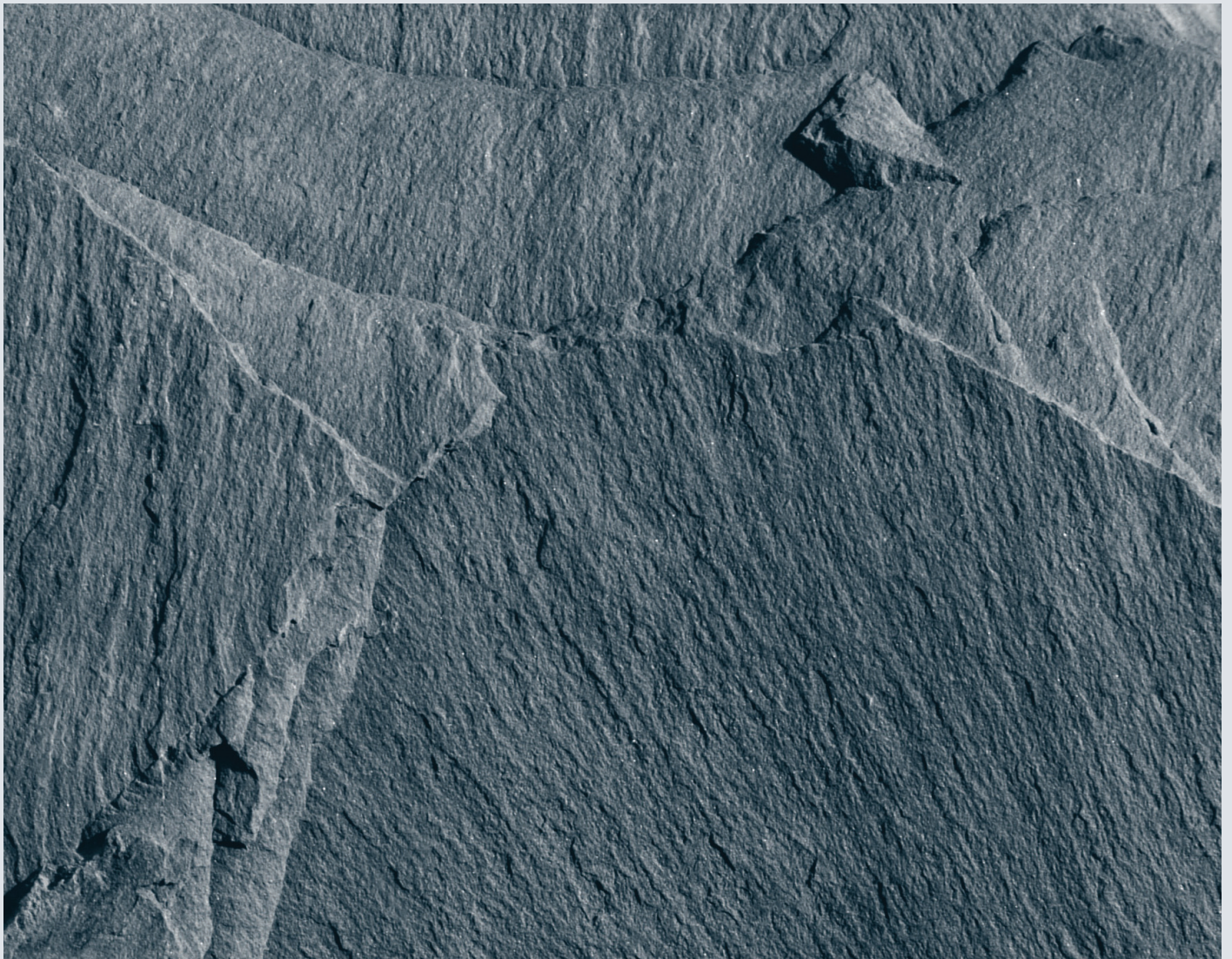# A new measure;
a new mind-set

The Welsh Language Commissioner's
Assurance Report for 2014–15

Published under section 4 of the Welsh
Language (Wales) Measure 2011

Comisiynydd y
Gymraeg
**Welsh Language
Commissioner**

Contents

1   Acknowledgement

1.1   I would like to acknowledge the work of the officers who were involved in the preparation of this report. I would also like to thank the following companies for their assistance: Atom PR, Gweriniaith, IAITH, Mabis, Nico, Old Bell 3 and Wavehill.

2   Foreword

2.1   This report is the first by the Commissioner to provide a general overview of how organizations meet their language commitments. The report also discusses what opportunities the public has to use the Welsh language in public life.

2.2   It is a period of change in terms of the way in which organizations are expected to use the Welsh language. I have informed 26 organizations that they must comply with the Welsh language standards, and another 540 organizations still have a statutory duty to implement a Welsh language scheme. I look back in this report at last year's performance and highlight the opportunities and lack of opportunities people have had to use the Welsh language. Based on what I've seen, I'm of the view that organizations need to change their approach if they are to use and promote the Welsh language in accordance with the principles of the Welsh Language (Wales) Measure 2011[1].

2.3   This report shows geographical trends and that an individual's ability to use the Welsh language in Wales, to date, has been a postcode lottery. Although the opportunities on offer are currently greatest in the north west, there is also good practice in the south-east, which is a testament to what can be achieved with goodwill, ambition and leadership. Cwm Taf University Health Board's initiative is one example of how practical steps can be taken to improve people's experiences of using the Welsh language. All public sector organizations should read about the good practice in this report and consider carefully what can succeed in the context of their organization. They should learn and better understand what opportunities or lack of opportunities exist to use the Welsh language in their organizations.

2.4   Although the mystery shopper surveys give only a snapshot of the situation, the findings are an accurate and true reflection of public experience.

2.5   Organizations have the ability to improve, provided that they adopt the mind-set needed to explore new ways of doing things. With the introduction of the Welsh language standards, organizations will have a duty to solve systemic problems which mean that a Welsh language service is not currently being offered.

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[1] The Welsh Language Measure (Wales) 2011

2.6 The key to successful implementation depends on the linguistic capacity of the workforce. Although organizations collect information and report on the workforce's language skills, my review has not found evidence of effective planning when recruiting bilingual staff. Organizations should maintain a skilful and bilingual workforce and be able to demonstrate that this is the case.

2.7 As standards are introduced over time, I will be able to investigate failures to comply with duties and take enforcement action to ensure improvement. However, the aim of this report is to encourage organizations to strengthen their arrangements and to support individuals who use the Welsh language.

Meri Mwr

3   Introduction

3.1   This report provides an overview of the Welsh Language Commissioner's findings in terms of the opportunities and lack of opportunities to use the Welsh language in public life in Wales in 2014-15. It also reports on the findings of surveys undertaken and highlights some good practices.

3.2   An executive summary of the main findings of the review follows this introduction and an overview of the implementation of Welsh language schemes is provided in section 5 of the report. Section 6 illustrates service experiences through the user's eyes by reporting on the findings of mystery shopper surveys undertaken in reception areas, when telephoning, using the web and trying to fill out forms. Section 7 discusses three case studies and analyzes the elements which led to successful Welsh provision in each case. Section 8 includes the findings and recommendations of detailed studies in two areas, namely organizations' practices when assessing the linguistic outcomes of new policies and initiatives and their practices in terms of specifying the linguistic requirements of posts when recruiting and selecting.

4 Executive summary

4.1 The Commissioner looked at the availability of Welsh language services provided by public sector organizations in reception areas and online. She also looked at methods of assessing the impact of policies on the Welsh language, the Welsh language requirements when recruiting staff and how organizations report on the language skills capacity of their workforce. The report also highlights good practice when using the Welsh language, in order to assist organizations to improve their arrangements.

Reception areas

4.2 A full Welsh language greeting and response was received in one of the 20 locations.

4.3 No Welsh language response was received in five of the 20 locations.

4.4 A Welsh language response was given to a Welsh language greeting in 42 of the 100 reception areas.

4.5 A full response was given to a Welsh language enquiry in 36 of the 100 reception areas.

4.6 The arrangements for transferring an enquiry to a bilingual officer were not effective in most cases.

4.7 In some reception areas, a variety of English-only posters, leaflets and public notices were displayed; whilst permanent signage and touch screens tended to be bilingual.

Online services

4.8 30% of the organizations surveyed (who offer online services) do not do so in Welsh.

4.9 A number of online forms had been partially translated and there was some evidence that translation software such as Google Translate had been used on some websites.

4.10 The standard of the Welsh language used by some organizations was deficient.

4.11 The quality of online services varies depending on geographical area and sector.

4   Executive summary

Assessing the impact of policies

4.12 Methods of assessing the impact of policies on the Welsh language vary.

4.13 The evidence gives no assurance that sufficient consideration is given to the Welsh language and that the assessment processes are sufficiently detailed and objective.

Recruitment

4.14 It is often difficult for an individual to find information about the Welsh language skills requirements of vacant posts.

4.15 Information about the level of proficiency needed is unclear and inconsistent.

4.16 The Welsh language was specified as an essential skill for vacant posts advertised in the public sector in Wales in 2% of advertisements (31 of the 1,576 posts).

Reporting to the Commissioner on Welsh language skills capacity

4.17 Only 54% of organizations gave a full report to the Commissioner on the language skills capacity of their workforce; 43% gave a partial account, and 3% failed to provide any information.

5 Overview of compliance

2 Section 7, The Welsh Language Commissioner's Assurance Report 2014-15

5.1 In considering the general performance of public sector organizations, little progress has been made during 2014-15 to promote and facilitate the use of the Welsh language. When responding to monitoring reports, dealing with complaints or undertaking independent performance reviews, the Commissioner rarely found examples of significant improvement, although some are to be found.[2]

5.2 The same difficulties and concerns arise among complainants every year, and they are fairly consistent across sectors. Since 2012, the main concerns brought to the Commissioner's attention have been in relation to individuals receiving English-only publications or forms, as well as the failure of organizations to communicate with individuals in Welsh, whether through written correspondence or by telephone. Issues relating to visual material, such as signs or websites which treat the Welsh language less favourably, have also caused concern consistently over recent years.

5.3 This report shows that basic issues such as organizations' websites that treat the Welsh language less favourably than the English language, and a failure to fully consider the impact of policy decisions on the Welsh language, continue to prevent service users from being able to live their lives through the medium of Welsh.

5.4 Individuals face difficulties when using the Welsh language in reception areas. There are no bilingual staff working in many of the main public reception areas in Wales. Organizations do not provide sufficient information about their workforce's linguistic skills and their current recruitment and selection practices do not give sufficient assurance of their ability to attract a bilingual workforce.

The number of language schemes in operation

5.5 On 31 March 2015, 566 Welsh language schemes were in operation. They include the schemes of 353 public sector organizations,[3] 54 educational institutions, 40 Crown bodies and four private companies who are under a statutory duty. Language schemes were also operated by 12 public sector organizations and two private companies on a voluntary basis, and 101 by third sector organizations.

[2] Section 7, The Welsh Language Commissioner's Assurance Report 2014-15
[3] This figure includes social housing providers.

5   Overview of compliance

Annual monitoring reports

5.6   During 2014-15, 154 annual monitoring reports were received. Although 27% of organizations who implement Welsh language schemes provided a report during 2014-15, it should be noted that a proportion of those who did not are town and community councils who do not normally provide an annual monitoring report. As a rule, the Commissioner focuses her efforts on considering and responding to the annual monitoring reports of those organizations that have the most regular contact with Welsh speakers and those that have a significant influence on daily life.

Annual performance indicators

5.7   Organizations provide an annual report on performance indicators.[4] Not all 2014–15 data had been received in the form of reports from organizations at the time this assurance report was being prepared. Therefore, figures for the 2013-14 reporting period were analyzed.

5.8   One particular indicator was focussed on, namely the ability of organizations to report on the number and percentage of their workforce who can speak Welsh, either by grade of post and/or by department and workplace.[5] The purpose of collecting information and reporting on this indicator is to enable the organization to measure whether its workforce's linguistic skills are sufficient, compared with the requirement to provide Welsh language services. Data from 62 organizations was analyzed with a total of 84 performance indicators (as further education and higher education institutions provide data on the linguistic skills of their administrative and academic staff separately).

Results of the analysis

5.9   A full account was given on 45 of the 84 indicators (54%). A partial account was given on 36 indicators (43%) and no information was provided for 3 indicators (3%).

The ability of organizations to report on the skills of their staff
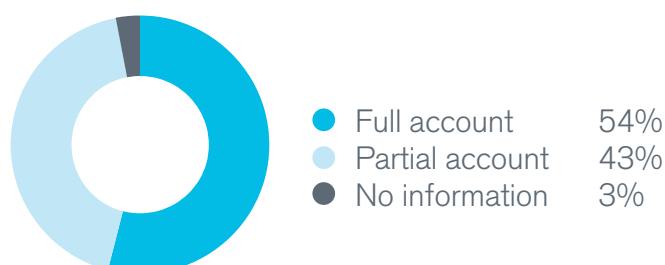
Full account   54%
Partial account   43%
No information   3%

5   Overview of compliance

5.10 In terms of individual sectors, 9 of the 10 universities in Wales provided a full account on the number and percentage of administrative staff who can speak Welsh as well as the number of academic staff who can speak Welsh, with the remaining university providing a full account on the number and percentage of administrative staff but failing to provide information on its academic staff. It is therefore interesting to note that the widest range (within a sector) is within further education institutions, with 6 of the 12 colleges providing a full account on the two indicators, 5 providing a partial account and the other providing a full account on the number of academic staff but failing to provide information on the number of administrative staff.

5.11 With regard to other sectors, it appears that national park authorities and police forces in Wales have effective arrangements in place for collecting information and reporting, in view of the fact that those seven organizations have succeeded in providing a full account on the indicator relating to the Welsh language skills of their staff. The picture with regard to health boards and NHS trusts was mixed, with half of the organizations providing a full account and the other half providing a partial account.

5.12 In terms of the Welsh Government and local authorities in Wales, only one organization succeeded in providing a full account on the indicator relating to the language skills of staff. Of those remaining, 21 provided a partial account and one organization failed to provide any information.

The Commissioner's opinion

It is difficult to understand how an organization can plan and provide services in Welsh without comprehensive information on the language skills of its workforce. Organizations which fail to provide a full report on the skills performance indicator should be alert to the need to be able to do so in order to comply with Welsh language standards in the future.

Part 1

6   Welsh language services through the eyes of the user

Between January and March 2015, external suppliers were commissioned to undertake surveys of Welsh language services provided by a wide cross-section of public sector organizations.[6] The aim of the surveys was to collect information about Welsh speakers' service experience. The findings enable the Commissioner to express her opinion on that experience. This section provides findings and conclusions of surveys undertaken in the following areas: public reception areas, telephone services, online services, websites and forms.[7]

[6] All of the organizations surveyed were already subject to statutory language duties.
[7] The surveys were not commissioned in order to measure levels of compliance with Welsh language schemes.

6.1 Mystery shopper survey: using the Welsh language in reception areas

6.1.1   Iaith Cyf was commissioned to undertake a survey of 100 reception areas across Wales. The aim of the survey was to discover whether the reception areas provided a comprehensive Welsh-medium face-to-face service and provided all visual material in Welsh.

6.1.2   The survey was undertaken during February and March 2015.[8]

The methodology used

6.1.3   20 locations across Wales were chosen where it was possible to visit five reception areas managed by public sector organizations. The following 20 towns and cities were visited: Brecon, Swansea, Aberystwyth, Cardiff, Carmarthen, Caerphilly, Holyhead, Newport, Neath, Denbigh, Haverfordwest, Llandudno, Merthyr Tydfil, Bridgend, Pontypridd, Porthmadog, Wrexham, Barry, Newtown and Mold.

6.1.4   Five reception areas were visited in each location — a total of 100 reception areas managed by county councils and county borough councils, health boards and NHS trusts, further and higher education institutions, the Welsh Government, the Police and the Fire and Rescue Service.

6.1.5   A mystery shopper technique was used. In each reception area a verbal enquiry was made in Welsh and the enquiry details and the face-to-face response received were recorded. The language of the visual materials displayed in the reception was also noted. In order to facilitate the process of collecting evidence in a consistent and standardised manner, the findings of each visit were noted on location.

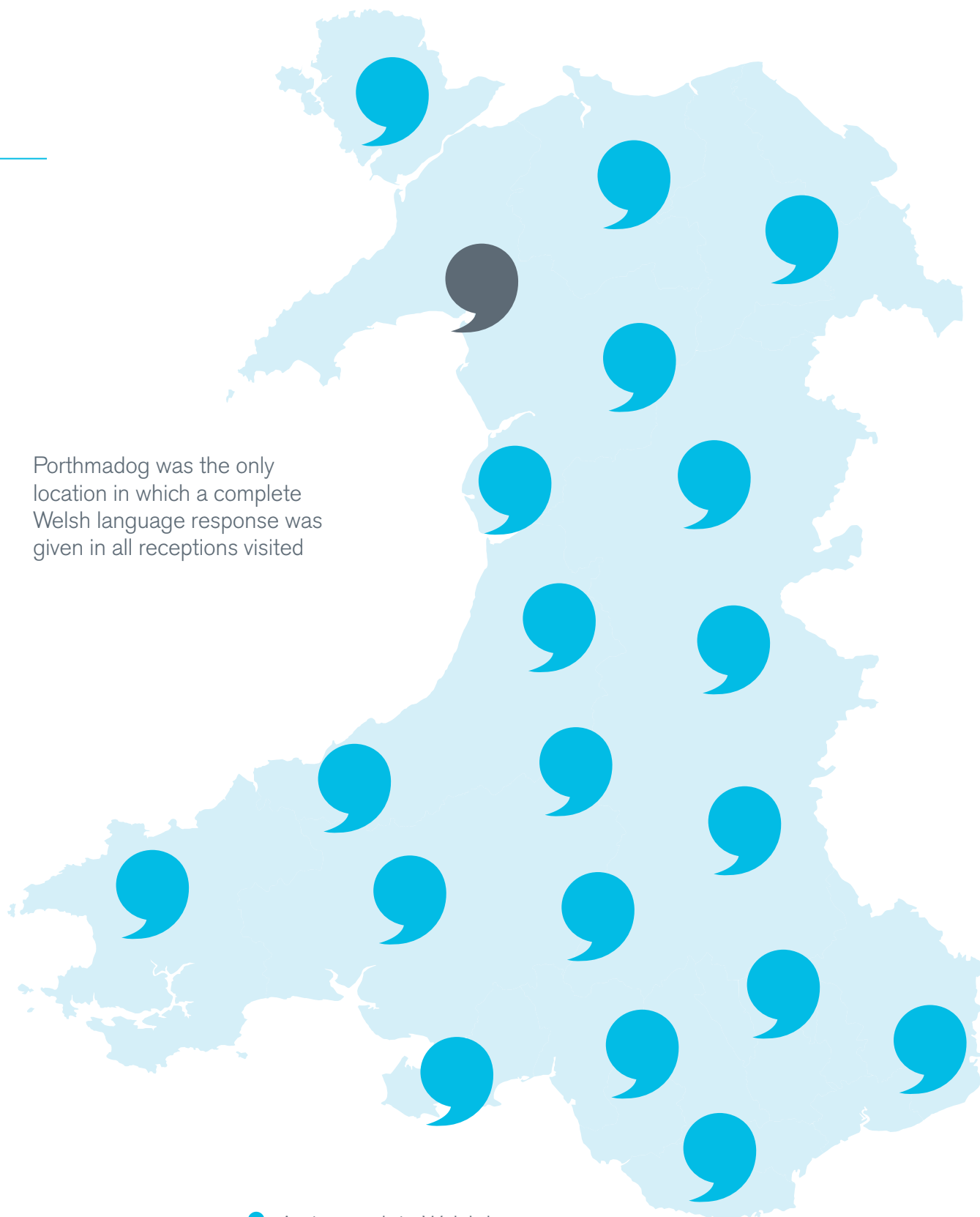[8] Relevant commitments in organizations' Welsh language schemes were noted in order to ensure that the methodology was relevant.

6.1 Mystery shopper survey: using the Welsh language in reception areas

Porthmadog was the only location in which a complete Welsh language response was given in all receptions visited

- An incomplete Welsh language greeting and response
- A Welsh language greeting and full response

6.1 Mystery shopper survey: using the Welsh language in reception areas

Results

A Welsh language greeting and full response was received in each reception area in one of the 20 towns and cities included in the survey. In five locations, no Welsh language greeting or Welsh language response was given in the reception areas visited.

A Welsh language greeting or response to a Welsh language greeting was received in 42 of the 100 reception areas. A full response to a Welsh language enquiry was received in 36 reception areas. The arrangements for transferring an enquiry to a bilingual officer were not effective or prompt in the majority of cases (64%).

Although there was evidence of visual bilingualism in terms of the materials displayed in reception areas, this was not always the case. Iaith Gwaith (Working Welsh) materials were displayed in 17% of reception areas. A variety of English-only materials were seen – they were mostly less permanent materials, such as posters, leaflets, public notices and display and promotional material. There was a tendency to display more permanent material bilingually, for example general signage, warning and prohibition signs, digital information screens and touch screens.

6.1.6 The quality of the provision varied between different locations. No Welsh language response (i.e. initial greeting or full response) was received in Newport, Newtown, Merthyr Tydfil, Bridgend or Neath. A Welsh language response was received in one of the five reception areas in Pontypridd, Caerphilly and Mold, and in two of the five reception areas in Wrexham, Cardiff, Brecon and Swansea. Of the 20 towns and cities visited, the only location where a Welsh language greeting and full Welsh language response was received to all five of the enquiries was Porthmadog. In one other location, Brecon, a Welsh language greeting or Welsh language response to a Welsh language greeting was given in each of the five reception areas, and two of the five were able to give a Welsh language response to a Welsh language enquiry.

6.1 Mystery shopper survey: using the Welsh language in reception areas

Aspects of the face to face service	Positive responses (number and percentage)
Welsh language greeting / Welsh language response to a Welsh language greeting	42
Welsh language response to a Welsh language enquiry	37
Full Welsh language response to a Welsh language enquiry	36
Courteous response to a Welsh language enquiry	89

Results by sector

County councils and county borough councils

6.1.7   Visits were made to 58 county council and county borough council reception areas. A Welsh language greeting, or a Welsh language response to a Welsh language greeting, was received in 19 (33%) of the reception areas. A Welsh language response to a greeting and a full response to a Welsh language enquiry was received in 17 (29%) of the reception areas. Nine enquiries were transferred to another officer to be answered and there was a delay before answering three of those enquiries. A courteous response was received to a Welsh language enquiry in 49 (84%) of the reception areas.

The National Health Service

6.1.8   Visits were made to 15 NHS reception areas. A Welsh language greeting, or a Welsh language response to a Welsh language greeting, was received in six (40%) of the reception areas. A Welsh language response to a greeting and a full response to a Welsh language enquiry were received in five (33%) of the reception areas. Not one enquiry was automatically transferred to another officer to be answered, but an offer to do so was made on three occasions. On those occasions, there was a delay before answering two of the enquiries. A courteous response was received to a Welsh language enquiry in 14 (93%) of the reception areas.

Further education institutions

6.1.9   Visits were made to seven reception areas in further education institutions. A Welsh language greeting and a Welsh language response to a Welsh language enquiry were received in four (57%) of the reception areas. Three enquiries were transferred to another officer to be answered and there was a delay before answering one of those enquiries. A courteous response was received to the Welsh language enquiry in all (100%) of the reception areas.

Higher education institutions

6.1.10 Visits were made to four reception areas in higher education institutions. A Welsh language greeting was received in three of the reception areas. A Welsh language response to a Welsh language enquiry was received in one of those reception areas. One enquiry was transferred to another officer to be answered and there was no delay on that occasion. A courteous response was received to the Welsh language enquiry in all of the reception areas.

Welsh Government

6.1.11   Visits were made to four Welsh Government reception areas. A Welsh language response, or a Welsh language response to a Welsh language greeting, was received in two of the reception areas. A Welsh language response to a Welsh language enquiry was received in two of the reception areas but no full Welsh language response was received. Two enquiries were transferred to another officer to be answered and there was no delay on those occasions. A courteous response was received to the Welsh language enquiry in all of the reception areas.

Visual materials

A variety of visual materials were surveyed, such as signs, posters, leaflets and publications.

Iaith Gwaith materials

6.1.12 Iaith Gwaith materials were on display in 17 of the 100 sample reception areas. Of the 58 county council and county borough council reception areas, 53 (91%) did not display Iaith Gwaith materials. Of the 15 NHS reception areas, 13 (87%) did not display Iaith Gwaith materials. The materials were not displayed in four of the seven reception areas in further education institutions, nor in four of the reception areas in higher education institutions. Of the four Welsh Government reception areas, Iaith Gwaith materials were not displayed in two of them.

Counter signs

6.1.13 Of the 48 reception areas which displayed counter signs, bilingual signs were seen in 40 (83%). In seven of those reception areas, some English-only signs were also displayed.

General signs

6.1.14 The majority of general signs seen in the reception areas were bilingual. The general signs were all bilingual in the following reception areas: the four Welsh Government reception areas, the four higher education institution reception areas, the four Police reception areas and the Fire and Rescue Service reception area.

6.1.15 Of the 58 county council and county borough council reception areas, 52 (90%) displayed bilingual signs. Three reception areas displayed English-only signs, and another seven displayed English only signs as well as bilingual signs.

6.1.16 Bilingual signs were on display in 13 (87%) of the 15 NHS reception areas. In two reception areas, some English-only signs were seen alongside bilingual signs, and in one reception area, all general signs were in English only.

Warning and prohibition signs

6.1.17 The majority of warning and prohibition signs in reception areas were bilingual – in 88 of the 100 reception areas. In 14 (16%) of those reception areas, some English-only signs were seen alongside bilingual signs. All warning and prohibition signs in the following reception areas were bilingual: the four Welsh Government reception areas, the four higher education institution reception areas and one Fire and Rescue Service reception area.

Visual materials

Public notices

6.1.18 Public notices were displayed in 90 of the 100 reception areas. Bilingual public notices were seen in 75 (83%) of those reception areas and some English-only notices were also seen in 21 (23%) of the reception areas. There were no English-only public notices in the following reception areas: the seven in further education institutions, the four in higher education institutions and the Fire and Rescue Service reception area.

Leaflets and publications

6.1.19 Leaflets and publications were displayed in 88 of the 100 reception areas. Bilingual material was displayed in 39 (44%) of those reception areas. In 35 (40%) of the reception areas, English-only materials were seen alongside bilingual and Welsh language materials. In 14 reception areas (16%), all leaflets and publications were in English only. There were no English-only leaflets or publications in the four Welsh Government reception areas or the Fire and Rescue Service's reception area.

Display and promotional material

6.1.20 Display and promotional material was seen in 85 of the 100 reception areas. Bilingual material was seen in 64 (75%) of those reception areas and English-only material was seen in 33 (39%) of them. In 19 reception areas (22%), all display and promotional material was in English only. In one of the NHS reception areas, Welsh only display and promotional material was seen.

Digital information screens

6.1.21 Digital information screens were provided in 24 of the 100 reception areas. 21 of the screens were bilingual and the others were English only, one in a further education institution and two in county council and county borough council reception areas.

Touch screens

6.1.22 Touch screens were provided in 15 of the 100 reception areas. 11 reception areas had bilingual screens. In two reception areas, separate Welsh language and English language screens were provided. One reception area had an English-only screen as well as a bilingual one. In another reception area, run by a county borough council, the only provision was an English-only screen.

Visual materials

The Commissioner's opinion

The Welsh language is visible in reception areas but is not heard or spoken to the same degree. There is no guarantee that users will be given a comprehensive Welsh language service in reception areas and, on some occasions, there is no Welsh language service at all. The linguistic ability and behaviour of individuals in their workplaces is integral to the success of creating a Welsh-medium first point of contact in a reception area. A new mindset is needed if a Welsh language face to face service is to be provided in reception areas.

6.2   Mystery shopper survey: using the Welsh language on the telephone

6.2.1   Atom PR was commissioned to undertake a survey of Welsh language telephone services provided by public sector organizations, using a mystery shopper approach.

The methodology used

6.2.2   A sample of 55 organizations from nine different sectors were chosen and a mystery shopper technique was used to present a Welsh language telephone enquiry. Quantitative and qualitative data from the conversations was recorded.

6.2.3   The quality of the experience was assessed using criteria based on presence, prominence, accessibility, willingness, penetration, practicability and the ease of use of the service.

6.2.4   A common scenario was used, relevant to every organization, in order to provide consistency when assessing the organizations' ability to respond to a Welsh language enquiry from a member of the public. All calls were made during February 2015. Every effort was made to speak only in Welsh, or to restrict any English to asking for a Welsh language service. The results of the research reflect how likely an individual was to receive a Welsh language telephone service from the organizations at the time.[9]

Results

A Welsh language or bilingual greeting was given by the receptionist in 58% of cases. Transferring to the relevant department, where a Welsh language service was available, that service was as effective as it would have been in English in 81% of cases.

However, what the statistics do not show is that a great deal of perseverance was sometimes needed before a Welsh language service provided. The researchers reported that, if they had not been undertaking the survey of Welsh language services, it is more than likely that they would have relented and proceeded with the enquiry in English.

In one or two cases, the researcher was put under a great deal of

[9] Relevant commitments in organizations' Welsh language schemes were verified in order to ensure that the methodology used was relevant to the organizations in this survey.

6.2 Mystery shopper survey: using the Welsh language on the telephone

A Welsh language or bilingual greeting was received in 58% of Welsh language telephone enquiries to switchboards

Prominence

6.2.5 Of the organizations with a telephone answering machine, 32 of 55 had a Welsh or bilingual message. 58% of switchboard greetings were in Welsh or bilingual. Organizations serving areas outside Wales were most likely not to provide a Welsh language service.
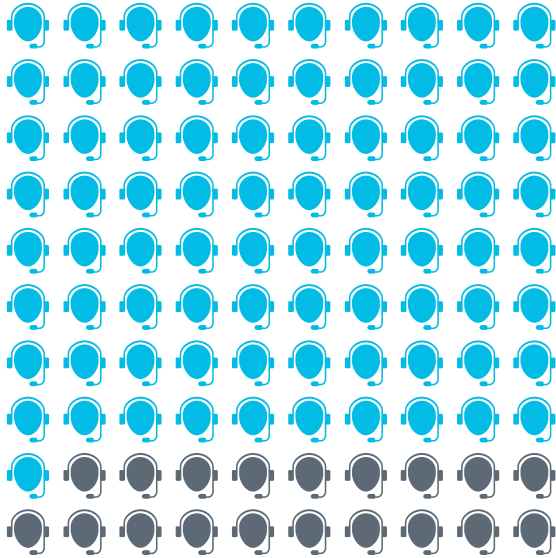
Transferring to the relevant department, where a Welsh language service was available, that service was as effective as the English service in 81% of cases

6.2.6 In 68% of cases (19 of 28 calls) where no Welsh language service was available, the switchboard offered to transfer the call to a Welsh speaker.

County Councils and County Borough Councils

6.2.7 **Switchboard:** of the 50% of calls answered by switchboards bilingually, the Welsh language was used first in 57% of cases. A conversation was held successfully in Welsh with five of 14 council switchboards included in the survey (36%). Two council switchboards (7%) had difficulty responding to the enquiry and asked to turn to English. Seven council switchboards were unable to respond to the enquiry in Welsh.

6.2.8 **Transferring calls to the relevant department:** it was not possible to conduct any conversation in Welsh with the relevant department in one council — it was explained that 'the translator' was on leave that day but that the enquiry could be emailed to the relevant individual.

6.2.9 **The entire telephone call:** it was possible to conduct the entire call in Welsh with six of 14 councils (43%). Three councils (24%) could partly respond to the enquiry in Welsh and five councils (36%) were unable to respond to the enquiry in Welsh.

6.2.10 In one council the switchboard operator offered to transfer the call to a Welsh speaker. No Welsh speaker could be found after a 2 minute wait, so the only option offered was to take the call in English. When the researcher asked if anyone could ring them back, the answer was 'no'.

Fire and rescue services

6.2.11 **Switchboard:** a conversation was held successfully in Welsh with one of three switchboards included in the survey (33%). Two fire and rescue services switchboards (67%) made every effort to conduct a conversation in Welsh but the experience wasn't as easy due to the lack of Welsh language skills.

6.2.12 **Transferring calls to the relevant department:** the relevant department of two of the fire and rescue services offered an efficient service of the same standard as someone would have expected to receive in English. The other succeeded in providing an Welsh language service but the experience wasn't as easy due to the lack of Welsh language skills.

6.2.13 **The entire telephone call:** one fire and rescue service conducted the entire telephone call in Welsh with the other two conducting a fair amount of the call in Welsh.

Results by sector

National parks

6.2.14 **Switchboard:** a Welsh language only response was given by one switchboard, one bilingual response and one in English only. A successful conversation was held in Welsh with two of the three national parks. As the telephone operator in the other national park could not speak Welsh the call was transferred to someone else.

6.2.15 **Transferring to the relevant department:** successful conversations were had in Welsh in two of the three calls to the organization's relevant department. The service was efficient and readily available in the other national park, however, the experience wasn't as easy due to the lack of Welsh language skills.

Police forces

6.2.16 **Switchboard:** of the four calls made, an English-only response was received in two police services. In one case, there was a wait of nearly 20 minutes with an English only recorded message saying 'Our lines are busy, thank you for your patience'. As a result, the call was terminated without completing the enquiry, due to the inefficiency of the service. The call to one switchboard was answered bilingually and another in Welsh only. Where a Welsh language switchboard service was provided, it was possible to conduct the entire call in Welsh.

6.2.17 **Transferring to the relevant department:** two of the police services offered an efficient service in Welsh of the same standard as someone would have expected to receive in English. One other police service succeeded in providing a Welsh language service but the experience wasn't as easy due to the lack of Welsh language skills. In the other police service the call was terminated without warning after a long wait.

Colleges

6.2.18 **Switchboard:** the switchboard was answered in Welsh in one of seven colleges (14%) and bilingually in two (29%). The switchboard was answered in English by four of seven colleges (57%), however, the operator offered to transfer the call to a Welsh speaker in two of those cases. A conversation was held successfully in Welsh in two of seven (29%) calls to switchboards and in one (14%) of the calls, the person answering the call had difficulty conducting the call in Welsh.

6.2.19 **Transferring to the relevant department:** five of seven colleges were able to deal with the enquiry in Welsh in the relevant department. Of those, three provided an easy experience and the other two offered a service that was efficient and readily available, but it wasn't quite as easy to use due to linguistic ability.

6.2.20 **The entire telephone call:** it was possible to conduct the entire telephone conversation in Welsh with four of seven colleges (57%). It was not possible to conduct any part of the enquiry in Welsh with two of seven colleges (29%) and it was possible to conduct some of the enquiry in Welsh with the other college (14%).

Universities

6.2.21 **Switchboard:** a conversation was held successfully in Welsh with two of eight university switchboards (25%). Three universities (37.5%) had difficulty responding to the enquiry in Welsh due to the lack of Welsh language skills and it was not possible to conduct any part opf the enquiry in Welsh with the remaining three of eight universities — the operator insisted on turning to English in those cases.

6.2.22 **Transferring to the relevant department:** it was not possible to conduct the call in Welsh with three of eight universities (37.5%) and in one case (12.5%), the department had some difficulty conducting the enquiry in Welsh. A conversation was held successfully in Welsh with four of eight relevant departments in the universities (50%).

Health Boards

6.2.23 **Switchboard:** one of seven health boards succeeded in providing a bilingual greeting when receiving a call. The other six provided an English-only greeting. Even though the switchboard operator in the health board where the call was answered bilingually could understand Welsh and answered every question correctly, the person insisted on answering in English. As a result, none of the health boards succeeded in providing a Welsh language switchboard service.

6.2.24 In one case, the call was terminated because it was not possible to find a Welsh speaker. After requesting a Welsh language service and waiting eight minutes, the operator returned and offered to give the researcher the mobile phone number of a Welsh speaker. The operator then disappeared again for another seven minutes and returned (15 minutes after the start of the call) to say that they couldn't find a Welsh speaker. In addition, the operator also insisted on referring to a 'Welsh interpreter' and then asked 'Do you speak any English at all? Can you tell me what you wanted?'

6.2.25 **Transferring to the relevant department:** four of seven health boards could not provide a Welsh service to deal with the enquiry. An efficient service, of the same standard as one would expect in English was provided by three of seven health boards (43%).

6.2.26 **The entire telephone call:** four of seven health boards (57%) failed to deal with any part of the enquiry in Welsh. It was possible to conduct a fair amount of the enquiry in Welsh with three of seven Health Boards (43%).

The Commissioner's opinion

A little over half of the researchers' telephone service experiences were easy and there were examples of having to persevere to enable them to use the Welsh language. The researchers used vocabulary such as 'pressure' and 'surrender' to describe some experiences to convey the mental resilience needed to seek a Welsh service in some situations. It is the responsibility of the organization, not the individual, to persevere until it can offer a satisfactory bilingual telephone service. Some of the practices found are not satisfactory.

Further survey work to assess telephone services will be undertaken during 2015-16.

6.3   Mystery shopper survey: the use of the Welsh language online

6.3.1   During 2014-15, Wavehill was commissioned to undertake a survey of organizations' online services.[10]

6.3.2   The Commissioner is aware that a number of factors (including the need to provide services through more efficient processes, technical developments and customer expectations) mean that organizations are increasingly keen to develop online services through the medium of interactive forms.

6.3.3   A number of the complaints received by the Commissioner relate to online services. The Commissioner is therefore keen to ensure that such developments do not have a detrimental effect on the experience of Welsh speakers. The Commissioner's wish was to collect quantitative evidence on the current performance of organizations in providing online services.

6.3.4   The commitments with regard to online services in Welsh language schemes vary. A number of organizations do not refer specifically to interactive forms.

6.3.5   Normally Welsh language schemes include a commitment similar to the following which can be applied to online forms if there is no explicit reference to them in the scheme: 'In planning new policies and initiatives which affect the provision of public services in Wales, Literature Wales will ensure that all developments comply with the commitments made in this scheme.'[11]

The methodology used

6.3.6   A desktop exercise was undertaken which involved visiting organizations' websites and testing forms.

6.3.7   Almost all organizations in rounds 1, 2 and 3 of the Commissioner's standards investigations who also implement a Welsh language scheme were surveyed.

6.3.8   The survey included 472 forms from 187 organizations.

[10] Online services were defined as interactive forms on web pages which enable users to send information. The project did not include, for example, downloadable PDF or Word forms attached to web pages, or interactive forms on television or mobile phone apps.

[11] Literature Wales' Welsh Language Scheme

6.3 Mystery shopper survey: the use of the Welsh language online

Step 1

Visits were made to the English language websites of the 187 organizations to establish whether they provided online forms, before checking whether those forms were available in Welsh.

The researcher noted the number of English language forms found (which is likely to be lower than the total number of forms on the website), the number of corresponding Welsh language forms, and comments of a more qualitative nature relating to the websites and forms sourced.

Step 2

88 organizations provided Welsh language online forms and the quality of these forms was assessed. A score was given to each form based on its appearance, accessibility and prominence, ease of use and the standard of language used. The number of technical faults found was also recorded.

The score (between 1 and 3) reflected the extent to which the researcher felt that the Welsh language version corresponded with the English language version.

Results

30% of the organizations surveyed which provide online services do not provide those services in Welsh.

The interactive forms provided by some organizations were not accessible and prominent, which emphasises that websites need to facilitate the use of Welsh language online services.

A number of forms had been partially translated, suggesting a failure by organizations to ensure quality.

A number of organizations use software such as Google Translate to translate online content, leading to incorrect and incomprehensible translations.

### 6.3 Mystery shopper survey: the use of the Welsh language online

Step 1

6.3.9   A total of 187 organizations were surveyed.

6.3.10   Of those, 125 organizations (67%) offered online services. With regard to sectors, all county councils and county borough councils and national parks offered online services, along with the majority of further and higher education institutions. A small proportion of community health councils, health boards and NHS trusts offered online services, along with 26 of the 38 social housing providers (68%).

6.3.11   Of the 125 organizations who offered online services, 88 (70%) offered online services in Welsh with 30% offering online services only in English.

Online services (125 organizations)

● Online services in Welsh	70%
● Online services in English	30%
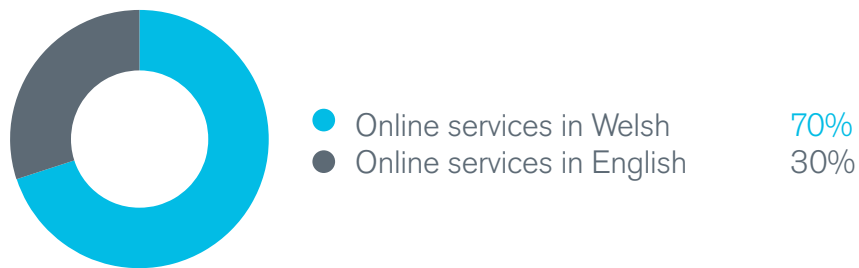
6.3.12   Of the 88 organizations who offered online services in Welsh, 28 (32%) did not provide all forms in Welsh. This trend was strongest amongst county councils and county borough councils (organizations who provide a large number of online forms) and colleges. For example, one council provided 2 of the 41 forms sourced (5%) in Welsh.

6.3.13   A number of organizations referred users to external forms on gov.uk which are not available in Welsh. There is also a suggestion that financial processing forms are more likely to be available in English only.

6.3.14   One clear practice, especially amongst county councils and county borough councils, was the inclusion of statements noting that the Welsh language provision was in the process of being developed. There was also a tendency to provide English language forms on Welsh language websites without any warning or explanation.

6.3 Mystery shopper survey: the use of the Welsh language online

Step 2

6.3.15 The 88 organizations which provided online services in Welsh were surveyed. However, the websites of 2 organizations weren't working at the time the survey was undertaken, therefore the total sample was 86 organizations.

6.3.16 The appearance of the Welsh language forms corresponded with the English language versions in all cases (100%).

6.3.17 In terms of accessibility and prominence, it was just as easy to find the Welsh language forms as the English language forms in 79 of the 86 cases (92%). However, there were some exceptions:

- On the websites of three higher education organizations, a link from a form to the Welsh website went to the homepage rather than the corresponding English language form.
- The word 'Cymraeg' had to be typed into the search box on the English language website of one organization in order to find the Welsh language website.
- The Welsh language forms on the website of one of the councils were in a different location to the English language ones.
- The fact that the website of one of the councils had been partially translated caused confusion.

6.3.18 It was just as easy to use the Welsh language forms as the English language forms in all cases, in terms of functionality.

6.3.19 Examples of poor translation were seen in the case of 12 organizations (14%). A number of housing associations used Google Translate to translate the website and, in a number of cases, those translations were incorrect and incomprehensible. Furthermore, four organizations (5%) also provided partially translated forms, where some of the fields and parts of the interface remained in English.

6.3.20 The researcher noted that the performance of organizations whose headquarters were based in south Wales tended to be less positive than the performance of those whose headquarters were based in north Wales.

The Commissioner's opinion

Further work will need to be undertaken to compare the results of the survey with the commitments noted in individual organizations' language schemes. The Commissioner will pay particular attention to online services when responding to annual monitoring reports on the implementation of Welsh language schemes, referring to the results of the survey.

6.4 Mystery shopper survey: using the Welsh language when browsing the web

6.4.1 Gweriniaith was commissioned to collect information about the accessibility of organizations' Welsh language websites. Their online bilingual corporate identity and image were also surveyed.

The methodology used

6.4.2 The work was a desktop exercise. The methodology adopted would give a clear and quantitative picture of the actual service experienced by Welsh users and provide evidence showing the ability to find Welsh language services; the process of moving from an organization's first tier service to a further service, and the extent to which the Welsh language can be used up to the end of the supply route, if relevant.[12]

6.4.3 The methodology included three specific steps:

Step 1
The Welsh language schemes of 55 organizations were verified in order to compare the level of commitment made in their statutory language scheme with regard to their website and their actual online provision.

Step 2
Navigating websites. The A–Z map of every website was surveyed in order to ascertain the scale of the individual site. Only the text of the websites' pages was verified. The content of appended documents was not viewed. The content of the websites was checked systematically and the findings in terms of navigation were recorded. Online videos and services and ways of contacting individual organizations were checked as part of the survey.

Step 3
Inputting data for each website under standardised headings on a spreadsheet. The researcher made a judgement on each individual organization's level of compliance with their language scheme, from the options seen on the opposite page:

[12] Relevant commitments in organizations' Welsh language schemes were noted in order to ensure that the methodology used was relevant to the organizations in this survey.

6.4   Mystery shopper survey: using the Welsh language when browsing the web

Level of compliance with the language scheme	Description
Fully compliant	Consistent provision in accordance with the language scheme and/or completely bilingual
Compliant to a large extent	Combination of sufficient and semi-sufficient provision
Partly compliant	Provision is sufficient/ semi-sufficient/insufficient
Compliant to a lesser extent	Combination of semi-sufficient and insufficient provision
Non-compliant	Insufficient provision or no provision

Results

There are clear trends in terms of the geographical location of the organizations. The majority of organizations found to be fully compliant were located in north and west Wales. Not one organization based in north Wales was placed in the category 'partially compliant' or 'compliant to a lesser extent'.

Organizations based in south Wales were weakest in terms of their compliance with their Welsh language schemes.

The provision is not consistent within each sector. A clear example is Welsh Police Forces who have been placed in 4 different compliance categories. On the other hand, every Community Health Council is fully compliant.

The researcher stated that the standard of Welsh was good on the whole with very little evidence of misspellings and incorrect language.

6.4 Mystery shopper survey: using the Welsh language when browsing the web

6.4.4 The number of websites with a 'Splash' language choice page[13]

Local Government	7 (54%)
Welsh Government	1 (100%)
National Park Authorities	1 (33.3%)
Health Boards and NHS Trusts	3 (43%)
Police Forces	1 (20%)
Fire and Rescue Authorities	2 (33.3%)
Universities	0
Further Education Colleges	0
Community Health Councils	5 (100%)
Other organizations in rounds 1, 2 and 3 of standards investigations	1 (33.3%)

38% of organizations used a 'Splash' page to promote language choice. The practice was most commonly used amongst Local Government organizations and Community Health Councils.

The number of websites with a language option button (on the homepage and beyond)

Local Government	12 (92%)
Welsh Government	1 (100%)
National Park Authorities	3 (100%)
Health Boards and NHS Trusts	7 (100%)
Police Forces	5 (100%)
Fire and Rescue Authorities	3 (100%)
Universities	8 (100%)
Further Education Colleges	7 (100%)
Community Health Councils	5 (100%)
Other organizations in rounds 1, 2 and 3 of standards investigations	2 (66.6%)

This is now a common practice amongst the vast majority of the sample, and is an expedient and direct way of providing a language choice.

[13] These results are based on using the Welsh name of the organizations in the search engine. It is likely that the results would be different if the English name was used. In the context of this survey, a 'Splash' page was defined as a page which appears before the website's 'Homepage' and offers the user a choice of language.

6.4 Mystery shopper survey: using the Welsh language when browsing the web

The number of websites where a language option button enables direct transfer between languages on every page

Local Government	11 (85%)
Welsh Government	1 (100%)
National Park Authorities	3 (100%)
Health Boards and NHS Trusts	0
Police Forces	4 (80%)
Fire and Rescue Authorities	3 (100%)
Universities	5 (63%)
Further Education Colleges	5 (71%)
Community Health Councils	5 (100%)
Other organizations in rounds 1, 2 and 3 of standards investigations	1 (33.3%)

6.4.5 A less common practice than a language choice button which is used by 69% of the sample is the ability to transfer directly from a page in one language to the corresponding page in another language. On one website, it was possible to change the language of all pages except for the Welsh jobs page. Nine examples were found where clicking a button sent the user back to the website's homepage rather than to the corresponding page. This is standard practice amongst all health boards and NHS Trusts surveyed – although some have an additional button on every page which states 'This page in English/Welsh' which sends the user to the corresponding page in the other language.

The number of websites with a bilingual corporate identity and image

Local Government	13 (100%)
Welsh Government	1 (100%)
National Park Authorities	3 (100%)
Health Boards and NHS Trusts	7 (100%)
Police Forces	5 (100%)
Fire and Rescue Authorities	3 (100%)
Universities	8 (100%)
Further Education Colleges	7 (100%)
Community Health Councils	5 (100%)
Other organizations in rounds 1, 2 and 3 of Standards investigations	1 (33.3%)

6.4 Mystery shopper survey: using the Welsh language when browsing the web

6.4.6   21 (38%) organizations were fully compliant and 16 (29%) were compliant to a large extent — 67% of the whole sample. Two organizations (4%) were compliant to a lesser extent and one organization was not compliant at all.

The Commissioner's opinion

Organizations should review their arrangements for providing bilingual websites to ensure that they are able to comply with the relevant commitments in their Welsh language schemes.

6.5   Mystery shopper survey: using Welsh language forms

6.5.1   Mabis was commissioned to undertake a survey which involved collecting information on the extent to which forms provided by public sector organizations are available in Welsh.[14]

The methodology used

6.5.2   Forms provided by 82 organizations were surveyed and a total of 645 forms.

6.5.3   Two methods were used to collect evidence – telephoning organizations directly using a mystery shopper approach and desktop research.

6.5.4   The survey was undertaken over a period of three weeks between the end of February and the start of March 2015.[15]

Results

Of the 645 forms surveyed as part of the survey, 243 (38%) were available in Welsh and 61 (9%) were available bilingually (i.e. rather than as separate Welsh and English copies).

Seven public sector organizations which are based in north and west Wales (or which have a strong presence there) provided all of the forms which were subject to the survey in Welsh or bilingually. Three other public sector organizations provided over 80% of their forms in Welsh or bilingually.

Six public sector organizations in south and south-east Wales did not provide any of the forms which were subject to the survey in Welsh or bilingually.

It was noted that the standard of Welsh on some of the forms was poor and, as a result, the Welsh language provision is less accessible than the English language provision as the forms are not always as easy to read.

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[14] In the context of this survey, a 'form' was defined as a printed document — for use by the public — which includes a number of questions to be answered on a specific matter.

[15] Relevant commitments in organizations' Welsh language schemes were noted in order to ensure that the methodology used was relevant to the organizations in this survey.

Results by sector

6.5.5 **Welsh Government**
- A total of 15 forms were surveyed.
- 15 forms were available in Welsh or bilingually (100%).

6.5.6 **Welsh Government sponsored bodies**
- A total of seven forms were surveyed.
- Six forms were available in Welsh or bilingually (86%).
- One form was available in English only (14%).

6.5.7 **County councils and county borough councils in Wales**
- A total of 330 forms were surveyed.
- 141 forms were available in Welsh or bilingually (43%).
- 114 forms were available in English only (34%).
- 75 of the forms requested were not available (23%).
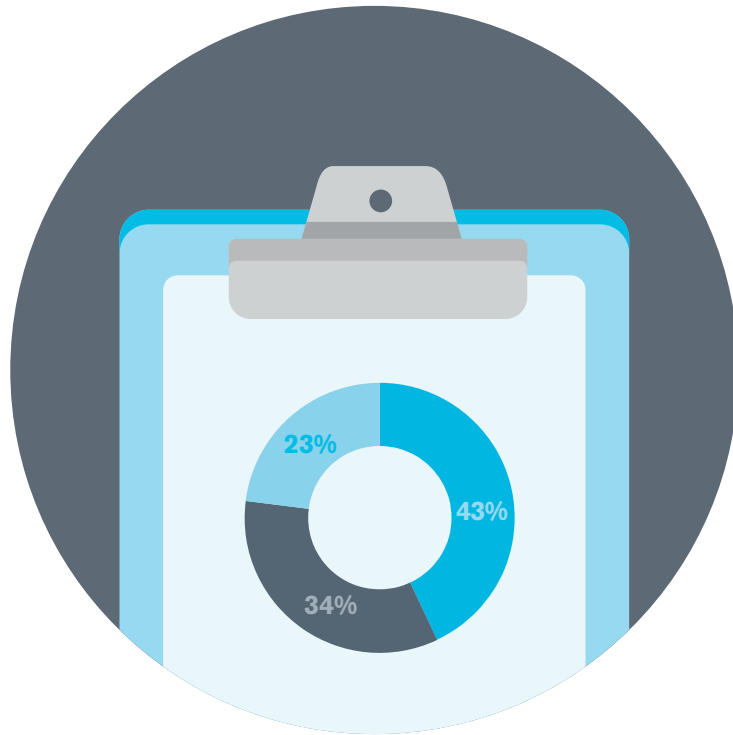
43% of forms were in Welsh or bilingual, 34% English only, 23% not available

6.5.8 **National Park Authorities**
- A total of 21 forms were surveyed.
- 20 forms were available in Welsh or bilingually (95%).
- The other form was not available in Welsh but users could write to the organization to request a copy (5%).

Results by sector

6.5.9 Health Boards in Wales
- A total of 70 forms were surveyed
- 33 forms were available in Welsh or bilingually (47%).
- 18 forms were available in English only (26%).
- 19 of the forms requested were not available (27%).

6.5.10 Police forces and police and crime commissioners in Wales
- A total of 20 forms were surveyed.
- 13 forms were available in Welsh or bilingually (65%).
- Six forms were available in English only (30%).
- One of the forms requested was unavailable (users were expected to contact the organization directly by phone in this case) (5%).

6.5.11 Fire and rescue authorities
- A total of 15 forms were surveyed.
- 12 forms were available in Welsh or bilingually.
- Four forms were available in English only.

6.5.12 Higher education corporations
- A total of 90 forms were surveyed.
- 25 forms were available in Welsh or bilingually (28%).
- 45 forms were available in English only (50%).
- 20 of the forms requested were not available (22%).

6.5.13 Further education institutions
- A total of 60 forms were surveyed.
- 34 forms were available in Welsh or bilingually (57%).[16]
- 16 forms were available in English only (27%).
- 10 of the forms requested were not available (16%).

6.5.14 UK Government Departments and their agencies and sponsored bodies
- A total of 16 forms were surveyed.
- 10 forms were available in Welsh or bilingually (63%).
- Six forms were available in English only (37%).

[16] Of the 34 Welsh or bilingual forms, the researcher felt that four had been translated badly.

The Commissioner's opinion

The experience of using Welsh language forms should be no less favourable than the experience of using English language forms. An organization's geographical location and the medium of the form, whether electronic or paper, should not affect its ability to provide it in Welsh. As the Welsh language standards are gradually introduced, organizations have an opportunity to review how the Welsh language is treated in the context of providing forms. In some cases, organizations should take urgent action to ensure that their arrangements for preparing text lead to a satisfactory product.

Part 2
7   Case studies

One of the Commissioner's functions is to provide advice and encourage good practice in terms of the use of the Welsh language. This is undertaken in accordance with section 4 of the Welsh Language Measure. Section 4(2) states that the Commissioner may encourage best practice in relation to the use of Welsh by persons who deal with, or provide services to, other persons. She may also carry out, or commission others to carry out, research and give advice to any person.

One aspect of recognising successes and good practice is extrapolation. Extrapolation is an attempt to offer a better understanding of why something is good or why a specific organization or service is succeeding. Examples of services which the Commissioner considers good practice are noted in this section.

7.1 Maintaining a bilingual website

7.1.1 Betsi Cadwaladr University Health Board provides a Welsh language service on its website which is as easy to use as its English language service. The user does not have to search for information in Welsh. It is proactively offered on a website which includes over 1000 pages in each language.

Characteristics
Offering a proactive language choice

7.1.2 A toggle link is provided at the top of the Welsh and English homepage which offers individuals a language choice as soon as they enter the website.

Providing a clear language choice on every page

7.1.3 The option to change the language of the page is provided via a box which appears on the left-hand side of each page. This enables individuals to move to the corresponding page in the other language without having to return to the website's homepage in the other language.

7.1.4 Therefore, there are two ways of choosing a language — one which takes the user back to the website's homepage in the other language and one which takes them to the corresponding page in the other language.

English and Welsh search function

7.1.5 Metadata which has been embedded to facilitate the use of the website is included in Welsh and English. This enables individuals to choose whether to search in Welsh or English and results are returned in the current language of the interface which is in use at the time. The search results don't inform the individual whether additional results are available in the other language.

Welsh and English pages of equal quality

7.1.6 The interface of the website's pages is identical in both languages. The quality and clarity of the content is consistent and the Welsh and English languages are treated equally — for example, with regard to colour, size, font and the format of the text.

7.1.7 The NHS Wales website enables this by maintaining two separate English and Welsh websites and taking advantage of the link facility of the Content Management System (CMS) used.

7.1   Maintaining a bilingual website

Website editing system

7.1.8   The health board has guidelines for publishing bilingual web pages (Cascade Users Handy Hints - Bilingual Pages) which note, in accordance with local policy and the requirements of the health board's Welsh language scheme, that the public website is provided in Welsh and English. During training sessions, the standard practice required will be highlighted (e.g. format, how to name bilingual documents, the use of images).

7.1.9   The main responsibility for uploading, editing and reviewing the current and new content of the health board's website lies with the health board's E-Communications Manager and Web Editor who both have basic Welsh language skills (Level 1 ALTE self assessment Framework[17]).

7.1.10   As it is a large organization, the work of editing the website has been delegated to 112 website editors in various departments. During training sessions, the E-Communications Manager and Web Editor ask editors about the level of their Welsh language skills. It is not essential for editors to have Welsh language skills as the system ensures that staff are assisted in providing bilingual services regardless of whether they have Welsh language skills or not.

7.1.11   The system enables the health board to ensure that individual editors can only edit those pages which are included within their specific remit. Those pages are allocated by the E-Communications Manager and the Web Editor who ensure that the system is robustly monitored.

7.1.12   All editors receive training on how to manage the website's Content Management System (provided by NHS Wales' Informatics Service). Ensuring that editors understand the guidelines for publishing bilingual web pages is an essential part of that training. Editors are instructed not to publish revised or new website content until it is available in Welsh and English, in order to ensure consistency between the pages in both languages.

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[17] The Association of Language Testers in Europe

7.1   Maintaining a bilingual website

7.1.13 When text is available to the editor in one language (normally English), they must arrange for it to be translated into the other language. A process has been established whereby the editor of a section of the website sends a request to the health board's Translation Service to prepare the text in the other language. The translated text is sent back to the editor responsible for placing it on the new page and publishing the corresponding Welsh and English pages simultaneously on the website.

7.1.14 Every time an editor publishes new content, an automatic warning is sent by e-mail to the Web Editor and E-Communications Manager so that they are able to monitor the standard to ensure that the guidelines have been followed correctly and that the content has been displayed simultaneously on the Welsh and English versions of the website. A record is kept of how often the editors edit the website and all edited text can be tracked, including deleted documents.

7.1.15 Using the same interface for pages in both languages facilitates the work of the editors, especially those with limited Welsh language skills. It also allows website users who are less confident about their Welsh language skills, but who choose to use the language, to change from one language to the other as required.

7.1.16 The responsibility for ensuring that the Welsh and English text on the website are consistent lies with the health board's Communication Specialist, who has Welsh language skills (Level 5).

7.1.17 The above officers, who work for the health board's Communications Team, work alongside the Welsh Language Team — Welsh Language Officers and Translators — who all have Welsh language skills (Level 5) to monitor and examine the web pages in order to update or modify them.

Links to other websites

7.1.18 When a link on the website takes the user to an external website, which is available in Welsh, the language choice continues when moving from one website to another, by linking with the Welsh language pages of the other website.

Ensuring high quality translations

7.1.19 The health board employs four full-time translators to meet all its Welsh and English translation requirements. All of the translators have Welsh language skills (Level 5). In order to ensure the quality and consistency of the translated text, Wordfast translation software is used (which ensures consistency with regard to the terms used). The translation team is responsible for translating all of the health board's public documents, including the text for the website.

7.2   Collaborative working

7.2.1   Examples were seen of collaboration between organizations in order to provide joint services and to undertake monitoring and continuous improvement work. There are numerous advantages to collaborating including financial savings, consistency in terms of the standard of service, improving quality and ensuring compliance.

7.2.2   One example of collaboration between organizations is Conwy County Borough Council's written translation service. The council provides a written translation service for Denbighshire, Wrexham and Flintshire councils as well as Cartrefi Conwy. Since the service level agreement was established in 2013, Wrexham and Flintshire councils have also agreed contracts for their written translation needs. Every council has agreed on a specific number of words for translation, based on data from previous years, with a leeway of 10% either way.

7.2.3   Every organization has a three year contract with Conwy Council, and the council meets with the organization at least once a year to discuss the service. Every organization's administrative arrangements are different. Denbighshire County Council uses the Proactis system which enables members of staff to order translation work themselves. Recently, Denbighshire Council has renewed the agreement for 2016 onwards. One specific officer is responsible for arranging the translation work on behalf of other officers at Wrexham County Borough Council, and the council also has one part-time translator. An administration team is responsible for arranging the translation work on behalf of other members of staff at Flintshire County Council, and the council also has two part-time translators.

Characteristics
Financial savings
7.2.4   The rates for translation work are lower than those previously paid.

7.2.5   One council stated that it made £20,000 worth of savings in the first year of implementing this system even though the number of words translated rose compared to the previous year.

Quality
7.2.6   The service ensures consistency in terms of the quality of work and how quickly it is returned, which has meant a drop in the number of complaints.

Consistency
7.2.7   As the translation service offers translation and proofreading, all services within the councils use the same group of translators which ensures more consistency in terms of accuracy and greater adherence to a corporate style.

7.2   Collaborative working

7.2.8   The types of documents translated vary extensively, from semi informal letters to advice reports and technical documents. By using the translation service, consistency can be ensured in terms of style and quality due to an understanding of local government terminology.

7.2.9   The service also uses a translation memory which means that text which has already been translated doesn't need to be translated again. This leads to consistency in terms of style and terms and means that more words can be translated in a shorter period of time.

Stability

7.2.10   Although there were initial difficulties with the service, there has been a definite improvement in the work of coordinating translation requests which has led to a far more consistent service.

7.2.11   The service prioritises translation work. For example, priority is given to press releases and, if the work is received by 14:00, the work is returned on the same day.

How can this work for other organizations?

7.2.12   Organizations in the same sector could benefit from establishing joint translation contracts with other organizations in the field or designating one centre to be responsible for translation work for a specific field. An agreement or arrangement of this kind could:

- lead to financial savings by jointly commissioning translation work and using a translation memory
- ensure consistency in terms of translation arrangements and the quality of the work
- ensure consistency in terms of accuracy, terminology, style and terms
- provide stability by reconciling the translation service and tailoring the service to meet the needs of the sector e.g. by prioritising specific documents.

7.3   Proactively offering a Welsh language service

7.3.1   Cwm Taf University Health Board offers Welsh-medium care on B2 general ward at Ysbyty Cwm Rhondda. The ward, which provides care mainly for long-term patients in need of rehabilitation, was established in order to proactively offer a Welsh language service. When patients are admitted to the community hospital, they are asked whether they wish to stay on this ward so that they can receive their care in their language of choice.

7.3.2   Arrangements are made to ensure that the Welsh language skills of staff attached to the ward — including porters, catering staff and vocational therapists — are sufficient to allow patients to receive all aspects of their care in their chosen language. Following a successful pilot phase, the ward has become a permanent part of the health board's provision and the initiative is being introduced in other hospitals.

Characteristics
Offering language choice

7.3.3   The B2 Ward initiative is an extension of the 'Dyma fi' scheme, which was introduced for dementia patients admitted to the hospital. A booklet was provided to the patient or their carer in order to collect information on the individual's needs, choices, likes and dislikes. This information was then shared with professionals in order to allow them to meet those needs, including linguistic needs.

7.3.4   A Welsh language service is now offered proactively to every patient when they are admitted to a general ward at the community hospital.

Recording individuals' language choice

7.3.5   Arrangements are in place to ensure that there is a record of individuals' language choice and that all members of staff are aware of it. This is done via the patient record, patient information chart, sign above the bed and/or notice boards on the ward.

Promoting availability of the Welsh language service

7.3.6   The Iaith Gwaith logo is used effectively on staff uniforms on B2 Ward to show patients and visitors that those members of staff speak Welsh.

7.3.7   Public awareness of the ward's Welsh language service was raised via local and national press coverage. Positive feedback from patients and their families was used to promote the initiative and there has also been coverage after the initiative was shortlisted for the Institute of Welsh Affairs Awards 2014 and after winning the Minister's Special Award in the Welsh Language in Health, Social Services and Social Care Awards 2015.

7.3 Proactively offering a Welsh language service

7.3.8 The initiative was promoted internally to staff in news items on the intranet, the Chief Executive's blog and the bulletin board on the intranet and a Welsh language notice board was placed on the ward for staff, patients and the public.

Providing all aspects of the service to individuals in their chosen language

7.3.9 Workforce planning lies at the heart of the health board's ability to provide healthcare to Welsh speakers in their chosen language on B2 Ward. This is done in an area not considered to be traditionally Welsh-speaking by making the best use of the current workforce's skills and resources.

7.3.10 The Welsh language skills of current staff members were analysed in order to identify those able to speak Welsh, placing them on the ward and providing Welsh language training to staff who wished to learn or improve their existing skills.

7.3.11 An action plan was produced and progress was monitored by the hospital's Senior Nurse and Ward manager. Staff from the health board's Welsh Language Unit meet with the Senior Nurse in charge of the ward on a regular basis in order to maintain the initiative. They also provide Welsh language training for hospital staff wishing to learn or improve their Welsh.

Awareness of patients' linguistic needs

7.3.12 Welsh language awareness training sessions are provided to existing staff and new members of staff as part of the rolling programme 'Creating a Culture of Care' and a Welsh language awareness session forms part of the corporate induction programme for new members of staff. Language awareness sessions were held for key members of staff at Ysbyty Cwm Rhondda as part of this initiative.

Strong leadership and the Welsh Language Team's approach

7.3.13 Cwm Taf's Welsh Language Group was established five years ago, a strategic group which meets on a regular basis every three months. The members include the Chair of the health board, who is also the Welsh Language Champion, the health board's Secretary who is also the Corporate Director, the Head of Corporate Services, the Director of Workforce and Organizational Development, a number of senior nurses, Welsh Language Unit staff and directorate representatives. Relevant information is cascaded to all directorate staff.

7.3   Proactively offering a Welsh language service

7.3.14   Staff from the Welsh Language Unit facilitate the work of the Welsh Language Group and maintain a working relationship with colleagues across the health board. A staff member from the health board's Welsh Language Unit is a member of the Workforce and Organizational Development Sub-group, the Champions Steering Group, the Equality Forum, the Stories for Improvement Group, the Website Steering Group and they attend Patient Experience Group meetings and Public Forums.

Sharing good practice across the organization

7.3.15   The health board's Welsh Language Unit has held sessions on the success of the initiative on Ward B2 at Ysbyty Cwm Rhondda with other departments. As a result, the health board is in the process of introducing the initiative on a ward at Ysbyty Cwm Cynon and Ysbyty George Thomas (a community hospital for long term Mental Health inpatients).

7.3.16   The health board has adopted a Bilingual Skills Strategy since April 2014 and there is ownership of the strategy at the highest level. The Workforce and Organizational Development/Welsh Sub-Group meets regularly.

7.3.17   The strategy focuses on the following:
- Auditing the Welsh language skills of the current workforce — finding out where Welsh speakers are located
- Assessing the need for Welsh language services — analyzing data in order to decide what Welsh language provision is needed to meet the needs of the local population
- Identifying current skills gaps — within specific departments and teams across the health board
- Bridging the skills gap — developing action plans with team managers; using creative methods of working with current Welsh speaking staff; providing training for staff to learn Welsh; recruiting Welsh speakers

In order to gain a wider understanding, on a national level, of some Welsh language services, thematic surveys were held during 2014-15 as an additional evidence-gathering tool. The Commissioner's thematic surveys have been targeted to address priorities and issues based on risk. They allow the Commissioner to gather detailed evidence on a specific topic. This section includes findings of surveys relating to assessing the impact of policy decisions and the linguistic requirements of new and vacant posts.

8.1 Assessing the linguistic outcomes of new policies and initiatives

8.1.1 The main objectives of the survey were:

- to produce short individual reports summarising the arrangements of the 26 organizations subject to the first round of the Commissioner's standards investigations in order to assess the impact of new policies and initiatives on the Welsh language and present conclusions based on the evidence collected
- to produce an overview considering whether the arrangements for impact assessment consider the policy's impact on the implementation of the language scheme, the situation of the Welsh language as a community language and opportunities for the public to use the Welsh language
- to present recommendations to the Commissioner on how the organizations should reinforce their Welsh language impact assessment processes.

8.1.2 Face to face interviews were conducted by Nico, on behalf of the Commissioner, with officers from the 26 organizations from 23 January to 17 March 2015. The officers ranged from language officers to heads of service and elected members. The organizations were given prior warning by the Commissioner and the interviews were based on a questionnaire provided by the Commissioner.

8.1.3 The survey did not examine organizations' compliance with their language schemes. The questions were based on the following three areas:

- Adequacy of process management arrangements
- Adequacy of impact assessment methodology/tool
- Adequacy of monitoring and reporting arrangements

8.1.4 In undertaking the work, it was considered that a Welsh language Impact Assessment had several aims in the context of policy development, which were:

- to provide assurance that the organization complies with a language scheme or, in due course, Welsh language standards
- to provide assurance that the organization ensures the continuation and growth of the Welsh language as a family, community, workplace language
- to provide assurance that the organization contributes to Welsh language strategies at a national level and in specific policy areas (e.g. A living language: a language for living; More Than Just Words).

8.1   Assessing the linguistic outcomes of new policies and initiatives

8.1.5   Consideration was given to the differences between organizations in terms of size and capacity and consequently their arrangements and resources.

8.1.6   Although flexibility is important within a policy impact assessment system, so too is consistency — not only in terms of the assurance it gives the organization with regard to undertaking the process across its services, but also so that the Commissioner can make a fair and commensurate judgement on the compliance of public authorities. The survey provided an opportunity to examine the consistency of systems and procedures, and the general conclusion from the evidence gathered is that there is a significant difference in approach.

Results

The methods of assessing the impact of policies on the Welsh language vary across the organizations in Wales, as well as the degree to which they meet the statutory requirements of Welsh language schemes.

The current processes tend to be insufficient in terms of giving the Welsh language prominence and robust guidance to enable officers to consider all the relevant factors when developing policy. Although there are various strengths and examples of effective practice, often strengths in certain areas are diluted by insufficiency in others.

The areas where there is a risk to policy decision assurance include: lack of formal connection between the language officer and the process; lack of detailed and specific training; lack of detailed guidance or advice to guide officers through the process and a lack of detailed guidance or advice for members, those ultimately responsible for the organization's decision-making; lack of transparency in terms of the template questions and the challenge faced by the officer, including management points within the process. One obvious area was the lack of formal (or informal) arrangements to monitor and evaluate a policy's impact on the Welsh language, particularly post-adoption.

The evidence shows that it is not always the case that larger organizations/better-resourced organizations have the most effective arrangements.

On the other hand, there are examples of existing procedures which are going in the right direction in terms of meeting the statutory requirements relating to the Welsh language.

Corporate Arrangements

8.1.7   In terms of process, it is common to include the Welsh language in the integrated/equality impact assessment. One organization has a separate procedure for assessing the impact of policies on the Welsh language, namely the Welsh Government. The remaining organizations have mainstreamed the Welsh language into integrated/equality impact assessments.

8.1.8   Organizations noted that the process did not always meet the need. Five of them conduct a more detailed impact assessment or a comprehensive study in specific cases where the Welsh language would be a prominent factor (e.g. planning; education). Others commission external experts to undertake this work or they work jointly with external partners.

Roles and responsibilities

8.1.9   Control points within the process vary across the organizations but, in general, accountability at the highest levels plays a fundamental role. The importance of targeting awareness training and guidance at senior managers and members was identified in this context. A small minority of organizations have officers specifically responsible for the Welsh language who have a role in terms of managing the process.

8.1.10 Although having a Welsh language committee, group or working group is common practice within organizations, it does not follow that assessing the impact of policies on the Welsh language or monitoring that regime is part of their remit.

Guidance, training, awareness

8.1.11 On the whole, officers responsible for conducting impact assessments within their organizations will receive training on the process. This training will usually involve equality impact assessments with the Welsh language identified as an additional 'characteristic'. There is no evidence that such training examines all the relevant factors, such as statutory requirements, the impact on Welsh speakers and communities or the link with wider strategies in terms of the Welsh language, in enough detail.

Guidance

8.1.12 It is common for organizations to provide guidance notes to accompany the impact assessment templates. However, the guidance given to officers on requirements relating to consideration of the Welsh language varies and, on the whole, very little information is provided in the guidance for officers on legislative implications, the needs of Welsh speakers or the relevance of wider strategies.

Methodologies and templates

8.1.13 Impact assessment methodology follows a similar pattern across the organizations as they follow general duty requirements on public sector organizations in Wales in accordance with the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. Therefore, there is a procedure in place to conduct an impact assessment and to record that process and publish the results.

8.1.14 Due to the nature of the template and organizations' desire to maintain a simple process, the Welsh language is included in the list of protected characteristics and there is no separate section or specific questions.

8.1.15 Although this is not common practice across Wales, a more detailed impact assessment on the Welsh language is conducted in specific cases. The main policy areas in question are education and planning and it is normal for an organization to commission external experts to undertake the work. The completed assessments examine the impact of policy development on the Welsh language and the community in detail, and they provide comprehensive evidence as the basis for robust decision-making.

Data and research

8.1.16 Organizations' data sources lack substance and the databases and evidence sources provided to officers completing impact assessments relating to the Welsh language are limited. It was noted that responsibility for finding relevant data sources lies with the specific service departments themselves, depending on the policy in question. There are examples of organizations providing summary factsheets and relevant links to local and national data sources and others depending on officers to ask for guidance and advice from the language officer.

Monitoring

8.1.17 On the whole, there is no specific procedure for monitoring and evaluating the impact of policies on the Welsh language post-adoption. Language officers will not, as such, undertake any formal or informal monitoring work, although there are cases when they will monitor developments in some areas. As only limited central records are held by organizations of all their impact assessments, it is not possible to conduct an overview of the impact of policies on the Welsh language. Such an overview would allow the organization to identify weak areas where Welsh language impact assessments are not effective, highlight trends or negative themes in policy areas which could justify the language officer's attention and advice or, of course, highlight best practice and lessons to be learnt.

The Commissioner's opinion

Organizations' current arrangements to assess the impact of their decision-making on the Welsh language are insufficient. The arrangements do not allow detailed assessment which addresses the range of relevant considerations. It is common practice within organizations to incorporate the Welsh language as part of the equality impact assessment. Very few organizations have identified that the need to increase the use of Welsh and implement purposeful planning actions means that the Welsh language must be considered differently to those protected characteristics which are to be treated equally.

Organizations should take steps to reinforce their arrangements in order to ensure that an assessment allows an organization to comply with its statutory linguistic requirements; to ensure that consideration is given to the continuation and growth of the Welsh language as a family, community and workplace language; and to ensure that the organization contributes to Welsh language strategies at a national level and in specific policy areas.

In addition, organizations should make arrangements to equip officers to conduct rigorous linguistic impact assessments, and set control points within the process to allow scrutiny and challenge decision-making promptly.

8.2   Assessing recruitment and selection practices: linguistic requirements of vacancies and new posts

8.2.1   A survey was held from November 2014 to March 2015 to collect information on the recruitment practices of 65 public sector organizations in terms of including Welsh language skills requirements when advertising vacancies and new posts. All of the organizations were already subject to statutory language duties. The work involved two steps.

Step 1

8.2.2   From November 2014 to February 2015, the Commissioner's officers collected information on the practices of health boards and NHS trusts in Wales.

Step 2

8.2.3   During February and March 2015, Old Bell 3 were commissioned to collect information on public sector organizations' recruitment practices within other sectors, including county councils and county borough councils, the higher and further education sectors and social housing providers. The practices of 55 organizations were surveyed during this step.

8.2.4   The survey findings allow the Commissioner to express her views on the effectiveness of public sector organizations' arrangements in ensuring that the linguistic skills requirements of new posts and vacancies are clear and meaningful during recruitment. They also allow the Commissioner to offer clear and practical recommendations to organizations in order to address any weaknesses which exist in terms of complying with Welsh language scheme commitments.

The methodology used

8.2.5   Information was collected on an organization's recruitment practices by checking the content of job advertisement pages on the organizations' websites or group websites, if they existed. Data was recorded on 1576 posts advertised during the survey's two stages.

8.2.6   Information was recorded on the recruitment practices of 10 organizations within the health sector by monitoring a sample of 661 posts advertised on the NHS Jobs website[18] between 21 November 2014 and 10 February 2015. Information was recorded on the linguistic skills requirements included in the advertisement, the job description and the person specification (if available).

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[18] The NHS Wales website states that NHS employers advertise the 'majority of their vacancies' on the 'NHS Jobs' website.

8.2 Assessing recruitment and selection practices: linguistic requirements of vacancies and new posts

8.2.7 Information was recorded on the recruitment practices of 55 public sector organizations that were included in the second stage of the survey by monitoring the content of websites between 2 February 2015 and 13 March 2015.[19] Information was recorded on the Welsh language skills requirements included in the advertisement, the job description and the person specification (if available).

8.2.8 The survey noted the language medium of recruitment materials, along with the quality of any information about the linguistic competency needed for the post — how clear and meaningful the requirements were, for the organization and the candidate.

8.2.9 An advertisement, person specification and job description were not available for every post — a total of 1574 advertisements, 1497 job descriptions and 1486 person specifications were checked.

Number of posts checked by sector

Sector	Number of organizations surveyed	Number of posts checked
Part 1		
Local Health Boards and NHS Trusts	10	661
Part 2		
County Councils and County Borough Councils	9	595
National Park Authorities	2	10
Police Authorities	3	16
Fire and Rescue Authorities	3	5
Higher Education	4	155
Further Education	10	53
Providers of Social Housing	19	51
Other National Organizations[20]	5	30
Total	65	1576

[19] The organizations' individual websites or the sector's group websites where available were used e.g. the FE sector.

[20] Welsh Government, National Assembly for Wales, National Association of Citizens Advice Bureaux, Sports Wales and the Care Council for Wales.

8.2 Assessing recruitment and selection practices: linguistic requirements of vacancies and new posts

Results

The survey shows that it is often difficult for individuals to find information on the Welsh language skills requirements of posts and when this is included, it is inconsistent. The information provided on the level of proficiency needed is also often unclear.

As the information on vacancies is not always up-to-date on the Welsh language 'job advertisement' pages of organizations' websites, an individual using Welsh language pages cannot rely on these and this, in turn, could lead to missing potential job opportunities.

Organizations' use of concise standard wording to describe Welsh language skills requirements, in a large percentage of their advertisements and job specifications, suggests that those organizations do not conduct a sufficient assessment of the requirements for specific posts.

No obvious trends were seen within sectors or geographical areas.

Thematic results

References to Welsh language skills requirements during recruitment

8.2.10 53.3% of job specifications included a reference to Welsh language skills requirements. Limited reference was made to the essential status of Welsh language skills requirements in the advertisements, person specifications and job descriptions checked.

Percentage of advertisements, person specifications and job descriptions including Welsh language skills requirements
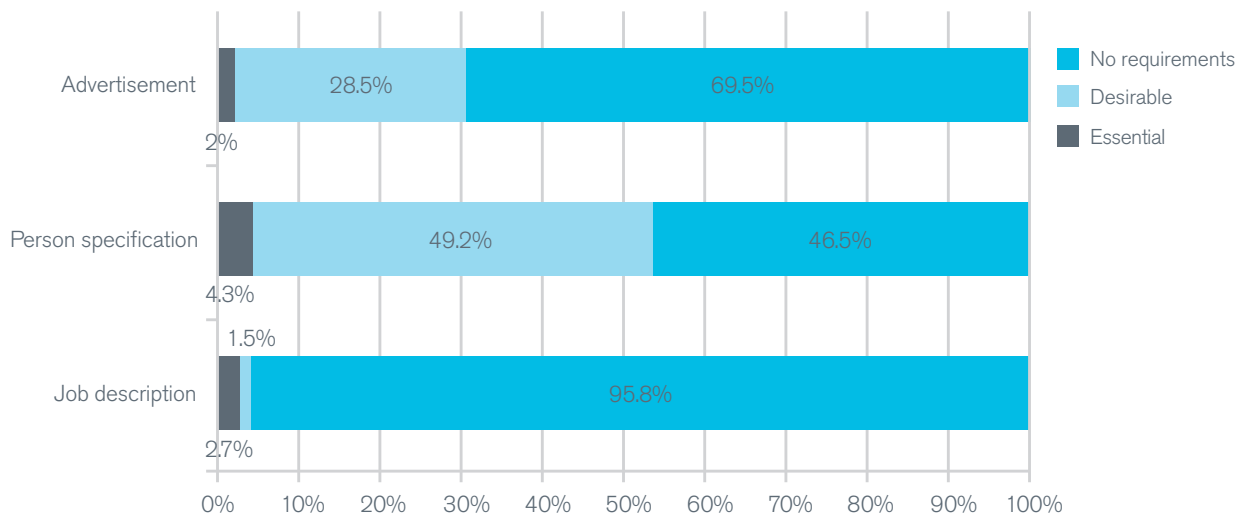
Advertisements

8.2.11 Of all the advertisements, 2% (31 posts) included essential status requirements and 28.5% (448 posts) included desirable status requirements.

8.2.12 In the health sector, six of the 659 advertisements verified (0.9%) included essential status linguistic requirements. Of the 595 council advertisements, 2% (12) included essential status linguistic requirements.

8.2.13 Six of the 65 organizations had included essential status Welsh language skills requirements in more than 10% of the posts advertised by them.

Thematic results

8.2.14 The percentage of advertisements including desirable status requirements varied significantly from one organization to the next and within sectors. Of the 659 advertisements checked within the health sector, 411 (62.4%) included desirable status linguistic requirements — the percentage varied significantly from one local health board to the next (from 6% to 99%).

8.2.15 Of the 595 posts checked in the case of county councils and county borough councils, 10 (1.7%) included desirable status linguistic requirements. Three councils had not included any Welsh language skills requirements in their job advertisements.

8.2.16 In the further education sector, three organizations had included Welsh language skills requirements in their job advertisements. Seven organizations made no reference to linguistic requirements.

8.2.17 In the social housing provider sector, 16 of the 19 organizations subject to this survey made no reference to the linguistic requirements of the job advertisements.

Person specifications and job descriptions

8.2.18 Of all the person specifications checked, 4.3% (64 posts) stated that Welsh language skills were of an essential status and 49.2% (731 posts) included desirable status requirements.

8.2.19 A total of 89% (40) of further education institutions' person specifications included essential or desirable status Welsh language skills requirements. Amongst the sectors less likely to include Welsh language skills requirements in the person specifications were the councils (31%), police authorities (28%) and social housing providers (18%).

Number and percentage of person specifications containing Welsh language skills requirements by sector

Sector	Person specifications including Welsh language skills requirements			
	Essential status		Desirable status	
	Number	Percentage	Number	Percentage
Part 1				
Health Boards and NHS Trusts	3	0.5%	451	68.4%
Part 2				
County Councils and County Borough Councils	43	7.9%	126	23.1%
National Park Authorities	0	0%	10	100%
Police Authorities	1	14.3%	1	14.3%
Fire and Rescue Authorities	0	0%	2	40%
Higher Education	6	4%	92	60.5%
Further Education	8	17.8%	32	71.1%
Providers of Social Housing	1	2.6%	6	15.8%
Other National Organizations	3	4.8%	18	29%

Thematic results

8.2.20 In terms of the county councils and county borough councils checked, one organization identified essential status requirements in 76.5% (26) of their person specifications. No essential status requirements were included in the advertisements of three councils and the desirable status requirements of those three councils ranged from 11% to 46%.

8.2.21 Of the 659 person specifications checked within the health sector, 3 (0.5%) included essential status Welsh language skills requirements. A total of 451 (69%) included desirable status linguistic requirements. Seven of the 10 health organizations had included desirable status linguistic requirements in over 70% of their person specifications.

Inconsistencies

8.2.22 The survey highlighted inconsistencies in the Welsh language requirements identified in the recruitment documents — the advertisement, job description and person specification.

8.2.23 Details regarding the Welsh language skills requirements of posts are more likely to be included in the person specification.

8.2.24 There were examples of posts where no mention was made of linguistic requirements in the advertisement although the person specification or job description stated that they were essential and that the candidate needed to possess a high level of skills in order to fulfil the role. For example, in the case of one local authority, 27 posts were advertised without any reference to Welsh language skills requirements in the advertisement although 24 (88.9%) of the relevant job descriptions stated that Welsh language skills were essential. Ten of the relevant person specifications included the requirements.

8.2.25 There were also examples to the contrary where job advertisements referred to essential or desirable status linguistic skills requirements but without referring to those skills in the relevant person specification or job description.

Describing Welsh language skills requirements

Standard wording

8.2.26 Organizations had a tendency to use concise standard wording in advertisements or person specifications which included desirable status Welsh language skills requirements, such as: 'The ability to speak Welsh is desirable for this post'. The organizations did not usually include further information to describe the competencies required to fulfil the specific role.

8.2.27 In the county councils and county borough councils sector, one council used the same person specification template for every post — where Welsh language skills had desirable status the standard wording 'Welsh Speaking — Desirable' was included in the specification without any further explanation. Another council had provided space to either tick a 'desirable' box or include a 'level' number in an 'essential' box in the communication section of the person specification (if Welsh/English oral and/or written skills were essential). It was reported that one council had used the standard wording that 'the ability to speak Welsh or a local ethnic language is desirable' in five of the 14 job advertisements which included a reference to desirable status Welsh language skills requirements.

8.2.28 In the further education sector, one organization had used the standard wording 'Level 1 Welsh language skills are desirable' in every job advertisement. Similarly, one health board had included the standard wording 'Whilst the ability to speak Welsh is not essential to this post, it is desirable and the successful applicant may be supported through the personal development plan process if they wish to develop an understanding of the language' in every job advertisement. No further information was provided on the nature of the requirements in the vast majority of the relevant person specifications.

Clarity regarding the nature of Welsh language skills requirements

8.2.29 Seven of the 65 organizations in the survey used the advertisement and recruitment documents to elaborate on the level of linguistic proficiency needed for posts where it was noted that Welsh language skills were essential or desirable.

8.2.30 One council included a 'linguistic requirements' section in every job advertisement and provided a Welsh language skills workplace assessment. This council had considered the nature of the necessary requirements and skills and they were described concisely and practically. For example:

> 'Spoken (Welsh): Basic conversation/information sharing, detailed discussion/interviewing/auditing, presentations, advocacy representation';

Describing Welsh language skills requirements

> 'Written (Welsh): record simple messages/emails, writing letters, preparing reports and public documents';

> 'Spoken Welsh skills (detailed discussion/interviewing auditing, presentations and advocacy/representation) and written Welsh skills (recording simple messages/emails, writing letters, and preparing reports and public documents) are required.'

8.2.31 Three posts advertised by one Local Authority stated that Level 1 Welsh language skills were desirable, and provided practical wording to explain what that meant exactly:

> 'greet, introduce and open and close conversations, say place names, first names and signs correctly, recognise departments, locations and ranks, give and receive personal details, open and close meetings and write simple requests.'

8.2.32 There was one example of an organization differentiating between linguistic requirements on a geographical level – an organization in the further education sector which operates across Wales. It was noted that the ability to speak, read and write Welsh fluently was desirable, but this was essential when the post was located in Gwynedd and Ceredigion.

8.2.33 Every post advertised by the Welsh Government included a specific 'Welsh language skills' section. For 10 of the 11 posts recorded, Welsh language skills were desirable or essential. It was noted that the line manager had produced a list of linguistic requirements and the details were provided, such as:

> 'the ability to read some words and basic phrases, the ability to conduct a basic conversation in Welsh, understand some basic conversation, and the ability to write basic messages on everyday topics' or 'the ability to understand all material in a work situation properly, speak Welsh fluently, understand conversations in every work situation, and prepare written materials for every work situation is essential to the post.'

Using levels to describe Welsh language skills requirements

8.2.34 Nine of the 65 organizations in the survey, across all sectors, used a 'levels' scale to describe the level of proficiency in terms of linguistic requirements, with two doing so consistently.

8.2.35 One organization in the higher education sector used 'standards A to E' when referring to Welsh language skills requirements and gave a practical explanation of the meaning of levels in the recruitment documents.

Describing Welsh language skills requirements

Including time constraints

8.2.36 Two of the 65 organizations in the survey — one council and one police authority — had set a timescale for candidates to meet Welsh language skills requirements for the posts advertised by them. For example, it was noted that Welsh language listening/speaking, reading and writing skills (Level 2), or reaching that level in two years, were required for one post being advertised and another Customer Support Contact role stated that candidates would 'need to reach Level 1 Speaking Welsh within three months of starting a role via training and assessment'.

Language medium of advertisements

8.2.37 On the 'NHS Jobs' website, five advertisements included information in Welsh on the requirements of the specific post. Although Welsh or English language versions of the 'NHS Jobs' website are offered, little Welsh language content is available in reality. Details specific to individual posts – such as job title, advertisement text, the job description and person specification, are usually in English.

8.2.38 Of the posts recorded in the second part of the survey, 52% were in Welsh (or bilingual). A total of 63% of council posts were advertised in Welsh (or bilingually) compared to 28% of posts in the higher and further education sectors and 4% in the social housing provider sector.

8.2.39 In the county council and county borough council sector, 4 of the 9 organizations advertised 100% of the posts in Welsh (or bilingually). Two organizations did not advertise any of their posts in Welsh.

8.2.40 In the further education sector, two of the 10 organizations which were included in the survey had advertised 100% of their posts in Welsh. Four of the organizations did not advertise any posts in Welsh or bilingually.

8.2.41 In the higher education sector, one of the four organizations advertised 100% of the posts in Welsh (or bilingually). Of the 125 posts advertised by the other three organizations within the sector, nine advertisements were available in Welsh (or bilingually).

Job recruitment websites

8.2.42 The survey highlighted the fact that organizations' Welsh language job advertisement page, if one was available, was routinely late in providing translations of documents, placing those individuals using Welsh- medium pages at a potential disadvantage.

Describing Welsh language skills requirements

8.2.43 One council listed every vacancy on the English job advertisement page of their website, but only some vacancies appeared on the Welsh version of the page. Another council did not offer a Welsh language link to their jobs page and only the job title appeared in Welsh in advertisements.

8.2.44 In another case of a council failing to advertise posts in Welsh the following message appeared on the Welsh job advertisement page:

'As information on posts changes so often, it is not possible for us to provide all the information in Welsh, unfortunately. Where the Welsh language is essential to a post, the details and application form, job description and personal specification are all available in Welsh on the Council's main jobs homepage'.

8.2.45 On the websites of two Police Authorities, all advertisements on the Welsh language job advertisement pages were in English only.

The Commissioner's opinion

I am concerned about the low numbers of vacancies and new posts identified as those where the Welsh language is an essential skill. It appears to me that a significant proportion of organizations do not assess the Welsh language skills requirements status of new posts and vacancies in an objective manner e.g. by looking at the ability of a team or office as well as individual posts.

I suggest that consideration should be given to the best way of describing linguistic requirements in recruitment material such as advertisements, person specifications and job descriptions and that the most effective approach should be used to explain the requirements clearly to candidates.

As a result of this survey, I will collect and share evidence from those organizations that have displayed good practice.

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