General Osteopathic Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding grants.¹²⁸

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate. They noted further that they did not award grants regularly, and expecting the organization to hold this activity in Welsh would be disproportionate, and the costs of doing so would be prohibitive.

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

The General Osteopathic Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding contracts.¹²⁹

¹²⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹²⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹²⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹²⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate, as they did not have an office in Wales and operated across the UK, and as they did not have the infrastructure or finance to comply. They acknowledged that the standards would possibly be appropriate for an organization that had a presence in Wales and which tendered for work to be carried out in Wales.

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.¹³⁰

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

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The General Osteopathic Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.¹³¹

They confirmed that they would be able to comply with the standard in relation to their work in Wales. They noted further than it would be disproportionate to expect them to comply with the standard across the UK.

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

The General Osteopathic Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.¹³²

¹²⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹³⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹³¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹³² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Osteopathic Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.¹³³

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

They considered that making the standards that deal with the supplementary matters in relation to the service delivery standards specifically applicable to them would be reasonable and proportionate, due to the fact that a number of similar processes were operational under its language scheme. They noted that some elements of the standards in question would not be relevant as they did not have an office that was open to the public.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 30% of the commitments corresponded to the standards relating to policy making.¹³⁴

The General Osteopathic Council considered that standards 86-95 would be more relevant to public bodies in Wales than to a body that operated across the UK and did not have an office in Wales. They confirmed that they were committed under their existing language scheme not to treat the Welsh language less favourably than English and to ensure that new policies and initiatives facilitated the use of Welsh where appropriate. They further added that all their policies related to regulatory matters and fitness to practice procedures, and those policies could have no effect on opportunities for the public in Wales to use the Welsh language. However, they confirmed that any new or amended procedures involving individuals giving evidence at hearings would be assessed in order to ensure that there were opportunities for them to speak in Welsh.

In considering the requirements of standards 88-91, they noted that all their consultations sought opinions on the equality and diversity implications of proposed policies or initiatives, including any effects on the Welsh language.

They confirmed that they did not possess a policy for awarding grants, as they did not undertake the activity.

In terms of carrying out research work to assist them in taking policy decisions, they confirmed that any focus groups for the public or patients held in Wales would give participants an opportunity to speak Welsh.

The General Osteopathic Council did not consider that making the policy making standards specifically applicable to them would be reasonable and proportionate for the reasons noted above.

¹³³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹³⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

They considered that making the standards that deal with the supplementary matters in relation to the policy making standards specifically applicable to them would be reasonable and proportionate, due to the fact that a number of similar processes were operational under their language scheme. They noted that some elements of the standards in question would not be relevant as they did not have an office that was open to the public. They confirmed that they could comply with standard 169 as long as an adequate period of notice was given in order to prepare to comply. In their opinion, a period of two months would be reasonable.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of all the persons in question, none of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.¹³⁵

The General Osteopathic Council noted that they could not comply with standards 96-109, as they did not consider that they were relevant to an organization that operated across the UK and did not have an office in Wales. They went on to note that they did not possess the necessary finance or infrastructure to comply with the standards in question.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding complaints by members of a body's staff.¹³⁶

The General Osteopathic Council noted that they could not comply with standards 110-113, as they did not consider that they were relevant to an organization that operated across the UK and did not have an office in Wales. They went on to note that they did not possess the necessary finance or infrastructure to comply with the standards in question.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding a body disciplining staff.¹³⁷

The General Osteopathic Council noted that they could not comply with standards 114-117, as they did not consider that they were relevant to an organization that operated across the UK and did not have an office in Wales. They went on to note that they did not possess the necessary finance or infrastructure to comply with the standards in question.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

¹³⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹³⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹³⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding information technology and support material provided by a body, and regarding the intranet.¹³⁸

They noted that standards 118-124 were not relevant to them, as they did not employ any Welsh speakers and as they did not have an intranet.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 78% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.¹³⁹

In considering the requirements of standards 125-133, they confirmed that a copy of their language scheme was provided to employees as well as written guidelines regarding it. They also noted that developing staff understanding in terms of the organization's commitments to operate within its Welsh language scheme was part of the induction process for new staff.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards regarding recruiting by a body.¹⁴⁰

They noted that Welsh language skills were not required for any post within the organization, as they did not have an office in Wales and that only a small percentage of their work was carried out in Wales.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding signs displayed in a body's workplace.¹⁴¹

They confirmed that the signs displayed inside their buildings were not in Welsh.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.¹⁴²

They noted that no announcements were made over an audio system within the workplace.

On the whole, they considered that making the operational standards specifically applicable to them would not be reasonable and proportionate, either because they did not

¹³⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹³⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁴⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁴¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁴² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

carry out the activity (for example in relation to standards 140-142) or because they were of the opinion that the standards would be more appropriate for organizations that had an office in Wales and employed Welsh speakers (for example in relation to standards 134-139A).

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

The General Osteopathic Council considered that making the standards that deal with supplementary matters in relation to operational standards specifically applicable to them would be reasonable and proportionate. However, some elements of the standards in question were highlighted that would not be relevant due to the nature of the organization.

Promotion standards [143-144]

The General Osteopathic Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 23% of the commitments corresponded to the standards regarding record keeping.¹⁴³

The General Osteopathic Council noted that they did not foresee any additional processes would be needed to the current ones under their language scheme in order to comply with the relevant standards. They noted that some elements of the proposed standards would not be relevant due to the nature of the organization.

On the whole, they did not consider that making the record keeping standards specifically applicable to them would be reasonable and proportionate, as they were not clear regarding the purpose of keeping additional records. They added that they would not have any data to report on the majority of the proposed categories.

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

The General Osteopathic Council did not consider that it would be reasonable and proportionate to make the standards that deal with supplementary matters in relation to record keeping standards specifically applicable to them. They stated that they would be able to comply with the standards, but that they believed they would be a disproportionate and an unnecessary burden. They noted further than they had an extensive publications scheme, in accordance with the requirements of the Information Commissioner.

The Health and Care Professions Council

¹⁴³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Service delivery standards

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.¹⁴⁴

They noted that they would be able to comply with standards 1 and 6 in relation to correspondence with the public, and that it would be possible to comply with some aspects of the other standards in question in the medium term although additional resources would be needed in order to do so.

In general, they did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

As a general comment on the standards relating to this activity, they noted that the Commissioner should consider the proportionality of the requirements of standards to organizations having a presence across the UK, adding that three registered members have so far noted their desire to receive Welsh language correspondence regarding their registrations.

They went on to note that they did not consider it to be reasonable or proportionate to expect an organization that operated across the UK to request the chosen language of individual registered members from the outset.

They were of the opinion that it would be more reasonable and proportionate for them to send correspondence in Welsh on request, rather than all pieces of correspondence such as registration renewal forms. They suggested that they would be able to comply with the standard if it was relevant to correspondence with the public and patients only rather than to registered members as well.

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

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for telephone calls made and received by a body.¹⁴⁵

They did not consider that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate on the whole.

They confirmed that they would be able to comply with standard 18 and that a translation service was provided via Language Line. As they did not have any employees who could

¹⁴⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁴⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

speak Welsh, they noted that it would not be possible for them to transfer calls to a Welsh speaker and thus it would not be possible to comply with standards 10, 11, 19 and 20.

They noted that they would have to consider the proportionality of stating that their registration section welcomed calls in Welsh, but that they could possibly comply with some aspects of standards 12, 13 and 14. In relation to standard 13, they noted that they did not mention the Welsh language in an automatic message for calls to the registration department number.

They did not consider standard 16 to be relevant to them, as they did not use a telephone answer service for their main telephone numbers. Similarly, they did not consider standard 17 to be relevant as they used a translation service.

They noted that they did not consider standard 21 to be reasonable and proportionate for an organization that operated across the UK, and that the majority of calls made by the organization to individuals were outside Wales.

When considering the requirements of the standards in question, they noted that complying with some of them required substantial financial resources, and that this should be considered when imposing standards on self-funding bodies.

**Activity 3: Meetings held by a body that are not open to the general public
Standards for meetings held by a body that are not open to the general public [23-29]**

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 89% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.¹⁴⁶

They confirmed that they met a wide range of stakeholders regularly in implementing their statutory role, and that they tried to meet as many of the communication needs of participants as possible, including the Welsh language. In the majority of cases, they noted that this would mean using a simultaneous translation service. As such, they considered that imposing standards 24A, 26A, 27A, 27B, 27C, 27E and 29A would be reasonable and proportionate.

They did not consider that it would be reasonable or proportionate for them to request the communication choices of all visitors to private meetings at their offices in London, and it would not always be possible to know that it was a visitor from Wales.

This was reinforced by noting that they did not have any employees who spoke Welsh, and therefore that it was not possible for them to hold any meetings in Welsh without the aid of a translation service.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

¹⁴⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Welsh Language Commissioner's Standards Report – Public Bodies: General (3) – Section 64 Welsh Language (Wales) Measure 2011

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.¹⁴⁷

They confirmed that they would be able to comply with standards 31, 33 and 34 in relation to meetings open to the public in Wales.

On the whole, they did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate.

In terms of standard 30, they did not consider that providing an on-line registration process for public events in Wales would be reasonable and proportionate, due to the high associated costs in terms of IT and the lack of demand for Welsh services from participants in past events.

In submitting evidence relating to the standards in question, they expressed concern regarding the costs of translating meeting papers where no request had been made for Welsh language versions.

This was reinforced by noting that members of the public were not usually allowed to participate at meetings of the organization's committees and Council.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.¹⁴⁸

They confirmed that they could comply with standards 35 and 36, and they considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate. However, they expressed concern regarding the need to provide an on-line registration process for all public events in Wales.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.¹⁴⁹

They confirmed that they could comply with elements of the standard in relation to publicity and advertising targeted at a Welsh audience.

Activity 7: Displaying material in public

¹⁴⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁴⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁴⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Standards for displaying material in public [38-39]

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.¹⁵⁰

They confirmed that it would be possible to comply with some elements of standards 38-39 in relation to events in Wales that are open to key stakeholders.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 70% of the commitments corresponded to the standards for a body producing and publishing documents.¹⁵¹

They noted that Welsh versions of documents such as core standards, guidelines and other specialist material for the attention of members were already produced on request, and that this commitment was stated in all their publications. Bearing this in mind, they confirmed that they could comply with a number of the requirements to a greater or a lesser extent.

On the whole, they did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate, noting the high costs of translating all the documents published by the organization and the low demand for them so far. However, they noted that they would consider translating some additional documents upon request, such as registration certificates.

This was reinforced by stating that it would not be reasonable and proportionate to expect the organization to provide Welsh versions of press releases involving regulatory functions outside Wales.

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

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body producing and publishing forms.¹⁵²

They confirmed that they would provide Welsh registration forms on request, and a form received in Welsh would not be treated less favourably than the English version. In relation to the requirements of standard 51 they noted that the registration renewal process was

¹⁵⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

maintained on-line, and that the present system was not bilingual. They went on to note that it would only be possible to provide paper registration forms in Welsh, as they included information that had been inputted beforehand.

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate, as most of those registered by the organization operated outside Wales. They therefore considered that it would be unreasonable to provide Welsh versions of forms without receiving a request for them.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body's websites and on-line services.¹⁵³

They stated that any requirements in terms of the bilingual nature of the website should be restricted to material targeted at the public or patients in a Welsh section of the website. They noted that they would not be able to comply fully with standards 52, 54 and 55 although they confirmed that they could ensure that relevant Welsh pages were fully operational.

They did not consider that it would be reasonable and proportionate to provide a Welsh version of the homepage of their website in accordance with standard 53, although they acknowledged that they already provided a link to their Welsh website on the homepage of their English website.

In relation to standard 57, they noted that they considered this standard to be unreasonable and disproportionate for an organization that operated across the UK, and that it would be more cost-effective to develop new Welsh versions of their two apps.

On the whole, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for signs displayed by a body.¹⁵⁴

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate in relation to public events held in Wales only.

Activity 12: A body receiving visitors at its buildings

¹⁵³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Standards for a body receiving visitors at its buildings [61-66]

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body receiving visitors at its buildings.¹⁵⁵

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate in terms of cost, as they were of the opinion that the requirement to provide a reception service in Welsh should be relevant only to organizations that had an office in Wales.

However, they noted that they already complied with some aspects of standard 63, as they used the Language Line service for calls received in languages other than English. Also, they confirmed that any requests received beforehand for a reception service in Welsh would be considered, and thus it would be possible to comply with certain aspects of standard 62A.

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

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for official notices made by a body.¹⁵⁶

They confirmed that it would be possible to comply with standard 67 in the context of any Welsh language correspondence resulting from the issuing of an official notice.

On the whole, they considered that making the standards in relation to this activity specifically applicable to them would not be reasonable and proportionate, as it would not be reasonable or proportionate to expect Welsh text to appear before English text when the vast majority of their work was carried out through the medium of English.

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

The Health and Care Professions Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding grants.¹⁵⁷

They did not consider that making the standards relating to this activity specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

¹⁵⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body awarding contracts.¹⁵⁸

They considered that standards 75, 75A and 78 were reasonable and proportionate as they were similar to current commitments in their Welsh language scheme.

Should a tender be received in Welsh where an interview formed part of the award process, they confirmed that the interview would be offered in Welsh using a simultaneous translation service. It should be noted that they would also retain the right to assess an interviewee's competence in the English language in such cases.

However, they noted that they considered standards 74 and 76 to be unreasonable and disproportionate for a body that operated across the UK.

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

The Health and Care Professions Council noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.¹⁵⁹

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

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate, on the whole.

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

The Health and Care Professions Council noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for a body's corporate identity.¹⁶⁰

¹⁵⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁵⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁶⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate in relation to their logo, bilingual stationery and staff e-mail signatures. This was reinforced by noting that any further requirements should be relevant to organizations based in Wales.

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

The Health and Care Professions Council noted that they did not carry out the activity in question, save for the fact that it held some information events as part of its statutory function.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.¹⁶¹

They considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate, as they were of the opinion that they did not arrange relevant courses except for certain information events targeted at key stakeholders only.

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

The Health and Care Professions Council noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.¹⁶²

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

Standards in relation to the service delivery standards [158-163]

They noted that many elements of standards 158, 159, 160 and 162 were similar to the monitoring and reporting requirements under their language scheme, and that they would therefore be reasonable and proportionate. They also confirmed that they would comply with standard 163 as long as a reasonable period of time was offered in order to respond to any requests.

However, they noted that the record keeping elements in 161 would be challenging for their largest departments, such as the registration department.

Policy making standards [86-95]

¹⁶¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁶² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 20% of the commitments corresponded to the standards relating to policy making.¹⁶³

The Health and Care Professions Council confirmed that they could comply with some aspects of standards 86-88, as they acknowledged the need to carry out further work on formalising internal processes regarding assessing new policies and their effects on the Welsh language.

In considering the requirements of standards 89-91, they noted that many aspects of those standards were consistent with their present commitments. However, in general they noted that the standards would not be reasonable and proportionate if they were relevant for all consultations they carried out across the UK, adding that the majority of their stakeholders were not Welsh speakers and thus they would not necessarily be able to respond to questions regarding this. They noted that consideration would need to be given to the reasonableness and proportionality of planning toolkits for assessing the impact on equality for consultations across the UK on policy decision that could affect Welsh members. In general, they considered that the standards did not differentiate between the responsibilities of public bodies based on Wales (such as a Government department) and bodies operating across the UK which could be self-funding.

They confirmed that they did not have a policy on awarding grants, as they did not undertake the activity.

They noted that it would be able to comply with some aspects of standards 93-93, but that some aspects of them would be unreasonable and disproportionate for a body that operated across the UK. It should be noted that they confirmed that they welcomed tenders for research work in Welsh, and that they confirmed that an application received in Welsh would not be treated less favourably than an application received in English.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The Health and Care Professions Council considered that making the standards that deal with supplementary matters in relation to policy making standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.¹⁶⁴

They considered that the requirement to develop specific policy in accordance with standard 96 was an unreasonable expectation for an organization based in London and which had no Welsh-speaking employees. They confirmed that they had undertaken to ensure that members of staff dealing with the public and who wished to learn Welsh would

¹⁶³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁶⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

be supported to do so as appropriate to their posts and in the context of their objectives and those of the organization in general.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding complaints by members of a body's staff.¹⁶⁵

They noted that they did not comply with the requirements of standards 110-113 when the evidence was submitted, noting that they would not be reasonable and proportionate for an organization that operated across the UK that did not have an office in Wales or any employees who spoke Welsh.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding a body disciplining staff.¹⁶⁶

They noted that it would not be able to comply with the standards in question as a body that was based in London.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding information technology and support material provided by a body, and regarding the intranet.¹⁶⁷

They confirmed that their homepage, interfaces and menus were not provided in Welsh, and that complying with the standards regarding the provision of an intranet would not be cost-effective to them where there was no demand for the service. They therefore did not consider that standards 119, 120, 121, 122 and 124 were reasonable and proportionate, although they acknowledged that they could possibly comply with some aspects of standard 123.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 22% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.¹⁶⁸

They confirmed that they did not assess the Welsh language skills of their employees, and they provided training in the areas specified in standard 126 through the medium of English only. This was reinforced by noting that there had been no demand for the types of training noted in standards 127, 128 and 129.

In terms of standard 129, they noted that they were already committed under their language scheme to ensure that any member of staff wishing to learn Welsh and who

¹⁶⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁶⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁶⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁶⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

works with the public is supported to do so within the scope of his/her role and the objectives of the organization.

They confirmed that they raise staff awareness of their Welsh language scheme as part of the induction process.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards regarding recruiting by a body.¹⁶⁹

They confirmed that Welsh language skills would be added to any job descriptions where appropriate, though this had not been necessary so far. However, they noted that they would try to meet as many of the linguistic needs of applicants as possible in relation to any posts located in Wales. It should be noted that they would also retain the right to assess an interviewee's competence in the English language in such cases.

They noted that some aspects of standards 135-138 would be unreasonable and disproportionate for a body that operated across the UK.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language schemes of the person in question, none of the commitments corresponded to the standards regarding signs displayed in a body's workplace.¹⁷⁰

They confirmed that the signs displayed inside their buildings were not in Welsh.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.¹⁷¹

They noted that no announcements were made over an audio system within their workplace.

In general, they noted that many elements of the operational standards were unreasonable and disproportionate for an organization operating across the UK with its only office in London, and which had no members of staff who could speak Welsh.

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

The Health and Care Professions Council considered that making the standards that deal with supplementary matters in relation to operational standards specifically applicable to them would be reasonable and proportionate.

¹⁶⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁷⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁷¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Promotion standards [143-144]

The Health and Care Professions Council confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 46% of the commitments corresponded to the standards regarding record keeping.¹⁷²

On the whole, the Health and Care Professions Council did not consider that making the record keeping standards specifically applicable to them would be reasonable and proportionate.

They were not of the opinion that the requirements of standards 145 and 146 were reasonable and proportionate, as they did not have any members of staff who could speak Welsh, or any presence in Wales. They acknowledged that there would be a need to develop more formal procedures in order to comply with standard 147.

Similarly, concern was expressed regarding their ability to comply with standards 150, 152 and 154, due to the nature of the internal systems used.

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

The Health and Care Professions Council confirmed that they would be able to comply with standards 178-179. This was reinforced by noting that they would consider making the documents in question available on their website and that it would be possible to provide hard copies on request.

They considered that making the standards in question specifically applicable to them would be reasonable and proportionate, in accordance with their comments regarding the record keeping standards.

¹⁷² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The Care Council for Wales

Service delivery standards

Activity 1: Correspondence sent by a body

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.¹⁷³

The Care Council for Wales considered that making the standards in relation to correspondence specifically applicable to them would be reasonable and proportionate.

Activity 2: Telephone calls made and received by a body

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for telephone calls made and received by a body.¹⁷⁴

The Care Council for Wales considered that making the standards in relation to telephone calls made and received by a body specifically applicable to them would be reasonable and proportionate.

Activity 3: Meetings held by a body that are not open to the general public

Standards for meetings held by a body that are not open to the general public [23-29]

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.¹⁷⁵

In considering the requirements of the standards relating to this activity, they noted that they did not offer attendees the option of using the Welsh language as a matter of course, as not all members of the Council and staff could speak Welsh. They also added that it would not be possible to offer consecutive translation as this service had not been included in their contract arrangements with its suppliers. They went on to note that they had agreed to use the Welsh Government translation services framework in future, and that the framework did not include consecutive translation services. They did not consider

¹⁷³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁷⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁷⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

that making the standards in relation to this activity specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.¹⁷⁶

They considered that making the standards in relation to meetings arranged by a body that are open to the public specifically applicable to them would be reasonable and proportionate.

Activity 5: Public events organised or funded entirely by a body
Standards for public events organised or funded entirely by a body [35-36]

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.¹⁷⁷

They considered that making the standards in relation to public events organised or funded entirely by a body specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.¹⁷⁸

They considered that making the standards in relation to publicity and advertising specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

¹⁷⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁷⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁷⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.¹⁷⁹

They considered that making the standards in relation to displaying material in public specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing documents.¹⁸⁰

In considering the requirements of the standards in question, they noted that they published the vast majority of their documentation bilingually. However, they considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate, due to the fact that they could not provide reports for their public board meetings in Welsh. They added that the timetable for producing papers for these meetings meant that minutes and agendas were provided in Welsh, but not at the same time as the English versions were provided.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing forms.¹⁸¹

They considered that making the standards in relation to a body producing and publishing forms specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's websites and on-line services.¹⁸²

They considered that making the standards in relation to websites and on-line services specifically applicable to them would be reasonable and proportionate.

¹⁷⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for signs displayed by a body.¹⁸³

They confirmed that all the signs they published were bilingual, with the Welsh appearing first. However, they considered that making the standards relating to this activity specifically applicable to them would not be reasonable and proportionate, due to the fact that it was not possible to ensure that signs produced by third parties (such as the Health and Safety Executive) complied with the requirements.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body receiving visitors at its buildings.¹⁸⁴

They considered that making the standards in relation to a body receiving visitors at its buildings specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for official notices made by a body.¹⁸⁵

They considered that making the standards in relation to official notices made by a body specifically applicable to them would be reasonable and proportionate.

¹⁸³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body awarding grants.¹⁸⁶

They considered that making the standards in relation to a body awarding grants specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body awarding contracts.¹⁸⁷

They considered that making the standards in relation to a body awarding contracts specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.¹⁸⁸

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

They considered that making the standards in relation to raising awareness about Welsh language services provided by a body specifically applicable to them would be reasonable and proportionate.

¹⁸⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁸⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.¹⁸⁹

They considered that making the standards in relation to a body's corporate identity specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for courses provided by a body.¹⁹⁰

They considered that making the standards in relation to courses provided by a body specifically applicable to them would be reasonable and proportionate.

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

The Care Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standard for public address systems used by a body.¹⁹¹

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

The Care Council for Wales noted that all the information regarding their service delivery standards and their complaints procedures were available in Welsh. They confirmed that making a complaint in Welsh would not lead to delay, and that they was able to report against the proposed standards in Welsh. However, they considered that making the standards relating to the supplementary matters in question would not be reasonable and proportionate.

They stated that they would not be able to comply fully with the reporting requirements as it would not be possible to provide detailed statistics regarding the number of people who had made calls in Welsh to direct numbers, or the number of people who wanted to speak Welsh at meetings.

¹⁸⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁹⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

¹⁹¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standard in relation to policy making standards.¹⁹²

The Care Council for Wales confirmed that new policies were already assessed in terms of their impact on the Welsh language as part of equality impact assessments. They considered that making the policy making standards specifically applicable to them would be reasonable and proportionate, noting that it would be possible to alter current practice to meet the requirements of the standards where appropriate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The Care Council for Wales considered that making the standards that deal with supplementary matters in relation to policy making standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for use of the Welsh language within a body's internal administration.¹⁹³

Bearing in mind the requirements of standard 96, the Care Council for Wales confirmed that they implemented a policy on the use of the Welsh language internally, and that this policy had been published on the intranet. This was reinforced by noting that they had developed internal guidelines based on the principles of the 'active offer' outlined in the Welsh Government's 'More Than Just Words' strategy. They confirmed that they provided all documents noted in standards 87-102, and that the majority of those documents were available in Welsh. In terms of recording annual leave and absence from work, they noted that they used software supplied by a third party that was not available in Welsh. They confirmed that all the human resources policies noted in standards 103-109 were provided in Welsh.

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

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding complaints by members of a body's staff.¹⁹⁴

They confirmed that they will inform staff that they can submit or respond to complaints in Welsh, although they did not do so when the evidence was submitted. They noted that it would not be possible to comply fully with standards 111-113 as not all their managers were Welsh speakers. However, they acknowledged that it would be possible to provide translation services in order to facilitate meetings where members of staff wished a disciplinary process to be conducted in Welsh.

¹⁹² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁹³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁹⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding a body disciplining staff.¹⁹⁵

Considering the requirements attached to standards 114-117, the Care Council for Wales noted that they allowed all members of staff to respond in Welsh to allegations made against them through the internal disciplinary process. They noted that they would not be able to comply with all the standards in question as not all managers or members of the human resources team could speak Welsh. It should be noted that they had stated that it would be possible for them to comply by offering a simultaneous translation service and by translating written information in relation to disciplinary hearings.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding information technology and support material provided by a body, and regarding the intranet.¹⁹⁶

The Care Council for Wales confirmed that they would be able to comply with the standards regarding information technology and support material provided by a body, and regarding the intranet. They added that they already implemented a bilingual intranet.

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

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding a body developing Welsh language skills through workforce planning and development.¹⁹⁷

They confirmed that they assessed the Welsh language skills of their employees, and that all members of staff were given the opportunity to have Welsh language lessons during working hours as well as further training after staff had completed one series of lessons. They noted that they provided the types of training listed in standard 126 only, although they could provide training in accordance with standard 127 in the future. They confirmed that it would be possible to provide specific training for managers upon request, and that they already provided training in accordance with standards 130 and 131, except for standard 130(a). They confirmed that they already complied with standards 132 and 133.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding recruiting by a body.¹⁹⁸

They noted that managers had to answer a specific question regarding the Welsh language requirements of all new posts (whether an internal or an external post), as they prepared the relevant business case. This was done in consultation with the human resources team, which kept a record of the language skills of the organization's staff. They

¹⁹⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁹⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁹⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

¹⁹⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

confirmed that they provided the documents noted in standard 135A in Welsh. However, they did not state that individuals were welcome to apply for a post in Welsh, and that an application submitted in Welsh would not be treated less favourably than an application in English. This was reinforced by stating that application forms did not provide a space for the applicant to note a desire to be interviewed in Welsh. However, they confirmed that an interview or assessment would be carried out in Welsh, using a simultaneous translation service. They also noted that an applicant who had submitted an application for a post in Welsh would be informed of the final decision in Welsh.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding signs displayed in a body's workplace.¹⁹⁹

They already complied with the requirements of standards 139-141.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards regarding audio announcements and messages in a body's workplace.²⁰⁰

They did not make announcements using audio equipment in the workplace.

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

The Care Council for Wales noted that they did not implement any of the standards in question, save for standard 171 in relation to their complaints procedure. However, they confirmed that there would be no obstacles to them being able to comply with the standards, if they were made specifically applicable.

Promotion standards [143-144]

The Care Council for Wales confirmed that they would consent for promotion standards to be potentially applicable to them.

In considering the requirements of the proposed standards, information was provided regarding the terms of reference they had been given by the Welsh Government in terms of promoting use of the Welsh language for service users and in terms of emphasising language sensitivity within the social care workforce. Similarly, the Care Council for Wales noted that they played a lead role in terms of implementing the Welsh Government's 'More than Just Words' strategy.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards regarding record keeping.²⁰¹

¹⁹⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁰⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁰¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The Care Council for Wales confirmed that it would be necessary to establish some recording and monitoring procedures in order to collect some of the new information that would be necessary under the standards procedure, beyond the current requirements under their language scheme. Although they had noted that they kept appropriate records for complying with some of the standards, they acknowledged that it would not be possible to comply with each one in full. They stated that it would not be possible for them to provide detailed information about individuals who wished to have services in Welsh beyond those reordered on its central database, and also that it would not be possible to provide detailed information regarding the number of calls made to direct numbers in Welsh. They considered that making the record keeping standards specifically applicable to them would not be reasonable and proportionate.

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

The Care Council for Wales considered that making the standards that deal with supplementary matters in relation to record keeping standards specifically applicable to them would be reasonable and proportionate.

The Commissioner for Older People in Wales

Service delivery standards

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.²⁰²

No objection was received to the requirements attached to standards 1-7. The Commissioner for Older People in Wales confirmed that they were now able to record the chosen language of those persons contacting the Commissioner. However, they did not currently have a database for general enquiries that would enable them to record all calls and all correspondence.

The Commissioner for Older People in Wales considered that making the standards in relation to correspondence specifically applicable to them was reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 73% of the commitments corresponded to the standards for telephone calls made and received by a body.²⁰³

The Commissioner for Older People in Wales confirmed that they had a fully bilingual reception which meant that all calls could be dealt with in Welsh. This was reinforced by noting that they asked callers whether they would like to continue with their call in Welsh or in English, and that all their caseworkers were bilingual.

The Commissioner for Older People in Wales considered that making the standards relating to telephone calls specifically applicable to them would be reasonable and proportionate.

Activity 3: Meetings held by a body that are not open to the general public **Standards for meetings held by a body that are not open to the general public [23-29]**

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

²⁰² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁰³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.²⁰⁴

In responding to the requirements attached to standards 23-29, it was noted that the Commissioner for Older People in Wales offered mostly face to face meetings for individuals who found it difficult to make contact over the telephone. They confirmed that this service was available in Welsh or in English, and it was offered in a proactive way. If a person(s) noted that they wished a meeting to be held in Welsh, that meeting could be held in Welsh or simultaneous translation could be provided.

The Commissioner for Older People in Wales considered that making the standards in relation to meetings held by a body that are not open to the general public specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they did not carry out the activity in question, nor did they do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.²⁰⁵

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

Activity 5: Public events organised or funded entirely by a body
Standards for public events organised or funded entirely by a body [35-36]

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.²⁰⁶

They confirmed that it asked invited guests to inform them beforehand if they wished to speak Welsh. This was reinforced by stating that invitations and notices giving information about events were bilingual, with a checklist to follow when planning and holding organised events.

The Commissioner for Older People in Wales considered that making the standards in relation to public events specifically applicable to them would be reasonable and proportionate.

²⁰⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁰⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁰⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.²⁰⁷

They noted that they were fully committed to being a bilingual organization and that this was reflected in all aspects of their corporate identity.

They considered that making the standards in relation to publicity and advertising specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.²⁰⁸

They confirmed that any display stand, together with the material at exhibitions and conferences were bilingual.

They considered that making the standards in relation to displaying material in public specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the standards for a body producing and publishing documents.²⁰⁹

They noted that any material intended for use by the public in Wales was produced bilingually. This was reinforced by stating that documents were produced bilingually as a rule, but that separate versions were produced in exceptional circumstances.

However, they noted that some reactive press releases were not produced bilingually at present. Similarly, they confirmed that some internal documents were available in their original language only.

²⁰⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁰⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁰⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standards in relation to producing and publishing documents specifically applicable to them was reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing forms.²¹⁰

They confirmed that all published forms and surveys could be completed in Welsh and in English. This was reinforced by noting that from now on English forms would state that the form was available in Welsh.

They considered that making the standards in relation to producing and publishing forms specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body's websites and on-line services.²¹¹

They confirmed that their website was fully bilingual, and that there were Welsh and English sites that fully corresponded. They went on to note that they do not currently publish apps.

They considered that making the standards in relation to websites and on-line services specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for signs displayed by a body.²¹²

They confirmed that any signs displayed were signs they themselves had printed, and they were displayed bilingually.

²¹⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standards in relation to signs displayed by a body specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 57% of the commitments corresponded to the standards for a body receiving visitors at its buildings.²¹³

They noted that it provided a fully bilingual reception service and provided the 'Cymraeg' badge to denote this. They acknowledged that they do not note visitors who are Welsh speakers beforehand at present, but they will go about doing so before an appointment from now on, informing the staff in reception.

They considered that making the standards in relation to a body receiving visitors at its buildings specifically applicable to them was reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.²¹⁴

In responding to the requirements attached to standards 67-68, they noted that all official notices were published bilingually on their corporate website.

They considered that making the standards in relation to official notices specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they did not carry out the activity in question, nor did they do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body awarding grants.²¹⁵

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

²¹³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body awarding contracts.²¹⁶

They confirmed that they advertised the specifications of all tenders over £15000 bilingually. This was reinforced by noting that a Welsh language assessment was included as part of the tendering interview in cases where the language is part of the service specification.

They noted that the tender would need to be available in Welsh and in English for the assessment panel, considering the present nature of the staff.

They did not consider that making the standards in relation to awarding contracts specifically applicable to them would be reasonable and proportionate, as tender documents tended to be lengthy. This was reinforced by noting that the costs could be disproportionate to the value of the contract and their service needs.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.²¹⁷

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

They noted that all its services were offered and advertised in Welsh and in English via their website and leaflets produced.

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

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, and that they did so in Welsh.

²¹⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.²¹⁸

They noted that they were fully committed to being a bilingual organization and that this was reflected in all aspects of their corporate identity.

The Commissioner for Older People in Wales considered that making the standards in relation to corporate identity specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they carried out the activity in question, but that they did not do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.²¹⁹

They confirmed that they now offered training on age discrimination only, but that the member of staff providing that training could not speak Welsh. Therefore, the training was delivered in English. However, they confirmed that the documents accompanying the training were available in Welsh.

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

The Commissioner for Older People in Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.²²⁰

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

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

In responding to the standards that deal with supplementary matters in relation to the service delivery standards, the Commissioner for Older People in Wales confirmed that they recorded the chosen language of individuals when they contacted their casework team. They noted that they did not currently differentiate between meetings, telephone calls and written correspondence. Similarly, the telephone system did not currently offer an option to continue with a call in Welsh or English; rather a fully bilingual reception service was in operation.

²¹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²¹⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²²⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They did not consider that making the standards that deal with supplementary matters in relation to the service delivery standards specifically applicable to them would be reasonable and proportionate, due to the need for a substantial investment in a new telephone system and data base in order to comply with all the requirements.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the policy making standards.²²¹

No evidence was provided in relation to the policy making standards, as the Commissioner for Older People in Wales were of the opinion that they did not create policies as an organization. However, they noted that internal policies in relation to human resources and governance practices were formulated. They noted that they were of the opinion that these would be policies in relation to the operational standards.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

No evidence was provided in relation to the policy making standards, as the Commissioner for Older People in Wales was of the opinion that they did not create policies as an organization.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 7% of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.²²²

The Commissioner for Older People in Wales confirmed that they did not implement a policy on use of the Welsh language internally at present. However, they did not envisage any obstacle in implementing such a policy in future.

They were not of the opinion that it would be possible to comply fully with standard 96 as they did not have a bilingual intranet site at the moment. This was reinforced by stating that the cost of building a new intranet would be too high considering the paucity of specialist internal resources to undertake the work. As a result, they were of the opinion that other methods and forms of internal communication would be more reasonable.

Considering the requirements attached to standards 97-109, no problems were foreseen in terms of general compliance. However, they noted that there would be a need to provide the correspondence, the policies and the forms bilingually as not all the Human Resources support staff or the line manager could speak Welsh. Similarly, there were problems with the MYSCP Pension service which provided information about pension, such as balance sheets, in English only.

²²¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²²² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 40% of the commitments corresponded to the standards in relation to complaints made by members of staff.²²³

The Commissioner for Older People in Wales noted that they would be able to comply with standards 110-113. However, they confirmed that there would be a need to amend existing policies in order to do so as not all the officials within Human Resources, or the line managers were all Welsh speakers.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 40% of the commitments corresponded to the standards in relation to a body disciplining staff.²²⁴

The Commissioner for Older People in Wales noted that they would be able to comply with standards 114-117. However, they confirmed that there would be a need to amend existing policies in order to do so as not all the officials within Human Resources, or the line managers were all Welsh speakers.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.²²⁵

The Commissioner for Older People in Wales confirmed that they already complied with standard 118. However, they noted that limited resources affected their ability to comply with the requirements attached to standards 119-124. This was reinforced by noting that the Commissioner had a very simple intranet, which was created years ago through the medium of English only. They had not succeeded in obtaining a SharePoint 2010 plug-in in Welsh to work on the existing site. As a result, they would have to invest in a new intranet system in order to comply.

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

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.²²⁶

The Commissioner for Older People in Wales confirmed that it assessed the Welsh language skills of its employees.

In responding to the requirements attached to standards 126-127, they noted that they did not provide training in those areas. Similarly, they confirmed that there was currently no training for employees on the use of Welsh in their role as managers. However, they

²²³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²²⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²²⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²²⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

confirmed that opportunities were available for their employees to receive basic Welsh lessons, together with training in relation to the areas outlined in standards 130-131.

There was no objection to the requirements attached to standards 132-133 as these were current practice.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of the commitments corresponded to the standards in relation to recruiting by a body.²²⁷

The Commissioner for Older People in Wales noted that they held a review in relation to all new or vacant posts advertised. This was reinforced by noting that they considered the balance of Welsh language skills across the organization and not simply for the role only. They confirmed that they now made efforts to be more specific in job descriptions regarding what skills were required e.g. holding interviews with the media in Welsh.

They confirmed that they complied with the requirements of all other aspects of standards 134-138, except for the need to inquire whether an applicant would like to have an interview or assessment in Welsh.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 75% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.²²⁸

The Commissioner for Older People in Wales confirmed that they displayed signs within their buildings in Welsh, but that the Welsh text had not currently been placed so that it was the one likely to be read first.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.²²⁹

The Commissioner for Older People in Wales confirmed that audio announcements were not currently made within the workplace.

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

In responding to the requirements, the Commissioner for Older People in Wales noted that they would be able to publish an annual report. Similarly, they noted that they would promote the ability to submit a complaint in Welsh, and to receive Welsh services on the website and, when appropriate, in leaflets and other publications.

However, the Commissioner for Older People in Wales did not consider that making standards that deal with supplementary matters in relation to operational standards

²²⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²²⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²²⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

specifically applicable to them would be reasonable or proportionate, due to the reasons outlined in this section.

Promotion standards [143-144]

The Commissioner for Older People in Wales confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 85% of the commitments corresponded to record keeping standards.²³⁰

In providing information on their current corporate arrangements, the Commissioner for Older People in Wales noted that copies of assessments were not currently kept; rather the decision was reflected in the final job description and the advert. Similarly, they noted that only Welsh calls regarding inquiries were currently kept.

In responding to the requirements attached to standards 152-154, they confirmed that they recorded language choice as individuals contacted the casework team. However, there were no arrangements in place to differentiate between meetings, telephone calls and correspondence.

They did not consider that making the record keeping standards specifically applicable to them would be reasonable and proportionate, due to the need for a substantial investment in a new telephone system and data base in order to comply with all the requirements.

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

The Commissioner for Older People in Wales were of the opinion that an annual report would be a proportionate method of achieving all the requirements for publishing and providing information to the Welsh Language Commissioner.

They considered that making the standards that deal with supplementary matters in relation to the record keeping standards specifically applicable to them would be reasonable and proportionate.

²³⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

The Children's Commissioner for Wales

Service delivery standards

Activity 1: Correspondence sent by a body

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.²³¹

In responding to the requirements attached to standards 1-7, they confirmed that it welcomed correspondence in Welsh and English, and that all replies from the Children's Commissioner for Wales, whether correspondence or electronic communication, would be in the language of the original correspondence.

They considered that making the standards in relation to correspondence specifically applicable to them would be reasonable and proportionate.

Activity 2: Telephone calls made and received by a body

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 87% of the commitments corresponded to the standards for telephone calls made and received by a body.²³²

They confirmed that their arrangements in receiving telephone calls, and in making calls to members of the public complied with the standards. This was reinforced by stating that arrangements were in place to ensure that Welsh speakers were available to deal with calls when the officer on reception was not there.

They considered that making the standards in relation to telephone calls specifically applicable to them would be reasonable and proportionate.

Activity 3: Meetings held by a body that are not open to the general public

Standards for meetings held by a body that are not open to the general public [23-29]

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.²³³

²³¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²³² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²³³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They confirmed that they had a large number of staff who could speak Welsh. As a result, an appropriate officer was set aside for meetings, based on the language of the person wishing to have a meeting. However, in cases where no competent Welsh speaker was available, the offer was made to continue with the meeting in English or to deal with the matter via correspondence.

They considered that making the standards in relation to meetings held by a body that are not open to the general public specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they did not carry out the activity in question, nor did it do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of commitments corresponded to the standards in relation to meetings arranged by a body that are open to the public.²³⁴

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity. However, they noted that making these standards specifically applicable to them was reasonable and proportionate.

Activity 5: Public events organised or funded entirely by a body
Standards for public events organised or funded entirely by a body [35-36]

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.²³⁵

They noted that their current arrangements for holding public events complied fully with the requirements. They confirmed that contributions were welcomed in Welsh and/or in English, and that translation facilities were provided for those who do not speak Welsh.

The Children's Commissioner for Wales considered that making the standards in relation to public events specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.²³⁶

²³⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²³⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²³⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

The Children's Commissioner for Wales confirmed that they had adopted a fully bilingual corporate identity. This meant that all external relations work, including publication and marketing had due regard for the requirements of its Welsh language scheme. This was reinforced by stating that any proactive press release was bilingual. However, it was noted that reactive statements were submitted in the chose language of the media body receiving them.

They considered that making the standards in relation to publicity and advertising specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.²³⁷

They confirmed that all audio visual exhibitions, together with stalls used at events were bilingual. Therefore, the Children's Commissioner for Wales considered that making the standards in relation to displaying material in public specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 80% of the commitments corresponded to the standards for a body producing and publishing documents.²³⁸

They confirmed that all documents produced and which are available to the public are bilingual, including reports and newsletters.

They considered that making the standards in relation to a body producing and publishing documents specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing forms.²³⁹

²³⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²³⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²³⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They confirmed that all forms are available in Welsh and in English, and that they ensure that the Welsh language is not treated less favourably than English.

They considered that making the standards in relation to a body producing and publishing forms specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body's websites and on-line services.²⁴⁰

They noted that all pages on all their websites were bilingual, and that any page is updated and loaded at the same time. However, in cases where there is no Welsh version of a publication that has not been produced by them, a disclaimer will be included explaining that no Welsh version is available.

The Children's Commissioner for Wales considered that making the standards in relation to websites and on-line services specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for signs displayed by a body.²⁴¹

They considered that making the standards in relation to signs displayed by a body specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 71% of the commitments corresponded to the standards for a body receiving visitors at its buildings.²⁴²

They noted that unannounced visitors were received into the building by administrative officers; posts assessed as ones for which bilingualism was essential. This was reinforced by stating that expected visitors were offered a choice of language prior to the visit.

²⁴⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁴¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁴² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standards in relation to receiving visitors specifically applicable to them would be reasonable and proportionate.

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

The Commissioner for Older People in Wales noted that they did not carry out the activity in question, nor did it do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of commitments corresponded to the standards in relation to official notices made by a body.²⁴³

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity. However, they noted that making these standards specifically applicable to them was reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they did not carry out the activity in question, nor did it do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body awarding grants.²⁴⁴

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity. However, they noted that making these standards specifically applicable to them was reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body awarding contracts.²⁴⁵

They noted that adverts for tendering opportunities were published in Welsh and in English. They considered that making the standards in relation to awarding contracts specifically applicable to them would be reasonable and proportionate.

²⁴³ Average percentage of commitments within the Welsh language schemes of the persons in question, that correspond to the standards, for each activity.

²⁴⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁴⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.²⁴⁶

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

They noted that an advice and support service was offered in Welsh and in English. They considered that making the standards in relation to raising awareness about Welsh language services provided by a body specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they carried out the activity in question, and that they did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.²⁴⁷

They confirmed that they had adopted a fully bilingual corporate identity. This meant that all corporate material had due regard for the requirements of their Welsh language scheme.

They considered that making the standards in relation to corporate identity specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.²⁴⁸

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

²⁴⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁴⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁴⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Children's Commissioner for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.²⁴⁹

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity. However, they noted that making these standards specifically applicable to them was reasonable and proportionate.

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

In responding to the standards that deal with supplementary matters in relation to the service delivery standards, the Children's Commissioner for Wales confirmed that they had a complaints policy that was available bilingually on their website, together with hard copies in their offices.

They did not foresee any difficulty in complying with the requirements of standard 158-163, and they considered that making the supplementary standards in question specifically applicable to them would be reasonable and proportionate.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the policy making standards.²⁵⁰

The Children's Commissioner for Wales confirmed that an impact assessment was held on all occasions when an internal or external project was developed. They noted that the impact assessment included a category for the impact of policies on the Welsh language.

It was further confirmed that small groups within the organization undertook assessments of this kind, and contributed their opinions to the assessment process.

They considered that making the standards in relation to policy making specifically applicable to them would be reasonable and proportionate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

In responding to the standards that deal with supplementary matters in relation to the policy making standards, the Children's Commissioner for Wales confirmed that they published an annual report which tackled the relevant matters.

They considered that making the supplementary standards in question specifically applicable to them would be reasonable and proportionate.

²⁴⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁵⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 79% of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.²⁵¹

In considering the requirements attached to standards 96-109, the Children's Commissioner for Wales were of the opinion that it would be possible to comply with a substantial number of the requirements, although this was to a varying degree at present. They noted that only upon request were employment documents provided in Welsh as a matter of course. However, they confirmed that they were working towards substantially improving what was offered to employees.

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

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to complaints made by members of staff.²⁵²

The Children's Commissioner for Wales confirmed that they informed members of staff of any decision in Welsh on request, or if the member of staff had initiated the process with a request for it to be carried out through the medium of Welsh. Based on its current staffing arrangements, they were of the opinion that it would be possible to comply in part, but that they would strive to improve the provision by means of translation services.

Standards regarding a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to a body disciplining staff.²⁵³

The Children's Commissioner for Wales confirmed that they informed members of staff of any decision in Welsh on request, or if the member of staff had initiated the process with a request for it to be carried out through the medium of Welsh. Based on its current staffing arrangements, they were of the opinion that it would be possible to comply in part, but that they would strive to improve the provision by means of translation services.

Standards regarding information technology and support material provided by a body, and regarding the intranet [118-124]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.²⁵⁴

In considering the requirements attached to standards 118-124, the Children's Commissioner for Wales confirmed that they provided their employees and workers with

²⁵¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁵² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁵³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁵⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

computer software for checking spelling and grammar. However, they did not implement an intranet system in Welsh at present, nor did they provide Welsh interfaces.

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

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.²⁵⁵

The Children's Commissioner for Wales confirmed that they assessed the Welsh language skills of its employees. However, they did not provide training in Welsh in the areas outlined in standard 126. This was reinforced by noting that wider training in the Welsh language was provided or agreed upon request from individual workers and line managers.

They noted that they offered applicants an information pack, and that their induction programme included an introduction to operational policies, outlining their commitment to providing a language choice.

Standards regarding recruiting by a body [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of the commitments corresponded to the standards in relation to recruiting by a body.

The Children's Commissioner for Wales noted that they had developed a language skills policy, and that an assessment of the linguistic needs was carried out whenever a post was open for recruitment. They confirmed that all the recruitment documents were available in Welsh, and that a statement had been included welcoming applications in Welsh. In conducting interviews, they noted that it was not possible for them to conduct interviews or assessments in Welsh, due to their present staffing arrangements. However, simultaneous translation service would be organised upon request by an applicant.

Standards regarding signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.²⁵⁶

The Children's Commissioner for Wales confirmed that they displayed signs within their buildings in Welsh, and that the Welsh text is placed so that it is the one that is likely to be read first.

Standards regarding audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.²⁵⁷

²⁵⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁵⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁵⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

The Children's Commissioner for Wales confirmed that audio announcements were not currently made within the workplace.

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

The Children's Commissioner for Wales considered that making the standards in relation to operational standards specifically applicable to them would be reasonable and proportionate.

Promotion standards [143-144]

The Children's Commissioner for Wales confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to record keeping standards.²⁵⁸

The Children's Commissioner for Wales noted that they intended to review the Welsh language scheme and the Equality Scheme in order to ensure progress and compliance with the requirements attached to the regulations. This was reinforced by stating that they complied in part with the requirements at present, as a number of them were not current practice within the organization.

They considered that making the standards in relation to record keeping specifically applicable to them would be reasonable and proportionate.

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

The Children's Commissioner for Wales confirmed that they published relevant documents bilingually on their website as a matter of course. The Children's Commissioner for Wales considered that making the supplementary standards in question specifically applicable to them would be reasonable and proportionate.

²⁵⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

The General Teaching Council for Wales

Service delivery standards

Activity 1: Correspondence sent by a body

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.²⁵⁹

In considering the attached requirements, they did not foresee any difficulties in complying with the vast majority of the standards. However, they did not consider that making the standards in relation to correspondence specifically applicable to them would be reasonable and proportionate. This was reinforced by noting that standard 2 would be onerous and that it would take too much time and resources for a small organization like them, which had a large number of stakeholders.

Activity 2: Telephone calls made and received by a body

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 67% of the commitments corresponded to the standards for telephone calls made and received by a body.²⁶⁰

They confirmed that it would be possible for them to comply with a number of the standards in relation to telephone calls. However, concern was expressed regarding some standards within the activity, drawing attention to some specialist services that could not be provided in Welsh.

They did not consider that making all the standards in relation to telephone calls specifically applicable to them would be reasonable and proportionate, due to the difficulties a small organization would face in terms of record keeping requirements.

Activity 3: Meetings held by a body that are not open to the general public

Standards for meetings held by a body that are not open to the general public [23-29]

The General Teaching Council for Wales noted that they carried out the activity in question, but that it did not do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 78% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.²⁶¹

²⁵⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

No further evidence was provided in relation to this activity by the General Teaching Council for Wales.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the general public.²⁶²

They confirmed that it would be possible for them to comply with all the requirements, due to the fact that they were already current practice under their Welsh language scheme. However, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the additional costs in order to satisfy the standards where simultaneous translation would be needed.

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

The General Teaching Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.²⁶³

No evidence was provided in relation to this activity, as the General Teaching Council for Wales was of the opinion that they did not carry out the activity.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.²⁶⁴

They confirmed that they considered that making standards in relation to publicity and advertising specifically applicable to them was reasonable and proportionate, as it was current practice under its Welsh language scheme.

²⁶² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.²⁶⁵

They confirmed that they considered that making standards in relation to displaying material in public specifically applicable to them was reasonable and proportionate, as they were current practice under their Welsh language scheme.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing documents.²⁶⁶

Although they were of the opinion that the majority of the requirements were already current practice under their Welsh language scheme, concern was expressed regarding standard 41(b), due to the implications in terms of staff time and translation costs. Similarly, they did not consider that it would be reasonable and proportionate to comply fully with standard 44, noting that they prioritised documents for the public, including consultation papers.

The General Teaching Council for Wales considered that making the standards in relation to producing and publishing documents specifically applicable to them would be reasonable and proportionate.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 25% of the commitments corresponded to the standards for a body producing and publishing forms.²⁶⁷

They confirmed that they considered that making standards in relation to producing and publishing forms specifically applicable to them was reasonable and proportionate, as they were current practice under its Welsh language scheme.

²⁶⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body's websites and on-line services.²⁶⁸

They did not consider that there would be any obstacles to complying with the requirements attached to standards 52-57. However, they noted that they did not publish apps and so this standard, in their view, was irrelevant.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for signs displayed by a body.²⁶⁹

The General Teaching Council for Wales confirmed that they considered that making standards in relation to signs displayed by a body specifically applicable to them was reasonable and proportionate, as they were current practice under their Welsh language scheme.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 57% of the commitments corresponded to the standards for a body receiving visitors at its buildings.²⁷⁰

They were of the opinion that standards 62 and 62A were too bureaucratic and onerous. Similarly, they could not guarantee full compliance with standard 63 at present, due to the fact that a Welsh speaker in the administration team was not available at all times. Therefore, they did not consider that making standards in relation to receiving visitors specifically applicable to them would be reasonable and proportionate.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

²⁶⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁶⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁷⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.²⁷¹

They did not foresee any difficulties with standards 67-68 and so they were considered reasonable and proportionate.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding grants.²⁷²

They confirmed that they considered that making standards in relation to signs displayed by a body specifically applicable to them was reasonable and proportionate, as they were current practice under their Welsh language scheme. However, they noted that they were not of the opinion that some standards (71 and 72) within the activity were relevant to them.

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

The General Teaching Council for Wales noted that they carried out the activity in question, but that it did not do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding contracts.²⁷³

No further evidence was provided in relation to this activity by the General Teaching Council for Wales.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.²⁷⁴

It should be noted that section 12 (2) (b), Welsh Language Act 1993, notes that Welsh language schemes must specify how they will ensure that the scheme is publicised. The

²⁷¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁷² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁷³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁷⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Commissioner emphasises that this measure is not an optional element within the legislation.

They did not foresee any difficulties in complying with the requirements, and they considered that making standards in relation to raising awareness about their Welsh language services specifically applicable to them would be reasonable and proportionate.

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

The General Teaching Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.

It was noted that the Welsh Government should have checked the new logo of the new Education Workforce Council that would supersede the General Teaching Council for Wales.

They confirmed that they considered that making standards in relation to signs displayed by a body specifically applicable to them was reasonable and proportionate, as they were current practice under their Welsh language scheme.

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

The General Teaching Council for Wales noted that they did not carry out the activity in question.

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

No evidence was provided in relation to this activity, as the General Teaching Council for Wales was of the opinion that they did not carry out the activity.

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

The General Teaching Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.²⁷⁵

No evidence was provided in relation to this activity, as the General Teaching Council for Wales was of the opinion that they did not carry out the activity.

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

Although the General Teaching Council for Wales confirmed that it was possible to comply with a number of the requirements, concern was expressed regarding standard 161, noting

²⁷⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

that measuring some aspects of it would add to the workload in an unreasonable way. This was reinforced by stating that the standards in this section would be unnecessarily bureaucratic and overwhelming for smaller organizations.

Therefore, the General Teaching Council for Wales did not consider that making all the standards in relation to the supplementary matters in question specifically applicable to them would be reasonable and proportionate.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 30% of the commitments corresponded to the policy making standards.²⁷⁶

When considering the requirements attached to the policy making standards, the General Teaching Council for Wales noted that they included opportunities for registrants to obtain the relevant policies in Welsh, and that they monitored the way in which their services were provided on an annual basis. This was reinforced by stating that they did not consult on any policy decisions, nor did they collect opinions on policy implications at present.

They considered that making policy making standards specifically applicable to them would be reasonable and proportionate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

In considering the requirements attached, the General Teaching Council for Wales confirmed that it would be possible to comply with a number of the supplementary standards in question. However, they expressed concern regarding standard 166, noting that it appeared unnecessarily onerous. This was reinforced by questioning how useful it would be to arrange for monitoring processes to be available to the public.

They considered that making all the standards in relation to the supplementary matters in question specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.²⁷⁷

Considering the requirements of standard 96 the General Teaching Council for Wales confirmed that they did not implement a policy on use of the Welsh language internally. Similarly, they confirmed that they did not provide all the documents noted in standards 97-102 at present. However, the General Teaching Council for Wales was of the opinion that it would be possible to comply with the requirements, but that it would add to translation costs.

²⁷⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁷⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

In considering the requirements attached to standards 103-109, they noted that translating internal personnel policies would have a substantial effect on costs.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to complaints made by members of staff.²⁷⁸

The General Teaching Council for Wales confirmed that they could comply with the requirements in principle. However, concern was expressed regarding the practicality of some of the requirements, noting translation costs, the language skills of the existing staff as well as confidentiality matters.

Standards in relation to a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to a body disciplining staff.²⁷⁹

In responding to the requirements, although the General Teaching Council for Wales acknowledged that it was possible to comply, concern was expressed regarding the cost of the simultaneous translation service. Also, if written decisions were translated internally, they would have to consider confidentiality matters.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.²⁸⁰

The General Teaching Council for Wales did not consider the majority of the requirements to be reasonable and proportionate, due to the lack of finance and resources to translate and maintain current versions of policies, as well as to maintain a bilingual intranet. However, they noted that it would be possible for them to maintain a page raising awareness of training opportunities.

Standards in relation to a body developing Welsh language skills through planning and training its workforce [125-133]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 44% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.²⁸¹

The General Teaching Council for Wales confirmed that they did not assess the Welsh language skills of their employees. This was reinforced by noting that they did not provide training for staff in Welsh in any area outlined in standard 126. However, they noted that Welsh language training was available for learners, together with training to raise staff awareness of the Welsh language.

²⁷⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁷⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁸⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁸¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

They did not foresee any obstacles to complying with the requirements of standards 132-133.

Standards in relation to a body recruiting staff [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 71% of the commitments corresponded to the standards in relation to recruiting by a body.²⁸²

The General Teaching Council for Wales noted that they held an assessment of the need for Welsh language skills, with the decision being made between the line managers and the human resources team. This was reinforced by noting that application forms and job descriptions were available in Welsh. However, there was no opportunity for applicants to have an interview or assessment in Welsh at present.

Standards in relation to signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.²⁸³

The General Teaching Council for Wales confirmed that signs were not displayed in Welsh within their buildings.

Standards in relation to audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.²⁸⁴

The General Teaching Council for Wales confirmed that no audio announcements and messages were made within their workplace. Therefore they did not consider that making the standard specifically applicable to them would be reasonable and proportionate.

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

However, concerns were expressed regarding the internet and the need to publish documents internally. It was noted that they would need many resources, as well as additional translation costs in order to be able to comply. Similarly, it was noted that their budget for training had been cut completely, but if that situation were to change, they would be able to comply.

The General Teaching Council for Wales did not consider that making standards in relation to operational standards specifically applicable to them would be reasonable and proportionate. However, a positive response was received to the supplementary matters in question.

²⁸² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

²⁸³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

²⁸⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

Promotion standards [143-144]

The General Teaching Council for Wales confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 46% of the commitments corresponded to record keeping standards.²⁸⁵

In providing information on their current corporate arrangements, the General Teaching Council for Wales noted that they took data and information from across the entire organization as they monitored the implementation of their Welsh language scheme.

They confirmed that the present arrangements had veered away from measuring the demand, with the focus now on the opinion of users regarding the quality of the provision. To that end, they confirmed that it would not be possible to comply with a number of the requirements, with there being substantial financial implications to ensuring compliance.

They noted that a survey of staff linguistic skills was recorded by the human resources team. This was reinforced by noting that records in relation to complaints and training were kept centrally.

The General Teaching Council for Wales did not consider that making the standards in relation to record keeping standards specifically applicable to them would be reasonable and proportionate.

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

The General Teaching Council for Wales did not foresee any obstacles in complying with the requirements of the supplementary matters in question, and they were considered reasonable and proportionate.

²⁸⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

Higher Education Funding Council for Wales

Service delivery standards

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.²⁸⁶

They confirmed that a number of the requirements attached to the standards were current practice, in accordance with their Welsh language scheme. However, they expressed concern regarding a number of the standards, noting that implementing them would lead to more administrative costs.

Drawing attention to circulars they produced, they noted that the majority had been referred to universities, as well as to other educational organizations. Similarly, they corresponded with those organizations in relation to risk, financial state and governance. They were of the opinion that having to ensure that such correspondence was bilingual, and to a very small audience, would be a disproportionate burden. This was reinforced by stating that doing so would have a detrimental effect on the speed of their exchange with the target audience, and upon their reducing resources.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 53% of the commitments corresponded to the standards for telephone calls made and received by a body.²⁸⁷

They confirmed that they did not offer a call centre or helpline service, but that they did have one main number for external callers. However, they did not have a full-time switchboard operator. Rather, members of a specific team supervised the switchboard.

They did not consider that making the standards specifically applicable to them would be reasonable or proportionate. Among the reasons given was the staff's ability to deal with inquiries fully through the medium of Welsh in all areas of work. This was reinforced by stating that there would be substantial implications for the organization in order to guarantee such a service.

They did not consider standard 15 to be relevant to them, due to the nature of their work, together with the number of calls they receive.

²⁸⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁸⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Activity 3: Meetings held by a body that are not open to the general public
Standards for meetings held by a body that are not open to the general public [23-29]

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 94% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.²⁸⁸

They noted that meetings held in Welsh without the aid of a translation service happened ad hoc at present, depending on the linguistic skills of the members of staff involved. This was reinforced by noting that seminars and conferences they arranged for representatives from the higher education sector usually took place through the medium of English. However, consideration was given to use of the Welsh language, based on the subject, nature and likely audience for the event.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the lack of capacity within the workforce in order to guarantee that service. With this in mind, they were of the opinion that translation costs would increase substantially and that this would affect their ability to respond to requests for meetings at short-notice.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 80% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.²⁸⁹

They confirmed that persons attending public meetings were welcome to contribute through the medium of Welsh, with simultaneous translation facilities arranged. This was reinforced by noting that arrangements were made beforehand to confirm the chosen language of attendees, as well as to ensure that Welsh speaking members of staff were present in order to welcome people and to deal with enquiries.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for public events organised or funded entirely by a body.²⁹⁰

²⁸⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁸⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They confirmed that they contributed towards funding bodies that operated across the UK. On occasions, the service level agreement with those bodies included provision for holding an event in Wales. They noted that those events would be targeted at an audience of invited guests, and not the public. Similarly, seminars and conferences for representatives from the higher education sector were held through the medium of English. In submitting this evidence, they noted that they were uncertain whether events similar to the above would be included in the standards and wished to have further clarity regarding the definition of 'public'.

Despite the above, they noted that they expected events dealing with the provision of Welsh medium higher education to be held in Welsh or bilingually. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.²⁹¹

They confirmed that all the publicity materials they produced were bilingual. They considered that making the standards specifically applicable to them would be reasonable or proportionate.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.²⁹²

In responding to the requirements attached, they noted that they displayed information, such as copies of its annual publications, as well as other publications, bilingually. However, they noted that there were times when they did not display materials produced for UK or international audiences, and where no Welsh version was available. One example was a document produced by the Welsh Government, which was aimed at researchers and international universities.

Although they were of the opinion that it would be unreasonable and disproportionate to expect them to produce those documents in Welsh, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

²⁹⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁹¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁹² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing documents.²⁹³

In responding to the requirements attached, they confirmed that a number of their corporate documents had been published bilingually. This was reinforced by stating that some documents of a specialist nature were produced in English, with an operational summary in Welsh. However, where a text suggested that it should be in Welsh or if it was foreseen that the target audience would expect it to be in Welsh, it was produced bilingually.

The Higher Education Funding Council for Wales wished to have clarity regarding the words 'for public use' noted in the regulations. Similarly, they were not certain of the meaning of 'the press' in this context either, noting that if a member of the press requested a response in English, then the response would usually be in English.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate. A number of reasons were given for this in their evidence, including budgetary and operational reasons. They noted that there would be substantial implications in terms of translation costs in order to comply with all the requirements, as well as delays in the process of releasing documents to their stakeholders and internal council.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 25% of the commitments corresponded to the standards for a body producing and publishing forms.²⁹⁴

They noted that very rarely were forms produced for the public, but when this did happen, they were produced in Welsh. However, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate in relation to the nine Universities, namely their stakeholders. This was reinforced by noting that they produced a variety of forms for universities as part of their continuous liaison process.

²⁹³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁹⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body's websites and on-line services.²⁹⁵

They confirmed that all the text on their website pages was available in Welsh. Similarly, they noted that all Welsh pages were operational and mirrored the English content, allowing the user to choose in which language to browse the website.

However, they were not totally clear regarding the definition of 'interface' as noted in the draft regulations. Similarly, they noted that a further explanation was needed whether text on the page would refer to all the documents available to be downloaded from the website.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for signs displayed by a body.²⁹⁶

They confirmed that all their signs were bilingual, and that they ensured the Welsh language was not treated less favourably than the English. They considered that making the standards specifically applicable to them would be reasonable or proportionate.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of the commitments corresponded to the standards for a body receiving visitors at its buildings.²⁹⁷

They noted that they did not employ staff specifically for the reception. However, they noted that members of the public visiting its offices were welcome to make general inquiries in Welsh. Where bilingual staff were not available, arrangements were made in order to ensure that a member of staff could deal with the enquiry.

²⁹⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁹⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They did not consider that making the standards specifically applicable to them would be reasonable or proportionate. The reasons for this included the fact that they did not offer a service to welcome visitors directly, the disproportionality of ensuring that a Welsh speaker was available to provide a welcome service on all occasions, together with their present resources. This was reinforced by noting that they were not clear regarding the meaning of standard 61, and how compliance with that standard would work in practice.

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

The Higher Education Funding Council for Wales noted that it did not usually carry out the activity in question, but that it did so in Welsh from time to time.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.²⁹⁸

They noted that only rarely did they produce official notices, but when they did so, they ensured that they were bilingual. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Higher Education Funding Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body awarding grants.²⁹⁹

Although they noted that they did not carry out the activity, in referring to standards 71-72, they noted that there had been no occasions when interviews for grants were held. This was reinforced by noting that they would not have the capacity to interview without the aid of a translation service. This suggests that they could be awarding grants from time to time.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body awarding contracts.³⁰⁰

²⁹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

²⁹⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁰⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They confirmed that they did not procure many goods and services. However, when that did take place, they did this mostly via the National Procurement Service. They noted that they did not advertise tenders bilingually as a rule, but that bilingual adverts were placed for eligible or appropriate contracts.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate. The reasons for this included the substantial implications in terms of resources and operation, as well as the costs of translation. However, they acknowledged that they could undertake some public tendering bilingually if proportionate to the size of the organization and their ability to administer it effectively.

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

The Higher Education Funding Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.³⁰¹

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

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as it was of the opinion that it did not carry out the activity.

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

The Higher Education Funding Council for Wales noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.³⁰²

They noted that they were committed to maintaining a bilingual corporate identity in Wales, with standard information appearing on all their official materials and publications.

Although they considered that making the standards specifically applicable to them would be reasonable and proportionate in principle, they noted that their logo is the red 'HEFCW', with text in Welsh and English on the left. This was reinforced by noting that it would be costly to change this logo at a time when there was uncertainty regarding how long this name would be in existence in the medium term.

³⁰¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁰² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Higher Education Funding Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.³⁰³

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

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

The Higher Education Funding Council for Wales noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.³⁰⁴

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they were of the opinion that they did not carry out the activity.

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

The Higher Education Funding Council for Wales confirmed that they provided some 'service delivery' standards on its website, and that their Welsh language scheme was published. This was reinforced by noting that they had a common complaints procedure that was available bilingually, and that they produced a compliance report annually.

The Higher Education Funding Council for Wales considered that making the standards specifically applicable to them would be reasonable and proportionate.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the policy making standards.³⁰⁵

In responding to the requirements attached to the policy making standards, the Higher Education Funding Council for Wales noted that the policy-making standards, in principle, were current practice and that they operated in accordance with them, to varying degrees, through their Welsh language scheme. There were commitments in their Welsh language scheme to assess the possible linguistic effect of any new proposals submitted for approval by the organization.

³⁰³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁰⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁰⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

They noted that they consulted on policy decisions, holding an assessment of the policy's impact on the Welsh language. They did not have a policy on awarding grants. However, the Council noted that they were uncertain regarding the definition of the word 'grant' in this context, referring to the policy on funding universities and higher education in Wales. Welsh Ministers should ensure clarity regarding the above activity when specifying standards in regulations.

They did not consider that making the policy making standards specifically applicable to them would be reasonable and proportionate, due to uncertainty regarding the practicality of a number of the standards. Concern was expressed regarding consulting on policy decisions, rather than policy proposals. To this end, they wished to have an explanation regarding to what degree all finding decisions made by the organization would come under standard 92, as this would have an effect on time and resources, in their view.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The Higher Education Funding Council for Wales confirmed that they provided some 'service delivery' standards on their website, and that their Welsh language scheme was published. This was reinforced by noting that they had a common complaints procedure that was available bilingually, and that they produced a compliance report annually.

However, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the requirements attached to standard 165 (a) (ii). The reasons for this included the need to provide additional training, going beyond their usual procedures. Similarly, it was not clear to them why they would need to treat this policy differently to their other complaints policies.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.³⁰⁶

Considering the requirements of standard 96 the Higher Education Funding Council for Wales confirmed that they did not implement a policy on use of the Welsh language internally at present. However, staff were encouraged to receive Welsh lessons, and guidelines were provided on use of the Welsh language at work.

The Higher Education Funding Council for Wales confirmed that they provided some of the documents noted in standards 97-102. However, they acknowledged that they did not offer those documents officially to employees, but responded to the employee's language choice as a matter of course. They went on to note that a number of their human resources systems were electronic, and that those systems would need to be reproduced or rebuilt in order to maintain bilingual requirements.

In relation to the requirements attached to standards 103-109, they confirmed that all policies in question were published in English at present. However, they note that they appreciated that the work would have to be carried out only occasionally.

³⁰⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 20% of the commitments corresponded to the standards in relation to complaints made by members of staff.³⁰⁷

They did not allow members of their staff to submit complaints to the organization, or to respond to any complaints relating to him/her, in Welsh. Similarly, they noted that meetings in relation to complaints were not held in Welsh. Concern was expressed regarding the impact of using an external translator at the less formal or verbal stage, in terms of speed, the open nature of the process and confidentiality. However, they noted that it would be possible to ensure compliance with the requirements should an employee and/or worker so desire.

Standards in relation to a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 20% of the commitments corresponded to the standards in relation to a body disciplining staff.³⁰⁸

They did not allow members of their staff to respond in Welsh to allegations made in Welsh. Similarly, they noted that meetings in relation to disciplinary cases were not held in Welsh. Due to their present capacity, they noted that it would be impossible to hold those meetings without the aid of a translation service, leading to additional costs. However, they noted that it would be possible to ensure compliance with the requirements should an employee and/or worker so desire.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 29% of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.³⁰⁹

The Higher Education Funding Council for Wales noted that they provided computer software for checking Welsh spelling and grammar to employees and workers. Also, confirmation was received that they provided Welsh language interfaces. However, the pages of the intranet were not available in Welsh. This was reinforced by noting that they had a large number of policies, and that this comprised the major part of the content of their website. They were of the opinion that there would be a substantial effect on resources and working practices if they were expected to comply with some of the attached requirements.

They did not foresee any difficulty in providing Welsh language interfaces, where Welsh interfaces were available.

Standards in relation to a body developing Welsh language skills through planning and training its workforce [125-133]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards in

³⁰⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁰⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁰⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

relation to a body developing Welsh language skills through workforce planning and training.³¹⁰

The Higher Education Funding Council for Wales confirmed that they assessed the Welsh language skills of its employees.

In responding to the requirements attached to standard 126, they noted that they did not provide training in Welsh for staff in one of the areas noted. However, they noted that they would allow staff to attend training in relation to the areas outlined in standards 127-130, if they were noted as training requirements by staff. However, they desired a further explanation on the exact definition of standard 128(b).

Standards in relation to a body recruiting staff [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 71% of the commitments corresponded to the standards in relation to recruiting by a body.

The Higher Education Funding Council for Wales confirmed that all new posts, and all vacant posts, were considered in the context of linguistic skills requirements. This was reinforced by noting that they were aware of the need to tackle the deficit in terms of Welsh language skills.

The Higher Education Funding Council for Wales confirmed that they complied with the requirements of a number of aspects of standards 135-138. However, concern was expressed regarding the need to hold any interview or assessment in Welsh without the aid of a translation service. Similarly, concern was expressed regarding confidentiality and data protection matters in sharing the details of posts beyond the Human Resources department.

Standards in relation to signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 75% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.³¹¹

The Higher Education Funding Council for Wales confirmed that they displayed signs within their buildings in Welsh, and that the Welsh had been placed so that it is the one that is likely to be read first.

Standards in relation to audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.³¹²

The Higher Education Funding Council for Wales confirmed that no audio announcements and messages were made within their workplace. As a result, they did not consider that making the standard specifically applicable to them would be reasonable and proportionate.

³¹⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³¹¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³¹² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

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

The Higher Education Funding Council for Wales confirmed that it provided some 'service delivery' standards on its website, and that their Welsh language scheme was published. This was reinforced by noting that they had a common complaints procedure that was available bilingually, and that they produced a compliance report annually.

The Higher Education Funding Council for Wales considered that making the standards specifically applicable to them would be reasonable and proportionate.

Promotion standards [143-144]

The Higher Education Funding Council for Wales confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 77% of the commitments corresponded to record keeping standards.³¹³

The Higher Education Funding Council for Wales confirmed that they produced an annual report, with information regarding the provision of Welsh language services being collected across the organization. Despite those arrangements, they were of the opinion that they would need to implement a thorough record keeping procedure in order to ensure compliance.

Some concerns were expressed regarding their data protection requirements, together with the time required by the member of staff with responsibility for the Welsh language, to ensure that records were accurately kept. They explained that there was no capacity at present to increase the supervision and administration element within the relevant role.

The Higher Education Funding Council for Wales considered that making the standards specifically applicable to them would be reasonable and proportionate. However, in relation to standard 156(a), they noted that clarity was needed regarding the definition of 'need' and whether this would encompass essential or desirable skills or both.

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

It was confirmed that they produced and published a report on compliance annually.

The Higher Education Funding Council for Wales did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they did not see their relevance, considering their role. That evidence was not expanded upon in responding to the standards investigation.

³¹³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

Colleges Wales Ltd

Service delivery standards

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for correspondence sent by a body.³¹⁴

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 73% of the commitments corresponded to the standards for telephone calls made and received by a body.³¹⁵

In responding to the requirements attached to standards 8-22, Colleges Wales Limited confirmed that a number of them were already in place, in accordance with their Welsh language scheme. However, they noted that it would be difficult to guarantee full compliance with standards 18-19, as there could be occasions when no Welsh speaking staff were available.

Activity 3: Meetings held by a body that are not open to the general public **Standards for meetings held by a body that are not open to the general public [23-29]**

Colleges Wales Limited noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 17% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.³¹⁶

They confirmed that they partially complied with the standards at present. They noted that individuals wishing to contribute at meetings were not asked about their chosen language. This was reinforced by stating that what was reasonable was considered in relation to a specific meeting. As a result, without using translation services this would depend to a large extent on the linguistic skills and availability of staff.

³¹⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³¹⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³¹⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They noted that they did not inquire about language choice as a matter of course at present, due to the fact that meetings tended to happen naturally through the medium of Welsh where the person holding the meeting was able to speak the language. Similarly, they noted that it would be difficult for them to comply with some requirements at all times, due to the availability of staff able to speak Welsh. This was reinforced by stating that translation support would be needed in order to ensure compliance.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.³¹⁷

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.³¹⁸

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.³¹⁹

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

³¹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³¹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³¹⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.³²⁰

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing documents.³²¹

In responding to the requirements attached to standards 40-49, they confirmed that they already complied, in accordance with their Welsh language scheme. However, they acknowledged that they did not comply with standard 41 at present, due to the fact that the focus had been on public documents historically.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing forms.³²²

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body's websites and on-line services.³²³

³²⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate. However, they confirmed that they did not currently produce apps.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for signs displayed by a body.³²⁴

They noted that this activity was now well established as a matter of course under their Welsh language scheme. This was reinforced by noting that they followed the guidelines of the Welsh Language Commissioner, placing the Welsh above or to the left of the English. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 57% of the commitments corresponded to the standards for a body receiving visitors at its buildings.³²⁵

They confirmed that 2 members of staff worked in reception, with 1 being a fluent Welsh speaker, and the other able to greet in Welsh. They noted that it was possible to comply with the attached requirements, and they were considered reasonable and proportionate.

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

Colleges Wales Limited noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.³²⁶

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

³²³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

Colleges Wales Limited noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body awarding grants.³²⁷

No evidence was provided in relation to this activity, as Colleges Wales Limited were of the opinion that they did not carry out the activity.

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

Colleges Wales Limited noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language schemes of the person in question, 100% of the commitments corresponded to the standards for a body awarding contracts.³²⁸

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.³²⁹

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

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they carried out the activity in question, and did so in Welsh.

³²⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³²⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.³³⁰

They noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.³³¹

Despite the above, they confirmed that an MA course in Leadership and Management, together with a postgraduate certificate in Leadership and Management were being offered to lecturers in the further education sector. They noted that some of the seminars were in Welsh, and that 2 Welsh speakers worked in this field. Input, course work, assessments and feedback in Welsh were welcomed, and this was indicated in the advertising material. A premium was received from the Higher Education Funding Council for Wales in acknowledgement of this service.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.³³²

No evidence was provided in relation to this activity, as Colleges Wales Limited were of the opinion that they did not carry out the activity.

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

Colleges Wales Limited confirmed that a number of the requirements were operational as part of their current Welsh language scheme. However, they acknowledged that further documentation and procedures would have to be implemented in order to ensure full compliance over time.

Colleges Wales Limited considered that making the standards specifically applicable to them would be reasonable and proportionate, but reasonable imposition dates would be needed so that they could work towards full compliance.

³³⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³³¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³³² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Policy Making Standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 70% of the commitments corresponded to the policy making standards.³³³

They confirmed that the effects decisions made by the Board and the Senior Management Team had on the Welsh language were considered. This was reinforced by noting that a public linguistic impact assessment toolkit would be available shortly in order to assist those decisions. They confirmed that they did not award grants, and very rarely was research work commissioned by them.

They considered that making the standards in relation to policy making specifically applicable to them would be reasonable and proportionate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

Although Colleges Wales Limited did not comply with all the requirements of standards 164-169 at present, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.³³⁴

Considering the requirements of standard 96, Colleges Wales Limited confirmed that they did not implement a policy on use of the Welsh language internally at present. However, they noted that they did not implement an intranet system at present.

They confirmed that they did not provide all the documents noted in standards 97-102. However, since the current Welsh language scheme was adopted, staff were asked in which language they wished to receive documents.

In relation to the requirements attached to standards 103-109, they noted that it was possible to produce all policies bilingually, using a translator.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to complaints made by members of staff.³³⁵

Colleges Wales Limited noted that all staff were permitted to submit complaints in Welsh, although this was not conveyed to them in a formal manner. Concern was expressed

³³³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³³⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³³⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

regarding standards 111-113, noting that holding meetings in relation to complaints would require the Chief Executive and/or individuals within the human resources department to be able to speak Welsh. They noted that the sensitivity of the matter in question should be considered, together with confidentiality matters.

Standards in relation to a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to a body disciplining staff.³³⁶

In considering the requirements attached to standards 114-117, Colleges Wales Limited noted that they allowed members of staff to respond in Welsh to allegations made against them through the internal disciplinary process. Concern was expressed regarding their ability to ensure that meetings were held in the chosen language of the employee, due to the lack of specific human resources staff within the organization. As a result, they would need to arrange simultaneous translation in all cases.

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

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.³³⁷

Colleges Wales Limited noted that they provided computer software for checking Welsh spelling and grammar to employees and workers. Also, confirmation was received that they provided Welsh language interfaces. They did not implement an intranet system at present.

Standards in relation to a body developing Welsh language skills through planning and training its workforce [125-133]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.³³⁸

Colleges Wales Limited confirmed that they assessed the Welsh language skills of their employees. They also noted that training was not provided in Welsh in all areas noted in standards 126 and 130. However, they welcomed requests from staff to receive Welsh language training during working hours or outside those hours.

Standards in relation to a body recruiting staff [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 71% of the commitments corresponded to the standards in relation to recruiting by a body.³³⁹

³³⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³³⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³³⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³³⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Colleges Wales Limited noted that this activity was now well established as a matter of course under their Welsh language scheme. As a result, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

Standards in relation to signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.³⁴⁰

Colleges Wales Limited confirmed that they displayed signs within their buildings in Welsh, and that the Welsh was placed so that it was the one that was likely to be read first.

Standards in relation to audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.³⁴¹

Colleges Wales Limited confirmed that no audio announcements and messages were made within their workplace. However, they considered that making the standard specifically applicable to them would be reasonable and proportionate.

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

Colleges Wales Limited confirmed that they did not undertake any elements of the supplementary matters at present. However, they considered that making the standard specifically applicable to them would be reasonable and proportionate. The Welsh Language Commissioner was asked to give full consideration to imposition days in this respect in issuing compliance notices.

Promotion standards [143-144]

Colleges Wales Limited confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to record keeping standards.³⁴²

Although a number of the requirements were not current practice, Colleges Wales Limited confirmed that it would be possible for them to comply with the requirements over time, due to the need for a change in institutional behaviour.

Colleges Wales Limited considered that making the standards in relation to record keeping standards specifically applicable to them would be reasonable and proportionate.

³⁴⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁴¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁴² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

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

Colleges Wales Limited confirmed that it would be possible for them to comply with standards 178-179, after the other record keeping standards had become operational.

The National Institute of Adult Continuing Education

Service delivery standards

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 86% of the commitments corresponded to the standards for correspondence sent by a body.³⁴³

They confirmed that they ensured that the response to any correspondence was sent in the language in which it was received. Similarly, they noted that all correspondence sent for the first time was bilingual. Any record of language choice would be placed on a new system that would be implemented from April 2015 onwards.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 53% of the commitments corresponded to the standards for telephone calls made and received by a body.³⁴⁴

They noted that staff had now been trained to greet callers bilingually but that it was not possible for them to hold further discussions in Welsh, due to the departure of a Welsh-speaking member of staff recently. They confirmed that the answering service for the main telephone number had a bilingual recording asking the individual to leave a message.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the lack of Welsh-speaking members of staff. As a result of this shortage, it would not be possible for them to comply with a substantial number of the requirements.

Activity 3: Meetings held by a body that are not open to the general public Standards for meetings held by a body that are not open to the general public [23-29]

The National Institute of Adult Continuing Education noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.³⁴⁵

³⁴³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁴⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to cost implications and the lack of Welsh-speaking members of staff.

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

The National Institute of Adult Continuing Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 80% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.³⁴⁶

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not hold public meetings.

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

The National Institute of Adult Continuing Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.³⁴⁷

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not hold public events.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.³⁴⁸

They confirmed that all publicity and advertising material was produced bilingually, and that the Welsh version was not treated less favourably than the English version.

The National Institute of Adult Continuing Education considered that making the standards specifically applicable to them would be reasonable and proportionate.

³⁴⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁴⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁴⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁴⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.³⁴⁹

They confirmed that any material displayed was bilingual.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing documents.³⁵⁰

Where documents are produced for publication in Wales, they confirmed that they did so bilingually. Considering the above, they considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body producing and publishing forms.³⁵¹

They confirmed that they produced any public compliance forms bilingually. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 83% of the commitments corresponded to the standards for a body's websites and on-line services.³⁵²

³⁴⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They confirmed that the pages of their corporate website were bilingual. This was reinforced by stating that the content, where relevant, was published in both languages.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for signs displayed by a body.³⁵³

In responding to the requirements attached, they noted that all their signs were bilingual. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 57% of the commitments corresponded to the standards for a body receiving visitors at its buildings.³⁵⁴

They noted in their evidence that the organization was currently located in a multi-occupation building, which was managed by an external company. As a result, they did not have control over the staff of the main reception.

The National Institute of Adult Continuing Education did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for official notices made by a body.³⁵⁵

In responding to the relevant requirements, they noted that all official notices they produced were bilingual. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

³⁵² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding grants.³⁵⁶

They confirmed that all their grant documents were produced and circulated bilingually. Similarly, they noted that a translation service was available at any time during the interview process.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding contracts.³⁵⁷

They confirmed that documents in relation to contracting were available bilingually, where relevant. Similarly, they noted that a translation service was available at any time during the interview process.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that it did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.³⁵⁸

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

³⁵⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁵⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

In responding to the requirements, they noted that Welsh language services were not provided directly by them. This evidence was not expanded upon in responding to the standards investigation.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.³⁵⁹

They confirmed that their logo, together with their corporate identity were all bilingual. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The National Institute of Adult Continuing Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.³⁶⁰

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not provide or offer any educational courses to the public.

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

The National Institute of Adult Continuing Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.³⁶¹

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not have a public address system.

³⁵⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁶⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁶¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

No evidence specific to the standards was provided in relation to the supplementary matters. However, the National Institute of Adult Continuing Education considered that making the standards specifically applicable to them would be reasonable and proportionate.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the policy making standards.³⁶²

The National Institute of Adult Continuing Education did not consult on policy decisions at present. However, they had a policy on awarding grants, considering the requirements of standard 92.

The National Institute of Adult Continuing Education considered that making the standards specifically applicable would be reasonable and proportionate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

No evidence specific to the standards was provided in relation to the supplementary matters. However, the National Institute of Adult Continuing Education considered that making the standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.³⁶³

The National Institute of Adult Continuing Education confirmed that they did not implement a policy on use of the Welsh language internally, but that internal communication through the medium of Welsh could be ensured at their office in Wales if necessary. Similarly, they noted that all the documents outlined in standards 97-102 were available in Welsh should an employee or worker so desire.

Although the policies outlined in standards 103-109 were not available in Welsh at present, they did not foresee any difficulty in providing these policies to employees or workers should they request them.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to complaints made by members of staff.³⁶⁴

³⁶² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁶³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁶⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

Although it is possible for staff to submit and respond to any complaints in Welsh, the National Institute of Adult Continuing Education did not inform them of this. Although it was not their current practice to offer meetings in relation to complaints in Welsh, they did not foresee a difficulty in complying with that.

Standards in relation to a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to a body disciplining staff.³⁶⁵

Although it was possible for staff to submit and respond to allegations in Welsh, the National Institute of Adult Continuing Education did not inform them of this. Although it was not their current practice to offer meetings in relation to disciplinary cases in Welsh, they did not foresee a difficulty in complying with that.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.³⁶⁶

The National Institute of Adult Continuing Education noted that they did not offer support material in Welsh or Welsh language interfaces to their staff at present. Similarly, intranet pages were not available in Welsh either.

They did not consider that it would be reasonable for them to have to provide the intranet pages in Welsh, due to the fact that the system was maintained through their head office in England. They also noted that only 10% of their staff worked in Wales.

Standards in relation to a body developing Welsh language skills through planning and training its workforce [125-133]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 78% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.³⁶⁷

The National Institute of Adult Continuing Education did not assess the Welsh language skills of their employees at present. Similarly, no training was provided in Welsh in accordance with a considerable extent of standards 126-131. However, they noted that basic Welsh language training had been provided for staff in the past, with some members having developed their skills through further training.

Standards in relation to a body recruiting staff [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 57% of the commitments corresponded to the standards in relation to recruiting by a body.³⁶⁸

³⁶⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁶⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁶⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁶⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

They confirmed that they did not have any definite methodology in reaching a decision regarding the necessary Welsh language skills needed when advertising a vacant or new post. Rather, they included Welsh language skills as 'desirable' for all posts.

The National Institute of Adult Continuing Education confirmed that they complied with some of the requirements attached to standards 134-138 at present.

Standards in relation to signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.³⁶⁹

The National Institute of Adult Continuing Education confirmed that they displayed signs within their buildings in Welsh, but that the Welsh had not been placed so that it was the one that was likely to be read first.

Standards in relation to audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.³⁷⁰

They confirmed that no announcements were made over an audio system within their workplace. As a result, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

No evidence specific to the standards was provided in relation to the supplementary matters. However, the National Institute of Adult Continuing Education considered that making the standards specifically applicable to them would be reasonable and proportionate.

Promotion standards [143-144]

The National Institute of Adult Continuing Education confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 77% of the commitments corresponded to record keeping standards.³⁷¹

In providing information on their current corporate arrangements, The National Institute of Adult Continuing Education noted that records were kept via a database, in order to be able to identify those persons who wished to receive correspondence or further contact through the medium of Welsh. Similarly, those systems were already in place to record assessments of the Welsh language needs of posts, together with complaints.

³⁶⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁷⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁷¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

However, they acknowledged that relevant policies would need to be amended in order to reflect the new requirements that would be upon them under Welsh language standards.

The National Institute of Adult Continuing Education considered that making the standards in relation to record keeping standards specifically applicable to them would be reasonable and proportionate.

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

No evidence specific to the standards was provided in relation to the supplementary matters. However, the National Institute of Adult Continuing Education considered that making the standards specifically applicable to them would be reasonable and proportionate.

The Quality Assurance Agency for Higher Education

Service delivery standards

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 71% of the commitments corresponded to the standards for correspondence sent by a body.³⁷²

They did not foresee any difficulties in complying with the requirements. This was reinforced by noting that they were committed to receiving and responding to correspondence in Welsh, ensuring that the Welsh language is not treated less favourably than English.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 40% of the commitments corresponded to the standards for telephone calls made and received by a body.³⁷³

They were of the opinion that it would be unreasonable and disproportionate for them to have to comply with the standards, except in relation to the Welsh language line. This was reinforced by noting that its headquarters was in England, and that it was an organization that operated across the UK.

Activity 3: Meetings held by a body that are not open to the general public **Standards for meetings held by a body that are not open to the general public [23-29]**

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.³⁷⁴

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate. Referring specifically to standards 23, 25 and 26, they noted that they would have to be informed beforehand that a visitor wished to hold a meeting in Welsh, so that they could arrange a translation service. In relation to standards 28, 29 and 29A, reference was made to the fact that they were an organization that had a remit across the UK with their headquarters in England.

³⁷² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁷³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁷⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Quality Assurance Agency for Higher Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language schemes of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.³⁷⁵

They did not consider that making the standards in relation to meetings that are open to the public specifically applicable to them would be reasonable and proportionate, due to the fact that they did not carry out the activity.

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

The Quality Assurance Agency for Higher Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.³⁷⁶

They did not consider that making the standards in relation to meetings that are open to the public specifically applicable to them would be reasonable and proportionate, due to the fact that they did not organise or fund public events. This was reinforced by stating that they only held events that were by invitation only. Welsh Ministers should ensure clarity in relation to events of this kind in specifying standards and making them specifically applicable to the person in question.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.³⁷⁷

They considered that making the standards in relation to publicity and advertising specifically applicable to them would be reasonable and proportionate.

³⁷⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁷⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁷⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for displaying material in public.³⁷⁸

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not display material in public.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the standards for a body producing and publishing documents.³⁷⁹

Although they confirmed that documents produced specifically for Wales were available in Welsh, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate. Among the reasons for this was the irrelevance of some of the standards (42, 45) to their activities, together with the fact that they had a remit across the UK.

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

The Quality Assurance Agency for Higher Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 75% of the commitments corresponded to the standards for a body producing and publishing forms.³⁸⁰

The Quality Assurance Agency for Higher Education did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not produce and publish forms for use by the public.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for a body's websites and on-line services.³⁸¹

³⁷⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁷⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

In responding to the attached requirements, they noted that it would be unreasonable and disproportionate for them to have to comply with standards 53 and 56. Among the reasons for this was the fact that they had a remit across the UK and that their headquarters was in England. However, they confirmed that they had a specific section for Wales on their website, and that it was available in Welsh.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 33% of the commitments corresponded to the standards for signs displayed by a body.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK and the fact that their headquarters was in England. However, they confirmed that they had bilingual signs in the regional office in Cardiff.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 29% of the commitments corresponded to the standards for a body receiving visitors at its buildings.³⁸²

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK, and the fact that their headquarters was in England. This was reinforced by noting that visitors were received at their offices in Cardiff by invitation only, and that the staff on reception were employed by NUS Wales.

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

The Quality Assurance Agency for Higher Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for official notices made by a body.³⁸³

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not publish any official notices.

³⁸¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Quality Assurance Agency for Higher Education noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 67% of the commitments corresponded to the standards for a body awarding grants.³⁸⁴

The Quality Assurance Agency for Higher Education did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that they did not invite applications for grants or award grants.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for a body awarding contracts.³⁸⁵

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK and the fact that their headquarters was in England. This was reinforced by noting that procurement contracts were published across the UK.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.³⁸⁶

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

In responding to the attached requirements, they confirmed that guidance was issued to staff on their Welsh language scheme. Similarly, they noted that their induction programme further raised awareness regarding the Welsh language services.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

³⁸⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.³⁸⁷

They noted that recent changes to their logo had been approved by the Welsh Language Commissioner. They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Quality Assurance Agency for Higher Education noted that they did not carry out the activity in question, nor did they do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.³⁸⁸

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, as they did not provide education courses for the public.

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

The Quality Assurance Agency for Higher Education noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.³⁸⁹

They did not consider that making standards specifically applicable to them would be reasonable and proportionate, due to the fact that they rented a building on a lease at present, and that they were not responsible for the public address systems in that building.

³⁸⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

³⁸⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

Although the Quality Assurance Agency for Higher Education noted that they considered that making the standards in relation to the supplementary matters specifically applicable to them would be reasonable and proportionate, concern was expressed regarding standard 160. They were of the opinion that having to comply with that specific standard would be unreasonable, due to their remit across the UK, and the fact that their headquarters was in England.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the policy making standards.³⁹⁰ The Quality Assurance Agency for Higher Education confirmed that they consulted on any review methods introduced in Wales, and did so whilst considering the Welsh language provision. However, they did not consider standards 92, 93 and 94 to be relevant, due to the fact that they did not award grants.

Although they acknowledged that it would be possible to maintain the commitments outlined in their Welsh language scheme, they noted that any additional duties would be unreasonable and disproportionate.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The Quality Assurance Agency for Higher Education considered that making the standards specifically applicable to them would be reasonable and proportionate.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.³⁹¹

The Quality Assurance Agency for Higher Education confirmed that they did not implement a policy on use of the Welsh language internally, nor did they provide documents and forms in accordance with the requirements.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK, together with the fact that all the support services were located at their headquarters (England).

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to complaints made by members of staff.³⁹²

³⁹⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁹¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁹² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

The Quality Assurance Agency for Higher Education confirmed that they did not allow members of staff to make complaints, or to respond to any complaint in Welsh. Similarly, no meetings in relation to complaints were available in Welsh.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK, together with the fact that all the support services were located at their headquarters (England).

Standards in relation to a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to a body disciplining staff.³⁹³

The Quality Assurance Agency for Higher Education confirmed that they did not allow members of staff to respond in Welsh to any allegations made against them. Similarly, no meetings in relation to disciplinary cases were available in Welsh. However, they noted that, following a disciplinary case, they informed a member of staff of their decision in Welsh.

The Quality Assurance Agency for Higher Education did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to due to their remit across the UK, and the fact that their headquarters was in England.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.³⁹⁴

The Quality Assurance Agency for Higher Education confirmed that they provided support materials for employees and workers, in accordance with standard 118. However, they did not implement a bilingual intranet system, nor did they provide Welsh language interfaces at present.

The Quality Assurance Agency for Higher Education did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK, and the fact that their headquarters was in England. They noted also that there would be substantial costs involved in the work of ensuring a bilingual intranet, and that it would take at least 12 months to implement.

Standards in relation to a body developing Welsh language skills through planning and training its workforce [125-133]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 56% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.³⁹⁵

³⁹³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards, be that partially or completely.

³⁹⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁹⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

The Quality Assurance Agency for Higher Education confirmed that they assessed the Welsh language skills of their employees. In responding to the requirements, they noted that they did not provide training for staff in Welsh in one of the areas outlined in standards 126-129. However, they confirmed that training on awareness of the Welsh language and the Welsh language scheme was provided for them. They went on to note that assessments and personal development plans drew attention to any Welsh language training staff wished to receive.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to their remit across the UK, that their headquarters was in England and thus they operated through the medium of English only.

Standards in relation to a body recruiting staff [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards in relation to recruiting by a body.³⁹⁶

The Quality Assurance Agency for Higher Education noted that Welsh language skills were assessed as part of their general recruitment arrangements. This was reinforced by noting that the Welsh language was identified as a desirable skill for all vacant posts.

Standards in relation to signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 75% of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.³⁹⁷

The Quality Assurance Agency for Higher Education confirmed that they displayed signs within their buildings in Welsh, and that the Welsh had been placed so that it was the one that was likely to be read first.

Standards in relation to audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.³⁹⁸

The Quality Assurance Agency for Higher Education confirmed that audio announcements and messages were made within their workplace. However, they were not in Welsh, due to the location of their headquarters. This was reinforced by noting that they rented a building on lease at present, and that they were not responsible for the building's public address systems.

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

In responding to the requirements attached, they noted that their Welsh language scheme was available via the corporate website. They confirmed that the offices of the Quality Assurance Agency for Higher Education were not open to the public.

³⁹⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁹⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

³⁹⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Promotion standards [143-144]

The Quality Assurance Agency for Higher Education confirmed that they did not consent for promotion standards to be potentially applicable to them.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 92% of the commitments corresponded to record keeping standards.³⁹⁹

In providing evidence on their current corporate arrangements, the Quality Assurance Agency for Higher Education noted that the Welsh language was a standing item on their internal committee. Similarly, they noted that they recorded matters involving the Welsh language in a database.

They considered that making the standards in relation to record keeping specifically applicable to them would be reasonable and proportionate.

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

The Quality Assurance Agency for Higher Education confirmed that they would publish the record keeping standards they must comply with on their website. They noted that the offices of the Quality Assurance Agency for Higher Education were not open to the public.

They considered that making the standards in relation to the supplementary matters specifically applicable to them would be reasonable and proportionate.

³⁹⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Universities and Colleges Admission Service

Service delivery standards

Activity 1: Correspondence sent by a body

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 43% of the commitments corresponded to the standards for correspondence sent by a body.⁴⁰⁰

They confirmed that it would be possible for them to comply with standards 1-6, noting that it was already possible for applicants to register and apply for HE courses through the medium of Welsh. This was reinforced by noting that they could respond to correspondence in the language in which it was received. This was done by depending on the members of staff who had Welsh language skills, or by means of a translation service.

Despite the above, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate, in circumstances in which unprecedented levels of correspondence was received in Welsh. In such circumstances, they noted that it would be difficult to ensure compliance without delay, due to the limited number of staff with Welsh language skills, and also their dependence on translation services.

They noted that the requirements of standard 7 would be disproportionate, as it was possible for applicants to complete applications through the medium of Welsh, and that the option was noted clearly on the application form. They also stated that there would be substantial costs involved in making the necessary changes to their systems.

Activity 2: Telephone calls made and received by a body

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, on average 47% of the commitments corresponded to the standards for telephone calls made and received by a body.⁴⁰¹

They confirmed that it would be very difficult for them to comply with standards 8-10, 16-18 and 20-22. The reasons for this included the location of their office (England), and the fact that the majority of calls received came from applicants from the remainder of the UK and internationally. As a result, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

⁴⁰⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

Activity 3: Meetings held by a body that are not open to the general public
Standards for meetings held by a body that are not open to the general public [23-29]

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 28% of the commitments corresponded to the standards in the draft regulations for meetings held by a body that are not open to the general public.⁴⁰²

They confirmed that they held meetings twice a year, for the purpose of consultation and information sharing. They noted that all invitations, agendas and papers for those meetings were bilingual, with simultaneous translation available where one or more attendees had informed the organization of their desire to speak Welsh.

Despite the above, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to concern regarding standards 23-26 and 28-29B. However, they confirmed that all efforts would be made to hold the meeting in Welsh when a request to do so was received.

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

The Universities and Colleges Admission Service noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for meetings arranged by a body that are open to the public.⁴⁰³

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

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

The Universities and Colleges Admission Service noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for public events organised or funded entirely by a body.⁴⁰⁴

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

⁴⁰² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's publicity and advertising.⁴⁰⁵

They confirmed that two members of staff could speak Welsh in the organization, and can conduct television and radio interviews through the medium of Welsh. They also noted that press releases were not currently published in Welsh and that they were not of the opinion that this requirements would be proportionate, as a number of those releases were for articles that were not necessarily published in Wales. This was reinforced by noting that no request had been received from the press in Wales in recent years for the service. No confirmation was received from them whether it was the Welsh language press that was in question here.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for displaying material in public.⁴⁰⁶

Where they held activities in Wales, consideration is given to displaying public material in Welsh. However, they noted that the majority of the material produced was in English only, due to the fact that a considerable amount of their activities were held outside Wales. They noted that it would be reasonable for them to continue to provide necessary material in Welsh, providing other material in Welsh as required.

The Universities and Colleges Admission Service did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the standards for a body producing and publishing documents.⁴⁰⁷

⁴⁰⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They confirmed that documents were produced for the public in the UK, the European Union and internationally. Therefore, they did not consider that having to produce and publish all their documentation in Welsh would be reasonable and proportionate. Rather, they noted that it would be reasonable for them to continue to provide necessary documents for meetings in Welsh. This was reinforced by noting that other relevant documents could be produced as needed, in accordance with the requirements of standards 47, 48 and 49.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 25% of the commitments corresponded to the standards for a body producing and publishing forms.⁴⁰⁸

They noted that users were able to register and apply for HE courses through the medium of Welsh or English. They confirmed that the Welsh version is not treated less favourably than the English in any way.

The Universities and Colleges Admission Service considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language schemes of the person in question, an average of 33% of the commitments corresponded to the standards for a body's websites and on-line services.⁴⁰⁹

They confirmed that their corporate website was targeted at the public in the UK, the European Union and internationally. Therefore, they did not consider that having a fully bilingual website would be reasonable and proportionate. Rather, they noted that it would be reasonable for them to continue to provide an accessible sub-website, with a view to providing further information on its website as needed.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

⁴⁰⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴⁰⁹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for signs displayed by a body.⁴¹⁰

They confirmed that they did not have an office in Wales, and that no request had been received from employees with Welsh language skills to display Welsh signs in the workplace. As a result, the Universities and Colleges Admission Service did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 14% of the commitments corresponded to the standards for a body receiving visitors at its buildings.⁴¹¹

They confirmed that they did not receive visitors in Welsh at present, due to the low number of visitors received who could speak Welsh. However, where an appointment was made and the visitor had noted a desire for a reception service in Welsh, they would ensure that a member of staff was available to go to reception.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for official notices made by a body.⁴¹²

They noted that they published a number of official notices. These include technical updates on applications and admission systems for higher education providers and applicants.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the low percentage of applicants that were Welsh speakers, as well as the lack of demand for such notices in Welsh.

⁴¹⁰ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴¹¹ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴¹² For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Universities and Colleges Admission Service noted that they did not carry out the activity in question.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of the commitments corresponded to the standards for a body awarding grants.⁴¹³

No evidence was provided in relation to this activity, as they were of the opinion that they did not carry out the activity.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language schemes of the person in question, an average of 33% of the commitments corresponded to the standards for a body awarding contracts.⁴¹⁴

They confirmed that they did not publish invitations to tender officially, due to the status of the organization. However, alternative methods of tendering were used, selecting a shortlist of companies after reviewing the relevant market. Once a shortlist was drawn up, invitations to tender were sent to the companies on a confidential basis.

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the level of cost, and the efficiency of the process in their view.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for raising awareness about Welsh language services provided by a body.⁴¹⁵

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

It was confirmed that the Universities and Colleges Admission Service had created a Welsh section on their corporate website. This was reinforced by stating that the section promoted the application process that was available in both languages.

⁴¹³ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴¹⁴ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴¹⁵ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

They considered that making the standards specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 100% of the commitments corresponded to the standards for a body's corporate identity.⁴¹⁶

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to the fact that the acronym 'UCAS' was widely used across Wales and beyond. However, when business was being conducted in Wales, they noted that they were committed to promoting the Welsh services they provided.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, and did so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for courses provided by a body.⁴¹⁷

They confirmed that training sessions were held for higher education providers across the UK. They noted that these sessions varied from general packages to some that were much more bespoke and specific. As the vast majority of attendees were non-Welsh speakers, they did not consider that making the standards specifically applicable to them would be reasonable and proportionate. However, should there be an increase in the demand for courses in Welsh, they would consider providing the course with the aid of translation.

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

The Universities and Colleges Admission Service noted that they carried out the activity in question, but did not do so in Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards for public address systems used by a body.⁴¹⁸

They did not consider that making the standards specifically applicable to them would be reasonable and proportionate, due to them being based in England. This was reinforced by stating that a very low percentage of staff within the organization could speak Welsh and that it was unlikely that there would be an increase in those numbers due to their location.

⁴¹⁶ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴¹⁷ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

⁴¹⁸ For each activity the average percent of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or completely.

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

The Universities and Colleges Admission Service did not consider that making the standards specifically applicable to them would be reasonable and proportionate, on the basis that the standards made specifically applicable to them would be limited, in accordance with their response.

Policy making standards [86-95]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of the commitments corresponded to the policy making standards.⁴¹⁹

The Universities and Colleges Admission Service noted that they accepted their responsibilities in introducing any new policies or initiatives. This was reinforced by confirming that linguistic impact assessments were carried out by the legal team.

They confirmed that they consulted on policy decisions, but that they did not at present have a policy on awarding grants.

In considering the requirements attached, the Universities and Colleges Admission Service considered that having to comply with standards 89, 90 and 91 for all policy decisions would be unreasonable and disproportionate. They noted that having to do so would mean delays and complexity in the process.

However, they were of the opinion that it would be reasonable for them to seek opinions, and to consider the effects of any policies where the policy was relevant to Welsh users and services specifically.

Standards that deal with supplementary matters in relation to the policy making standards [164-169]

The Universities and Colleges Admission Service did not consider that making the standards specifically applicable to them would be reasonable and proportionate, on the basis that the standards made specifically applicable to them would be limited, in accordance with their response.

Operational standards [96-142]

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to use of the Welsh language within internal administration.⁴²⁰

Considering the requirements of standard 96, they confirmed that they did not implement a policy on use of the Welsh language internally at present. Although they acknowledged that implementing such a policy would not be a burden, they did not consider the requirement to be a reasonable one considering the location of the organization and the low percentage of staff with Welsh language skills. This was reinforced by noting that they

⁴¹⁹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁴²⁰ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

were of the opinion that it would be better for them to ensure compliance with the service delivery standards, enabling members of the public to deal with them in Welsh.

The Universities and Colleges Admission Service confirmed that they did not provide the documents noted in standards 97-102 in Welsh. Similarly, they confirmed that all the policies in question in standards 103-109 were available in English only.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to complaints made by members of staff.⁴²¹

The Universities and Colleges Admission Service confirmed that they did not allow members of staff to submit complaints to the organization, or to respond to any complaints relating to him/her, in Welsh at present.

Standards in relation to a body disciplining staff [114-117]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to a body disciplining staff.⁴²²

In considering standards 114-117, confirmation was received from the Universities and Colleges Admission Service that they did not comply with the requirements at present.

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

When analysing current commitments in the Welsh language scheme of the person in question, none of commitments corresponded to the standards in relation to information technology and support material provided by a body, and relating to the intranet.⁴²³

The Universities and Colleges Admission Service noted that they did not comply with any aspect of the standards regarding information technology, support material and the intranet. As a result, they did not consider that making these standards specifically applicable to them would be reasonable and proportionate.

Standards in relation to a body developing Welsh language skills through planning and training its workforce [125-133]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 56% of the commitments corresponded to the standards in relation to a body developing Welsh language skills through workforce planning and training.⁴²⁴

The Universities and Colleges Admission Service confirmed that they did not assess the Welsh language skills of their employees at present. This was reinforced by noting that there was training in the areas outlined in standards 126-129. However, they noted that they provided training to their employees and/or workers so that they could develop an awareness of the Welsh language.

⁴²¹ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁴²² Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁴²³ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁴²⁴ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

No support materials were available in Welsh by the organization at present.

Standards in relation to a body recruiting staff [134-138]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 57% of the commitments corresponded to the standards in relation to recruiting by a body.⁴²⁵

No evidence was received from the Universities and Colleges Admission Service in relation to the methodology used in order to reach a decision regarding including Welsh language skills need when advertising posts. In addition, they confirmed that they did not comply with any requirements in relation to 135-138 at present.

Standards in relation to signs displayed in a body's workplace [139-141]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to signs displayed in a body's workplace.⁴²⁶

The Universities and Colleges Admission Service confirmed that the signs displayed inside their buildings were not in Welsh.

Standards in relation to audio announcements and messages in a body's workplace [142]

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements and messages in a body's workplace.⁴²⁷

The Universities and Colleges Admission Service confirmed that no audio announcements and messages were made within their workplace. Therefore they did not consider that making the standard specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service did not consider that making the standards in relation to the supplementary matters specifically applicable to them would be reasonable and proportionate. The reasons for this included the location of their buildings, the low number of staff with Welsh language skills, and that it would be better to use its resources to ensure compliance with the service delivery standards, enabling members of the public to deal with them in Welsh.

Promotion standards [143-144]

The Universities and Colleges Admission Service confirmed that they did not consent for promotion standards to be potentially applicable to them.

⁴²⁵ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁴²⁶ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

⁴²⁷ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

Record keeping standards [145-157]

When analysing current commitments in the Welsh language scheme of the person in question, an average of 85% of the commitments corresponded to record keeping standards.⁴²⁸

The Universities and Colleges Admission Service noted that infrastructure was in place in order to deal with complaints they received, and that this would be done within a specific time frame. Similarly, they confirmed that they were aware of the number of calls noting a desire for service in Welsh. To the same end, they had a record of the number of applications received through the medium of Welsh. This was reinforced by noting that an internal Group received updates on compliance twice a year.

They considered that making the standards in relation to record keeping specifically applicable to them would be reasonable and proportionate.

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

The Universities and Colleges Admission Service did not consider that making the standards specifically applicable to them would be reasonable and proportionate, on the basis that the standards made specifically applicable to them would be limited, in accordance with their response.

⁴²⁸ Average percentage of commitments within the Welsh language schemes of the persons in question, which correspond to the standards in question, be that partially or completely.

5 Evidence received from members of the public

A total of 291 responses from members of the public were received during the standards investigations carried out by the Welsh Language Commissioner in relation to persons within the Public Bodies: General (3) report. 155 responses to the standards investigation were received from individuals who chose to complete the questionnaire provided for them by the Welsh Language Commissioner on the website.

136 further responses were received based on a standard response template published by Cymdeithas yr Iaith Gymraeg; in this case all responses were the same. In 14 cases, responses were received from individuals twice. This happened because individuals responded via the Commissioner's consultation as well as completing Cymdeithas yr Iaith Gymraeg's template. 4 responses were received from other organizations or movements⁴²⁹. The Commissioner has noted every response received.

A full list of respondents who were willing for their responses to be published can be seen at Appendix B.

Figure 1 indicates from where the respondents came according to their group and geographical location.

Figure 1 Number of responses to the standards investigation by location⁴³⁰

Locations	Number	Percentage (%)
Blaenau Gwent	1	0%
Bridgend	3	1%
Caerphilly	5	2%
Cardiff	32	11%
Carmarthenshire	21	7%
Ceredigion	30	10%
Conwy	9	3%
Denbighshire	22	8%
Flintshire	10	3%
Gwynedd	72	25%
Isle of Anglesey	19	7%
Merthyr Tydfil	3	1%
Monmouthshire	2	1%
Neath Port Talbot	2	1%
Newport	0	0%
Pembrokeshire	4	1%

⁴²⁹ A list of those movement /organizations has been included within Appendix B of this standards report.

⁴³⁰ These statistics include all the responses to the questionnaire, along with Cymdeithas yr Iaith's template.

Powys	9	3%
Rhondda Cynon Taf	13	4%
Swansea	16	5%
Torfaen	1	0%
Vale of Glamorgan	7	2%
Wrexham	4	1%
Outside Wales	6	2%
No information	0	0%
Total	291	100%

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

Service Delivery Standards

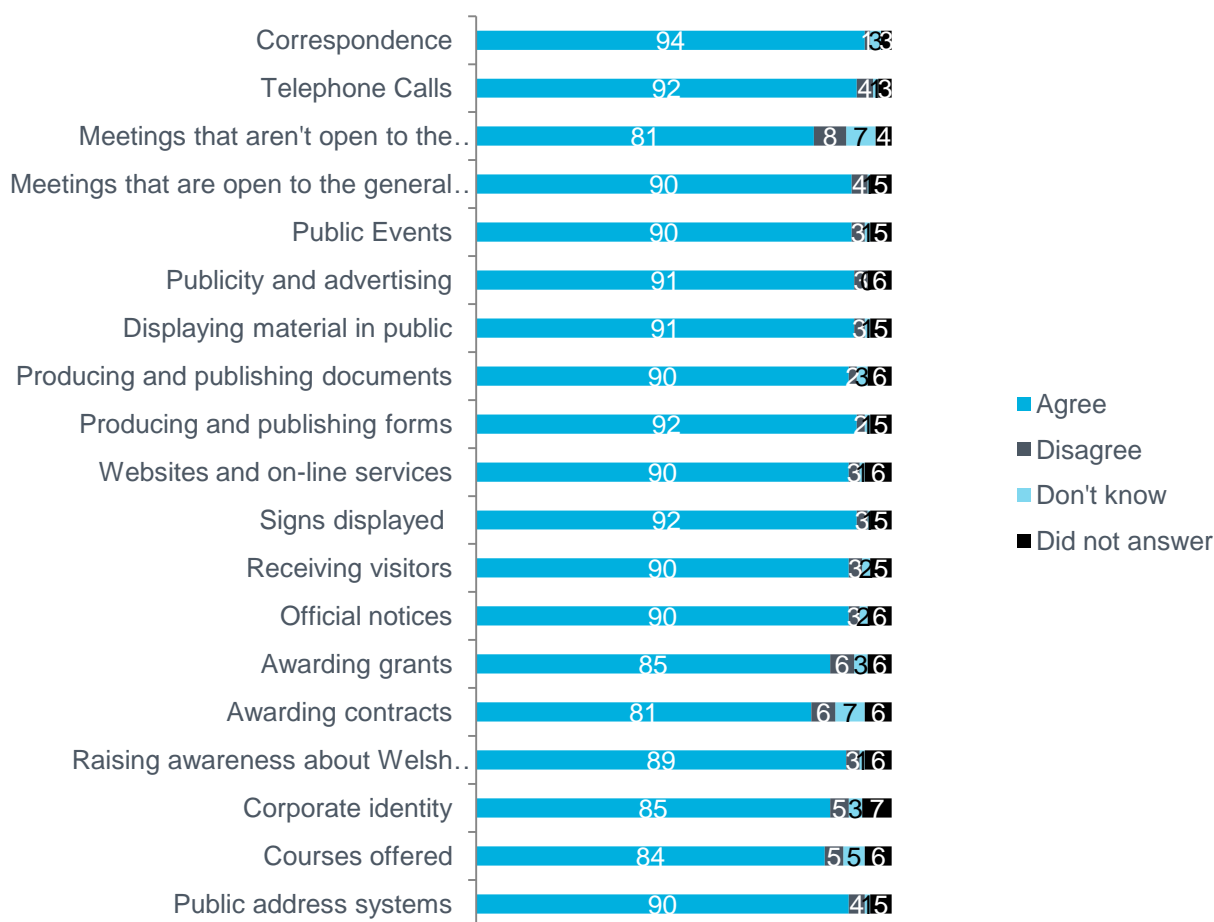
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the service delivery standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the organizations in question should carry out the service delivery standards activities in the Welsh language, in order to enable you as a member of the public to use the Welsh language in the following situations?

In answering this question as part of the questionnaire, the public were given the opportunity to respond per activity within the scope of the service delivery standards.

Figure 2 indicates the variety of the responses received.

Figure 2 Response to question 1 of the questionnaire - Service delivery standards⁴³¹



Policy making standards

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

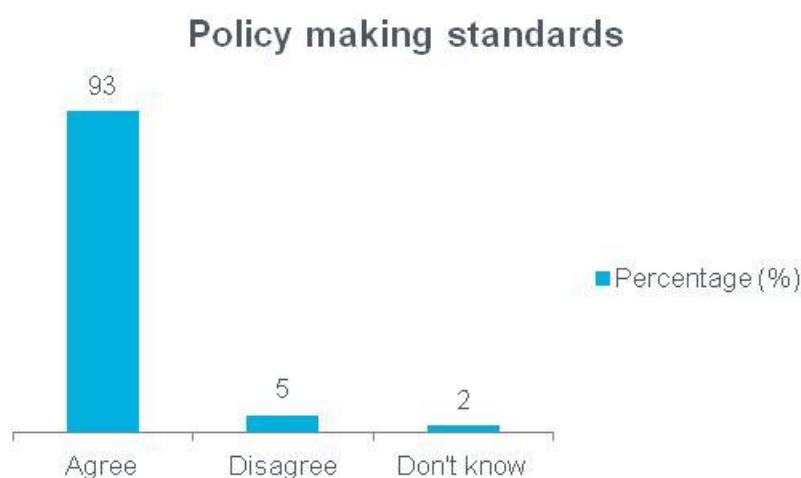
Do you agree or disagree that the policy decisions of the organizations in question should improve the opportunities for you to use the Welsh language and ensure better treatment for the Welsh language?

Of the 155 that responded via the questionnaire on the Welsh Language Commissioner's website, 94% (146) had answered this question. Of the 146 that responded, 93% (136) agreed that the relevant persons in question should have to consider their policy decisions, and ensure, or contribute to ensuring improved opportunities for persons to be able to use the Welsh language as well as ensure better treatment for the Welsh language.

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

⁴³¹ The rounding of figures may result in percentages which do not add up to 100% exactly.

Figure 3 Response to question 3 of the questionnaire - Policy making standards⁴³²



Operational standards

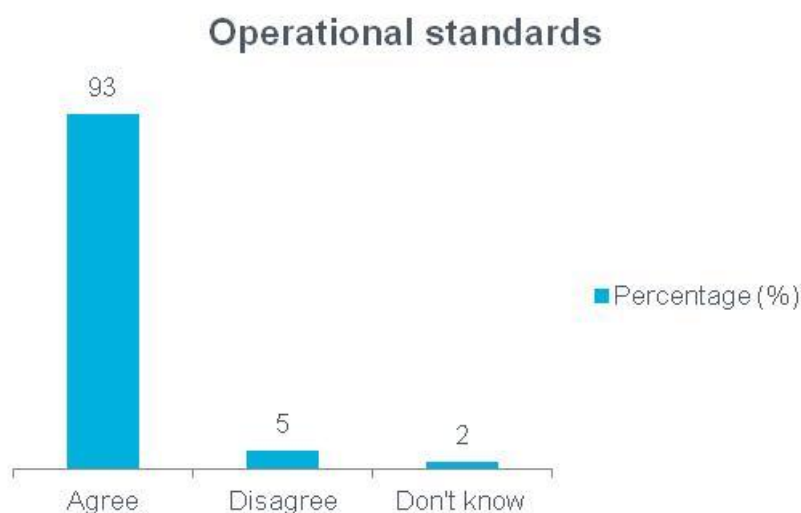
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the operational standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the organizations in question should facilitate the use of the Welsh language in accordance with the operational standards?

Of the 155 that responded via the questionnaire on our website, 94% (146) had answered this question. Of the 146 that responded, 93% (136) agreed that the relevant persons in question should have to facilitate and use the Welsh language in accordance with the definition of the operational standards in the Welsh Language (Wales) Measure 2011.

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

Figure 4 Response to question 4 of the questionnaire – Operational standards⁴³³



⁴³² Please note that these statistics relate to the respondents who had answered this question

⁴³³ Please note that these statistics relate to the respondents who had answered this question

Record keeping standards

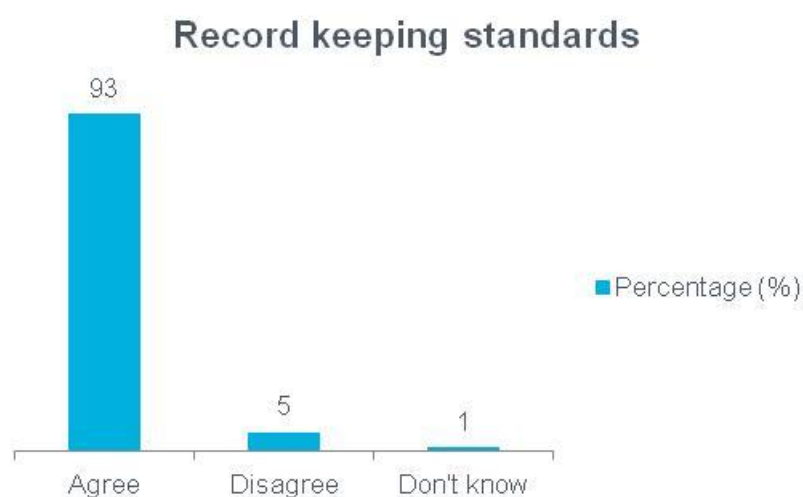
In seeking the public's opinion regarding the reasonableness of the requirements attached to the record keeping standards, they were asked to respond to the following question in the questionnaire:

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

Of the 155 that responded via the questionnaire on our website, 95% (148) had answered this question. Of the 148 that responded, 93% (138) agreed that this duty should be imposed on the persons in question.

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

Figure 5 Response to question 5 of the questionnaire – Record keeping standards⁴³⁴



Further Comments

As well as providing responses to specific questions on the subject of the standards investigation, the public were given the opportunity to note any additional standards they believed should be specified and made specifically applicable to the relevant persons, together with any further comments relevant to this standards investigation.

Of the 155 that responded via the questionnaire on our website, 49% (76) provided additional comments to be considered by the Welsh Language Commissioner as part of the standards investigation.

⁴³⁴ Please note that these statistics relate to respondents who had answered this question. The rounding of figures may result in percentages which do not add up to 100% exactly.

Figure 6 Further comments provided by members of the public



Service delivery standards

In relation to the standards relating to courses, many respondents emphasised the importance of professional training in health as well as other sectors, and the need to specify standards that would guarantee Welsh medium professional development courses. Also, concern was expressed regarding the clarity of the definition of courses, with a risk that courses that are open to the public could be seen only as those for members of the bodies or that are managed by the bodies.

Policy Making Standards

One respondent referred to the importance of making the policy making standards specifically applicable to the Commissioners identified in round 2, saying that they had a number of reports which do not mention the Welsh language at all, in areas where language rights are constantly ignored.

Based on evidence received from the public, references were made to a number of profession regulators in round 2, noting that action should be taken to ensure that standards were set for them leading to better workforce planning for a bilingual Wales.

6 Evidence received by the Welsh Language Commissioner's Advisory Panel

Evidence was received from the Advisory Panel in accordance with the requirements outlined in section 63 (3) Welsh Language (Wales) Measure 2011.

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

As with the persons in respect of which standards investigations were carried out in round 1, the Panel was of the opinion that the reasonableness and proportionality of making the standards specifically applicable to the relevant persons should be considered together with the context. In their opinion, this included the purpose of the legislation and the wish of the legislature in terms of the legal status of the Welsh language; the size of the persons in question; their engagement with the public; and the difference between setting standards and the timetable for complying with those standards.

In addition, it was noted that reasonableness and proportionality may be considered in one of two ways, namely; specifying different standards for persons in different areas of Wales, reflecting the linguistic nature of the relevant areas or setting out common standards across Wales, specifying different imposition days determining when they will be required to comply with the standard(s) e.g. where an element of staff training is required to comply with a standard, that particular person would be given more time to comply with the standard than a person where appropriate staff resources are already available. The Panel was once again of the firm opinion that the second method was the most suitable for the Welsh Language Commissioner to implement in most cases, bearing in mind that ensuring consistency between persons as regards providing Welsh language services is one of the main objectives of the Welsh Language (Wales) Measure 2011.

However, comments were received from the Panel regarding the reasonableness and proportionality of making the standards specifically applicable to persons whose headquarters are outside Wales; requiring them to comply with them across the UK. It was emphasised that any requirements imposed on similar persons have regard to those circumstances where they are expected to comply with the standard(s).

Public Bodies: General (3)

Service delivery standards

The Panel believed that service delivery standards relating to each one of the activities should be specifically applicable to the relevant persons, allowing members of the public to use the Welsh language in the situations in question.

In reaching that conclusion, the Panel stated that they did not find any reason why the relevant persons should not be able to undertake and comply with the majority of the activities in question, and in doing so increasingly engage with the public in Welsh. However, the Panel was of the opinion that some flexibility should be allowed in relation to some activities, drawing particular attention to producing and publishing documents, grant applications as well as courses. It was emphasised that exceptional circumstances would require flexibility, drawing particular attention to documents which would be limited in terms of the subject or likely target audience.

Similarly, the Panel was of the opinion that more consideration should be given to the location of the headquarters or offices of the persons in question, when issuing compliance notices. This was reinforced by noting that there would be a need to consider whether it would be reasonable for such persons to comply with a selection of such standards where they had no presence in Wales. The relevant clauses in section 44(3) of the Measure were emphasised as a means of the Commissioner being able to overcome such situations.

Policy making standards

The Panel welcomed the policy making standards specified in the draft regulations. It was added that these standards should be imposed on every person in respect of whom a standards investigation was to be conducted in round 2, emphasising the importance of compliance on all levels.

The Panel agreed that the policy decisions of the relevant persons should enhance opportunities for persons to use the Welsh language and secure better treatment of the Welsh language, and that policy making standards should be specifically applicable to them.

Operational standards

The Panel agreed that the relevant persons should be required to facilitate the use of Welsh in accordance with the operational standards, and that standards should be made specifically applicable to them.

Record keeping standards

The Panel were unanimous that making record keeping standards specifically applicable to persons within round 2 was absolutely essential in order to secure compliance with the rest of the standards with which they will be required to comply.

The Panel agreed that the relevant persons should keep a record of how they adhere to the other designated standards, and keep records of complaints. The conclusion was reached that record keeping standards should be made specifically applicable to them.

7 Conclusions of the standards investigation

General comments

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

The Explanatory Memorandum accompanying the Welsh Language (Wales) Measure 2011 states that one of the main objectives of the legislation was to modernise and build on the system of Welsh language schemes created under the 1993 Act. Similarly, it is noted that the aim of the Welsh Government in legislating was to secure improved consistency between persons, especially those within the same sector, in terms of providing Welsh language services.

Similarly, it is noted that section 42 of the Measure imposes a duty on Welsh Ministers to ensure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to the relevant persons if, and to the extent that, the persons carries out those activities.

However, it should be noted that they do not have to do so if the Commissioner indicates in a standards report, or if the Welsh Ministers are of the opinion that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a relevant person in relation to that activity. It should be noted that this section in the Measure does not prevent regulations under section 39 from providing for other service delivery standards to be specifically applicable to a person.

In line with the above, if the standards investigation found that a person undertook the activity⁴³⁵, be that to a greater or lesser degree, the Welsh Language Commissioner comes to the conclusion that all the standards in relation to that activity should be made specifically applicable to that person. These conclusions were reached due to the fact that the standards introduced by the Welsh Government are interdependent on each other within the scope of the activity.

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

However, where evidence exists that a person does not carry out an activity at all, whether by means of evidence acquired as part of the standards investigation, or by other means, the Welsh Language Commissioner will conclude that standards in relation to that activity should not be specifically applicable to them, unless there are valid reasons for doing so.

The Welsh Language Commissioner will consider the evidence provided in order to reach a decision on the content of compliance notices issued to relevant persons under section 44 of the Welsh Language (Wales) Measure 2011.

⁴³⁵ [Service delivery activity as defined in section 28 Welsh Language \(Wales\) Measure 2011](#)

Standards which should be made specifically applicable to persons falling within the Public Bodies: General (3) report

Service delivery standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that the persons falling within the Public Bodies: General (3) report should be able to deliver services in relation to the relevant activities.

Once again, the Commissioner wishes to note the importance of clearly differentiating between the commitments of the person (what is expected of them) and performance (the extent to which they currently comply with those expectations). Every Welsh language scheme is fully authorised by the person in agreeing on content. Not specifying standards that are equal, and making them specifically applicable to the persons in question, would be a step back and contravene the intention of the Welsh Language (Wales) Measure 2011.

It is noted that performance, along with the extent with which a person can comply with a standard within a particular period of time, is a practical matter. Those extents may improve, deteriorate or remain the same. The Welsh Language Commissioner is of the opinion that commitments should comply with the needs of the Welsh users that they serve, with a reasonable timescale specified for dealing with any existing obstacles. The Welsh Language Commissioner will consider those obstacles when determining the contents of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

It is acknowledged that the persons had identified potential challenges and obstacles in terms of ensuring full compliance with some of the service delivery standards. However, the matters raised on the whole were not relevant to all the standards associated with a specific activity. The Commissioner is of the view that commitments proportional to the needs of Welsh users could be achieved with a reasonable timescale for action and dealing with any challenges.

Evidence was received from persons within this standards report that expressed concern regarding the reasonableness of compliance with the requirements, and that based on the fact that they operated across the United Kingdom. It should be noted that section 44 of the Measure provides a flexible framework for the Welsh Language Commissioner to determine what a person is required to comply with in a compliance notice.

Conclusion 1: The Welsh Language Commissioner has reached the conclusion that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report:

- correspondence sent by a body
- telephone calls made and received by a body
- meetings arranged by a body that aren't open to the general public
- a body's publicity and advertising
- displaying material in public
- a body producing and publishing documents

- a body producing and publishing forms
- a body's websites and on-line services
- official notices made by a body
- a body awarding contracts
- raising awareness about Welsh language services provided by a body
- a body's corporate identity

Three relevant persons noted (The National Institute of Adult Continuing Education, Universities and Colleges Admissions Service, The Older People's Commissioner for Wales) that they did not hold meetings that are open to the public. Due to the nature and functions of one of the persons in question (The Older People's Commissioner for Wales), in addition to its aims and objectives, the Welsh Language Commissioner concludes that this could be a relevant activity to them.

In the same manner, there are commitments in the Welsh language schemes of all the persons in question, which correspond to the standards in relation to this activity.

Conclusion 2: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report:

- meetings arranged by a body that are open to the public

Three relevant persons (The National Institute of Adult Continuing Education, Universities and Colleges Admissions Service, General Teaching Council for Wales) noted that they did not hold public events. Due to the nature and functions of one of the persons (General Teaching Council for Wales), in addition to its aims and objectives, the Welsh Language Commissioner concludes that this could be a relevant activity to them.

In the same manner, there are commitments in the Welsh language schemes of all the persons in question, which correspond to the standards in relation to this activity.

Conclusion 3: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report:

- public events organised or funded in their entirety by a body

Three relevant persons (General Osteopathic Council, General Dental Council and the General Optical Council) noted that they did not display signs.

It would appear that displaying signs in Welsh was at issue with many, due to the fact that their offices were located in only England only at present. It should be noted that one relevant person (Nursing and Midwifery Council) confirmed that it would display signs in Welsh if it was to open an office in Wales in the future.

It should be noted that it is not signs displayed within the buildings of persons that are in question; persons could display signs when carrying out other service delivery activities e.g. public meetings.

In the same manner, and for the same reasons (namely offices located outside Wales), a

number of relevant persons noted that they did not receive visitors in Welsh. It should be noted that section 44 of the Measure provides a flexible framework for the Welsh Language Commissioner to determine the circumstances in which a person is required to comply with standards in a compliance notice.

Conclusion 4: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report:

- signs displayed by a body
- receiving visitors at a body's buildings

Eleven relevant persons (The Quality Assurance Agency for Higher Education, Colleges Wales Ltd, Health and Care Professions Council, General Osteopathic Council, Nursing and Midwifery Council, General Medical Council, General Dental Council, General Chiropractic Council, Universities and Colleges Admissions Service, Higher Education Funding Council for Wales, The Older People's Commissioner for Wales) noted that they did not award grants at all, or that they did not do so in Welsh due to the fact that they were located outside Wales. However, no evidence was received to highlight whether this was by choice, or due to their constitutions.

It should be noted that section 44 of the Measure provides a flexible framework for the Welsh Language Commissioner to determine the circumstances in which an organization is required to comply with standards in a compliance notice.

Conclusion 5: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report, to the extent to which each person has the power and the function to do so:

- a body awarding grants

Ten relevant persons (General Chiropractic Council, General Dental Council, General Medical Council, Nursing and Midwifery Council, General Optical Council, General Osteopathic Council, Higher Education Funding Council for Wales, General Teaching Council for Wales, The Quality Assurance Agency for Higher Education and The National Institute for Adult Continuing Education) noted that they did not provide courses to the public at present. However, there was a lack of clarity regarding information events carried out by health regulatory bodies as part of their statutory functions. There was also a lack of clarity regarding the definition of 'person' in relation to this activity, with many emphasising that these types of courses were not available to the wider public. Welsh Ministers should ensure clarity in relation to the above when specifying standards in regulations.

In the same manner, it appears that there was uncertainty among relevant persons as to the exact definition of an 'education course'. The draft regulations note that an education course is "any seminar, training, workshop or similar provision which is provided in order to educate members of the public or to improve the skills of members of the public; but does

not include activities or courses provided as part of the curriculum in accordance with any enactment.”⁴³⁶

The Welsh Language Commissioner will further consider these factors when determining the contents of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

Conclusion 6: Based on the present definition in the regulations, the Welsh Language Commissioner concludes that Welsh Ministers should ensure that the regulations make provision for service delivery standards in relation to the activities below to be specifically applicable to every relevant person who falls within this standards report:

○ **courses provided by a body**

All of the relevant persons except two (General Optical Council, The Quality Assurance Agency for Higher Education) noted that they did not announce messages over any public address systems at present. In a number of cases, it was unclear whether or not this was due to the fact that they did not carry out the activity at all, or whether they carried it out in England only.

The Welsh Language Commissioner believes that persons could undertake other service delivery activities of which public address systems would likely be a part: for example meetings that are open to the public, or public events. The Welsh Language Commissioner therefore concludes that this could be a relevant activity to each person within this report.

Conclusion 7: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report:

○ **public address systems used by a body**

Policy making standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that the policy decisions made by all persons falling within the Public Bodies: General (3) report should enhance opportunities for persons to use the Welsh language and ensure that the Welsh language is not treated less favourably than the English language.

The Commissioner's reasons for reaching that conclusion are that there is already an expectation to assess the linguistic implications of new policies and initiatives during the process of creating them and reviewing them. All of this was confirmed in the evidence received as part of this standards investigation.

Furthermore, the vast majority of persons stated that it would be reasonable and proportionate to make the policy making standards specifically applicable to them.

However, the evidence received from two persons in relation to other legislative requirements placed on them, and how those requirements relate to the Measure, should be noted. The General Chiropractic Council confirmed that the legislation which specifies

⁴³⁶ Paragraph 37, Part 3, Welsh Language Standards (Welsh Ministers, County and County Borough Councils and National Park Authorities) Regulations 2015

the organization's remit requires them to treat all countries within the UK equally. In accordance with this, it was noted that it would not be possible to favour Welsh speakers over others. In the same manner, the Nursing and Midwifery Council referred to the European 'Mutual Recognition of Professional Qualifications Directive', which states that each member state can only introduce one recognised language as a requirement. They went on to note that the UK Government has stated that English would be that language. As a result, the language requirements state that nurses and midwives should possess adequate English language skills.

Also considered were the required measures which form the basis for the content of Welsh language schemes which are available as statutory guidelines approved by the House of Commons (the Guidance as to the Form and Contents of Language Schemes was approved by the UK Parliament on 19 July 1995). The guidance notes that organizations should have to specify the measures they intend to take when assessing the impact of new policies, strategies and initiatives and implementing them.

Conclusion 8: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that the regulations provide for making policy making standards specifically applicable to all relevant persons falling within this standards report.

Operational standards

Section 30 of the Welsh language (Wales) Measure 2011 states that the meaning of operational standards is:

a standard that is intended to promote or facilitate the use of the Welsh language

- (i) by A in carrying out A's relevant activities
- (ii) by A and another person in dealings between them in connection with A's relevant activities, or
- (iii) by a person other than A in carrying out activities for the purposes of, or in connection with, A's relevant activities.

That means that the purpose of the operational standards is to ensure that members of staff can use the Welsh language when carrying out their relevant activities with others. This could include the public in Wales, or another relevant person. Through these standards, sufficient language skills of staff are ensured in order that an individual who wishes to use the language with that person can do so. It should be emphasised that this aim is as appropriate for persons who are located in other parts of the UK, but who deliver services in Wales, as it is to persons located in Wales. This is supported by the fact that Schedule 6 of the Welsh Language (Wales) Measure 2011 states that operational standards are potentially applicable to all persons.

The Welsh Language Commissioner notes that some persons of this nature (i.e. not located in Wales) are included within this standards report:

- **General Osteopathic Council**
- **General Optical Council**
- **General Chiropractic Council**
- **Nursing and Midwifery Council**
- **Health and Care Professions Council**
- **General Dental Council**
- **Universities and Colleges Admissions Service**

On 24 March 2015, the Welsh Language Standards Regulations (No.1) 2015 were approved in the National Assembly for Wales Plenary Meeting. These regulations were developed to impose duties on county borough councils and county councils in Wales, national park authorities and Welsh Ministers. All of these persons are located in Wales. Welsh Ministers should ensure that operational standards specified in regulations for round 2 achieve the same objectives noted above, whilst acknowledging that some persons are not located in Wales at present.

The Welsh Language Commissioner recognizes that some elements attached to the operational standards are new to many of the relevant persons which are included within this standards report. Similarly, some examples were received where arrangements are not in place in order to ensure full compliance with the requirements at present. The Welsh Language Commissioner will consider this further when deciding on the content of a compliance notice given under section 44 of the Welsh Language (Wales) Measure 2011.

However, it should be noted that a number of the requirements are expected from a number of persons under current Welsh language schemes. These include specifying measures to ensure that workplaces which have contact with the public in Wales seek access to sufficient and appropriately skilled Welsh speakers; measures to identify those posts where the ability to speak Welsh is considered to be essential and those where it is considered to be desirable together with measures to assess the need for training and to provide it for employees.

To that end, and based on the evidence received, the Commissioner concludes that it is reasonable and proportionate for these persons to enable its staff to carry out their relevant activities through the medium of Welsh.

Regarding those elements that are not embedded in the Welsh language schemes of the organizations in question, or that are not currently in operation, the Welsh Language Commissioner has reached the conclusion that allowing adequate time for persons to achieve this new signature policy, in addition to including other mitigating measures within a compliance notice, where appropriate, would be reasonable and proportionate.

For persons that are not located in Wales at present:

Conclusion 9: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for operational standards in relation to the matters below to be specifically applicable to The General Osteopathic Council, The General Optical Council, The General Chiropractic Council, The Nursing and Midwifery Council, The Health and Care Professions Council and The General Dental Council.

- Standards in relation to a body developing Welsh language skills through planning and training its workforce
- Standards in relation to a body recruiting staff.

Conclusion 10: The Welsh Language Commissioner concludes that Welsh Ministers should consider specifying other standards in relation to the matters below for the persons above:

- Standards relating to the use of the Welsh language within a body's internal administration
- Standards in relation to complaints made by a member of a body's staff
- Standards in relation to a body disciplining staff
- Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet
- Standards in relation to signs displayed in a body's workplace
- Standard in relation to audio announcements and messages in a body's workplace.

For persons who are located in Wales:

Conclusion 11: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for operational standards in relation to the matters below to be specifically applicable to all other relevant persons within this standards report:

- Standards relating to the use of the Welsh language within a body's internal administration
- Standards in relation to complaints made by a member of a body's staff
- Standards in relation to a body disciplining staff
- Standards in relation to a body's information technology and about support material provided by a body, and in relation to the intranet
- Standards in relation to a body developing Welsh language skills through planning and training its workforce
- Standards in relation to a body recruiting staff
- Standards in relation to signs displayed in a body's workplace
- Standard in relation to audio announcements and messages in a body's workplace.

Record keeping standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that all the persons falling within the Public Bodies: General (3) report should identify how they uphold the standards they are expected to comply with, as well as complaints. Welsh language schemes require the organizations in question to identify the action required to publish information on the organization's performance against the statutory requirements. The evidence received confirmed this, with the majority of persons, in general, noting that the record keeping standards, in principle, were current practice.

Conclusion 12: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that the regulations provide for making record keeping standards specifically applicable to all relevant persons falling within this standards report.

Promotion standards

The Care Council for Wales was the only person that wished to consent for promotion standards to be potentially applicable to them.

Conclusion 13: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that the regulations provide for promotion standards to be specifically applicable to The Care Council for Wales.

Standards which deal with supplementary matters

There are provisions in the Welsh Language (Wales) Measure 2011 regarding monitoring arrangements and reporting requirements for the standards system (Section 27 - Supplementary Provisions). Following the approval of 'The Welsh Language Standards Regulations (No.1) 2015'⁴³⁷ in the National Assembly for Wales Plenary Meeting, standards which deal with supplementary matters were specified under section 26 of the Measure.

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

The Welsh Government policy document 'Inspection, Audit and Regulation'⁴³⁸, explains that the role of inspectors is to "investigate independently using professional expertise and legal powers". This is supplemented by the Crerar Report on inspection in Scotland which notes that the role of external inspectors is to provide independent assurance that services are being managed well and are fit for purpose. According to Crerar, the five main principles are public focus, independence, proportionality, transparency and accountability. Crerar's proposals are consistent with the principles of Hampton which note that inspection should take place on the basis of risk; that inspections should not be carried out for no reason and that regulators should be able to provide authoritative and accessible advice. There is also an acknowledgement that it is not possible for inspection bodies to oversee everything service providers do. That is, there is an increasing expectation upon service providers to have robust internal scrutiny and audit arrangements. In addition, self-assessment plays an increasingly important role in external audit arrangements.

Conclusion 14: As a result of carrying out this standards investigation, and in consideration of the above, the Welsh Language Commissioner concludes that standards which deal with supplementary matters should be made specifically applicable to all relevant persons falling within this standards report.

⁴³⁷ <http://www.legislation.gov.uk/en/wsi/2015/996/made/data.pdf>

⁴³⁸ <http://gov.wales/docs/dpsp/publications/inspectionpolicystatement/090930inspstatementen.pdf>

Additional standards which should be made specifically applicable to persons falling within the Public Bodies: General (3) standards report

The following is noted in section 64 (3) of the Welsh Language (Wales) Measure 2011:

If –

- (a) the conclusions of the investigation are (in whole or in part) that any standards should be specifically applicable to a person, and
- (b) any or all of those standards are not specified by the Welsh Ministers under section 26(1), the report must set out the standards that are not specified.

The Welsh Language Commissioner concludes that standards should be added to those published by the Welsh Government on 7 November 2014. This opinion is based on evidence received from the public and relevant persons as part of the standards investigation.

Activities: social media; self-service machines

Since the conclusion of the standards investigation, a draft version of the Welsh Language Standards Regulations (No. 1) (Wales) 2015 was tabled on 3 March 2015. The National Assembly for Wales received these Regulations in Plenary on 24 March 2015. Service delivery standards regarding a body's use of social media, as well as self-service machines, were added to the range of activities subject to this standards investigation. These standards are 58, 59 and 60 from 'The Welsh Language Standards (No. 1) Regulations (Wales) 2015'.⁴³⁹

Conclusion 15: The Welsh Language Commissioner has reached the conclusion that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to every relevant person falling within this standards report, should the Welsh Ministers believe that the activities below are ones which the persons could currently undertake, or do so in future:

- a body's use of social media
- self-service machines.

⁴³⁹ <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

8 The next steps

In preparing this standards report, the Welsh Language Commissioner has considered all the responses submitted to the standards investigation. This report will be submitted to the following in accordance with section 64(4) of the Welsh Language (Wales) Measure 2011:

- all relevant persons
- Welsh Language Commissioner's Advisory Panel
- all persons who participated in the Commissioner's consultation in accordance with section 63
- Welsh Ministers.

Alongside the standards investigations of the Welsh Language Commissioner, Welsh Ministers are expected to carry out regulatory impact assessments in respect of relevant secondary legislation they intend to create, using their own secondary legislation powers.

The Government of Wales Act 2006 notes that a regulatory impact assessment is as follows:

'A regulatory impact assessment is an assessment as to the likely costs and benefits of complying with relevant Welsh subordinate legislation'.⁴⁴⁰

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;
- a means of submitting the relevant evidence on the positive and negative effects of such interventions for the purposes of scrutinizing that evidence.⁴⁴¹

Welsh Ministers will be expected to consider the evidence they collected for the purposes of the regulatory impact assessment, alongside the Welsh Language Commissioner's conclusions in a standards report in deciding whether or not to exercise the powers granted to them under Part 4 of the Welsh Language (Wales) Measure 2011.

The Rt Hon. Carwyn Jones AM, First Minister of Wales confirmed in a statement on 24 March 2015 that it is currently foreseen that the process of introducing regulations for all relevant persons noted within this report will begin by the end of 2015, with a debate and vote on approval of regulations at a Plenary Meeting of the National Assembly for Wales.

⁴⁴⁰ Section 76 (2) (a) The Government of Wales Act 2006.

⁴⁴¹ <http://gov.wales/docs/legislation/guidance/091020riacodeen.doc>

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

The responses received were generally supportive of the concept of specifying standards, to ensure that Welsh speakers have clear rights in relation to the Welsh language services provided by all organizations in round 2.

The public once again expressed considerable desire to ensure that the specified standards are clear, robust and coherent for ordinary people. It was added that the rights of Welsh speakers will only be secured in this way.

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

- The need to ensure that the standards specified fully reflect the recommendations of the Welsh Language Commissioner's Health Inquiry.
- The need to ensure that the standards ensure Welsh language services provision by default, ensuring that the concept of active offer is consistent across the board.
- Ensure that the process of awarding or dealing with tenders or contracts does not disregard the need to specify Welsh language conditions on the grants/contracts awarded by organizations included in round 2.
- The need to ensure that standards in relation to a face-to-face service goes beyond the main reception areas and personal meetings arranged in advance.
- The need to ensure clarity that the definition of personal meetings includes all face-to-face meetings
- The need to specify a standard which sets clear requirements on organizations' recruitment policies

Some responses were received from members of the public, expressing general objection 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 on the Welsh language.
- Prioritising other policy areas over the Welsh language
- The relevance of the Welsh language in Wales
- Disagreement with the requirement that Welsh should appear or be published first.

Service delivery standards

Comments were received from members of the public calling for the need to ensure that specific standards are identified for health bodies which reflect the findings of the Welsh Language Commissioner's report 'My Language, My Health: the Welsh Language Commissioner's Inquiry into the Welsh Language in Primary Care'. Statements added that standards relating to national GP and primary care provider contracts should be specified.

Comments were received that noted that there were inadvertent weaknesses, in their view, in the draft regulations, because the standards in relation to receiving a Welsh language service face-to-face did not go beyond personal meetings organised beforehand and

services in the main reception areas. Similarly, it was noted that it is essential for regulations concerning health bodies to specify standards for personal meetings which involve appointments, consultations and all other face-to-face contact.

The importance of personal meetings in health, education and justice was emphasised, and comments drew attention to the fact that they were not of the opinion that the draft regulations would secure a face-to-face Welsh language provision beyond personal meetings and in reception areas. It was added that the definition should be extended to other various contexts.

A number of responses were received which supported the standards relating to meetings that aren't open to the general public, bearing in mind that a number of organizations in the justice sector are included in round 2. Although the standards referred to personal interest or wellbeing, some were concerned that it was not entirely clear whether that would include a person's right to be interviewed in Welsh in the aforementioned context.

In the context of signs, some respondents were of the view that electronic signs and audio exhibitions in places such as museums should be encompassed within the definition of this activity. Similarly, it was noted that surtitles and subtitles in plays and performances should also fall under the definition of signs, with a view to placing standards on persons such as National Theatre Wales and Welsh National Opera.

In relation to the standards relating to courses, many respondents emphasised the importance of professional training in health as well as other sectors, and the need to specify standards that would guarantee Welsh medium professional development courses. Also, concern was expressed regarding the clarity of the definition of courses, with a risk that courses that are open to the public could be seen only as those for members of the bodies or that are managed by the bodies. One respondent highlighted the importance of these standards in relation to the WCVA.

In responding to the standards in relation to awarding grants, many individuals referred to the importance of specifying standards that would ensure that Welsh language conditions are specified for the grants allocated by the organizations in round 2. Emphasis was placed on bodies such as Sport Wales, Arts Council and Big Lottery Fund, noting that they were organizations where the awarding of grants is crucial in terms of increasing the use and provision of the Welsh language.

To that same end, some respondents said that an additional standard should be specified in relation to awarding contracts, with a view to ensuring that independent production companies who are responsible for supplying services on behalf of S4C also fall under the duty to move towards internal use of Welsh as part of their contracted activities with the channel.

A number of members of the public expressed concern that a standard hadn't been specified in the draft regulations for public appointments. It was added that the former Local Government Minister had said that standards would relate to public appointments in order to set thresholds for the number of Welsh speakers.

In considering the standards in relation to official notices, many respondents noted that it should be ensured that those standards are made specifically applicable to every organization included in this round. One respondent noted that prescriptions should be encompassed within the definition of this activity. However, some comments were received which questioned the propriety of issuing notices on specialist subjects in both

languages, going on to question the need to publish an official notice at all in those cases.

One respondent noted that the standards in relation to education corporations (further and higher) should require them to commit to a Welsh medium of bilingual educational provision, using their own resources, as well as the resources received via external streams. It was added that the bodies in question should also stimulate student demand, as well as respond to it. The 'Welsh Language Regulations 2015'⁴⁴² state:

For the purposes of standards 84, 85 and 86 (courses), an “education course” means any seminar, training, workshop or similar provision which is provided in order to educate members of the public or to improve the skills of members of the public; but does not include activities or courses provided as part of the curriculum in accordance with any enactment.

Welsh Ministers should ensure clarity regarding the above when specifying standards, and make them specifically applicable in regulations to higher and further education corporations.

Policy making standards

One respondent referred to the importance of imposing the above standards on each body in round 2, bearing in mind that these policies form the bases of all their activities. Another respondent referred specifically to organizations such as Police and Crime Commissioners, Sport Wales, the Millennium Centre and the Commission for Equality and Human Rights, noting that they should give more consideration to the Welsh language in making policy decisions.

To the same end, one respondent referred to the importance of making the policy making standards specifically applicable to the Commissioners identified in round 2, saying that they had a number of reports which do not mention the Welsh language at all, in areas where language rights are constantly ignored.

Specific comments were received in relation to Ofcom, noting that they had a crucial role in awarding radio and TV licences. With that in mind, the respondents in question believed that a standard should be set making licences subject to language conditions under the policy making standards or the contract awarding standards.

Based on evidence received from the public, references were made to a number of profession regulators in round 2, noting that action should be taken to ensure that standards were set for them leading to better workforce planning for a bilingual Wales.

One respondent expressed concern regarding the constriction of the effectiveness of the proposed policy making standards. It was added that not many policies exist on a local level only, and that they should be part of a wider context, often on a national level.

Operational standards

One respondent emphasised the important role played by organizations such as the National Museum of Wales, Wales Millennium Centre, S4C, Natural Resources Wales, National Library of Wales and the Welsh Books Council in terms of contributing to the Welsh language as a working language. They noted that the organizations in question, amongst others, should work towards undertaking their internal administration in Welsh. As a result, they were of the opinion that operational standards should be specified in

⁴⁴² Paragraph 37, Part 3, Schedule 1, Welsh Language Standards (Welsh Ministers, County and County Borough Councils, and National Park Authorities) Regulations 2015

addition to those in the draft regulations, that would allow organizations to work towards that goal.

Similarly, many were of the opinion that higher tier standards should be specified in relation to recruitment, requiring those organizations that conduct their internal administration in Welsh to recruit Welsh speaking staff only.

A number of responses were received from the public asking for standards which would place duties on universities to provide opportunities for students in Welsh (and for non-Welsh speakers to become fluent), as well as a standard which would ensure that they had a duty to train the future workforce.

In their comments on the Local Democracy and Boundary Commission for Wales, one respondent said that a standard should be specified which would ensure that a proportion of those appointed to the Commission can speak Welsh, in order to reflect what was expressed during the revision of that legislation. A number of comments were received which highlighted the importance of specifying such a standard across the organizations in question, in order to ensure that organizations can operate and comply with the requirements in full. To that end, one respondent noted that it should be ensured that a standard is specified to impose a duty on organizations to offer intense Welsh learning programmes.

Some comments were received, expressing the view that organizational offices outside Wales should be exempt from operational standards.

Record keeping standards

Many responses were received which were of the firm opinion that organizations should have to keep records, to ensure public accountability and transparency in relation to compliance with the requirements.

However, some respondents emphasised that the record keeping duty should be proportional, and improving the range and quality of their Welsh medium services would be a better investment for organizations. It was added that it was the Welsh Language Commissioner's responsibility to determine that appropriate balance.

Students' unions of higher and further education corporations

In responding to the standards investigation carried out in relation to higher and further education corporations, many comments were received which noted the need to make the standards potentially applicable and specifically applicable to the students' unions. One respondent emphasised the essential part of the students' union in providing services to the students along with the corporations in question, and referred specifically to the support and academic representation as well as protecting the welfare and interests of the students.

The respondents in question referred to the direct and far-reaching influence the unions have on student experience, together with the fact that they receive substantial amounts of money from the corporations in question. It was also added that the current Welsh language scheme of one corporation acknowledges the relationship between it and the union, and the responsibility it has in this respect.

Many examples were submitted of students' unions operating bilingually during the past academic year. However, bearing in mind the requirements associated with the draft regulations, one respondent emphasised that it was fragmented, and often following

pressure from students. With this in view, concern was expressed regarding the lack of strategic and central planning for developing the Welsh language within students' unions, causing the unions to treat the Welsh language less favourably than the English.

In this respect, the respondent was of the opinion that Welsh Ministers should ensure that specific standards are specified and made specifically applicable to education corporations, to acknowledge the all important relationship with the unions, together with the range of services provided by them to students on behalf of the corporations in question. The respondent went on to note that he was of the opinion that not specifying these types of standards would mean that the linguistic rights of students in Wales will not be protected, and from the viewpoint of those students, any attempt to set out standards on a corporate level would be in vain.

Appendix B – List of respondents to the standards investigation

Below is a list of the relevant persons in respect of which a standards investigation was carried out, the Advisory Panel, together with the members of the public who were willing for us to publish their comments.

Relevant persons

- The Quality Assurance Agency for Higher Education
- Colleges Wales Ltd
- The Children's Commissioner for Wales
- The Commissioner for Older People in Wales
- The General Teaching Council for Wales
- The Higher Education Funding Council for Wales
- The Care Council for Wales
- Universities and Colleges Admissions Service
- The National Institute of Adult Continuing Education
- The General Chiropractic Council
- The General Dental Council
- The General Medical Council
- The Nursing and Midwifery Council
- The General Optical Council
- The General Osteopathic Council
- The Health and Care Professions Council

Members of the public

- Alun Jones
- Alun Ceri Jones
- Eifion Jones
- Elin Walker Jones
- Eiliw Alwyn
- Selwyn Lloyd-Jones
- Hywel Wyn Jones
- John Arwel Griffiths
- Lloyd Evans
- Anthony Barry
- Sharon Roberts
- Sion Jobbins
- Owen Saer
- Einir Sion
- Siân Gwenllian
- Lisbeth McLean
- Amanda Evans
- Rhys Glyn
- Anthony Barnard
- Anthony Caradog Evans
- Tim Jones
- Yasmin Morris
- Llinos Jones

- Aled Jones
- Dewi Snelson
- Emrys Wynne
- Curon Wyn Davies
- Bethan Harvey
- Mair Edwards
- Kathryn
- Helen Thomas
- Geraint Brython Edwards
- Rhodri Williams
- Ruth Evans
- Penri Williams
- Huw Jones
- Emyr Tomos
- Bethan Williams
- Llyr ap Gruffydd
- Robin Farrar
- Robert Jones
- Iago ap Steffan
- Sophie Hughes
- Huw Alun Roberts
- Chris Andrew
- Heledd Gwyndaf
- John Wynn Jones
- Manon James
- Gill Stephen
- Gwyn Williams
- Daron Pierce
- Sian Wyn Jones
- Emma Lloyd
- Neville Evans
- Diane Jones
- Jane Aaron
- Emyr Puw
- Harri Bryn Jones
- Liz Saville Roberts
- Craig ab Iago
- Rhian Davies
- Gwyn Sion Ifan
- Anna Williams
- Dyfan Jones
- Dai Hawkins
- Trefor Jones-Morris
- Dilwyn Morgan
- Rev. Emyr Wyn Thomas
- Bryn Davies
- Dr Ceridwen Lloyd Morgan
- Howard Thomas
- Connor
- Lydia Jones
- Rhodri Jones
- Bob Gaffey
- Angharad

- Ruth Williams
- Nic Daniels
- Jeffrey Jones
- Pablo Dubois
- Gareth Wood
- Llinos Roberts
- Bethan Jones
- Sian Mererid Jones
- Duncan Brown
- B Griffiths
- Awen M G Schiavone
- Osian Wyn Owen
- Robin Owain
- Judith Griffith
- Richard John Griffith
- Clive James
- Sion Williams
- Mathew Rees
- Thomas John Davies
- Ben Screen
- Mari Williams
- Enfys Jones
- Thomas Shaw
- Dafydd Thomas
- Angharad Brown
- John Jones
- Iago Sion
- Dafydd Williams
- Ieuan Parry
- Huw Thomas
- William Schleising
- Huw Roberts

Organizations / Movements

- Cymdeithas yr Iaith
- Dyfodol i'r Iaith
- Mentrau Iaith Cymru
- Welsh Language Officer, Cardiff University Students Union and the Welsh Society Committee, Cardiff University
- Coleg Cymraeg Cenedlaethol

Welsh Language Commissioner's Advisory Panel

- Dr Ian Rees
- Gareth Jones
- Professor Gwynedd Parry
- Bethan Jones Parry
- Carl Cooper