Rights in use
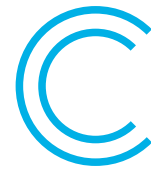
The Welsh Language Commissioner's assurance report
2018-19

**Comisiynydd y Gymraeg
Welsh Language Commissioner**

Contents

Foreword

My main aim as Welsh Language Commissioner will be to increase the use of Welsh. A key part of achieving this is to ensure that public organisations' service users and staff have opportunities to use the Welsh language, and to ensure that they utilise their rights.

People's rights to receive Welsh language services are not dependent on demand. But unless consumers feel reassured that services will be easily available, there is a risk that they will not attempt to use them. Additionally, increasing the use of Welsh language services can lead to improving the provision, by enabling further investment.

Recent years have seen an encouraging increase in the availability and quality of Welsh language services, although there is much work to be done before Welsh speakers can be fully confident that any service will be available in Welsh.

In order to safeguard and extend this progress, organisations need to plan and monitor their provision carefully, and increase capacity within their workforce through recruitment, training and innovation.

The findings of verification work done in 2018-19 suggest that the momentum is slowing down in some areas, with performance in some services – though by no means all – deteriorating. This is not the time to be complacent. Organisations need to continue to invest and innovate to ensure Welsh language services are always available.

Alongside increasing provision, organisations need to prompt people to use the Welsh language when accessing their services. This means focusing on what influences users' decisions, designing services to make people more likely to use Welsh, and raising awareness of Welsh language services. Services should be offered by default or proactively, and organisations should use simple and plain language that people can understand. We want to see organisations gather evidence to measure the effectiveness of any efforts to increase the use of Welsh language services.

This report is based on quantitative results about organisations' performance, but goes beyond the bare figures – my officers have a thorough understanding of the factors behind that performance. The report is full of practical examples that organisations should adopt.

In the months to come, I will be working tirelessly with my officers to support organisations in their duty to increase the use of Welsh language services. I am keen to hear about the innovative work that is taking place, and to use my connections and influence to get the best out of public organisations across Wales.

Aled Roberts
Welsh Language Commissioner
August 2019

Executive summary

1. Introduction

This report presents evidence on the performance of organisations as they implement language duties, and about the public's experiences of using Welsh language services. The evidence is based on monitoring, engagement with Welsh speakers, and contact with organisations.

The report is intended to prompt organisations to:

- ensure that their provision guarantees people's rights to receive Welsh language services

- increase the use of those services.

We suggest practical actions in three areas:

- robust internal arrangements to ensure compliance

- increasing workforce capacity to improve provision

- prompting people to use Welsh language services.

The right to receive Welsh language services is not dependent on demand, but increasing availability is key to increasing use. In turn, higher use can:

- enable the provision to be improved

- contribute to achieving the Cymraeg 2050 target of doubling the percentage who use Welsh daily to 20% by 2050

- ensure the best outcomes for Welsh speakers.

2. Organisations' performance in 2018-19

**Opinion survey:
opportunities to use Welsh with public organisations**

3%

11%

37%

48%

1%

- opportunities increasing
- opportunities remaining the same
- opportunities decreasing
- don't know
- not relevant
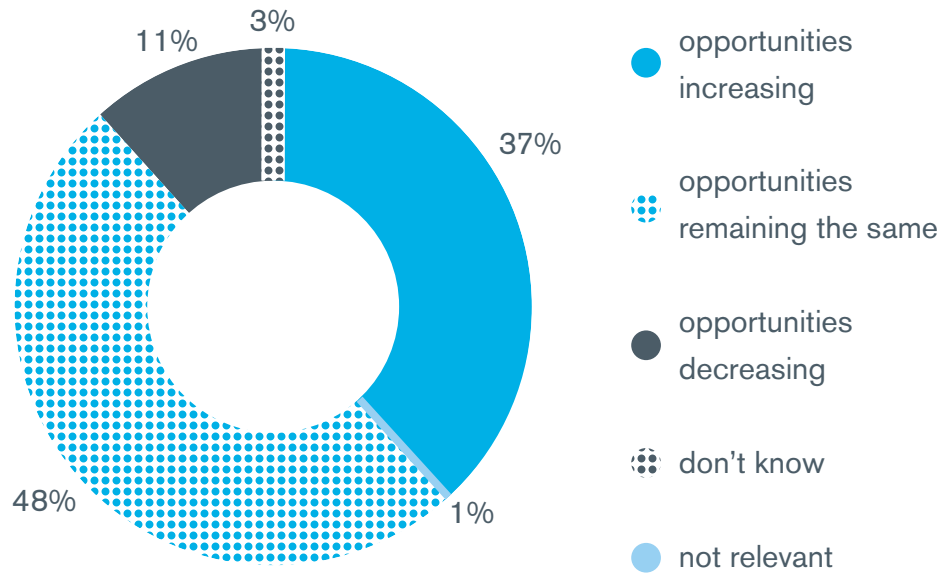
The public's views

"I'd say that the standards have made a big difference."

The public's views

"I think we need to celebrate the services that are now available in Welsh and share successes."

Main results

Verifying the services of a sample of public organisations suggests that users can be confident of receiving written services, and services that can be planned for, in Welsh.

Users are less likely to be able to receive more personal, or time-sensitive, services in Welsh.

93% of signs were in Welsh

81% of Welsh correspondence received a response, and

78% of leaflets available in Welsh

91% of responses were in Welsh

73% of forms available in Welsh

82% of automated telephone information available in Welsh

73% of web pages available in Welsh

46% of reception queries dealt with in Welsh

52% of telephone queries dealt with fully in Welsh

66% of Twitter posts and

63% of Facebook posts available in Welsh

Consistency

There were several examples of inconsistent services – organisations sometimes able to provide a service in Welsh, but not always doing so.

We heard many examples of a Welsh language service being offered or advertised, but not actually available, for example non-Welsh speaking staff wearing the Iaith Gwaith logo, or lack of language continuity between different stages of a service.

Service	Percentage of all examples available in Welsh	Percentage of organisations providing in Welsh every time
Web pages	73%	27%
Twitter posts	66%	25%
Response to Welsh correspondence	81%	60%

Comparing with 2017-18

Over the last few years, there has been a rapid increase in the availability of Welsh language services. In 2018-19, growth has been maintained for some services, but for others it appears that the momentum has slowed down.

It is encouraging that reception services have improved, but the level of performance remains unacceptable.

There was an increase in 3 of the 6 services where previous results were available, but there was a downturn in the other 3.

The regression in telephone services is a cause for concern, and this is compounded by discourteous behaviour of staff answering the phone, a Tribunal case where an organisation had misinterpreted a standard relating to phone services, and organisations' concerns about recruiting frontline staff.

93% ▲
of signs in Welsh in 2018-19
82% in 2017-18

81% ▲
of Welsh correspondence received a reply in 2018-19
75% in 2017-18

46% ▲
of reception queries dealt with in Welsh in 2018-19
37% in 2017-18

78% ▼
of corporate identity in Welsh in 2018-19
88% in 2017-18

73% ▼
of forms in Welsh in 2018-19
79% in 2017-18

64% ▼
of phone calls received a Welsh greeting in 2018-19
89% in 2017-18

Comparing sectors

On the whole, regulations nos. 1, 2 and 4 organisations performed best, with performance over 80% for most services.

Users' experiences of services provided by organisations that still operate Welsh language schemes are likely to be significantly poorer.

The performance of health organisations, although by no means satisfactory, does not lag behind other organisations to the same extent as in previous years.

Comparing areas

The data suggests that there is no direct correlation between the percentage of Welsh speakers in an area and the performance of councils. Although councils in the north-west were the best performing, performance was similar in many other regions (such as north-east Wales, mid and west Wales, and south Wales central).

The three regions in south Wales are similar in terms of the percentage of residents who speak Welsh, but councils in south Wales central performed better than south Wales west, and south Wales east, for many services.

This suggests that it's the arrangements that organisations put in place, rather than the number of Welsh speakers living in their area, that makes the difference.

3. Robust internal arrangements to ensure compliance

Understand the organisation's performance

Organisations should understand the experiences of people using (or trying to use) their Welsh language services, so that arrangements can be improved. This can be done by:

o **random checking of services –** some organisations have robust arrangements for self-monitoring and ensuring that the results lead to improvement

o using or replicating the **performance management arrangements** already in place, for example internal audit arrangements, reporting on delivery of operational plans, evaluating projects or risk registers

o **using complaints and user feedback –** using a complaints procedure and engagement activities to encourage people to share their experiences, and responding firmly and constructively to any shortcomings.

55% of organisations had published a complaints procedure

39% of organisations did not receive any complaints directly

Successful practice

"We have a feedback box in the reception area, and we include questions about the Welsh language in the annual student voice survey. We hold informal coffee and chat sessions in Welsh, and have appointed a number of Welsh language ambassadors. As part of their role, they will talk to their fellow students about Welsh language provision, and report back. The Welsh language is also discussed at the Learners' Assembly."

Lynwen Harrington, Welsh Language and Standards Officer, The College Merthyr Tydfil

Effective leadership and systematic planning

Organisations should have robust arrangements to ensure all staff and processes are working towards improving the Welsh language provision.

There are two important leadership roles:

o **strategic lead** – head or director with responsibility for the Welsh language, creating a culture of support, ensuring adequate investment, and creating an accountability structure that takes the Welsh language seriously.

Staff's views

"We have a new chief executive and she has committed to learning Welsh. It makes a big difference to the whole organisation when leaders lead by example from the top."

o **a specialist individual or team**, who offer operational support, raise awareness and train staff, and plan the Welsh language provision from day to day and within projects.

Successful practice

"During 2018, the Council approved a bid for funding to appoint a Welsh language officer. Creating this role has enabled us to give much more attention to Welsh language provision."

Gareth Watson, Communications Team Leader, Denbighshire County Council

Organisations need to plan systematically – to have a clear understanding of the requirements, and identify what practical changes are necessary to comply with the requirements. Sometimes elementary things, that are required in the standards, had not happened (e.g. publishing specific statements), and new websites and apps were not available in Welsh.

Successful practice

"Although we have developed our Welsh language provision over a number of years as we implemented our Welsh language scheme, we soon realised that careful planning, and long term action, would be needed to be ready to comply with the Welsh language standards when they came into force. We have:

o established a Welsh language standards project management group, which includes representation from the three areas within the Board, and influential managersfrom the services and departments most responsible for implementing the standards.

o drawn up a Welsh language standards work programme with specific action points to ensure compliance, which includes local action plans in the various departments and services."

Eleri Hughes-Jones, Head of Welsh Language Services, Betsi Cadwaladr UHB

4. Increase workforce capacity to improve provision

Have sufficient numbers of staff with Welsh language skills

Users' experience is dependent on organisations having sufficient numbers of Welsh speaking staff, and those staff being in the right roles. To increase their capacity to provide Welsh language services, organisations need to:

- **identify the skills of the existing workforce** – establish a baseline of the number, location and roles of Welsh speaking staff. Arrangements for recording staff's language skills need to be more consistent in terms of timescales and levels used. Some organisations map the organisation's Welsh speakers in a sophisticated way

- **improve Welsh language skills of the existing workforce** – provide opportunities for staff to improve their Welsh language skills, or develop their ability to use Welsh in specific situations. Most organisations offered opportunities to improve skills, but it was not clear to what extent staff in specific roles were being targeted. A number of police forces have seen progress by including improving Welsh language skills as part of the promotion process

- **carry out a meaningful assessment of the language needs in every vacant post** in order to recruit the necessary Welsh speakers. It's important to be clear when using skill levels in job advertisements, and levels cannot replace categories of need (e.g. essential, desirable)

Welsh language skills mentioned in

67%

of job advertisements

Welsh language skills essential for

7%

of posts where mentioned

Welsh language skills desirable for

88%

of posts where mentioned

o **attract Welsh speakers to work for the organisation**, for example by enabling candidates to submit applications in Welsh. Some organisations adapt their recruitment procedures in order to increase the number of Welsh speakers who apply, for example by recruiting staff to be trained on the job rather than staff who have already qualified, or establishing links with education providers

24%
of job advertisements were in Welsh

51%
of job advertisements indicated that it is possible to apply in Welsh

o **innovate in order to manage the demand for staff** – some organisations use technology to direct users to channels which require less staff time to provide services, or use automatic translation to cut costs.

Effective training and allocation of staff

Organisations need to make the most of staff's skills to ensure that Welsh language services are available. This means:

- **raising awareness** – providing guidance (such as training, materials or communication campaigns) to ensure that everyone in the organisation knows the requirements and how to deal with contact in Welsh. We saw examples of organisations failing to ensure that individual staff members acted in accordance with corporate compliance arrangements, and in some cases staff behaved discourteously when we were checking telephone and reception services

Responses from staff

"Speak English to me"

"There's obviously no language barrier, but if you want to speak to someone in Welsh – ok"

"There's no Welsh spoken here"

"I don't like making a fuss"

- **arranging and locating staff effectively**, for example effective rota arrangements, telephone referral systems, and agile working arrangements, or locating offices in areas where sufficient numbers of Welsh speakers are available. There were examples when there were no Welsh speaking staff available to provide services even when the service was promoted. Some organisations have formed partnerships to increase the pool of Welsh speakers available to provide a service quickly.

5. Prompt people to use Welsh language services

Data on the use of Welsh language services is fragmented and inconsistent, but we believe that usage is currently low.

Opinion survey: "Which language would you prefer to use when dealing with public organisations?"

Welsh: 33%
English: 47%
Depends on type of service: 20%

Percentage indicating 'Welsh':
- 2018-19: 33%
- 2017-18: 33%
- 2016-17: 32%
- 2015-16: 32%
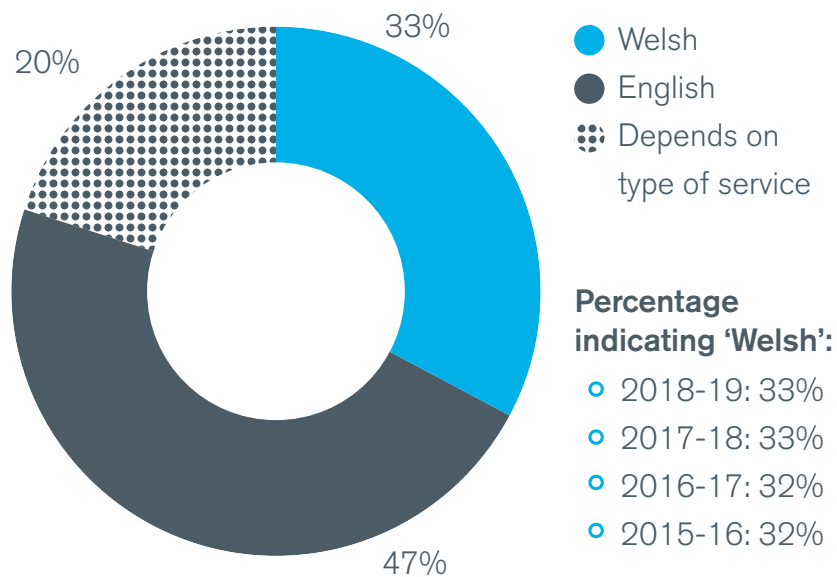
By conducting an opinion survey and user shadowing sessions, and by talking to people in discussion groups, we have concluded that, in order to change their patterns of use, Welsh speakers need:

- assurance that a Welsh language service is available

- a Welsh language service that is at least as easy, quick and seamless as the English service

- contact initiated in Welsh or offered proactively

- assurance that using Welsh will not disadvantage them in terms of the outcome or speed of the process

- language that's easy to understand.

Organisations should apply behavioural theory to the task of increasing use of Welsh language services. Some of the main relevant ideas include:

o people are keen to do what they consider to be normal and socially approved

o people tend to follow the default option set by the organisation rather than making their own conscious choice

o people want to avoid losses, for example delay or less favourable treatment.

Design services to make people more likely to use Welsh

Over the years, organisations have regularly designed their services so that English appears to be the default or most prominent option, or – at best – that the Welsh and English options are equal. To promote Welsh language services, organisations can take active steps to make users more likely to use Welsh language services. This can be done by:

o **offering the Welsh service by default or proactively** – ensuring that the service appears in Welsh first, or that users are made a real offer to use Welsh at the start of the process. Users should be greeted in Welsh and detailed attention should be given to the service delivery environment in order to condition people to use Welsh. There are examples of organisations setting Welsh as the automatic option, and encouraging users to go to the Welsh language side of websites

The public's views

" I don't like making a fuss – I just tend to accept what is offered to me."

Opinion survey: "Public organisations ask me in which language I would like to deal with them"

- Agree
- Disagree
- Don't know

5%
33%
62%
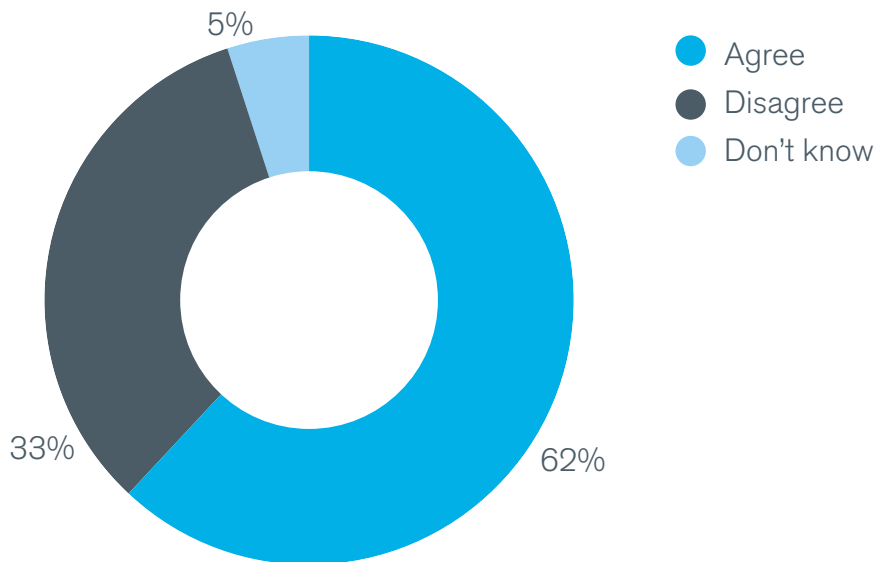
○ **recording users' language choice and acting in accordance with that preference.** The Commissioner has convened a Task and Finish Group on technical solutions for recording and sharing language choice, which recommends using consistent, user-tested wording for establishing preferred language, and for recording language choice to be considered when procuring IT systems

○ **ensuring that Welsh language services are of good quality –** there should be no delay, inaccuracy or gaps in the Welsh language service. Organisations took more than double the time to respond to Welsh correspondence

The public's views

"It was very difficult to get through to someone that could speak Welsh – I had to wait over 10 minutes. So next time, I didn't use Welsh, and got an answer straight away."

98% of responses to English written queries answered the query in full, but only

88% of responses to queries in Welsh

22% of Welsh language web pages treated Welsh less favourably than English due to minor errors, missing text, or content not working properly

- using clear and understandable language, and offering services **bilingually** to allow people to use Welsh, but also being able to refer to the English to make sure that they have understood everything.

The public's views

"It has to be simple, doesn't it? What is the point of putting in complex words? Someone who is learning Welsh, and tries to use Welsh language services, would turn to English if they used complex words because they wouldn't understand."

Raise awareness of Welsh language services

For years, Welsh language services were not as widely available as they should be. So organisations need to emphasise that changes have taken place, and make sure that users are aware that Welsh language services are available.

The public's views

"When there's some kind of event at the college, everyone knows about it because there are posters everywhere. Welsh language services should be promoted just as prominently."

Opinion survey: "I know what types of service I have a right to receive in Welsh from public organisations"
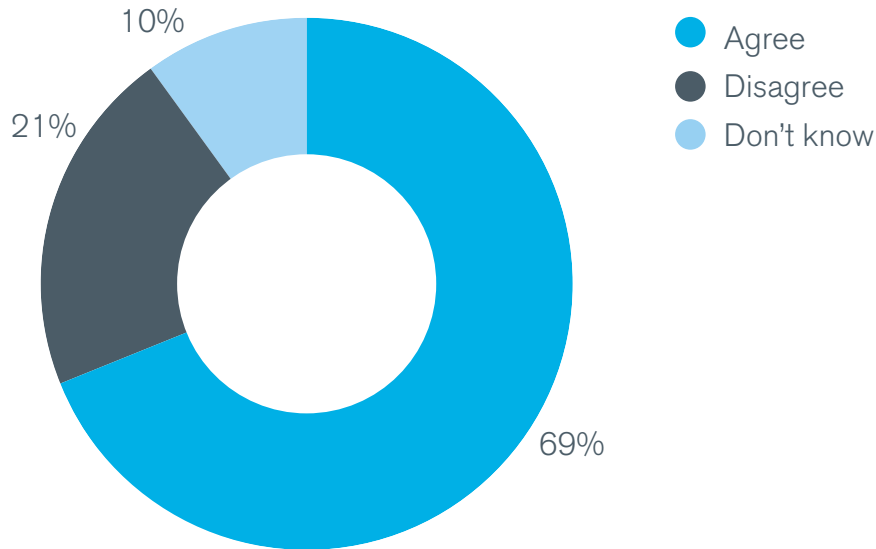
It's possible to raise awareness of Welsh language services by:

○ **letting people know about Welsh language services in general.** There weren't many examples of long-term, co-ordinated campaigns to promote Welsh language services, although about a quarter of organisations we asked mentioned the use of social media, press releases and so on. Using the Iaith Gwaith logo on badges, signs etc is a simple and effective way of letting people know that Welsh language services are available. Organisations should publish the required documents (annual report, compliance and oversight arrangements, etc) to provide assurance to users

The public's views

"Having to ask someone to speak Welsh, and the possibility of being rejected, is awkward. If I see that they are wearing a Iaith Gwaith badge, I'll speak Welsh straight away."

○ **drawing attention to specific Welsh language services.** The standards require simple steps, such as including a statement that a Welsh option is available with specific services, but the percentage of organisations that actually does so is disappointing.

Gather evidence to measure progress

Organisations should gather robust quantitative evidence to determine whether their efforts to increase the use of Welsh language services are working, and set firm targets.

1. Introduction

1.1   Strategic context – rights and use

1.1.1   This is the Commissioner's fifth assurance report. The purpose of assurance reports is to present the Commissioner's opinion on how organisations are operating in order to comply with their language duties, paying particular attention to the experiences of users of Welsh language services. Our intention is that organisations use the findings of the report as an evidence base to change their approach.

1.1.2   This report focuses on how organisations can:

- o ensure that their provision guarantees people's rights to receive Welsh language services, and complies with duties

- o increase people's use of those services.

1.1.3   The right to receive Welsh language services is not dependent on demand, but increasing availability is key to increasing use. In turn, greater use will enable the provision to be improved.

1.1.4   The Welsh Language Measure 2011 states, in defining Welsh language standards, that part of their intention is to "promote or facilitate the use of the Welsh language".

1.1.5   "Increasing the range of services offered to Welsh speakers, and increasing the use of Welsh language services" is one of the aims of the Welsh Government's Cymraeg 2050 strategy. It is one of the methods identified to achieve the target of doubling the percentage who use Welsh daily to 20% by 2050.

"It is essential that there are no barriers to receiving services in Welsh and that Welsh-language services are offered proactively, are widespread, and of an equivalent quality to those offered in English."

Cymraeg 2050 strategy

1.1.6   The strategy also mentions "attracting and nurturing a growing customer base for Welsh language services" through "intelligent marketing" and a "customer focused approach". It is stated that providers have a duty to "design services in a way which is geared to the needs of the customer", and that there is a need to "improve our understanding of what could assist Welsh speakers of all abilities to use Welsh in circumstances where they are not accustomed to doing so."

1.2   The report's evidence base

1.2.1   The report is based on robust and varied evidence, including:

- **monitoring –** conducting user experience surveys (checking services such as correspondence, telephone, receptions, signs, self-service machines, documents, corporate identity, apps, websites and so on); checking annual reports, supplementary documents and job advertisements; and asking organisations for evidence through thematic studies regarding recording and improving Welsh language skills, and measuring and increasing use of services

- **engagement –** holding discussion groups across Wales, an opinion survey, and user shadowing work

- **contact with organisations –** impressions of officers based on dealing with organisations when supporting compliance, setting standards, and conducting investigations.

1.2.2   For user experience surveys, it should be noted that:

- the results are based on checking the services of a sample of a third of organisations in regulations 1, 2, 4, 5, 6, and 7, and a selection of organisations operating Welsh language schemes, unless otherwise stated

- services were checked three times during the year in most cases

- results in 2017-18 were mostly based on checking the services of all relevant organisations – this year, the results are for a randomly-selected sample of a third of organisations

- in most cases, we report on user experience rather than compliance with standards or Welsh language schemes. The results sometimes refer to organisations that were not under a duty to comply with the specific requirements (e.g. when organisations had challenged the duty, the imposition day had not passed, lower requirements were set, or organisations were implementing Welsh language schemes)

- all organisations were implementing Welsh language standards during the relevant period, except regulations no. 7 organisations and language scheme organisations.

1.2.3   Organisations operating language duties include:

Group of organisations	Specific organisations	Duties
Regulations no. 1	County councils, national parks and Welsh Government (26 organisations)	Implementing standards since 30/03/2016
Regulations no. 2	Various national organisations (32 organisations)	Implementing standards since 25/01/2017
Regulations no. 4	Welsh tribunals (6 organisations)	Implementing standards since 30/03/2017
Regulations no. 5	Police forces, police and crime commissioners, and fire services (16 organisations)	Implementing standards since 30/03/2017
Regulations no. 6	Universities and further education organisations (25 organisations)	Implementing standards since 01/04/2018
Regulations no. 7	Health boards, NHS trusts, and community health councils (18 organisations)	Implementing Welsh language schemes during 2018-19 Implementing standards from 30/05/2019
Welsh language schemes	UK Government departments and executive agencies and other companies and organsiations implementing Welsh language schemes	Implementing Welsh language schemes (no plans to impose standards in the near future)

1.2.4 There is a full methodology, and a list of relevant organisations, at the end of the report.

2. Organisations' performance in 2018-19

The Commissioner's opinion

I'm glad that our verification work suggests that performance has continued to improve or has remained consistent for a number of services, and that this is supported by public opinion. It is particularly encouraging to see growth in areas of Wales where services have not always been strong, and to see that location is not a barrier to delivery.

But inconsistency is a problem, with some services not always available. Personal services are less likely to be available, and phone services had deteriorated since last year.

In order to resolve this, I want to see organisations improve their internal arrangements and increase their workforce capacity – I look forward to seeing organisations use the next sections of this report as a basis for action.

2.1 Availability of services in 2018-19

Users' opinion

2.1.1 Opinion survey respondents were asked a number of questions about the availability and quality of Welsh language services.

Opinion survey: opportunities to use Welsh with public organisations

3% 1%

11%

37%

- opportunities increasing
- opportunities remaining the same
- opportunities decreasing
- don't know
- not relevant

48%

(fluent Welsh speakers only)
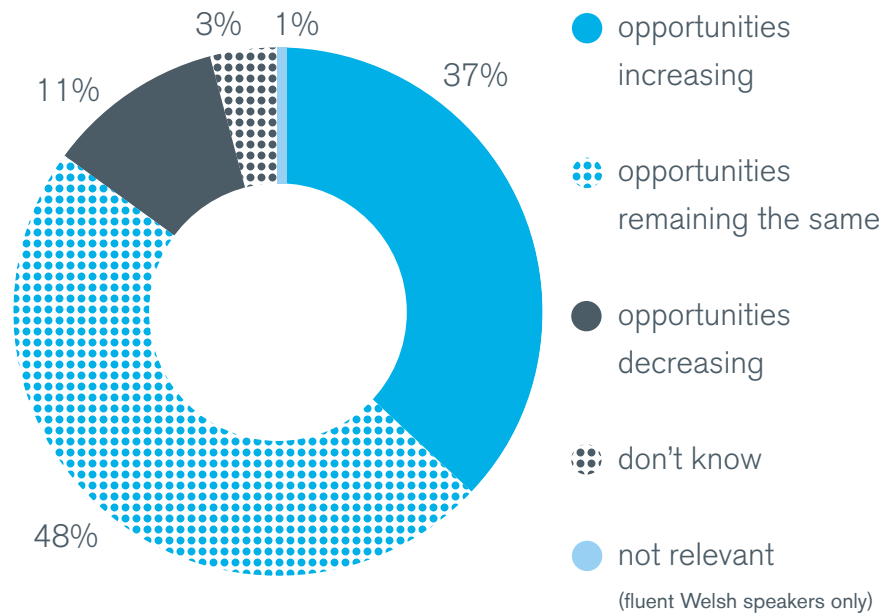
Opinion survey: "I can usually deal with public organisations in Welsh if I want to"

6% 1%

10%

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

35%

48%

Percentage agreeing (somewhat or strongly):

- 2018-19: 83%
- 2017-18: 72%
- 2016-17: 91%
- 2015-16: 84%
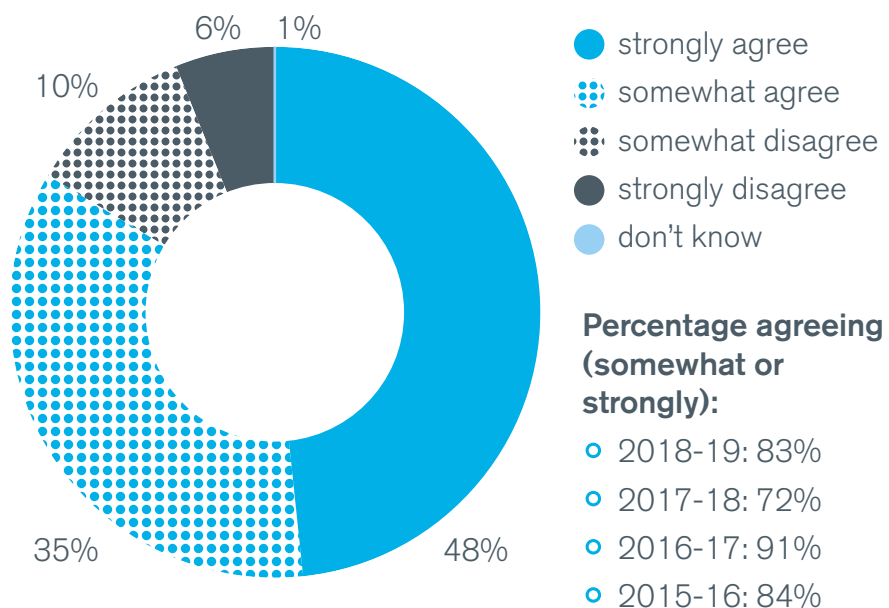
(respondents who wished to use Welsh with public organisations at all times or sometimes only)

**Opinion survey: "Public organisations'
Welsh language services are improving"**

24%

20%

4%

11%

41%

- 🔵 strongly agree
- ⦚ somewhat agree
- ⦚ somewhat disagree
- ⚫ strongly disagree
- 🔵 don't know

**Percentage agreeing
(somewhat or
strongly):**

- ○ 2018-19: 65%
- ○ 2017-18: 64%
- ○ 2016-17: 76%
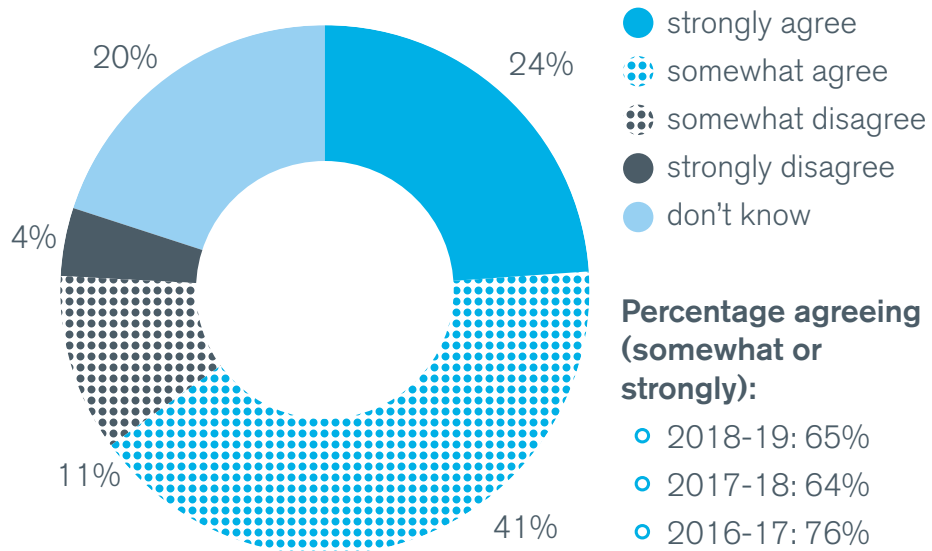
2.1.2   Although discussion groups tended to focus on specific
examples where Welsh language services had not been provided
as expected, there was a general feeling that the situation was
now better than before.

The public's views

"I'd say that the standards have made a big difference."

"I see the local council doing a lot more planning and preparation across
all departments now."

"I've had a good experience of calling the police emergency line – a
completely Welsh service."

"I think we need to celebrate the services that are now available in
Welsh and share successes."

"E-mails from the University are always bilingual now."

Verification results – main services

2.1.3   If users are not completely sure that a Welsh language service will be available, they may fear that trying to use the service in Welsh will be a wasted effort. As Welsh language services have been deficient until recent years, Welsh speakers often assume – based on their previous experiences – that services will not be available. Services need to be very widely available to reverse that assumption.

The public's views

"If the service is available I have no problem using it."

93% of signs were in Welsh

81% of Welsh correspondence received a response, and

78% of leaflets available in Welsh

91% of responses were in Welsh

73% of forms available in Welsh

82% of automated telephone information available in Welsh

73% of web pages available in Welsh

46% of reception queries dealt with in Welsh

52% of telephone queries dealt with fully in Welsh

66% of Twitter posts and

63% of Facebook posts available in Welsh

2.1.4　The table shows organisations' overall performance in providing different services in Welsh, based on the results of user experience surveys. It shows how many times the criteria were met from every occasion when a service or material was accessed. In most cases, all services or materials were accessed three times for each organisation in the sample.

2.1.5　Performance is stronger for services and materials where:

- they can be provided once and for all by making text or systems available in Welsh (e.g. signs, automated telephone informations and options, websites, forms), or

- text may need to be sent to a Welsh speaker (either to deal with the matter or to translate it), but there is no significant time pressure (e.g. correspondence, press releases).

2.1.6　Performance is weaker for services where a Welsh speaking member of staff needs to be available at the time the service is accessed in order to provide a personal service (e.g. reception and telephone services).

2.1.7　The phone performance of organisations subject to standards varies in line with the duty that has been set. There are two options for the Commissioner in terms of standards that can be imposed. Organisations with the higher requirement – to provide a full service in Welsh – perform well. But the organisations with the lower requirement – to provide a Welsh language service up to the point when it is necessary to transfer to someone who doesn't speak Welsh to provide a response on a specific subject – were less likely to comply even with that lower requirement.

2.1.8　The performance for different types of documents varies greatly. This reflects the fact that organisations have different duties. The performance is better for the types of documents that are most useful to the public.

Main verification results 2018-19

Signs	
All text in Welsh	93%
Correspondence	
Welsh language correspondence – response in Welsh (if received)	91%
Welsh language correspondence – received a response (any language)	81%
Telephone calls	
Automated information in Welsh (if available)	82%
Automated options in Welsh (if available)	73%
Welsh language greeting from the receiver	64%
Provide full response to query in Welsh (all organisations in sample)	52%
Specific results according to duty:	
Provide full response to query in Welsh (organisations subject to relevant standards only)	82%
Provide full response in Welsh, or Welsh language service up to the point when it is necessary to transfer to someone who doesn't speak Welsh to provide a response on a specific subject (organisations subject to relevant standards only)	56%
Websites	
Home page of the organisation's website available in Welsh	80%
Pages with all text in Welsh	73%
Corporate identity	
Appears in Welsh	78%

Documents

Documents overall – available in Welsh	66%
Booklet, leaflet, pamphlet or card – available in Welsh	78%
Press statement – available in Welsh	77%
Form – available in Welsh	73%
Guidelines / code of practice – available in Welsh	72%
Policy / strategy / annual report / corporate plan – available in Welsh	67%
Rules – available in Welsh	60%
Agenda, papers and minutes for management board / cabinet meeting – available in Welsh	45%
Consultation paper – available in Welsh	44%
Certificate / permit – available in Welsh	13%

Social media

Twitter – number of posts available in Welsh	66%
Facebook – number of posts available in Welsh	63%

Receptions

Deal with query in Welsh	46%
Welsh language greeting from the receptionist	40%

Consistency

2.1.9   There are examples of inconsistency in the availability of services – organisations are sometimes able to provide a Welsh language service, but do not always succeed in doing so. This suggests that organisations do not have a good enough understanding of their own performance, or arrangements for anticipating and preventing shortcomings. For example:

Service	Percentage of all examples available in Welsh	Percentage of organisations providing in Welsh every time
Web pages	73%	27%
Twitter posts	66%	25%
Facebook posts	63%	23%
Rules	60%	29%
Response to Welsh language correspondence	81%	60%

2.1.10   Other examples of inconsistency included:

- organisations performing better with one social media platform than the other – for example, 87% of one organisation's Twitter posts were available in Welsh, but only 27% of Facebook posts

- students in discussion groups said that the language of communication varied from one department to another or was dependent on the language of the member of staff

- people in a discussion group said that there was inconsistency in the language of messages from hospital.

2.1.11   Another aspect of inconsistency is services not being available to the extent that organisations have promoted them, or a lack of continuity between different stages. For example:

- there were several examples, when checking telephone services, where no one was available to provide a service after we chose the Welsh option

- one of the student discussion group attendees had received Welsh correspondence inviting her to a university interview, but the interview itself was in English without warning

- a discussion group attendee had ticked a box on the driving test booking form expressing a preference for a Welsh test, but the examiner did not speak Welsh

- a discussion group attendee had received a Welsh letter but it was not possible to discuss the letter in Welsh on the phone

- a case was investigated where a telephone payment system offered a Welsh language service but the subsequent receipt was in English only

- several examples of health service staff wearing work clothes with the Iaith Gwaith logo although they did not speak Welsh.

2.2 Comparisons

Comparing with 2017-18

2.2.1   For some services, results can be broadly compared with 2017-18. This applies to 6 surveys: signage, correspondence, receptions, telephone calls, corporate identity, and certain types of documents (forms and rules).

93% ▲
of signs in Welsh in 2018-19
82% in 2017-18

73% ▼
of forms in Welsh in 2018-19
79% in 2017-18

81% ▲
of Welsh correspondence received a reply in 2018-19
75% in 2017-18

78% ▼
of corporate identity in Welsh in 2018-19
88% in 2017-18

46% ▲
of reception queries dealt with in Welsh in 2018-19
37% in 2017-18

64% ▼
of phone calls received a Welsh greeting in 2018-19
89% in 2017-18

Results in 2017-18 were based on checking the services of all relevant organisations – this year, the results are for a randomly-selected sample of a third of organisations

2.2.2   For 3 of the services where previous results were available (signs, correspondence and receptions), there was a small increase or results remained stable.

	2018-19	2017-18
Signs		
All text in Welsh	93%	82%
Correspondence		
Correspondence in Welsh – response in Welsh	91%	93%
Correspondence in Welsh – response received (in any language)	81%	75%
Receptions		
Deal with query in Welsh	46%	37%

2.2.3   It is encouraging to see a small increase in the availability of Welsh language reception services. This suggests that organisations are changing their staffing arrangements to meet the need to provide a Welsh language service. But the level of performance remains far below what is necessary.

2.2.4   For the other 3 services (phone, corporate identity and two types of documents), we saw a reduction.

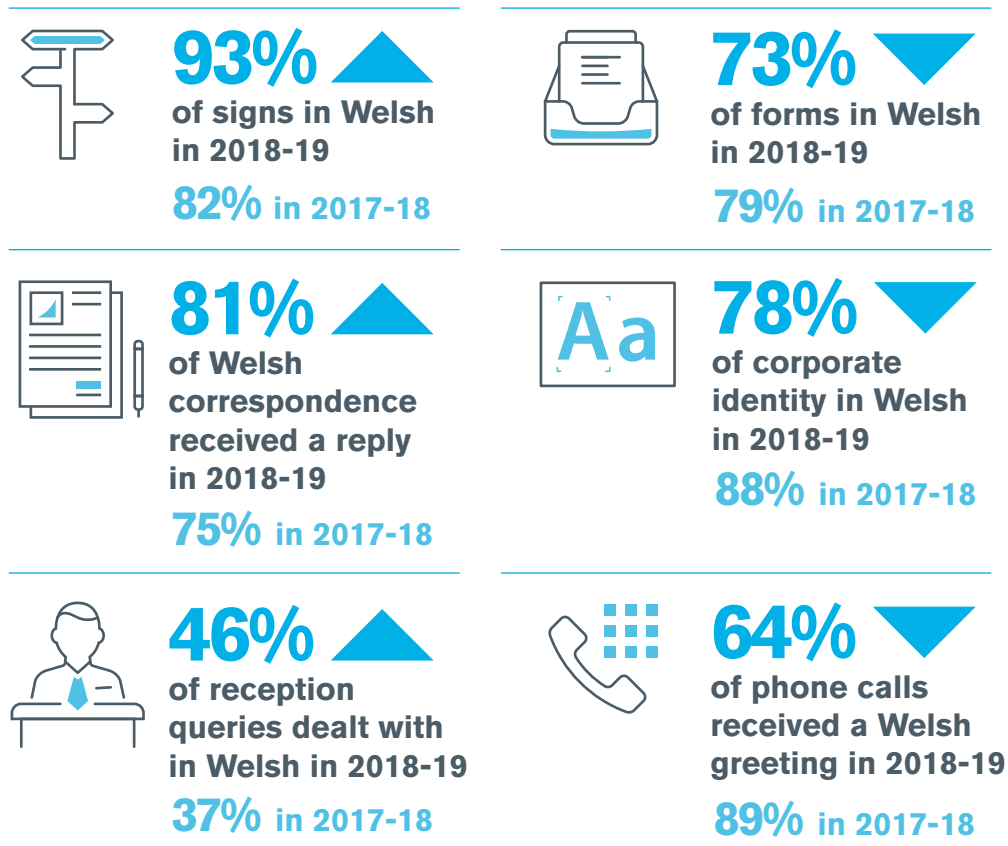|	2018-19	2017-18
Telephone calls		
Automated information in Welsh	82%	89%
Provide full response in Welsh (organisations subject to relevant standards only)	82%	88%
Welsh language greeting from the recipient	64%	89%
Provide full response in Welsh or Welsh language service up to the point when it is necessary to transfer to someone who doesn't speak Welsh to provide a response on a specific subject (organisations subject to relevant standards only)	56%	66%
Corporate identity		
Appears in Welsh	78%	88%
Documents		
Forms – available in Welsh	73%	79%
Rules – available in Welsh	60%	70%

2.2.5   We saw a deterioration in several aspects of telephone services. This included a reduction in the availability of automated information in Welsh, and fewer organisations providing a Welsh language greeting. There was also a reduction in terms of providing a response in Welsh – both among organisations which are subject to standards to provide a full response in Welsh, and those required either to provide a full response in Welsh or a Welsh language service up to the point when it is necessary to transfer to someone who doesn't speak Welsh to provide a response on a specific subject.

2.2.6   Consistent investment in the availability and awareness of staff is needed in order to provide an effective Welsh language telephone service.

2.2.7   Concern about telephone services, based on the results of verification work, is reinforced by other findings mentioned in this report. For example:

- when carrying out verification work, we experienced rude and unpleasant behaviour from staff members who did not know how to deal with a request to use Welsh during telephone calls (see 4.2.4)

- a recent determination by the Welsh Language Tribunal has highlighted a case where an organisation had misinterpreted a telephone service standard. The standards imposed on organisations require telephone calls to main numbers be dealt with in Welsh either in their entirety, or until the point when it is necessary to transfer to a non-Welsh speaker to provide an answer on a specific topic (see 3.2.13 onwards)

- organisations' concerns about the ability to recruit Welsh speakers often relate to frontline staff (see section 4.1 regarding recruitment).

Comparing sectors

2.2.8   The table shows the performance for a selection of main services and materials, broken down by sector.

2.2.9   Overall, regulations no. 1, 2 and 4 organisations perform best, with performance over 80% for most services, although there are exceptions to this (e.g. poor performance by tribunals in responding to coprrespondence; poor performance by regulations no. 1 and national organisations in responding to telephone queries; and good performance by police forces and fire services in receptions).

2.2.10   Users' experiences of services provided by organisations with Welsh language schemes are likely to be significantly poorer. As these organisations still operate Welsh language schemes, the same requirements will not apply to them as to those operating standards. Many of these organisations do not have offices in Wales.

2.2.11   The duty to comply with website standards had not yet come into force for regulations no. 6 organisations during the period in question.

2.2.12   Regulations no. 7 organisations were not subject to a duty to comply with standards during the period in question – they still operated Welsh language schemes. While their performance level is by no means satisfactory, the gap between health organisations and others is not as large as in previous years (except for telephone calls). This may be because the organisations are changing their arrangements as they prepare to comply with the standards.

	Whole sample	Regulations no. 1 (all – not sample only) (councils, national parks and Welsh Government)	Regulations no. 2 (various national organisations)	Regulations no. 4 (tribunals)	Regulations no. 5 (police and fire services)	Regulations no. 6 (higher and further education)	Regulations no. 7 (health)	Welsh language schemes (mostly undevolved)
Signs – all text in Welsh	93%	91%	100%	100%	100%	96%	78%	83%
Correspondence in Welsh – response in Welsh	91%	86%	100%	67%	92%	95%	100%	72%
Corporate identity – appears in Welsh	78%	95%	73%	100%	80%	96%	78%	33%
Websites – pages with all text in Welsh	73%	93%	94%	100%	78%	64%	69%	26%
All types of documents – available in Welsh	66%	77%	84%	81%	70%	56%	54%	71%
Twitter – posts available in Welsh	66%	85%	95%	-	61%	80%	54%	14%
Facebook – posts available in Welsh	63%	82%	85%	-	82%	66%	54%	11%
Telephone calls – full response in Welsh	52%	58%	65%	83%	57%	50%	35%	60%
Receptions – deal with query in Welsh	46%	58%	60%	-	75%	56%	50%	0%

Comparing areas

2.2.13   By grouping local authority results by area, we can see whether performance varies when comparing different regions within Wales.

2.2.14   The data suggests that there is no direct relationship between the percentage of Welsh speakers in an area and the performance of organisations. Specifically:

- although organisations in the north-west were the best performing, performance was similar for many other regions (such as north-east Wales, mid and west Wales, and south Wales central)

- organisations in north-east Wales performed better than those in mid and west Wales for correspondence, signage, social media, and telephone calls, although the percentage of Welsh speakers in the north-east is half that of mid and west Wales

- the three regions in south Wales are similar in terms of the percentage of Welsh speakers who live there, but organisations in south Wales central performed better than south Wales west and south Wales east for many services (correspondence, social media, documents, telephone calls).

2.2.15   This suggests that it's the arrangements that organisations put in place, rather than the number of Welsh speakers living in their area, that makes the difference.

2.2.16   The table shows the performance for a selection of the main services and materials.

	All councils	North-west (Anglesey, Gwynedd, Conwy)	North-east (Denbighshire, Flintshire, Wrexham)	Mid and west (Powys, Ceredigion, Carmarthenshire, Pembrokeshire)	South Wales west (NPT, Swansea, Bridgend)	South Wales central (Rhondda Cynon Taf, Cardiff, Vale of Glamorgan)	South Wales east (Blaenau Gwent, Caerphilly, Newport, Monmouthshire, Merthyr Tydfil, Torfaen)
Percentage and number of Welsh speakers	19% 562,016	49% 146,168	16% 58,238	32% 159,788	12% 60,133	11% 77,703	10% 59,986
Signs – all text in Welsh	94%	100%	100%	100%	100%	100%	78%
Correspondence in Welsh – response in Welsh	92%	98%	98%	98%	94%	89%	83%
Corporate identity – appears in Welsh	91%	100%	100%	92%	89%	100%	78%
Websites – pages with all text in Welsh	85%	100%	100%	56%	89%	100%	79%
All types of documents – available in Welsh	84%	100%	93%	84%	76%	100%	68%
Twitter – posts available in Welsh	79%	100%	100%	84%	69%	98%	54%
Facebook – posts available in Welsh	75%	93%	81%	92%	68%	71%	57%
Telephone calls – full response in Welsh	56%	100%	86%	75%	22%	71%	18%
Receptions – deal with Welsh language query in Welsh	55%	100%	33%	75%	66%	66%	17%

2.2.17   When opinion survey respondents were asked whether there were more opportunities to use Welsh with public organisations, 65% of respondents in the counties of south-east Wales (i.e. Torfaen, Monmouthshire, Newport, Cardiff, Vale of Glamorgan, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly, Blaenau Gwent, Neath Port Talbot, Bridgend) felt that opportunities were increasing, compared to 37% throughout Wales.

3. Robust internal arrangements to ensure compliance

The Commissioner's opinion

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

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

3.1   Understand the organisation's performance

3.1.1   We want organisations to develop an understanding of the likely experience of people who use (or attempt to use) their Welsh language services. This will enable them to adapt arrangements to improve experiences.

Verify services

3.1.2   The Commissioner's surveys cannot be relied on as the only source of actual performance information.

3.1.3   The most obvious way of getting this information is to check services randomly, using a similar methodology to the Commissioner's surveys. This means:

- drawing up criteria based on the requirements of the standards

- accessing the service like a normal user

- recording whether the experience matches the criteria.

3.1.4　We have seen several examples of organisations checking their own services. Verification is carried out by the organisation's own staff in Coleg Cambria, Coleg Ceredigion, Coleg Sir Gâr, The College Merthyr Tydfil and other organisations.

3.1.5　Other organisations form partnerships to obtain semi independent checks at a reasonable cost.
For example:

- Pembrokeshire Coast NPA and Pembrokeshire County Council have carried out an exercise checking each other's telephone services

- organisations such as Caerphilly CBC, Merthyr Tydfil CBC, Gwent Police, and Denbighshire County Council have commissioned surveys of their services from the local Menter Iaith. Caerphilly CBC said that the work helped them to identify gaps and celebrate successes, and that it was tied in with implementation of the Council's strategy to promote the Welsh language

- organisations have identified groups of real residents to test services on their behalf – such as secondary school students on work experience for Merthyr Tydfil CBC, and a group of local Welsh learners for Pembrokeshire County Council. Merthyr Tydfil CBC is working with the Coleg Cymraeg Cenedlaethol to identify opportunities for similar work in future.

3.1.6   It is important that the results of verification work are used to change the organisation's arrangements. For example, in the case of The College Merthyr Tydfil, a mystery shopper exercise is held annually, with the results reported back to the College Executive Team, and the information shared directly with Heads of Department so they can take action if necessary.

Successful practice

"We have adopted an internal monitoring framework to gather information about compliance, and ensure that staff in every part of the organisation take responsibility for the Welsh language.

As part of this, we send all professional departments and colleges a self-monitoring form annually (as well as additional forms for some departments like Human Resources). This gives us early warning of any shortcomings, and ensures that we know about good practice.

In addition, we in the Welsh Language Office undertake internal monitoring to verify compliance. If the exercise shows any shortcomings, we support improvement within a specific timescale.

To make the process understandable to our staff, we use a traffic light system to report back to departments, bringing the results to life.

We've seen that this framework makes the Welsh language part of the responsibilities of all departments within the University, and encourages staff to make positive changes to improve Welsh language provision."

Nia Besley and Emily Hammett, Welsh Language Policy and Promotion Officers, Swansea University

Incorporate Welsh in performance management arrangements

3.1.7   Organisations will have various arrangements in place for monitoring and improving their overall performance – internal audit, reporting on the progress of operational plans, evaluating projects, risk registers and so on.

3.1.8   These arrangements should internalise the Welsh language, in order to take advantage of structured systems for gathering information, ensuring accountability, and dealing with failure. Where this is not possible, or where the Welsh language needs more detailed attention, separate arrangements can be established.

3.1.9   The Welsh language is included as part of Rhondda Cynon Taf CBC's corporate assessment, which is sent to the Wales Audit Office annually. Service managers' annual self-evaluation asks how the Welsh language provision has improved during the year.

3.1.10   Natural Resources Wales uses an annual Welsh language audit form for each department.

3.1.11   North Wales Police conducts an annual audit to ensure compliance with requirements of the Welsh language standards.

3.1.12   A number of police forces have commissioned an external company to conduct an audit of their compliance arrangements. The audits included interviews with staff, sampling services, and collecting paper evidence, and have resulted in strengthening arrangements. In the case of North Wales Police, this was done jointly with the Office of the Police and Crime Commissioner.

Successful practice

"We have piloted a standards compliance monitoring procedure – a specific performance management process for compliance with Welsh language standards.

Every Head of School and Functional Area Director completes a compliance form at the end of each term, which states whether there was compliance, partial compliance or non-compliance with the relevant standards during the term. The forms are submitted to me, and discussed during termly meetings with the Vice Principal. We provide feedback to all Heads of School and Functional Area Directors so that we can discuss, and hopefully resolve, any compliance issues.

Following the pilot we evaluated this process and, due to its success, we will continue with the process. Managers like to have a specific process to follow, and we have created a high level of accountability."

Lois Roberts, Welsh Language Officer, Coleg y Cymoedd

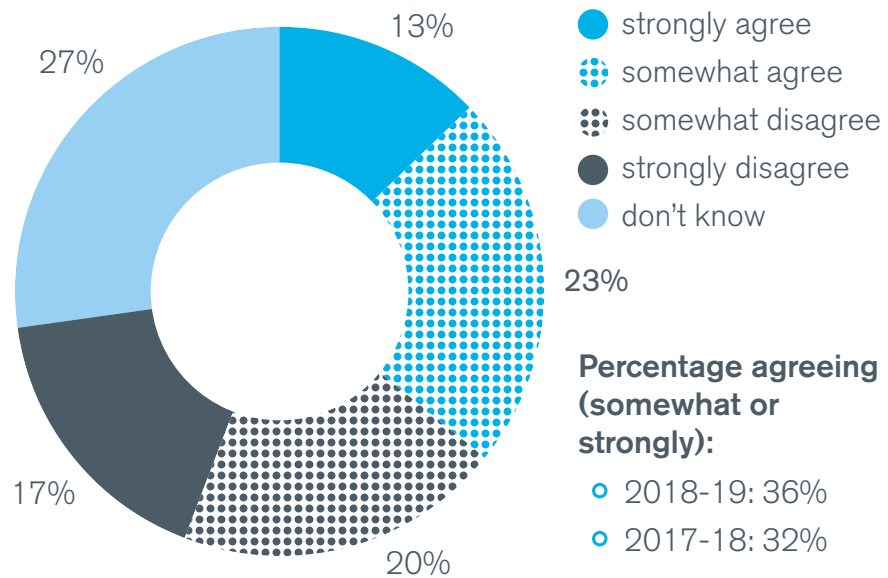3.1.13   Betsi Cadwaladr UHB has developed:

- a Welsh Language Risk Register to raise awareness within the organisation of potential challenges and concerns, as an incentive to take action to mitigate any complex issues

- a process for evaluating all projects and campaigns it undertakes to facilitate the provision and use of the Welsh language. This means that the investment of resources can be justified by referring to what interventions have achieved, and that future interventions can be adapted based on learning lessons.

Use complaints and user feedback

Give users opportunities to complain and provide feedback

3.1.14   Complaints can be a useful source of information about the organisation's performance. They create an opportunity to rectify any wrongs done to individual users, and also to learn and improve for the future.

Opinion survey: "Organisations make it clear to me how to complain if I am unhappy with their Welsh language services"

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

13%
23%
20%
17%
27%

Percentage agreeing (somewhat or strongly):
- 2018-19: 36%
- 2017-18: 32%

3.1.15   55% of regulations no. 1, 2, 4 and 5 organisations had published a complaints procedure as required. So almost half of organisations had not taken steps to explain to people how to complain about Welsh language services, and provide reassurance to people that they will deal appropriately with those complaints.

55% **of organisations had published a complaints procedure**

3.1.16   The best complaints procedures, for example that of the Local Democracy and Boundary Commission for Wales:

   o are clear about how to make a complaint

   o give detailed information on how the complaint handling process will proceed, and how staff will be trained to deal with complaints, conveying the organisation's wish to take responsibility and correct mistakes

   o refer to people's right to complain to the Commissioner as well as to the organisation.

3.1.17   Some organisations have also increased the visibility of the complaints procedure, and have made reference to complaints about the Welsh language in the general complaints sections of their websites as well as the sections about the Welsh language.

39% **of organisations did not receive any complaints directly**

3.1.18　97% of organisations with an annual report had reported on the number of complaints they had received directly. Of these:

- 39% received no complaints

- 50% received between 1 and 5 complaints

- 3% received between 6 and 10 complaints

- 8% received 11 or more complaints.

3.1.19　Feedback does not have to be in the form of a complaint, or be negative. We saw several organisations asking users directly about their experiences and needs. For example:

- Neath Port Talbot CBC is exploring the possibility of using its website survey to ask specific questions about Welsh language service

- Cardiff and Vale UHB is looking into using its 'Minute of your time' inpatient survey to ask questions about Welsh language services.

Successful practice

"The views of our students are extremely important to us as a college, and we have set out to maximise opportunities for learners to give feedback on Welsh language services.

Some of these opportunities take advantage of things that the college does anyway, and others are things we have specifically developed for the Welsh language.

We have a feedback box in the reception area, and we include questions about the Welsh language in the annual student voice survey. We hold informal coffee and chat sessions in Welsh, and have appointed a number of students as Welsh language ambassadors. As part of their role, they will talk to their fellow students about the Welsh language provision, and report back. The Welsh language is also discussed at the Learners' Assembly.

By doing this, we have a very good idea of what students think works well and what needs to be improved. We are actively improving our provision based on what students say."

Lynwen Harrington, Welsh Language and Standards Officer, The College Merthyr Tydfil

Robust internal arrangements to ensure compliance

Take action based on complaints and feedback

3.1.20   The Commissioner has received several complaints where the complainant has initially complained to the organisation, but does not feel that the organisation has taken the complaint seriously.

3.1.21   A number of discussion group attendees said that they were concerned that complaining about Welsh language services could affect how the organisation treats them in the future; this concern was most evident in situations where the organisation has a major influence on the welfare of users, for example in the health sector. Other attendees said that they did not have time or energy to complain and follow the full process.

The public's view

"You have to fight to get things in Welsh, don't you? I used to complain more, but when you're pregnant, or when you have a little baby, you just don't have the energy or time to do that."

3.1.22   Organisations have improved their Welsh language services following complaints and investigations by the Commissioner. For example, during 2018-19:

- a complaint was investigated that a website to encourage people to visit a county was not available in Welsh. The council's rationale for not creating a Welsh language website was that it was aimed primarily at people outside Wales. The investigation revealed that 33% of visitors to the website came from Wales. The Council was found to have failed to comply with a standard relating to websites. The enforcement action required the council to publish a Welsh version of the website which corresponded fully with the English version. The website is now available in Welsh

- we investigated a complaint that the majority of a national organisation's Twitter posts were in English. The organisation explained that it was unclear about the requirements of the standard. This investigation gave us an opportunity to clarify the requirements of the standard. The enforcement action required the organisation to publish English language posts in Welsh, and to ensure that the Welsh text was the same as the English text. The organisation now complies with the requirements of the standards.

3.2   Effective leadership and systematic planning

Strategic leadership and operational expertise

3.2.1   We have seen that two roles are important as organisations develop their Welsh language provision, namely:

- o strategic lead

- o an individual or team with operational expertise.

3.2.2   These roles do not diminish the need for the organisation's managers and other staff to take responsibility for developing Welsh language provision in their specific areas. Rather, the strategic lead and operational experts empower staff throughout the organisation to do so.

Strategic lead

3.2.3   A significant difference is seen when an individual at the highest levels within an organisation – that is, its head or a director – takes ownership of the Welsh language and offers strategic leadership on it. Positive effects include:

- o creating a culture of support for the Welsh language and conveying the message that the whole organisation is committed to improving the provision

- o using funding and resource decisions to ensure adequate investment in the Welsh language

- o creating an internal accountability structure which means that Welsh language provision is taken seriously.

3.2.4   Examples of effective strategic leadership include:

- a member of Newport Council's cabinet promoting Welsh lessons for staff, the council leader learning Welsh, Cabinet members have received language awareness training, and a backbench member appointed Welsh champion

- deputy head of The College Merthyr Tydfil chairing the Welsh Language Team, which meets termly to discuss the Welsh language and standards. It includes student ambassadors and a member of staff from each department

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

- senior managers in a number of education organisations were positively engaged from the outset in the process of setting standards, leading to the organisations getting a better understanding of the changes that needed to be made

- the Children's Commissioner for Wales has learned Welsh and uses it every day whilst undertaking the role. This has enabled the office to offer Welsh-medium, Commissioner-led events such as webinars and human rights training days for children. The Commissioner is also able to offer media interviews in Welsh as well as English. All staff at the organisation are supported to learn Welsh, or to improve their existing Welsh language skills, if required. Over half of the staff speak Welsh and four members of staff who are Welsh learners have improved their skills since being employed at the Commissioner's office to the extent that they are able to carry out many aspects of their role through the medium of Welsh. The Commissioner's office has seen increased engagement with Welsh-medium schools and organisations.

Staff's view

"We have a new chief executive and she is committed to learning Welsh. It makes a big difference to the whole organisation when leaders lead by example from the front."

Operational experts

3.2.5   The role of operational experts (often referred to as Welsh language officers or similar) can include (among other things):

- raising awareness of the Welsh language among the organisation's staff

- overseeing and monitoring compliance

- advising staff and managers within the organisation on how to adapt projects and procedures to consider the Welsh language and compliance

- planning Welsh language provision for the future

- co-ordinating Welsh language awareness or skills training for staff

- co-ordinating or commissioning translation services

- maintaining links with external organisations, and carrying out research, to learn about new approaches

- gathering information to report internally, to the public, and to other organisations, about performance.

3.2.6   It's important that:

- adequate staff resources and time are allocated for the role to be done effectively, including enough time to develop expertise and relationships

- the officers are in a suitable position within the organisation, and have sufficient status, to have good relationships with departments and staff across the organisation, and have a strong influence on their work where necessary.

Successful practice

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

During 2018, the Council approved a bid for funding to appoint a Welsh language officer. Creating this role has enabled us to give much more attention to Welsh language provision.

I now feel that we have a better grasp of our performance, and that we are better able to plan to develop our provision. Council staff are pleased to have someone to turn to for advice whenever they have a question about how to comply or consider the Welsh language."

Gareth Watson, Communications Team Leader, Denbighshire County Council

Using operational experts

3.2.7   It is beneficial to involve the operational experts at an early stage in project planning and implementation. As well as ensuring that the Welsh language provision ultimately provides the user with a good experience, this can save organisations money by making sure that changes are not required late on in the process.

3.2.8   Examples of useful contributions from Welsh language operational experts to project development include:

- the Food Standards Agency's Welsh Language Unit has given input from the beginning of the process of developing a new website – relevant parts of the website are fully bilingual

- officials from the Department for Work and Pensions's Welsh Language Unit have worked in London, alongside the developers, in implementing the Universal Credit system

- the Department for Work and Pensions has agreed a process for translating and publishing relevant content on the gov.uk website, enabling more consistency in the Welsh content and improving management.

3.2.9 In many cases, organisations succeed in ensuring that other departments take responsibility for considering the Welsh language in processes, without the need for the language officer to be directly involved in the process every time. For example, organisations have referred to:

- in-house printers or designers informing staff who commission work if the material is not in Welsh as it should be

- human resources departments in charge of processes to ensure that assessments are done of the Welsh language skills required for posts

- all of S4C's external events are organised through the communications team, who are responsible for ensuring compliance with the standards in relation to the events, and are familiar with the requirements.

Systematic planning

3.2.10   Organisations need to be clear about the requirements on them, and what practical changes are necessary to comply with the requirements. This can include the usual processes as well as new projects.

3.2.11   Shortcomings that suggest a lack of systematic planning include organisations not having implemented cheap and simple requirements, such as statements about the availability of a Welsh language service – this implies that they have not read all the standards and put in place basic actions. Investigations showed that organisations had published new online services — such as a website for staff recruitment, and an app – in English only after the standards had come into force.

3.2.12   Some organisations have engaged with the standards imposition process in a way that suggests they do not plan seriously to meet the needs of Welsh speakers. For example, some organisations:

○   did not refer to any concerns or barriers during the imposition process, but failings became apparent after the imposition day

○   were reluctant to be seen to challenge standards although they were not in a position to comply fully, and therefore likely to fail

○   had assumed that it was sufficient to have an action plan in place by the imposition day, rather than being ready to comply by that day.

Successful practice

"Although we have developed our Welsh language provision over a number of years as we implemented our Welsh language scheme, we soon realised that careful planning, and long term action, would be needed in order to be prepared to comply with the standards when they came into force.

For example, we checked well in advance what documents and materials need to be in place by the imposition day, and proceeded to produce and approve those documents in good time.

We have also developed a clear strategy for compliance, which focuses on behaviour change, strategic interventions, governance and performance. To implement the strategy, we have:

o established a Welsh language standards project management group, which includes representation from the three areas within the Board, and influential managers from the services and departments most responsible for implementing the standards

o drawn up a Welsh language standards work programme with specific action points to ensure compliance, which includes local action plans in the various departments and services.

We feel confident that this preparatory work has given us the foundations to comply with the standards."

Eleri Hughes-Jones, Head of Welsh Language Services, Betsi Cadwaladr UHB

Interpretation of telephone service standards

3.2.13 An important element of systematic planning is to have an accurate understanding of the requirements of the standards. A recent case determined by the Welsh Language Tribunal is an example of an organisation misinterpreting a standard.

3.2.14 Standards regulations include more than one option in terms of answering the telephone: the Commissioner may require a call to be dealt with in Welsh in its entirety, or require a query to be dealt with in Welsh until the point when it is necessary transfer the query to a specialist member of staff who does not speak Welsh in order to provide a response on a specific subject. The organisation in question was subject to the latter duty.

3.2.15 In its summary of the case, the Tribunal stated:

The [organisation]'s standard procedure for dealing with calls in Welsh was that members of staff must greet callers bilingually but that if the caller wished to speak Welsh, and the member of staff could not speak Welsh, the caller should be given the choice of either continuing the call in English or of receiving a call back from a Welsh speaker.

This clearly failed to comply with the [organisation]'s duty to "deal with the call in Welsh" until it became necessary to transfer it to someone who could not speak Welsh in order to deal with a specific subject matter.

Welsh Language Tribunal

3.2.16 The case highlights the importance of having an accurate and thorough understanding of the requirements of the standards, and changing arrangements in order to comply.

Arrangements for assessing the impact of policies on the Welsh language

3.2.17   In the 2017-18 assurance report, attention was drawn to shortcomings in assessing the impact of policy decisions on the Welsh language: organisations tended to integrate Welsh language impact assessments into other impact assessment processes, and in doing so asked about the Welsh language impact in a general way, which focused solely on prevention of adverse effects. The standards require the identification of potential positive effects, and how they can be increased, as well as adverse effects and how to reduce them. We focused on this during improvement workshops held in autumn 2018. Workshop discussions confirmed that most organisations do not:

- implement arrangements that meet all the requirements of the relevant standards

- assess all policy decisions as they should.

3.2.18   Some of the Commissioner's investigations during 2018-19 have also highlighted weaknesses in this regard. For example:

- a council had not asked about the potential positive and adverse effects on opportunities to use the Welsh language, and not treating the Welsh language less favourably than the English language, when undertaking a housing strategy consultation

- a council had not given sufficient consideration to the possible effects on the Welsh language when opening a new English language school. The assessment indicated that there would be no impact on Welsh language provision. There was no record of an analysis of surplus places in neighbouring Welsh and English language schools, and the Commissioner did not consider that the council had given sufficient consideration to delivering the aims of its Welsh in Education Strategic Plan in terms of increasing Welsh language provision.

4. Increase workforce capacity to improve provision

The Commissioner's opinion

Investing in organisations' staff will be one of the most effective means of ensuring that all services are available in Welsh at all times. I recognise that it is not always easy to make significant and rapid changes to Welsh language skill levels in organisations – opportunities for recruitment can often be limited.

It will not always be possible to provide Welsh language services on a cost neutral basis. It will sometimes be necessary to have an injection of new investment in staff to improve services and comply with requirements.

A third of posts advertised did not mention Welsh language skills. There is no excuse for not conducting a meaningful assessment of the language needs of each new and vacant posts, and not advertising jobs in Welsh.

I want to see more innovation – some organisations are changing their recruitment arrangements, and establishing links with education providers, in order to attract more applications from Welsh speakers. Some organisations are using technology to deliver services in ways that require less staff time – innovation such as this can enable organisations to make the most of resources.

It is also important that organisations make the most of their existing workforce. This means ensuring that everyone – whether Welsh speakers or not – understands how to deal with Welsh language contact. There have been several unfavourable experiences when verifying services, suggesting that this is not happening well enough at present. It also means ensuring that Welsh speakers are in the right jobs – some organisations use sophisticated methods to allocate or map staff.

4.1 Have sufficient numbers of staff with Welsh language skills

4.1.1 The main influence on organisations' ability to have suitable Welsh language provision is the number of their staff who have Welsh language skills. Increasing the levels is therefore key. Organisations need to identify and improve the skills of the existing workforce, and use recruitment procedures to attract more Welsh speakers.

Identify the skills of the existing workforce

4.1.2 The standards require organisations to keep a record of, and report on, the number of their staff with Welsh language skills.

4.1.3 All regulations no. 1 organisations which responded to our request for information had arrangements in place to collect data on staff's Welsh language skills. Methods included the recruitment process, HR system, language skills survey, and equality monitoring forms. It was not clear that all organisations were purposefully ensuring that the data was up to date at the end of the financial year, but several organisations had a live database, which was updated following any changes.

4.1.4 In all cases, the data was based on staff's self-assessment of their skills, with organisations using various level models. Organisations offered clear guidelines with practical definitions of the levels.

4.1.5 Some organisations find it challenging to get all staff to record their language skills. Examples of ways to overcome this are:

- Conwy CBC had an officer contact the different departments to ensure that information was recorded for everyone in the organisation. The council has a specific system on its intranet to enable effective recording of language skills

- Rhondda Cynon Taf CBC uses an IT system which requires staff to provide information before they can open their computer, and Gwent Police require staff to fill a skills self-assessment before being able to access the intranet

- Bridgend CBC has developed a new skills assessment tool for staff on its Learning and Development website.

4.1.6 We looked at the Welsh language skills statistics published in the annual standards reports of regulations no. 1, 2, 4 and 5 organisations. 86% of organisations reported on the number of staff with Welsh language skills, but it is difficult to compare as some organisations have identified percentages without numbers, or the number of Welsh speakers without the total number of staff; some organisations have detailed the level of staff's ability, while others have included staff on all levels within one figure.

4.1.7 It would be useful for organisations' annual reports to include an analysis of how adequate their staff's skills are in order to provide services.

4.1.8 Some organisations have gone further than simply recording numbers – they have mapped Welsh speakers by department or geographical location. For example:

- North Wales Police has taken deliberate steps to increase its workforce's Welsh language capability. One of the objectives in its Welsh Language Strategy was to work towards reflecting the linguistic situation in communities across its Area and ensure that the percentage of Welsh speakers working directly with the public is either equal to or higher than the percentage in the community. This aim has now been fulfilled on a county level. To aid staff to manage this work the force has developed a mapping tool which shows the percentage of Welsh speakers in its policing areas and the Welsh language capabilities of the staff working at each police site

- Coleg Ceredigion and Coleg Sir Gâr produce a Welsh language profile for each department individually.

Improve Welsh language skills of the existing workforce

4.1.9   The standards require organisations to provide opportunities for their staff to improve their Welsh language skills.

4.1.10   All 23 regulations no. 1 organisations which responded to the request for information referred to at least one type of provision, with the majority offering a variety of opportunities. The most common methods included:

- Welsh language training online (65%), especially the National Centre for Learning Welsh taster course (52%)

- referring staff to Welsh language learning courses held in the community (39%) and residential courses (13%)

- running in-house or working hours courses (65%), including working with a recognised provider (e.g. a local college or Learning Welsh provider).

4.1.11   4 organisations (17%) stated that they employed an internal tutor. Ceredigion County Council said that employing an internal tutor (in conjunction with the Welsh for Adults centre) meant that lessons could be offered during working hours, saving time and costs. In addition, Carmarthenshire County Council has now created the post of Learning and Development Language Adviser, initially for two years, to develop the language skills of the workforce.

4.1.12   48% of organisations mentioned that they provide opportunities to speak Welsh informally or at work, for example sessions over a cup of tea or lunch, use of language champions, mentoring schemes, and encouraging daily conversation in the office.

4.1.13   Most organisations monitored the development of staff's Welsh language skills, for example by looking at language skills records in a database (35%), using staff performance management processes (30%), or receiving reports from a training provider on staff members' progress (22%).

4.1.14   There is a requirement to give everyone in the organisation an opportunity to receive Welsh lessons, and to ensure that provision is available for all who wish to do so. But organisations could plan more purposefully, targeting staff in specific roles to promote opportunities for them to improve their skills.

4.1.15   Over 300 HMRC staff are receiving Welsh language lessons – 263 staff registered on the Working Welsh 'Welcome' course, 21 staff registered on the 'Welcome back' course, and 80 staff attending 2 hours of weekly lessons with a Working Welsh tutor, provided in the office.

4.1.16   A number of police forces have grown their number of Welsh speaking officers by making the promotion process dependent on improving Welsh language skills. South Wales Police reported that there had been a positive culture change towards the Welsh language within the organisation, and they believed that identifying the Welsh language as a policing skill, and including it as a requirement for promotion, was the main catalyst. In this respect, a number of forces are adopting practices developed initially by North Wales Police.

Successful practice

"For over fifteen years now, we have been investing heavily and planning long term to ensure that our workforce has the necessary skills to deliver Welsh language services.

Key to all this was leadership from our Chief Officers and the force's decision to acknowledge that Welsh language competency was a skill, alongside other policing skills.

We had also created a simple Welsh Language Competency Framework for the force in order to identify our staff's language skill levels. All our processes for identifying posts' language requirements and our language training arrangements are based on the contents of this Framework. It was important to invest in staff to manage and promote this work, as well as establishing internal language training provision.

We made it a requirement for officers who didn't speak Welsh already to have basic Welsh language skills before they were appointed. By now 100% of our officers have level 1 skills, and can therefore show courtesy to Welsh speakers. As part of our Welsh Language Skills Policy staff are expected to develop their Welsh language skills to the next level after they are appointed. Appropriate courses are provided.

As part of our leadership agenda, we ask staff who don't already speak Welsh and who apply for promotion to display level 2 spoken Welsh on our Framework before appointment, and then move to level 3 with the force's assistance.

We are also working to ensure that the percentage of fluent Welsh speaking officers in each area matches the level of Welsh speakers in that area according to the Census, and have developed a specific resource to aid this work."

Meic Raymant, Head of Welsh Language Services, North Wales Police

4.1.17   As well as offering Welsh lessons to staff, the skills of staff who already speak Welsh can be developed so that they are more confident to undertake a specific activity in Welsh. A specific example of this is that the North Wales Fire and Rescue Service has arranged in-house training to increase the pool of officers who are able to conduct press interviews in Welsh. In addition to raising staff's confidence to speak Welsh publicly, the course gave professional advice on the importance of plain Welsh and speaking naturally in interviews. One of the attendees stated that they "would never have done it before the training".

Assess the language needs of new and vacant posts

4.1.18   Staff recruitment offers an opportunity to increase the number who can offer a Welsh language service within an organisation. The financial situation of many organisations means that opportunities to recruit externally are limited, so it is important that the Welsh language requirements are always considered carefully.

4.1.19   The standards require consideration of the need for Welsh language skills when determining the requirements for each role, assigning each post into one of four categories:

- Welsh language skills essential

- Welsh language skills desirable

- need to learn Welsh following appointment

- Welsh language skills not necessary.

Welsh language skills mentioned in 67% of job advertisements

4.1.20   We verified the Welsh language skills requirements for all the posts advertised on the sampled organisations' websites, three times during 2018-19. Of the 1,981 posts that were part of the sample:

- Welsh language skills were not mentioned for 33%

- Welsh language skills were essential for 5%

- Welsh language skills were desirable for 59%

- Welsh needed to be learnt for 1%

- Welsh language skills were not required for 1%

- Welsh language skills were mentioned but not categorised for 3%.

4.1.21   There was obvious inconsistency – 55% of organisations had mentioned the Welsh language requirements for some, but not all, of their posts (39% had mentioned the Welsh language requirements every time, 6% did not mention the Welsh language at all).

Welsh language skills essential for

7%

of posts where mentioned

Welsh language skills desirable for

88%

of posts where mentioned

4.1.22   Of those posts where Welsh language requirements were mentioned, Welsh language skills were essential for 7%, and desirable for 88%. Often those posts where Welsh language skills were essential included a more meaningful and practical description of what skills were specifically required. With the desirable category being used for so many posts, it should be emphasised that it is necessary to:

- conduct a meaningful assessment of need – Welsh language skills should not be categorised as desirable as a matter of routine, where a meaningful assessment would conclude that Welsh language skills are essential

- use the desirable requirement as an active part in the selection of an individual for posts where appropriate.

4.1.23   Many organisations use skills levels, or practical descriptions of activities, to be specific about the needs. Sometimes a different level of skill is required for different methods of communication (e.g. need to to speak Welsh fluently, but more basic written skills acceptable).

4.1.24   The use of skill levels can be useful in providing prospective candidates with a practical picture of the requirements, and preventing the misconception that a high proficiency in Welsh is necessary for all posts where Welsh language skills are essential. However, some care is needed:

- it is necessary to identify which category (e.g. essential / desirable) a job falls into, even if skill levels are used (e.g. even when stating that level 4 spoken Welsh is needed for a job, it should be stated whether those skills are essential or desirable)

- some organisations identified nonsensical requirements (e.g. level 0 desirable, giving the impression that it was desirable not to have Welsh language skills)

- in some cases, using levels that candidates do not understand may prevent them from applying.

4.1.25   Some organisations state that basic Welsh language skills (e.g. level 1, or being able to greet and to communicate simple information in Welsh) are essential for all posts as a matter of course. Obviously, it is positive for all staff to be able to show courtesy by greeting, or responding to simple queries, in Welsh. However, some care is needed:

- the need for Welsh language skills at a higher level, whether essential or desirable, should be assessed even when basic Welsh is essential

- the requirements should be made completely clear for posts that fall into two categories (e.g. level 1 essential, level 5 desirable).

4.1.26   The majority of regulations no. 1 organisations that responded to our request for evidence had methods of ensuring that a needs assessment for Welsh language skills was carried out before advertising any post. For example, they included questions about Welsh language skills within general assessment forms or requests to fill a job, or had specific forms for the Welsh language.

4.1.27 Rhondda Cynon Taf CBC has adopted an electronic process for assessing job requirements, and the process asks managers challenging questions about the level of requirements they have identified. The recruitment process cannot progress without giving sound reasons for not requiring Welsh language skills. Gwent Police have delevoped a similar system.

4.1.28 The guidance / forms, generally, offered considerations which would presume in favour of Welsh language skills requirements. Examples of positive factors were:

- a post with frequent public contact

- a post engaging with more specific key groups (e.g. one organisation referred to "children and young people, vulnerable individuals of any age, or persons in a care setting", "Elected Members" and "education institutions")

- a post in an area where many Welsh speakers live

- a prominent public profile post, which represents the organisation publicly.

4.1.29 Flintshire County Council's assessment form:

- requires managers to state whether contact with the public in Welsh is a requirement for each of the functions in the job description, encouraging managers to consider each element of the post in turn

- enables managers to work out how many staff with Welsh language skills are needed at any one time in situations where there is more than one post to be filled.

Attract Welsh speakers to work for the organisation

4.1.30 In some circumstances, setting Welsh language skills requirements for a post will not be sufficient, on its own, to ensure that people with suitable skills apply.

24%
of job advertisements were in Welsh

51%
of job advertisements indicated that it is possible to apply in Welsh

4.1.31 One method of ensuring that Welsh speakers apply for posts is to ensure that they can apply in Welsh. Of the job advertisements we verified:

- 24% were advertised in Welsh

- 51% included a statement that it was possible to submit an application in Welsh

- 39% had an application form available in Welsh

- 24% allowed applicants to indicate the preferred language of assessment on the application form.

4.1.32 Some organisations have to use central job advertising portals – e.g. NHS Jobs for the health service, and Civil Service Jobs for UK Government departments – to advertise jobs in Wales, and those gateways do not facilitate application in Welsh.

4.1.33 Some organisations adapt their recruitment arrangements to try to increase the number of Welsh speakers applying, for example:

- Gwent Police usually recruits to its call centre 3 times a year, but the books are now open continually to recruit Welsh speakers

- Ceredigion County Council has identified a shortage of qualified social workers with Welsh language skills. In response to the problem, the Council has established a scheme in partnership with the Open University, where it provides intensive training leading to a professional social worker qualification. One of the criteria for access to this scheme is Welsh language skills. The scheme has been successful, and in September this year 4 officers who are fluent in Welsh will graduate as professional social workers.

4.1.34 Some organisations proactively engage with Welsh speakers to attract them to apply for jobs. For example:

- Gwent Police is producing a video for the media and web which will promote their campaign to recruit more Welsh speakers

- Bridgend CBC has established a link with the local Welsh medium secondary school, resulting in two pupils with Welsh language skills following an apprenticeship course in the Council's HR department.

Innovate to manage demand for staff

4.1.35 Organisations are looking for ways of directing users to channels where less staff time is needed to provide a service – moving users from reception to phone, or from phone to web. Cutting costs is the main driver for this, but as it is easier to provide a Welsh language service through those methods, it can lead to an improvement in the availability of Welsh language services.

Successful practice

"As a council we are always trying to innovate, and with the financial pressures on us, we are looking for ways of delivering services that meet user needs and also provide good value for money.

One of these methods is a chatbot – a way for customers to get answers to simple queries via our website without a member of staff being available. The chatbot analyses the queries and provides the correct answer completely automatically.

We realised that we would need to provide this service in Welsh as well as English, and we did not know whether the technology could work in Welsh. By working closely with the company providing the resource to us, we have been able to ensure that the chatbot will work fully bilingually."

Alan Burkitt, Equality and Welsh Language Officer, Monmouthshire County Council

4.1.36   Bridgend CBC has worked with the provider of an app that allows online payment for parking, to ensure that the process works fully in Welsh and English.

4.1.37   A number of UK Government departments, including HM Courts and Tribunals Service and the Department for Work and Pensions, have developed their online provision in an effort to reduce the telephone contact with their service users (and reduce the use of court time in the case of HMCTS). The online systems have been developed in Welsh as well as English.

4.1.38   There are examples, however, of technical solutions that do not enable the use of Welsh. For example, the Commissioner's investigation into a police force showed that a speech recognition system used as part of the 101 service was unable to identify Welsh language statements, e.g. department names and so on. This means that the force has to divert Welsh calls to the call centre rather than being able to deal with them automatically.

4.2 Effective training and allocation of staff

4.2.1   Alongside securing a sufficient number of Welsh speaking staff, organisations need to make the most of all the staff they have – whether they are Welsh speakers or not. This means making everyone aware of the requirements, and having effective working arrangements.

Raise staff awareness of requirements

4.2.2   Even in organisations that are committed centrally to providing Welsh language services, not everyone within the organisation always knows what is expected. Organisations need to ensure that all those working for the organisation understand the requirements, especially those who deal with the public.

4.2.3   A number of the Commissioner's investigations have highlighted failures that occur due to mistakes by individual members of staff. The organisation will often have clear corporate arrangements for activities such as answering the phone, responding to emails, approving letters, erecting signs and so on, but failures occur because the arrangements are not being followed as they should be. This may be due to lack of awareness, human error, or a negative attitude.

4.2.4   During our work checking telephone and reception services, we had several experiences of staff with no idea how to deal with Welsh language contact. This led to discourteous behaviour, and responses such as:

Responses from staff

"Speak English to me"

"Can I have that in English please?"

"There's obviously no language barrier, but if you want to speak to someone in Welsh – ok"

"Sorry, say that again"

"There's no Welsh spoken here"

4.2.5   On the other hand, a receptionist in one university was unable to find a Welsh speaking member of staff to transfer the caller to, so the receptionist gathered the information in order to answer the query, and conveyed the answer to the caller in Welsh.

4.2.6   A number of organisations have introduced effective methods of raising staff awareness of how they should deal with the public in Welsh. For example:

- Carmarthenshire County Council has produced guidelines for staff on how to use Welsh when answering the phone, designing materials, holding meetings, using the computer and so on, with supporting resources such as audio clips and videos supporting the written guide

- Aberystwyth University has produced a guide for meetings which includes a template for asking participants if they wish to use Welsh at the meeting, and instructions on how to book an interpreter. The guidance explains the conditions for meetings to be held bilingually and notes the difference between meetings with individuals and meetings with a number of people. The guidance is on the Welsh Language Services Centre website, and a copy was sent to Faculty managers reminding them that students have a specific right to meetings in Welsh

- the University of South Wales has placed an icon on its staff's desktops which includes a link to materials which aid compliance, such as documents about the standards, audio clips to assist with pronunciation, frequently asked questions, instructions for recording language choice on university systems, Welsh badges, and guidelines on different aspects of the standards like meetings, interviews, signs and branding

- Grŵp Llandrillo Menai has created an attractive 'Staff and Learners Journey' chart (in the form of an Underground map) which clearly sets out rights and responsibilities

- Betsi Cadwaladr UHB is running a permanent 'Use your Welsh' campaign to encourage staff to use their Welsh in the workplace when providing care to patients and their families. It encourages staff to use the language with their colleagues and to practice with learners within their teams, with useful promotional materials and Welsh phrase cards, and support from the health board's tutor

- Coleg y Cymoedd provides Welsh language training four times a year to frontline staff who answer the phone.

Staff's view

"The standards have changed the way we think – it's not something we're aiming for now, but something we have to do."

Organise and deploy staff to meet service delivery needs

4.2.7   Organisations can maximise the skills of their workforce by paying close attention to how it is organised – for example in terms of when and where people work.

4.2.8   We experienced ineffective arrangements when we checked telephone and reception services. Some organisations were unable to ensure that staff were available to deliver the options they offered, with organisations asking people to call back or leave a message after the caller chose Welsh.

4.2.9   On the other hand, many organisations organise their staff smartly to meet the demand for Welsh language services, for example:

   o Swansea Council is planning to introduce an agile working team within the Welsh language unit, which will focus on urgent translation, and will look to expand the role of the translation team to provide other Welsh language services within the organisation

   o Vale of Glamorgan Council considers the need to have a sufficient number of Welsh speakers on each shift when scheduling shifts

   o Betsi Cadwaladr UHB has a Whatsapp system for providing quick translations when required. It means that someone is always on duty to provide translations of tweets and so on where it is not possible to plan ahead.

4.2.10   It can be challenging for organisations to comply in situations where a large number of people are responsible for providing the service. This was particularly prevalent on the social media pages of education organisations, where responsibility for publishing information is spread across departments. In such situations, it is important that robust arrangements are in place for monitoring compliance.

4.2.11　The location of offices can be a challenge for organisations – some organisations operating at a UK or England and Wales level have call centres in England. The efforts of organisations to rationalise their number of offices create a risk of decreasing their ability to provide a Welsh language service. For example, one organisation is considering closing three of its offices in areas of Wales with a high percentage of Welsh speakers. As part of the change, customer services could be centralised in centres in England. This change could affect up to 70% of Welsh speakers working for the agency.

4.2.12　A number of discussion group attendees believed that locating telephone services in areas where there are enough Welsh speakers in the labour market leads to an improved service.

The public's views

"I would congratulate Inland Revenue in Porthmadog, because their service is excellent. That's an example of placing people among the people, to serve the people, and that is amazing."

4.2.13　Discussion group attendees also believed that organisations need to ensure that people within departments are able to discuss issues in Welsh, rather than just having front line services available.

The public's views

"I would like to look at specific departments, and who can speak Welsh in the back office, because if you want to discuss something seriously you have to practice your English."

4.2.14　Some organisations have partnered with others to increase their capacity to provide Welsh language services. For example, community health councils are working together to ensure that a pool of Welsh speakers are available to assist staff in those health councils where there are no Welsh speakers.

5. Prompt people to use Welsh language services

The Commissioner's opinion

It is the responsibility of organisations to provide Welsh language services and to encourage people to use them. Consumer behaviour is complex – it is based on a lifetime of previous assumptions and experiences, and follows psychological patterns that are difficult to change.

Research suggests that Welsh speakers are less likely to use Welsh language services if they believe that this will lead to any delay, discomfort or trouble. Our verification work suggested that some Welsh language services are slower, or have more errors, than the English option.

Organisations must offer good quality Welsh language services, and do so by default or proactively – users shouldn't have to go out of their way to use Welsh. The language should be understandable, with services offered bilingually if possible.
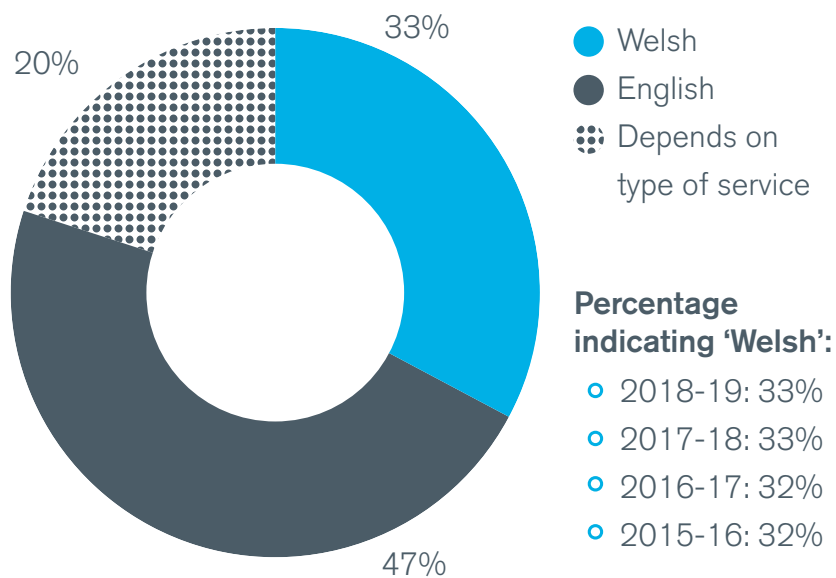
Every opportunity needs to be taken to ensure that users are aware of the Welsh language services available – three quarters of respondents to an opinion survey stated that they are more likely to use Welsh language services if organisations make it clear that they are available. I want to see more ambitious efforts to give high profile attention to Welsh language services, and compliance with specific requirements to let people know about services.

5.1 Understand what needs to happen to increase the use of Welsh language services

Existing levels of use

5.1.1 Opinion survey respondents were asked to indicate which language they would prefer to use when dealing with public organisations, for example phoning the county council, receiving health services, or obtaining information from government departments.

Opinion survey: "What language would you prefer to use when dealing with public organisations?"

33%

20%

47%

- Welsh
- English
- Depends on type of service

Percentage indicating 'Welsh':
- 2018-19: 33%
- 2017-18: 33%
- 2016-17: 32%
- 2015-16: 32%

5.1.2 Actual data about the use of Welsh language services is limited and fragmented. There is currently no duty to collect or report on this data, and therefore it's difficult to tell whether any information published by organisations is representative of the general situation. However, looking at the available data, there is a clear impression that the number of people choosing to use Welsh language services does not match the number who can speak Welsh.
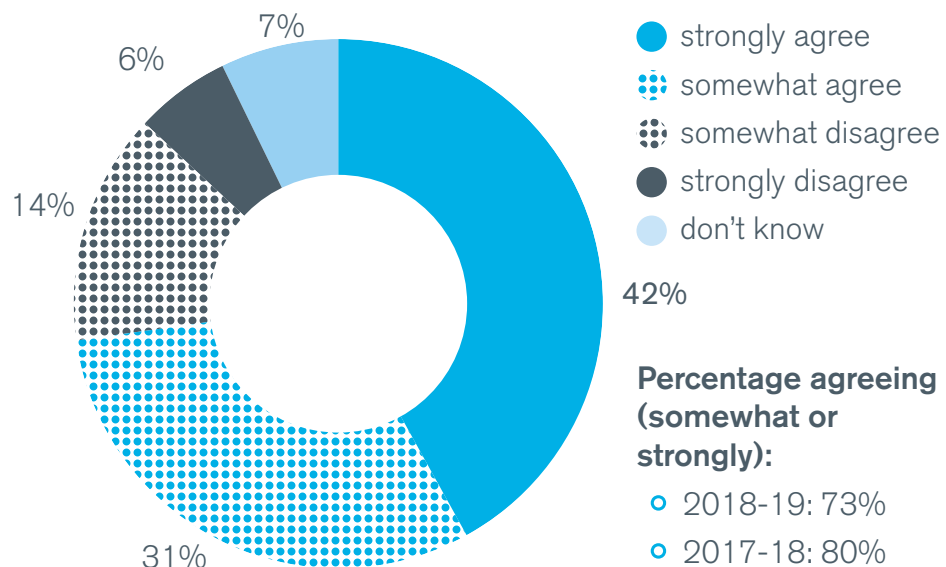
User requirements – the Commissioner's research

Opinion survey

5.1.3   Respondents were asked to say what would make them more likely to use public services in Welsh. Among the most frequently cited factors were:

o   users feel that they need to be more fluent, comfortable or confident in understanding and speaking Welsh

o   the organisation needs to start the conversation in Welsh or respond in Welsh

o   people need to know that the Welsh language service is available and have a clear choice, for example through badges

o   Welsh language services are not always available

o   some technical or formal words are difficult to understand in Welsh

o   Welsh language services need to be more easily and quickly available.

Opinion survey: "I am more likely to use Welsh language services if organisations make it clear to me that they are available"

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

7%
6%
14%
31%
42%

Percentage agreeing (somewhat or strongly):

o   2018-19: 73%

o   2017-18: 80%

Discussion groups

5.1.4   Several issues raised in discussion groups suggest which changes could lead to an increase in the use of Welsh language services. Clear themes were:

- o whether Welsh language services were available and of equal quality to English

- o the need to raise awareness of Welsh language services that are available and make them prominent

- o the need to offer Welsh first or by default

- o people do not want any fuss or embarrassment – they are not likely to ask specifically for a Welsh language service if it is not immediately available

- o the need for continuity between different stages of contact with organisations

- o people reluctant to complain about lack of service, as it is troublesome and they worry about being treated less favourably

- o the need to use understandable language.

User shadowing

5.1.5   During 2017-18, by observing and discussing the behaviour of participants in service access scenarios, we identified a number of influences on users' language decisions, for example:

- o a comprehensive, sub-conscious assessment of the likelihood of a Welsh language service being available

- o concern that trying to use the Welsh language where it is not available would lead to awkwardness or embarrassment, or that using the Welsh language service would put users at a disadvantage

- o previous experiences and knowledge of the organisation

- o visual and audible cues in the service delivery environment suggesting that a Welsh language service is available (e.g. signs and badges, staff language, music, and email addresses).

5.1.6   Similar trends were identified during 2018-19 user shadowing work.

5.1.7   Where the Welsh language service was as obvious and straightforward to use as the English service, participants in the formal shadowing sessions used Welsh. When the Welsh language service was not obvious, or when any obstacle, delay or difficulty was introduced, some of the participants decided to use English rather than persevering to receive a Welsh language service.

5.1.8   When the Welsh and English services were equal, the majority used Welsh. Participants were asked to email an organisation with a simple query, and 83% did so in Welsh.

5.1.9   Less use was made of Welsh when the Welsh language service was less obvious or more difficult to use:

- participants were sent a bilingual e-mail asking them to complete an online form, with English appearing first in the e-mail (there was no way of changing language after clicking the link to access the questionnaire). 33% of participants completed the form in English, with some saying that they did not notice the Welsh option

- participants were asked to find information (the price of a specific license), without being given definite instructions on how to find it. The information was available in Welsh over the phone, and online in English. 17% found the information in Welsh, and 83% in English. Participants were reluctant to use the telephone rather than use the internet, especially as there was an element of haste.

5.1.10   There was a strong social influence on user behaviour. Participants were asked to collect and complete a license application form. The prominence of the forms was varied — the Welsh form was obvious in session 1, in the middle of the pile in session 2, and only available on request in session 3. In sessions 2 and 3, after one participant found the Welsh form or asked for it, the other participants did the same.

5.1.11   Many of the participants chose to refer to the English form while completing the Welsh one, stating that the formality and tone of the language meant that they were not confident in using Welsh on its own.

5.1.12   Observation of the use of self-service machines by members of the public in a real situation revealed that people followed the default language of the machine — with some non-Welsh speakers using the machine in Welsh when Welsh was set as the default language. This emphasises the power of the default option, and suggests that placing Welsh as the default language does not inconvenience non-Welsh speakers.

5.1.13   In a health centre, when it was necessary to specifically select Welsh on a self-service machine menu, all Welsh speakers used the machine in English.

5.1.14   Welsh speakers, who chose the English option when calling a call centre, were asked why they did so rather than using Welsh. 48% stated that they would have to wait a long time for a reply on the Welsh line, 31% stated that they preferred to speak English, and 13% stated that they had not heard the Welsh option (the Welsh option was after the English option).

Applying behavioural theory

5.1.15   Organisations can consider other research alongside specific research around the influences on language use with Welsh language services. For example, behavioural theory examines how people make decisions.

5.1.16   By understanding some of the most common influences on decisions, organisations can be more effective in prompting Welsh speakers to use Welsh language services. Some of the main relevant ideas include that:

- people are keen to do what they consider to be normal and socially approved

- people tend to follow the default option set by the organisation rather than making their own conscious choice

- people want to avoid losses, for example delay or less favourable treatment.

5.2 Design services to make people more likely to use Welsh

5.2.1   Usually, the discussion about increasing the use of Welsh language services focuses on people's awareness that a Welsh language service is available. Promotion is important, but it can be more effective for organisations to change the service itself so that the Welsh language is a more obvious, accessible and intuitive choice for users.

5.2.2   Over the years, it has been the norm for organisations to design their services so that English appears to be the default or most obvious option, or – at best – that the Welsh and English options are equal. However, in order to meet the responsibility to promote Welsh language services, organisations can actively make users more likely to use Welsh language services.

Offer the Welsh language service by default or proactively

5.2.3   As users tend to follow the norm, and accept the default option, organisations should design their services so that no additional effort or decision is required to use the Welsh language. Users should not be given the impression that using Welsh is a secondary option for which special arrangements need to be made.

5.2.4   Ideally, this means that the Welsh language service is offered first automatically. Where this is not possible, users should not have to request to use the Welsh language. If the service is not in Welsh by default, organisations should ask users at the beginning of the process whether they wish to receive a Welsh language service.

5.2.5   Users have indicated that they do not want to change the language of the contact once the organisation has established it.

The public's views

"It's important to know that something is available through the medium of Welsh. I'm the kind of person who'd never ask. If they offer it in English, I take for granted that it's only provided in English."

"I feel like a nuisance when I have to ask for a Welsh language service."

"I don't like making a fuss, I just tend to accept what is offered to me."

"I don't think I've ever considered that I have the right to ask to change to a Welsh speaker, and I probably don't want to upset people."

5.2.6   Discussion group attendees also mentioned the importance of offering Welsh first or by default in technology.

The public's views

"The Welsh language needs to appear first on technology rather than follow the English – without having to change any settings."

"If something is in English by default and a person is in a hurry, they have no time to switch to Welsh."
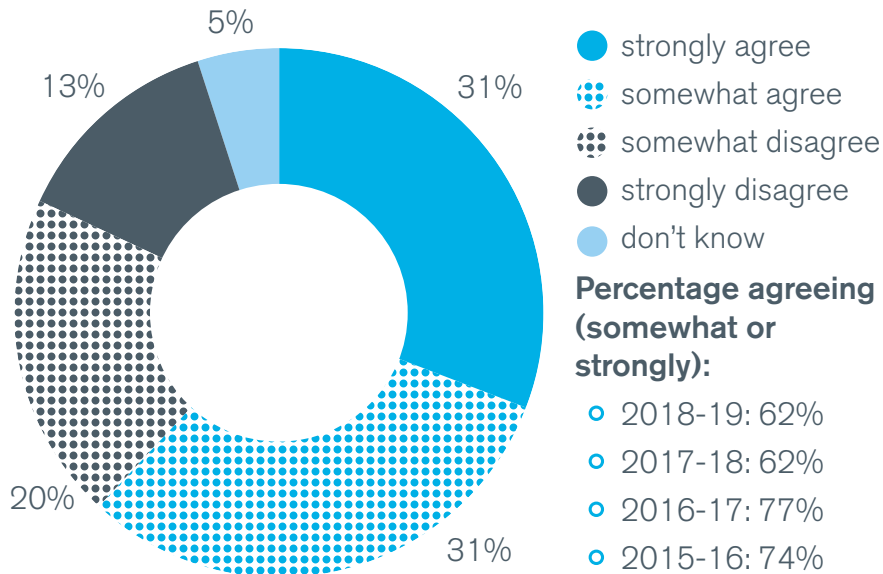
5.2.7   Users have mentioned the importance of a Welsh greeting – a way for the organisation to set the context for the language of the contact.

The public's views

"If I am not greeted in Welsh, I assume that the Welsh language service is not available."

5.2.8   Opinion survey results suggest that organisations do not give
         users a proactive offer often enough.

**Opinion survey: "Public organisations ask me
in which language I would like to deal with them"**

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

**Percentage agreeing
(somewhat or
strongly):**

- 2018-19: 62%
- 2017-18: 62%
- 2016-17: 77%
- 2015-16: 74%

5.2.9   Regulations no. 1 organisations were asked how they designed
         services in order to encourage the use of Welsh. There were few
         examples of organisations taking purposeful steps to guide users
         to use Welsh rather than English.

5.2.10   Organisations offered language choice at the start of 39% of
         telephone calls by using automated options.

5.2.11   In 64% of telephone calls, and 40% of reception visits, those
         doing the verification work were greeted in Welsh.

5.2.12 Addysg Oedolion Cymru | Adult Learning Wales operates a proactive offer telephone system. All external calls to the main number go to the bilingual line, where the caller is instructed to hold the line to speak Welsh, or press 1 to opt for the English service. This has resulted in over 30% of callers choosing to use Welsh.

5.2.13 Similarly, Ceredigion County Council's Clic customer service is offered bilingually from the start, without the need for users to be transferred to Welsh speakers.

5.2.14 When the user enters the English homepage of the Wales Millennium Centre's website, a pop-up appears to prompt the user to enter the Welsh site if they speak the language. The wording promotes the Welsh version of the website rather than presenting the Welsh and English options as equal.

Act in accordance with users' language choice

The Commissioner's task and finish group on recording and sharing language choice

5.2.15 The Commissioner believes that the standards relating to asking about and recording language choice are important. By implementing these standards, organisations are able to identify Welsh language users more effectively, and actively offer a Welsh language service. There is also potential to increase use by using lists of Welsh language users to raise awareness of the organisation's Welsh language services. As a result, the Commissioner convened a task and finish group of experts to get to grips with recording language choice.

5.2.16 The Commissioner's research showed that the main challenges that organisations needed to address were:

- ensuring that multiple IT systems can share information with each other

- including clear linguistic requirements when procuring IT services and systems

- understanding exactly what factors influence individuals as they choose to use Welsh or not.

5.2.17   For an organisation to be successful in actively offering Welsh language services, a fundamental change is needed in its culture. This change must ensure that the organisation's workforce offers a Welsh language service consistently and proactively, without assuming that people who speak Welsh can express themselves confidently in English, nor that they are happy to receive the service in English.

5.2.18   The group's recommendations include:

- having a standard form of questions to establish language choice, with the wording being user tested

- careful planning and a better understanding when procuring new IT systems

- considering the role of future developments / national developments and the link with the Welsh Government's Welsh Language Technology Action Plan.

Predicting language choice

5.2.19   Some organisations try to predict users' language choice rather than asking them. Care is needed in doing this, as the assumptions used are not always a reliable indication of language choice. For example:

- some apps are designed to display information in the same language as the mobile phone operating system, so only people who would have changed their phone language to Welsh would see the Welsh version of the app

- an investigation was conducted into a case where an organisation assumed that users wanted to receive correspondence in the same language as they completed an online form, rather than offering to send correspondence in Welsh

- an investigation was conducted into a case where the Welsh language information on an organisation's Facebook page was only available to people who had set Welsh as their Facebook account language.
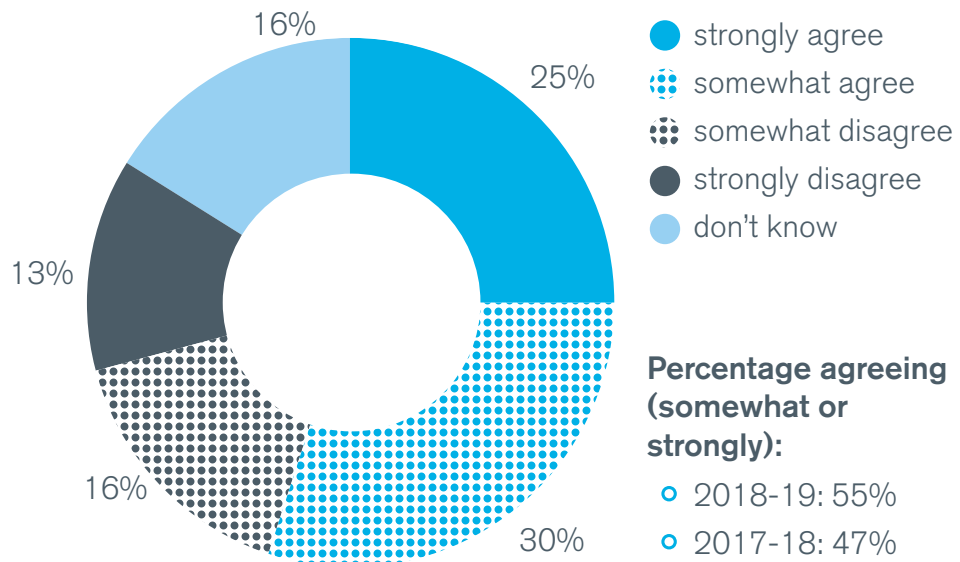
5.2.19   Betsi Cadwaladr UHB asks all Welsh speaking patients to place a Welsh magnet on their bed. This enables Welsh speaking staff to speak Welsh by default with those patients, so there is not always a need to establish the language of the patient. Efforts have also been made to place Welsh speaking patients together in wards, to enable Welsh speaking staff to serve them more easily.

Good quality Welsh language services

5.2.20   The Commissioner's research suggests that users are likely to act in a way that avoids losing time by delay, suffering unfavourable treatment, or not having the desired outcome to the process. It is therefore important that the quality of Welsh language services is good.

5.2.21   Opinion survey results suggest that there is still work to be done before users believe that the quality of Welsh language services compares favourably with the English equivalent.

Opinion survey: "I feel that the quality of Welsh language public services is as good as English services"

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

25%
30%
16%
13%
16%

Percentage agreeing (somewhat or strongly):
- 2018-19: 55%
- 2017-18: 47%

No delay

5.2.22   If users believe it will take longer for them to complete a task in Welsh, they are less likely to use Welsh.

The public's views

"It was very difficult to speak with someone in Welsh – I had to wait over 10 minutes. So the next time, I didn't use Welsh, and got an answer straight away."

5.2.23   The HM Revenue and Customs Welsh language phone line service was praised several times in discussion groups, with attendees saying that using the Welsh language means getting a faster service.

5.2.24   There were several examples during the telephone verification work where it took a long time to get a Welsh language service – or we had to wait a long time, and then get a message that a Welsh speaker was not available. For example, when checking one council's telephone services, after choosing the Welsh option there was a message saying that we could press 1 for an English language service immediately, or wait longer to receive the service in Welsh.

5.2.25   Written Welsh qeries took an average of 2.83 days to receive a response – more than double English queries (1.19 days) (but both languages were well within the response targets of public organisations). 8 examples of Welsh correspondence took more than 11 days to be answered – including one query which took 100 days, and others which took 29 and 23 days.

Accurate and complete

5.2.26 People will be less likely to use Welsh if they believe that there are errors or mistakes in the Welsh version, or if they believe that fuller information is available in English.

The public's views

"The website is there in Welsh but there are errors. I'd rather look at it properly in English."

5.2.27 98% of responses to English e-mail queries fully answered the query, but only 88% of responses to Welsh language queries provided a full response.

5.2.28 Of the web pages available in Welsh, 22% treated the Welsh language less favourably than English. The main reasons for this were usually minor errors that could be prevented by checking more carefully, for example:

- text missing in Welsh, or some text in English on the Welsh page

- links, attachments and images on a web page missing or not available in Welsh

- a Welsh version of the page not updated in line with the English version

- page not working in Welsh.

5.2.29   Welsh was treated less favourably than English in 13% of Welsh
          documents, 15% of Welsh Facebook posts and 7% of Welsh
          Twitter posts, 4% of signs, and 3 of the 7 apps checked in Welsh.

5.2.30   There were many examples of organisations treating the Welsh
          language less favourably than English on social media, for
          example by:

          o not having a Welsh language user name

          o re-posting messages from other organisations in English only,
             even though they were available in Welsh

          o pinning English only tweets to the top of the account

          o creating Instagram stories in English but not in Welsh.

5.2.31   The effect of this will be to prompt users to use the English
          service if the accounts are separate, or that Welsh is less
          prominent than English within bilingual accounts.

          Convenient

5.2.32   There are some examples of people having far less choice in
          terms of time and location of appointments or other activities –
          such as driving tests, or speed awareness courses – if they wish
          to use Welsh.

Use clear language

5.2.33   A very consistent message from discussion groups was that people felt that the style and terms used by organisations made Welsh more difficult to understand than English – it was described as "formal" and "stiff".

The public's views

"It takes a while to understand, it's not natural."

"It has to be simple, doesn't it? What is the point of putting in complex words? Someone who is learning Welsh, and tries to use Welsh language services, would turn to English if they used complex words because they wouldn't understand."

"The Welsh can be very clumsy on official things, and I find these things difficult enough in English without having to interpret them in Welsh on top of that."

"It's much quicker for me to use English as the Welsh used is not clear enough."

5.2.34   Organisations should make sure that information and materials are just as understandable to people, no matter what language they choose to use.

5.2.35 Some organisations have made an effort to ensure that they use suitable terms, including listening carefully to users' views, for example:

- the Food Standards Agency has developed and refined a glossary of food safety terms, which has now been externally moderated and added to the National Terminology Portal. It will be added to the website in due course, and the Agency is committed to continuing to refine terminology to ensure that it remains useful for the people who use the terms on a day-to-day basis

- as part of its work to digitise forms for legal processes such as divorce, HM Courts and Tribunals Service held user testing sessions to make sure that the wording of the forms was understandable to ordinary people, and several terms and sentences will be changed as a result of the feedback.

Operate bilingually if possible

5.2.36 Users say they want to use Welsh language materials, but want to be able to check that they have fully understood them by referring to the English version.

5.2.37 As well as providing reassurance to users, bilingual materials can also increase the visibility of the Welsh language, and encourage people who would otherwise use English to try using Welsh.

5.2.38 Of course, not all types of materials, such as longer documents, will be suitable to produce bilingually.

5.2.39 Sending standard information to users bilingually is a way of saving costs and effort by not having to establish language choice every time. For example, Betsi Cadwaladr UHB sends out correspondence such as appointment letters bilingually as a matter of course.

5.2.40 Overall, the documents we verified were separate Welsh and English versions. Where organisations used Welsh on social media, 59% of Facebook accounts, and 50% of Twitter accounts, were bilingual. Organisations offered a Welsh language phone service on the same number as the English service in 78% of cases. 83% of organisations' logos were bilingual, 12% were in Welsh only, and only in 5% of cases were the languages separate.

5.3 Raise awareness of Welsh language services

5.3.1   The availability and quality of Welsh language services has been lacking for years. Many users may be reluctant to use these services based on previous assumptions or experiences. It needs to be communicated that the chances of getting a good Welsh language service are now much higher.

5.3.2   The standards require organisations to promote and publicise any Welsh language services they offer. This can be done by promoting Welsh language services in general as well as highlighting the availability of specific services.

5.3.3   Members of the public in discussion groups mentioned that they were keen to see a celebration of organisations' success in providing Welsh language services, in order to change people's attitudes towards those services.
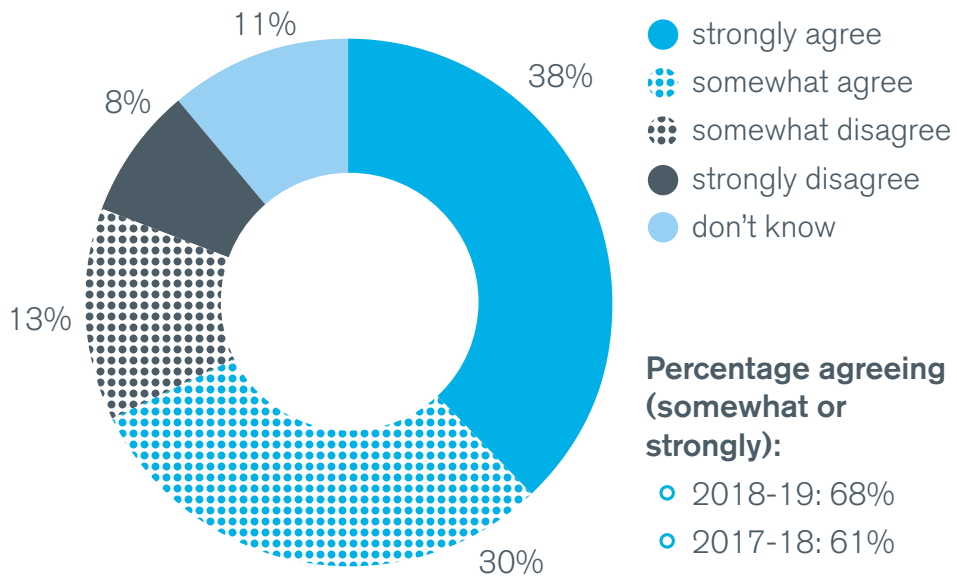
The public's views

"When there's some kind of event at the college, everyone knows about it because there are posters everywhere. Welsh language services should be promoted just as prominently."

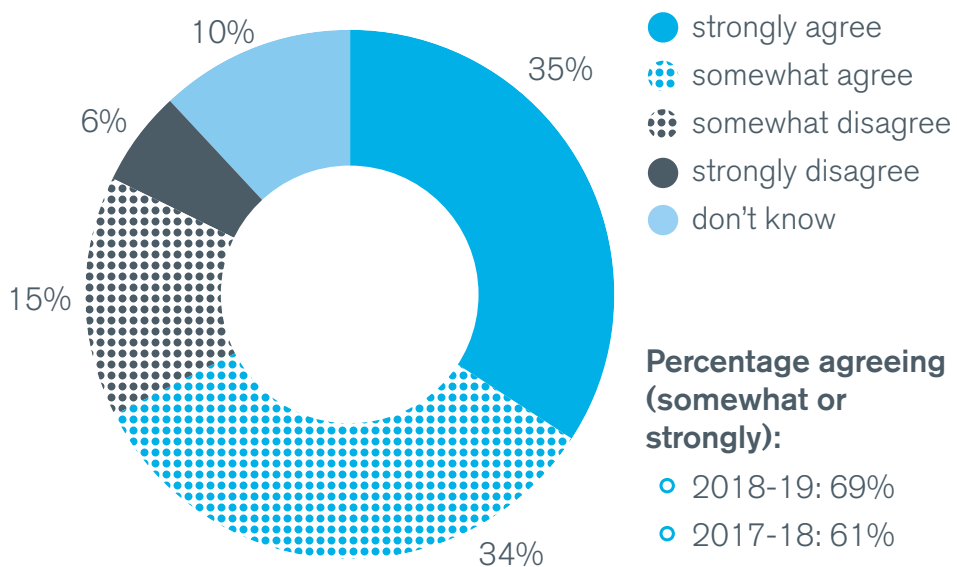## Let people know about Welsh language services in general

Public awareness

5.3.4   Opinion survey results suggest that people's awareness of Welsh language services is increasing, but not as high as it should be.

Opinion survey: "I know from which public organisations I have a right to get a Welsh language service"

11%
8%
13%
38%
30%

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

Percentage agreeing (somewhat or strongly):
- 2018-19: 68%
- 2017-18: 61%

Opinion survey: "I know what types of service I have a right to receive in Welsh from public organisations"

10%
6%
15%
35%
34%

- strongly agree
- somewhat agree
- somewhat disagree
- strongly disagree
- don't know

Percentage agreeing (somewhat or strongly):
- 2018-19: 69%
- 2017-18: 61%

Promotional work by organisations

5.3.5   We asked regulations no. 1 organisations what they did to promote Welsh language services.

5.3.6   Over half of the responses referred mainly or extensively to providing (not promoting) services, or to promoting the Welsh language in areas other than services, such as education or events for learners. Although these things are important, this wasn't what we asked about. The fact that the organisations have mentioned them suggests that they have not understood the responsibility to promote the use of services.

5.3.7   Carmarthenshire County Council, as noted in the 2017-18 assurance report, has undertaken a significant long-term campaign to increase the use of Welsh language services.

5.3.8   Beyond Carmarthenshire's 'Whichever way…' campaign, organisations did not offer any other examples of long-term, co-ordinated campaigns to promote Welsh language services in general.

5.3.9   However, 6 organisations (26%) mentioned other efforts to promote Welsh language services, for example by using social media, press releases and so on.

5.3.10 Rhondda Cynon Taf CBC has planned a calendar of events over the next year to raise awareness of Welsh language services, for example on Owain Glyndŵr day, with the approval of the Cabinet Steering Group on Welsh language matters in order to ensure top-level support.

5.3.11 A number of further education institutions promote Welsh language services to their students. In doing so, they take advantage of the fact that they have a specific audience, and reliable methods of reaching that audience. For example:

- at Coleg Ceredigion and Coleg Sir Gâr, learners attend induction sessions on the Welsh-medium support, activities and opportunities available to them during their time at college, and learners are updated via daily Twitter posts from the Welsh activities co-ordinators

- at Bridgend College, all students receive a bilingual booklet about college life, which includes a section on opportunities to use Welsh, and explains the 10 most relevant rights for students who speak Welsh, highlighted in the Commissioner's 'Mae gen i hawl' campaign

- Bangor University discussion group attendees said that the university's open days drew attention to opportunities to use the Welsh language at university, including a visit to the Welsh hall of residence. The University confirmed that a specific session is held during open days to let future students know about the Welsh language provision, with the aim of ensuring that visitors see that Welsh is a natural part of student life, in academic studies and leisure time

- the University of South Wales uses infographics or images on screens at the university to raise students' awareness of the standards.

5.3.12 A large number of organisations referred to using the Iaith Gwaith logo as a means of promoting the availability of Welsh language services – over half of the organisations that responded referred to the use of the logo on badges, lanyards, signs and so on. User feedback in discussion groups suggests that this is a useful method of providing assurance that a Welsh language service is available.

Applying behavioural theory

5.3.13 Behavioural theory offers some guidance on the communication methods and tone that should be used to encourage the use of Welsh language services:

- messages should come from a messenger that they trust or empathise with

- using services in Welsh should be portrayed as the normal, positive, socially approved thing to do, and people should be made to feel good about using Welsh language services

- it should be emphasised that users will not suffer any losses (e.g. delay or less favourable treatment) when using Welsh

- things that are novel, and relevant to the target audience, should be emphasised

- users' emotional attachments should be used.

Standing documents

5.3.14   Organisations are required to publish a number of documents explaining to the public how they will comply with the standards. We checked whether regulations no. 1, 2, 4, and 5 organisations had done this.

- 90% had published a document recording the standards they are under a duty to comply with – this means that 10% of organisations have not taken the simple step of publishing a copy of their compliance notice on their website

- 77% had published a document explaining how they intend to comply – but those documents were often superficial, saying that they would comply with the requirements but not what specific actions they would take to ensure compliance. Some organisations had designated officers to supervise the implementation of specific standards, and had created a clear action plan with specific targets to explain how the organisation intended to comply, oversee compliance, and promote and facilitate use

- 21% had published a document explaining their arrangements for overseeing compliance and promoting and facilitating use – this very low percentage raises concern that most organisations do not have effective arrangements for ensuring that they provide Welsh language services. In the documents that were available, few organisations gave serious attention to promotion and facilitation.

5.3.15   76% of organisations had published an annual report on how the standards were being implemented (a further 6% had sent a report to the Commissioner but hadn't published it). Organisations are required to publicise the fact that they have published a report, but we found evidence of only 28% of them being publicised.

5.3.16   The standards set out a number of specific statistics for organisations to include in reports.

- 97% reported on the number of complaints they had received

- 86% reported on the number of staff with Welsh language skills

- 78% reported on the number of new and vacant posts advertised by language category

- 33% reported on the number of staff who had attended specific vocational training (e.g. recruitment, health and safety) in Welsh – many had misunderstood the requirement, reporting instead on attendees of language awareness training or courses to learn Welsh.

5.3.17   Many of the annual reports indicated that the organisation would deliver services in accordance with the requirements but did not give any indication of what steps had been taken to achieve this, or what progress had been made during the year.

Draw attention to specific Welsh language services

5.3.18   The standards include a number of duties to inform users that Welsh can be used for specific services and materials.

5.3.19   We checked to what extent organisations complied with some of these duties as we carried out the user experience surveys (results for organisations operating standards only – regulations no. 1, 2, 4, 5 and 6).

5.3.20   In many cases, organisations did not take the simple steps required to highlight the availability of Welsh language services.

A sign in reception stating that use of Welsh is welcome	81%
Web pages offering Welsh proactively	80%
Welsh speaking reception staff wearing a badge	38%
Job advertisements stating that applications can be submitted in Welsh	38%
Correspondence including a statement welcoming correspondence in Welsh and indicating that correspondence in Welsh will not lead to delay	33%
English versions of documents stating that the document is also available in Welsh	20%

5.3.21   Many of the organisations which responded to our request for evidence referred to doing only one or two of these, although the majority were under a duty to do them all.

5.3.22   Some organisations prioritise specific services to promote thoroughly. For example, Rhondda Cynon Taf CBC is working with the Urdd locally to highlight opportunities for children to have Welsh swimming lessons.

5.4 Gather evidence to measure progress

Data on outcomes of specific interventions

5.4.1 As organisations comply with the duties to promote Welsh language services, it makes sense for them to want to measure whether their interventions are working, by gathering local data on the impact of the different interventions they implement.

5.4.2 One method of doing this is to establish a baseline:

- gather data on the level of use prior to intervention

- intervene (e.g. change service design, or promote the service in a different way)

- gather data on the level of use after the intervention.

5.4.3 Another method is a controlled trial:

- divide users into two or more groups

- no intervention with one group, intervention with other groups

- measure and compare levels of use within different groups.

5.4.4 Organisations may find it useful to set a target for increasing use. For example, Welsh Water has set a target to increase the number of its customers registering to receive Welsh correspondence from the company to 25,000 by 2025.

Methodology

Monitoring

The criteria for each survey and study were based on the requirements of a specific group of Welsh language standards.

Not all organisations were under a duty to implement all the standards that the survey criteria were based on – organisations may have been operating a Welsh language scheme, all standards may not have been imposed on organisations, the implementation day may not have passed, or organisations may have challenged the duty to comply with the standards. The aim of this report is usually to report on the user experience. In cases where compliance with standards is specifically referred to, only organisations subject to the standards are included.

The results of each exercise were analysed by one of the Commissioner's officers to identify the findings. The results were checked by colleagues and discussed and challenged internally.

User experience surveys

The verification work was carried out by the Commissioner's officers (excluding reception areas, signs and self-service machines – those surveys were conducted by Cwmni Iaith on behalf of the Commissioner). Verification was repeated 3 times (in June, September and December 2018) for all services except apps, reception areas, signs and self service machines, which were checked once.

For each survey, criteria were drawn up based on the requirements of the standards. Officers accessed the service and recorded whether their experience of using the service met those criteria.

The table below shows the services verified and the relevant standards. The standards numbers given below are as in the Welsh Language Standards (No.1) Regulations 2015; the numbers are different in other regulations, but the requirements are similar.

Survey	Relevant standards	Method of accessing the service
Correspondence	1, 6, 7	Send email queries in Welsh and English to the organisation's main account
Phone calls	8, 9, 10, 11, 12, 13, 16, 17, 22	Telephone the organisation's main number with a query
Documents	41 (Agenda, papers and minutes of management board / cabinet) 42 (Certificate / license) 43 (Booklet, leaflet, pamphlet or card) 44 (Policy / strategy / annual report / corporate plan / guidance / code of practice / consultation paper) 45 (Rules) 46 (Press statement) 50 (Form)	Search for an example of documents on organisation's website
Websites	52, 53, 54, 55, 56	Check home page and 10 pages on organisation's main website
Apps	57	Download and check app (where available)
Social media	58	Check 10 posts on organisation's Facebook and Twitter accounts
Self-service machines	60	Use a self-service machine in organisation's main reception area
Signs	61, 62, 63	Observe 3 signs at organisation's main reception area
Reception areas	64, 66, 67, 68	Attend organisation's main reception area with query
Corporate identity	83	Search for example of organisation's logo on website, social media and documents
Jobs	136, 136A, 137, 137A, 137B, 138, 139	Look at all the organisation's open job advertisements at the time of the survey

Services were randomly checked for a sample of a third of relevant organisations. A total of 48 organisations were included in the sample, and the results in the report are relevant to this sample unless otherwise stated. In addition, the services of all regulations no. 1 organisations were checked, but they weren't included in the general results unless stated. The following organisations were included in the sample:

Group of organisations	Specific organisations
Regulations no. 1	Pembrokeshire Coast National Park Authority; Caerphilly County Borough Council; Merthyr Tydfil County Borough Council; Torfaen County Borough Council; Swansea City and County Council; Newport City Council; Denbighshire County Council; Pembrokeshire County Council; Anglesey County Council
Regulations no. 2	Colleges Wales; Local Democracy and Boundaries Commission for Wales; Natural Resources Wales; Wales Council for Voluntary Action; Estyn; National Library of Wales; National Theatre Wales; Wales Audit Office / Auditor General for Wales; Electoral Commission; Office of Communications
Regulations no. 4	Special Educational Needs Tribunal for Wales; Agricultural Land Tribunal for Wales
Regulations no. 5	South Wales Fire and Rescue Authority; Independent Office for Police Conduct; North Wales Police and Crime Commissioner; Chief Constable of Dyfed Powys Police; Chief Constable of Gwent Police
Regulations no. 6	The Royal Welsh College of Music and Drama; Coleg Cambria; Gower College Swansea; Pembrokeshire College; Higher Education Funding Council Wales; Swansea University; Cardiff University; Glyndŵr University; The Open University
Regulations no. 7	Swansea Bay University Health Board; Cardiff and Vale University Health Board; Hywel Dda University Health Board; Public Health Wales NHS Trust; Cardiff and Vale Community Health Council; Powys Community Health Council
Welsh language schemes	Driver and Vehicle Licensing Authority; Department of Work and Pensions; HM Land Registry; HM Prison and Probation Service; Charities Commission for England and Wales; HM Revenue & Customs; Dŵr Cymru Welsh Water

Thematic studies

Regulations no. 1 organisations were asked a series of written questions. Questions related to:

o **workforce planning (skills of the organisation's staff) –** what organisations are doing to comply with the requirements of the Welsh language standards in terms of assessing, recording, and reporting on the Welsh language skills of staff, and in terms of skill development (standards 127, 129, 130, 131, 132, 133, 151 and 153 apply)

o **workforce planning (recruitment to new and vacant posts) –** what organisations are doing to assess the need for Welsh language skills, and categorise skills requirements, when advertising new and vacant posts (standards 136, 136A, 137, 137A, 137B, 138, 139 and 154 apply)

o **use of Welsh language services –** what steps are organisations taking to increase the use of Welsh language services, and what information could they collect to help show trends in the use of Welsh language services (standards 7, 9, 16, 30, 33, 49, 50A, 67, 68, 72, 71, 81 and 137 apply).

(Standards numbers are as in regulations no. 1, as explained above.)

23 of the 26 organisations that were asked for evidence responded. Llywela Edwards, a student from Cardiff University who was on a work placement with the Commissioner, contributed to the analysis of the evidence.

Standing duties

We checked whether all regulations no. 1, 2, 4 and 5 organisations which operate standards had published the required documents, and assessed the contents:

- a record of the standards they are under a duty to comply with (standards 155, 161, 167, 173 and 175)

- complaints procedure (standards 156, 162 and 168)

- supervision, promotion and facilitation arrangements (standards 157, 163 and 169)

- annual report (standards 158, 164 and 170)

- explanation of how the organisation intends to comply (standards 159, 165 and 171).

(Standards numbers are as in regulations no. 1, as explained above.)

Public engagement

Discussion groups

A structured discussion was led by the Commissioner's officers, with the aim of encouraging attendees to share their experiences of the availability and quality of Welsh language services, and the factors that influence their language choice. The following sessions were arranged:

- open to the public – Bangor, 02/08/2018; Cardiff Bay, 06/08/2018; Aberystwyth, 26/07/2018

- community groups – Learn Welsh, Mold, 05/02/2019; conversation session, Barry, 05/03/2019; Anglesey Young Farmers, 07/03/2019

- health and care – parent and child sessions at Salem Chapel, Canton, 20/06/2018 and Caersalem Chapel, Caernarfon, 27/06/2018; Alzheimers Cymru group, Bontnewydd, 05/07/2018

- students – Coleg Meirion Dwyfor, Pwllheli, 01/02/2019; Aberystwyth University, 04/02/2019; Coleg y Cymoedd, 13/02/2019; Bangor University, 20/02/2019

- staff of organisations – Natural Resources Wales, 19/06/2018; Rhondda Cynon Taf CBC, 28/06/2018; North Wales Police, 29/08/2018.

Opinion survey

Questions were asked on behalf of the Commissioner during a Welsh speakers omnibus survey conducted by Beaufort Research. The survey was conducted face to face in spring 2019. 500 Welsh speakers aged 16 and over were involved in the survey, and the results of the sample have been weighted to be representative of Welsh speakers in terms of age, location, socioeconomic class, and fluency in Welsh.

Percentages do not always add to 100 due to rounding.

User shadowing

3 sessions were held (in Dolgellau, Y Felinheli and Llangefni) during autumn 2018.

Each session involved a group of 4 participants. Participants were recruited on a 'specific interest group' basis. They received reasonable remuneration for their time to ensure that they were not all people with an active interest in Welsh language services. Demographic information was gathered about attendees (e.g. gender, age, home county, fluency in Welsh, home language, education leaving age, education medium, status and work area), as well as information about their usual language practices when seeking services from public organisations.

Facilitators prompted participants to complete a number of service access tasks, observing their behaviour and decisions, and then discussed participants' responses to the scenarios.

In addition, informal observation took place in real service delivery settings – reception areas of 3 public organisations, locations offering less formal services (e.g. shop, café, box office, bar) in 4 other organisations, self service machines in 3 locations, and phone services in one location.

Ateb Cyntaf was commissioned to complete the work. Ateb worked in partnership with Bangor University, using the expertise of two PhD students in the field of language behaviour (David Stephen Parry and Arwel Tomos Williams) and Dr Lowri Angharad Hughes (Canolfan Bedwyr) to plan the scenarios.

Engagement with organisations

Officers are continually engaged with organisations, responding to queries and discussing compliance issues. In addition, the report uses information gathered through other engagement with organisations:

o **feedback meetings –** during autumn 2018 individual meetings were held with 65 high priority organisations. Individual results from the 2017-18 verification work were shared with the organisations, and successful practices, challenges and developments in service delivery were discussed

o **workshops –** in autumn 2018, 5 workshops were held for organisations, based on the messages of the 2017-18 assurance report, A Measure of Success. The aim of the workshops was to encourage organisations to share methods of facilitating the provision of Welsh language services, to improve the consideration given to the Welsh language when making policy decisions, and to increase the use of Welsh internally. Representatives from over 80 organisations registered to attend the workshops

o **investigation and enforcement –** during 2018-19, 174 valid complaints were received about compliance with standards, and 31 valid complaints were received about the implementation of Welsh language schemes. 134 new investigations were opened, and 75 investigations were concluded. The investigations are carried out in accordance with the Commissioner's Enforcement Policy.