



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

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

Schedule 5(1): Public Authorities

(NHS Wales Informatics Service)

[Ref: 20151130ASAt5(1) - 1]

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1 Background and context

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011 ('the Measure'), is to promote and facilitate the use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the Commissioner's work:

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

On 24 March 2015, the Welsh Language Standards (No.1) Regulations 2015¹ were approved in the National Assembly for Wales' Plenary Session. These standards were developed to impose duties upon county councils and county borough councils in Wales, national park authorities and Welsh Ministers. All references to standards in this standards report refer to the standards specified in the above regulations.

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

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

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

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

¹ <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

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

2 Standards investigation in relation to Schedule 5(1): Public Authorities

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

- Schedule 5(1): Public Authorities

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

- NHS Wales Informatics Service

An exploration notice is a notice in writing stating the Welsh Language Commissioner's intention to carry out a standards investigation, and which specifies the subject matter of the standards investigation. The Commissioner may not carry out a standards investigation unless she has given an exploration notice to each relevant person (organization), at least 14 days before beginning the investigation.

The subject matter of this standards investigation was to determine:

- whether the person should be liable to be required to comply with standards;
- if the person is within Schedule 6, determine what standards (if any) should be potentially applicable to each relevant person within the group;
- what standards (if any) should be specifically applicable to the person (whether or not the standards are already specified by the Welsh Ministers under section 26(1)).

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

As part of this standards investigation, information was collected from NHS Wales Informatics Service. This was by means of a completed questionnaire. Evidence was also collected from the Advisory Panel and the public.

A public questionnaire was placed on the Welsh Language Commissioner's website. The purpose of this questionnaire was to give members of the public an opportunity to identify what they felt was reasonable for the relevant persons to undertake and provide in Welsh, in considering the requirements related to the standards specified in regulations on 24 March 2015. Advertisements were placed in the national press during the period of the standards investigation in order to make the public aware of this questionnaire. Furthermore, a video was posted on the Commissioner's website in order to provide an introduction to the process, and to provide guidance to the public on how to respond to the standards investigation.

3 Reasonableness and proportionality

In accordance with section 63(1) of the Measure, the Commissioner must have regard to the need to secure that requirements for persons to comply with standards by virtue of section 25(1) are not unreasonable or disproportionate.

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

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

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

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

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

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

By making regulations under this Measure exercisable by statutory instrument, the Commissioner is authorised to give a compliance notice to a person.

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

- (a) sets out, or refers to, one or more standards specified by the Welsh Ministers under section 26(1), and
- (b) requires a person to comply with the standard or standards set out or referred to.

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

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

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

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

The Welsh Language Commissioner's criteria

In reaching a conclusion on the subject of this standards investigation, in accordance with the requirements outlined in Part 4, Chapter 8 of the Measure, the following criteria were considered alongside the evidence received as part of the standards investigation. Each criterion need not be considered in each case, and no criterion is of more importance than any other.

- Is the relevant person liable to be required to comply with standards – does the relevant person come within Schedule 5 and also within Schedule 6, or do they come within Schedule 7 and also within Schedule 8?
- Is the class of standard (service delivery; policy making; operational; record keeping; promotion) potentially applicable to the relevant person?
- Does the relevant person carry out the activity³ in question?
- Has the relevant person already undertaken to provide the activity or action in question, in part or in full, via their Welsh language scheme?
- Does the relevant person already provide the service in Welsh (whether this corresponds exactly to the requirements included in the standard or not), or carry out the activity in accordance with the standard?
- Do the vast majority of other relevant persons within the same sector provide the service in Welsh, or carry out the activity?
- Are there any other reasons, for or against, making the standard specifically applicable to the relevant person?

³ This criterion will be considered in respect of service delivery standards only.

4 Evidence received from the relevant person

Evidence was received from NHS Wales Informatics Service. This evidence included responses to 199 questionnaire questions.

Regular meetings were held between the Welsh Language Commissioner's officers to analyse evidence received from NHS Wales Informatics Service as part of the standards investigation, together with the current commitments of their Welsh language scheme.

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

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

A summary of the evidence received from NHS Wales Informatics Service is given in section 4 of this report. The evidence submitted included information regarding which activities are carried out by the persons in question, which activities they carry out through the medium of Welsh and to what extent they can comply with the standards.

NHS Wales Informatics Service works under contract with the Velindre NHS Trust and provides informatics services to NHS Wales. It is noted that NHS Wales Informatics Service is subject to the Welsh language scheme of the Velindre NHS Trust. The present language scheme of the Velindre NHS Trust was approved by the Welsh Language Board under section 14(1) 1993 Welsh Language Act on 20 April 2010.

It is noted in their Welsh language scheme:

From 1 April 2010, the Velindre NHS Trust will be hosting the newly formed 'NHS Wales Informatics Service', which will bring together the following organizations:

- Informing Healthcare (IHC);*
- Health Solutions Wales (HSW);*
- Business Services Centre (BSC) IM & T function;*
- Primary Care Informatics Programme (PCIP);*

- *Corporate Health Information Programme (CHIP)*.⁴

This standards report makes specific reference to the Welsh language scheme of the Velindre NHS Trust.

NHS Wales Informatics Service

Activity 1: Correspondence sent by a body Standards relating to correspondence sent by a body [1-7]

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh. It was noted that they would make every effort to respond in Welsh to any correspondence sent to them in Welsh.

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

However, NHS Wales Informatics Service noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate. It was explained that it was not their current practice to interact directly with the public and that they only did so at the request of NHS Wales in developing service. Wales NHS Informatics Service noted that they already complied with standards 4 and 6, ensuring that any correspondence sent to a number of persons in Wales was bilingual.

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

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh. It was noted that the main switchboard provided a greeting in Welsh on the telephone, but that this is not regular practice in other departments.

In analysing the current Welsh language commitments of the person in question, on average, the commitments corresponded, whether partly or in full, to 68% of the standards relating to telephone calls made and received by a body.

However, NHS Wales Informatics Service noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate. Due to the specialist technical support offered to NHS Wales, it was foreseen that it would not be possible to provide a full service through the medium of Welsh. It was noted, however, that it would be possible to comply with standard 20 with further training.

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

⁴ <http://www.wales.nhs.uk/sitesplus/972/dogfen/175881>

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NHS Wales Informatics Service noted that they carried out the activity in question, but that they did not do so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, on average, the commitments corresponded, whether partly or in full, to 39% of the standards relating to meetings held that are not open to the general public.

NHS Wales Informatics Service noted that they did not hold meetings through the medium of Welsh and that any contact with service users was currently through the medium of English.

As a result, they considered that making these standards specifically applicable to them as unreasonable and disproportionate.

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

NHS Wales Informatics Service noted that they did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to each one the standards relating to meetings arranged by a body that are open to the public.

It was noted that this activity was not relevant to it as engagement with the public was carried out by NHS Wales health boards. Therefore, NHS Wales Informatics Service noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

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

NHS Wales Informatics Service noted that they did not carry out the activity in question.

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

It was noted that this activity was not relevant to it as public events were held by NHS Wales health boards. Therefore, NHS Wales Informatics Service noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

Activity 6: A body's publicity and advertising **Standard relating to a body's publicity and advertising [37]**

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

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

NHS Wales Informatics Service stated that the majority of the material available to patients was translated into Welsh. Therefore, they stated that they considered it reasonable and proportionate to make these standards specifically applicable to them.

**Activity 7: A body displaying material in public
Standards relating to a body displaying material in public [38-39]**

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

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

It was noted that standard banners used at events directly involving service users in Wales were bilingual.

NHS Wales Informatics Service considered making these standards specifically applicable to them to be reasonable and proportionate.

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

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

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

It was noted that documents that are available to the public are translated and that internal documents are not translated in all cases, but that there was a system in place should it be necessary to do so.

NHS Wales Informatics Service noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate. It was stated that they do not hold 'public' board meetings and that none of their Boards produce papers through the medium of Welsh at present.

It should be noted that the Welsh Language Standards (No.1) Regulations 2015 do not refer to the need for board meetings within standard 41 to be 'public' ones. In accordance with standard 41, if a person creates the documents outlined in sub-sections (a-b), they must be drawn up in Welsh.

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

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NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

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

NHS Wales Informatics Service confirmed that they considered that making these standards specifically applicable to them would be reasonable and proportionate. It was noted that paper forms produced for public use were bilingual and that the IT systems provided by NHS Wales Informatics Service enabled bilingual letters to be produced. It is noted in the evidence that NHS Wales Informatics Service does not send forms to the public and that its function is to provide the IT system to enable other health bodies to do so. It was confirmed that it was the local health boards or trusts that were responsible for the content and language of these forms.

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

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

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

It was stated that the majority of its websites and on-line services that were available to the public were available through the medium of Welsh. However, it was noted that some of the on-line services, for example statistical information services, were not currently available in Welsh. NHS Wales Informatics Service confirmed that they considered that making these standards specifically applicable to them would be reasonable and proportionate.

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

NHS Wales Informatics Service noted that they carried out the activity in question, but that they did not do so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to each one of the standards relating to a body's use of social media.

NHS Wales Informatics Service stated that this activity is carried out through the medium of Welsh by asking Welsh-speaking staff to help with providing responses, but that this is not regular practice. As a result, they noted that they considered making these standards specifically applicable to them would be unreasonable and disproportionate.

Activity 12: Self-service machines **Standard relating to self-service machines [60]**

NHS Wales Informatics Service noted that they did not carry out the activity in question.

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

NHS Wales Informatics Service was of the opinion that this activity was not relevant to it and noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

**Activity 13: Signs displayed by a body
Standards relating to signs displayed by a body [61-63]**

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

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

NHS Wales Informatics Service stated that all its permanent external signs were displayed bilingually, with the Welsh appearing first.

NHS Wales Informatics Service confirmed that they considered that making these standards specifically applicable to them would be reasonable and proportionate.

**Activity 14: A body receiving visitors at its buildings
Standards relating to a body receiving visitors at its buildings [64-68]**

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 83% of the standards relating to a body receiving visitors at its buildings.

NHS Wales Informatics Service confirmed in the context of standard 64, that reception services were not provided through the medium of Welsh as a matter of course, but that it was possible for reception staff to contact Welsh-speaking staff to help with that service when necessary. Due to the limited number of staff and the high level of visitors to the reception area, they noted that it would not be possible for them to comply with standards 65 and 65A. However, they did not foresee any difficulty in complying with standards 66, 67 and 68 and stated that it would be possible to make arrangements to comply where they did not do so at present.

It was stated that, as a result of the lack of ability to comply with two of the standards, they considered that making these standards specifically applicable to them was unreasonable and disproportionate.

**Activity 15: Official notices made by a body
Standards relating to official notices made by a body [69-70]**

NHS Wales Informatics Service noted that they did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 50% of the standards relating to official notices made a body.

NHS Wales Informatics Service was of the opinion that this activity was not relevant to them and noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

In Part 3, Schedule 1, Welsh Language Standards (No. 1) Regulations 2015, 'official notices' are defined as:

any notice that a body publishes to inform persons about service delivery activities or changes to the body's service delivery activities, but it does not include official notices prescribed by an enactment.

Activity 16: A body awarding grants

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

NHS Wales Informatics Service noted that they did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 83% of the standards relating to a body awarding grants.

NHS Wales Informatics Service was of the opinion that this activity was not relevant to them and noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

Activity 17: A body awarding contracts

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

NHS Wales Informatics Service noted that they carried out the activity in question, but that they did not do so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 83% of the standards relating to a body awarding contracts.

It was stated that they considered that making this standard specifically applicable to them would be unreasonable and disproportionate, as they do not currently carry out the activity through the medium of Welsh. It was also noted that the cost of translating these documents would be very high.

Activity 18: Raising awareness about Welsh language services provided by a body

Standards for raising awareness about Welsh language services provided by a body [81-82]

NHS Wales Informatics Service noted that they did not carry out the activity in question.

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

NHS Wales Informatics Service was of the opinion that these standards were not relevant to them. It was noted that they did not provide any services directly for the public, and that, rather, they provided IT systems or information to other NHS organizations. Therefore, NHS Wales Informatics Service considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

The Commissioner emphasizes that the requirements of these standards are not limited solely to contact with the public and that organizations have a duty to raise awareness of any Welsh language service provided by an organization to persons.

Activity 19: A body's corporate identity
Standard relating to a body's corporate identity [83]

NHS Wales Informatics Service noted that they carried out the activity in question, and did so through the medium of Welsh.

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to the standard relating to a body's corporate identity.

NHS Wales Informatics Service emphasized that it provided bilingual versions of all its corporate material including its logo and headed paper and that it ensured that the Welsh and English languages were treated with equality. Thus they considered that it would be reasonable and proportionate to make these standards specifically applicable to them.

Activity 20: Courses offered by a body
Standards relating to courses offered by a body [84-86]

NHS Wales Informatics Service noted that they did not carry out the activity in question.

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

NHS Wales Informatics Service did not consider these standards to be relevant to them, and thus they considered that making them specifically applicable to them would be unreasonable and disproportionate.

In Part 3, Schedule 1, Welsh Language Standards (No. 1) Regulations 2015, an 'education course' is referred to as:

any seminar, training, workshop or similar provision which is provided in order to educate or improve the skills of members of the public

**Activity 21: Public address systems used by a body
Standard relating to public address systems used by a body [87]**

NHS Wales Informatics Service noted that they did not carry out the activity in question.

In analysing the current Welsh language scheme commitments of the person in question, the commitments did not correspond to the standard relating to public address systems used by a body.

NHS Wales Informatics Service did not consider these standards to be relevant to them, and thus they considered that making them specifically applicable to them would be unreasonable and disproportionate.

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

NHS Wales Informatics Service emphasized that it was not a body that dealt with the public and that their offices were not open to the public.

NHS Wales Informatics Service noted that they already complied with standards 158 and 160 and that it would be possible to comply with standard 156 as a complaints procedure was already in force. It was explained that the complaints process was not published on-line at present, but it would be possible to do so in future.

They stated that they were of the opinion that the other standards were not relevant and went on to note that it was not possible for them to publicize the service delivery standards - they could not be displayed as none of their offices were open to the public.

Following the specifying of standards that deal with supplementary matters under section 26 of the Measure, there would be a duty upon NHS Wales Informatics Service to give publicity to any service delivery standards with which they were required to comply.

NHS Wales Informatics Service noted that they considered that making these standards specifically applicable to them would be unreasonable and disproportionate.

Policy making standards

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

NHS Wales Informatics Service stated that the organization used the policies of the Velindre NHS Health Authority and that the effects of any policy on the Welsh language was assessed by means of equality impact assessments. When policies are created by NHS Wales Informatics Service, it was noted that they were similarly

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assessed by means of an internal system. By virtue of the IT services they provided, it was stated that the impact on the Welsh language had been considered in the past per system, but that this had been formalized by means of a new assurance process.

NHS Wales Informatics Service noted that they consulted on policy decisions but did not have a policy on awarding grants.

NHS Wales Informatics Service considered that making these standards specifically applicable to them would be unreasonable and disproportionate. It was noted that they were unsure regarding the scope of the interpretation of 'policy' beyond what was noted as the definition of 'policy decision' in Part 2, Schedule 2, Welsh Language Standards Regulations (Number 1) 2015. A policy decision is defined as:

- ..any decision made by a body about the exercise of its functions or about the conduct of its business or other undertaking, and it includes, amongst other things (and as appropriate to the body), decisions about-*
- (a) the content of legislation;*
 - (b) the exercise of statutory powers;*
 - (c) the content of policy statements;*
 - (ch) strategies or strategic plans;*
 - (d) internal structures.*

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

NHS Wales Informatics Service noted that they could comply with all standards, except standard 161, as they did not consider that this standard was relevant to them.

Following the specifying of standards that deal with supplementary matters under section 26 of the Measure, there would be a duty upon NHS Wales Informatics Service to publicize any policy making standards with which they were required to comply.

NHS Wales Informatics Service confirmed that they considered that making these standards specifically applicable to them would be reasonable and proportionate.

Operational standards [98-144]

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

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

Bearing in mind the requirements of standard 98, NHS Wales Informatics Service confirmed that they implemented a policy on the use of the Welsh language internally, and that this policy had been published on the intranet.

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NHS Wales Informatics Service stated that not all the documents noted in standards 99-104 were currently provided in Welsh. This was reinforced by stating that they did not make an offer to employees regarding whether they would wish to receive the documents in question in Welsh.

Similarly, they confirmed that none of the policies noted in standards 105-111 were published in Welsh and that these documents were currently in English.

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

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 20% of the standards relating to complaints made by a member of a body's staff.

NHS Wales Informatics Service confirmed that they allowed members of staff to make complaints in Welsh and also respond in Welsh to any complaint. Similarly, it was noted that they informed staff of this.

It was noted that it was not current practice for them to hold meetings regarding complaints in Welsh or to provide a simultaneous translation service for them.

They went on to note that they held such internal meetings through the medium of English, but that staff are encouraged to make a complaint in Welsh if that is their wish.

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

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 20% of the standards relating to a body disciplining staff.

Considering the requirements attached to standards 116-119, NHS Wales Informatics Service noted that they allowed members of staff to respond in Welsh to allegations made against them through the internal disciplinary process, and that they also informed staff that it was possible to do this in Welsh.

When they arrange a meeting regarding disciplinary action against a member of staff, they do not ask staff whether they would prefer to hold the meeting in Welsh, nor do they ask staff whether they would like to use the Welsh language at the meeting. It was noted, however, that a simultaneous translation service was used at those meetings.

Furthermore, it was noted that NHS Wales Informatics Service did not currently inform members of staff in Welsh of their decision following disciplinary action against them. However, they were of the opinion that it would be possible for them to comply with standard 119.

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

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 14% of the

standards relating to information technology and support materials provided by a body, and relating to the intranet.

NHS Wales Informatics Service noted that it was current practice to provide computer software to check grammar and spelling in Welsh to employees and workers, but that they did not provide software interfaces in Welsh.

It was confirmed that they operated an intranet system, but that it was not currently available in Welsh. It was stated that it would be reasonable to translate the newsfeed items on the intranet, but that they were of the opinion that standards 121-124 in their entirety were not reasonable and proportionate. It was noted that it would be possible to comply with standards 120, 125 and 126.

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

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

NHS Wales Informatics Service noted that they did not assess the Welsh language skills of their employees. This contradicted the evidence received in relation to the record keeping standards for standards 147-154, where it was stated that the language skills of employees were noted.

In responding to the requirements associated with standards 128-129, NHS Wales Informatics Service noted that it was not current practice to provide Welsh language training in the areas in question. However, it was noted that provision was available for its employees to receive basic Welsh lessons during working hours. Further to the receipt of adequate requests, it was confirmed that three courses had been held during recent years.

NHS Wales Informatics Service did not comply with a number of the requirements attached to standards 130-131. It was noted that they did not provide opportunities for their employees and workers who are responsible for managing people to receive training on use of the Welsh language in their role as managers, nor did they provide opportunities for staff to receive further training following completion of Welsh lessons. It was confirmed that the organization was currently researching this provision in order to possibly offer it in the future.

It was confirmed that NHS Wales Informatics Service did not provide training courses for staff to develop awareness of the Welsh language or training in order for them to develop an understanding of the requirements upon the organization to implement its Welsh language scheme, or the way in which Welsh could be used in the workplace.

In relation to standards 134-135, it was noted that they did not provide logo wording for the e-mail messages of employees and/or workers in order to enable them to denote whether they speak Welsh fluently or that they are learning the language. However, it was noted that staff contact details in e-mail messages, together with staff e-mail messages noting their unavailability to answer messages, were in Welsh.

Standards relating to recruiting and appointing [136-140]

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to 88% of the standards relating to recruiting and appointing.

It was noted by NHS Wales Informatics Service that all posts advertised during the last year referred to the Welsh language as a desirable skill.

In relation to standard 137A, it was confirmed that job application forms, explanatory material and information regarding interviews or other assessment methods were provided in Welsh, but that job descriptions, however, were provided in English only at present.

It was noted that they did state that individuals were welcome to apply for a post in Welsh, and that an application submitted in Welsh would not be treated less favourably than an application in English. It was confirmed, however, that application forms did not provide space for the applicant to note that he/she would like to have an interview or an assessment in Welsh, nor did they inform the applicant regarding the decision in Welsh, when the job application was made in Welsh.

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

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

NHS Wales Informatics Service confirmed that no Welsh was used on the signs that are displayed within their buildings.

Standard relating to audio announcements and messages in a body's workplace [144]

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

NHS Wales Informatics Service noted that no announcements were currently made over an audio system within the organisation's workplace.

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

NHS Wales Informatics Service confirmed that the activities within these standards were not current practice, but that it would be possible to aim towards this in the future. It was emphasized that a translation service would be required to ensure compliance with these standards.

NHS Wales Informatics Service noted that they considered that making the standards that deal with supplementary matters in relation to operational standards specifically applicable to them would be reasonable and proportionate.

Promotion standards [145-146]

NHS Wales Informatics Service did not wish to consent to promotion standards being potentially applicable to them.

Record keeping standards [147-154]

In analysing the current Welsh language scheme commitments of the person in question, the commitments corresponded, whether partly or in full, to each one of the record keeping standards.

NHS Wales Informatics Service stated that it had a number of policies already in force for ensuring that record keeping standards were achieved. It was noted that the Welsh language skills of employees were noted on staff electronic records but that it was not currently mandatory practice for staff to do this.

NHS Wales Informatics Service confirmed that they considered that making the record keeping standards specifically applicable to them would be reasonable and proportionate.

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

NHS Wales Informatics Service noted that they considered that making the standards that deal with supplementary matters in relation to record keeping standards specifically applicable to them would be reasonable and proportionate.

5 Evidence received from members of the public

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

A further 78 responses were received based on a template of a standard response published by Cymdeithas yr Iaith Gymraeg; in this case, all of the responses were the same. In six cases, responses were received from individuals twice. Two responses were received from other organizations or movements.⁵ The Commissioner has noted every response received.

A full list of respondents who were willing for their responses to be published can be seen in Appendix B.

Figure 1 indicates where the respondents came from according to their group and geographical location.

Figure 1 Number of responses to the standards investigation by location⁶

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

⁵ A list of those movements/organizations has been included within Appendix B of the standards report.

⁶ These statistics include all the responses received via the questionnaire, as well as Cymdeithas yr Iaith Gymraeg's template.

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Rhondda Cynon Taf	3	2%
Pembrokeshire	4	2%
Denbighshire	10	6%
Monmouthshire	2	1%
Carmarthenshire	4	2%
Flintshire	4	2%
Torfaen	2	1%
Wrexham	8	5%
Isle of Anglesey	13	8%
Outside Wales	5	3%
No information	4	2%
Total	172	100%

The public's response to the standards investigation carried out in relation to schedule 5(1) persons - public authorities

Service delivery standards

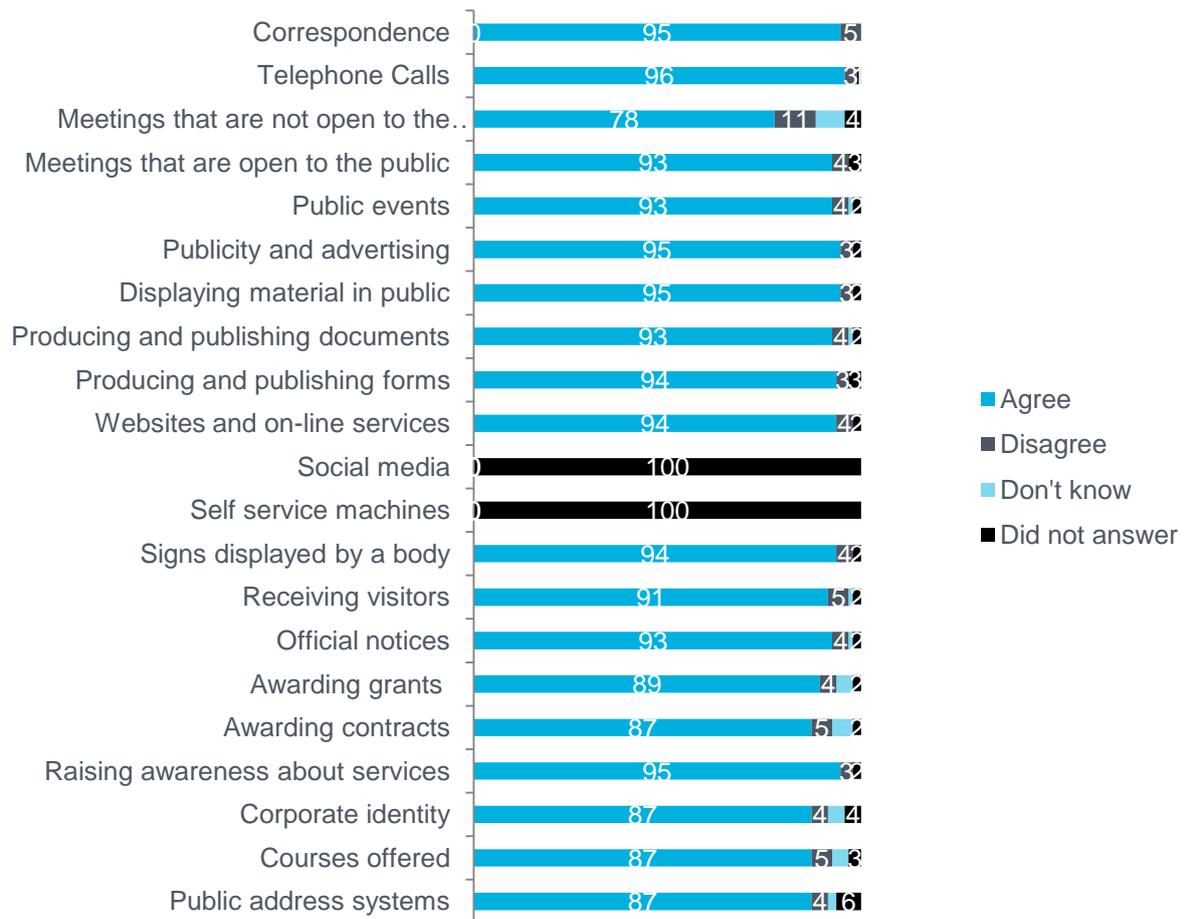
In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the service delivery standards, they were asked to respond to the following question for each activity:

Do you agree or disagree that the organizations in question should carry out service delivery standards activities in the Welsh language, in order to enable you as a member of the public to use the Welsh language in the following situations?

In answering this question, the public were given the opportunity to respond per activity within the scope of the service delivery standards.

Figure 2 indicates the variety of the responses received.

Figure 2 Response to question 1 of the questionnaire – Service delivery standards⁷



Policy making standards

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

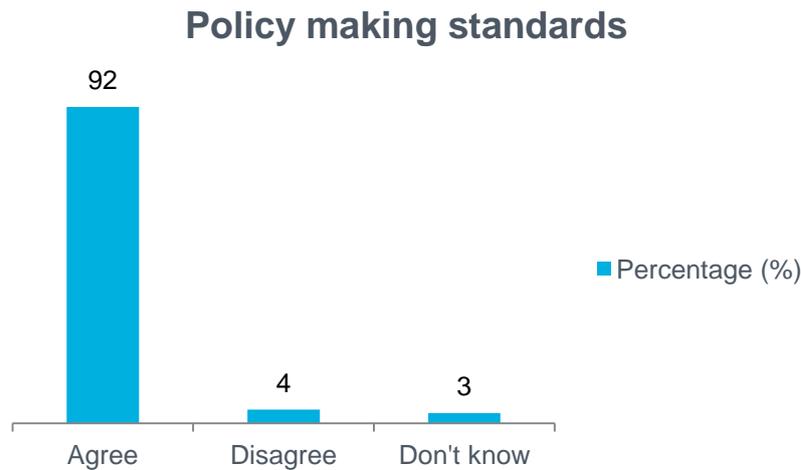
Do you agree or disagree that the policy decisions of the organizations in question should improve the opportunities for you to use the Welsh language and ensure better treatment for the Welsh language?

Of the 94 that responded via the questionnaire on the Welsh Language Commissioner's website, 97% (91) had answered this question. Of the 91 that responded, 92% (84) agreed with the above.

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

⁷ Questions were not asked in relation to social media nor self-service machines.

Figure 3 Response to question 3 of the questionnaire – Policy making standards⁸



Operational standards

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

Do you agree or disagree that the organizations in question should have to facilitate the use of the Welsh language in accordance with the operational standards?

Of the 94 that responded via the questionnaire on the Commissioner's website, 98% (92) had answered this question. Of the 92 that responded, 93% (86) agreed with the above.

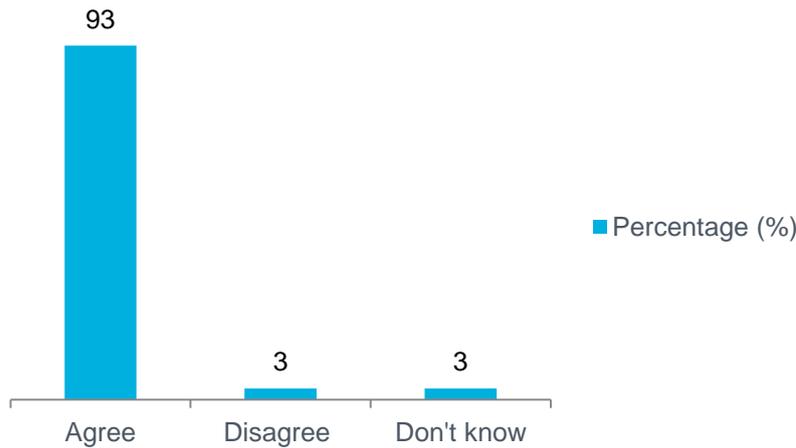
The figure below indicates how members of the public responded to this question:

Figure 4 Response to question 4 of the questionnaire – Operational standards⁹

⁸ Note that these statistics relate to the respondents who answered this question.

⁹ Note that these statistics relate to the respondents who answered this question.

Operational standards



Record keeping standards

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

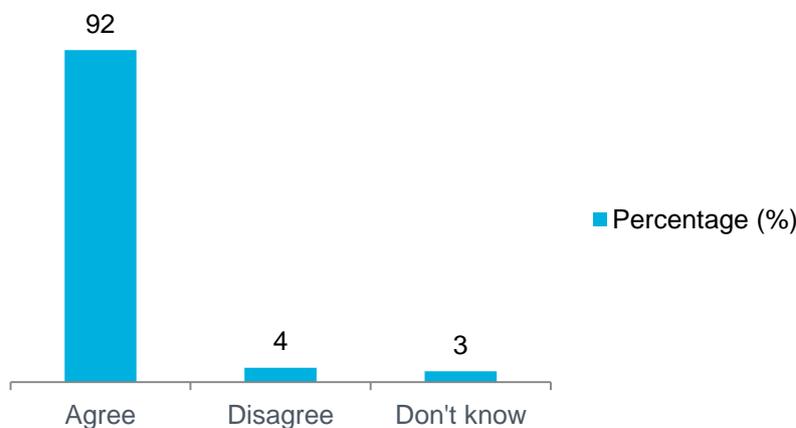
Do you agree or disagree that the organizations in question should have to keep a record of how they adhere to the Welsh language standards and keep a record of complaints?

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

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

Figure 5 Response to question 5 of the questionnaire – Record keeping standards¹⁰

Record keeping standards



¹⁰ Note that these statistics relate to the respondents who answered this question.

Further comments

As well as providing responses to specific questions on the subject of the standards investigation, the public were given the opportunity to note any additional standards they believed should be specified and made specifically applicable to the relevant persons in question, together with any further comments relevant to this standards investigation.

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

Figure 6 Further comments provided by members of the public



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

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

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

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

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- The need to specify a standard that imposes clear requirements for organizations' recruitment policies.

Some responses were received from members of the public expressing general opposition to language duties.

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

- The need to consider the current economic climate and how public money is spent in Wales.
- Prioritise other policy areas over the Welsh language.
- The relevance of the Welsh language in Wales.
- Disagreement with the requirement that Welsh should appear or be published first.
- The bureaucracy of the requirements.

Service delivery standards

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

However, one respondent believed that the standards as drafted were impractical in areas where Welsh is the majority language. Likewise, some comments were received stating that the Welsh service should only be provided on request, due to environmental and economic reasons.

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

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

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

based on the target audience, and others felt that these documents should only be produced in Welsh on request.

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

With regard to websites and on-line services provided by round 3 organizations, there was broad support in general for bilingual websites, given the increase in services offered through this medium by now, with some cases where those services are only available through that medium.

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

Policy making standards

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

Operational standards

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

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

Record keeping standards

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

6 Evidence received by the Welsh Language Commissioner's Advisory Panel

Evidence was received from the Advisory Panel in accordance with the requirements outlined in section 63(3) of the Welsh Language (Wales) Measure 2011.

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

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

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

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

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

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

7 Conclusions of the standards investigation

As noted in section 4 of this standards report, as part of their response to the standards investigation the person in question noted that they worked under contract with the Velindre NHS Trust. It was noted that NHS Wales Informatics Service was subject to the Welsh language scheme of the Velindre NHS Trust.

A comment was made by Welsh Ministers in the document entitled 'The Welsh Ministers' Response to the Welsh Language Commissioner's second standards investigation reports', regarding NHS Wales Shared Services Partnership, which has a similar legal status to NHS Wales Informatics Service. It was noted in the response that Welsh Ministers would not make the standards specifically applicable to this relevant person for the following reasons:

it is not a separate legal entity and is part of the Velindre NHS Trust. The shared services activities will therefore be caught by any standards imposed on Velindre NHS Trust (subject to the provisions of their compliance notice).¹¹

In coming to the conclusions below the Welsh Language Commissioner has exercised her functions based on the evidence of the person in question and on the contents of Schedule 5(1) of the Measure.

Conclusion 1: In specifying standards in regulations to the person in question, the Welsh Language Commissioner has concluded that Welsh Ministers ensure clarity regarding the degree to which standards imposed on the Velindre NHS Trust are applicable to NHS Wales Informatics Service.

General comments

The following conclusions were reached on the basis of the evidence received from the relevant person and the Advisory Panel on the subject matter of the standards investigation, along with independent evidence collected by the Welsh Language Commissioner in the context of the language scheme of NHS Wales Informatics Service.

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

Similarly, we note that section 42 of the Measure imposes a duty on Welsh Ministers to ensure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to a person if, and to the extent that, the person carries out those activities.

¹¹ <http://gov.wales/docs/dcells/publications/151019-second-standards-investigations-en.pdf>

However, it should be noted that they do not have to do so if the Commissioner indicates in a standards report, or if Welsh Ministers are of the opinion, that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity. It should be noted that this section in the Measure does not prevent regulations under section 39 from providing for other service delivery standards to be specifically applicable to a person.

In accordance with the above, if the standards investigation shows that a person undertakes the activity¹², be that to a lesser or a greater degree, the Welsh Language Commissioner will conclude that all standards relating to that activity should be made specifically applicable to them. These conclusions were reached due to the fact that the standards specified by the Welsh Government are interdependent of each other within the scope of the activity.

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

However, where evidence exists that a person does not carry out an activity at all, whether by means of evidence acquired as part of the standards investigation, or by other means, the Welsh Language Commissioner will conclude that standards in relation to that activity should not be specifically applicable to them, unless there are valid reasons for doing so. This was reinforced by the Welsh Ministers' response to the reports and conclusions of the Welsh Language Commissioner in relation to round 2 of her standards investigations, published in October 2015 and which notes the following:

*The Commissioner also concludes that if at least one organisation within a sector has identified that they undertake an activity, the draft standards relating to that activity should be specifically applicable to all organisations within that sector. The Welsh Ministers support this approach as it follows a precedent established in the first set of Regulations, which made the same standards specifically applicable to organizations within the same sector.*¹³

The Welsh Language Commissioner will consider the evidence provided in order to make a decision on the content of compliance notices given to NHS Wales Informatics Service under section 44 of the Welsh Language (Wales) Measure 2011.

It was explained above in section 2 of this report, that the subject matter of this standards investigation was:

- to determine whether NHS Wales Informatics Service should be liable to comply with standards:
- if NHS Wales Informatics Service comes within Schedule 6, to determine which standards (if any) should be potentially applicable to NHS Wales Informatics Service;

¹² Service delivery activity as defined in section 28 of the Welsh Language (Wales) Measure 2011.

¹³ <http://gov.wales/topics/welshlanguage/response-to-welsh-language-standards-investigation/?lang=en&ghq>

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- to determine which standards (if any) should be specifically applicable to NHS Wales Informatics Service (whether or not the standards have already been specified by the Welsh Ministers under section 26(1)).

Based on the evidence received, and taking the objectives of the Measure as outlined above into consideration, the Welsh Language Commissioner concludes that the public authority that comes within this standards report – namely NHS Wales Informatics Group – should be liable to comply with standards.

It is the Commissioner's opinion, based on the evidence received, that the following standards should be potentially applicable to NHS Wales Informatics Service:

- Service delivery standards;
- Policy making standards;
- Operational standards;
- Record keeping standards.

Standards which should be made specifically applicable to schedule 5(1) persons - public authorities

Service delivery standards

Having undertaken this standards investigation, and on the basis of the evidence received, the Commissioner concludes that NHS Wales Informatics Service should be able to deliver services in relation to the relevant activities.

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

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

It is acknowledged that NHS Wales Informatics Service has identified potential challenges and obstacles in terms of full compliance with some of the service delivery standards. However, the Commissioner is of the view that commitments proportional to the needs of Welsh users could be achieved with a reasonable timetable for action and dealing with any challenges. Some examples of lack of compliance were received, or concerns regarding some requirements attached to the service delivery standards.

Conclusion 2: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to NHS Wales Informatics Service:

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

NHS Wales Informatics Service noted that they do not hold meetings that are open to the general public, or organize public events. It was noted in the evidence received from NHS Wales Informatics Service that any contact with the public was carried out through NHS Wales health boards. However, the commitments of the current language scheme corresponded, whether partly or in full, to all the standards within these two activities.

Considering the above, together with the nature of the relevant activity in question, the Welsh Language Commissioner concludes that this may be a relevant activity which NHS Wales Informatics Service may undertake at present, or in the future. The Welsh Language Commissioner will give further consideration to this evidence when determining the content of compliance notices under section 44 of the Measure.

Conclusion 3: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to NHS Wales Informatics Service:

- meetings arranged by a body that are open to the public
- public events organized or funded by a body

NHS Wales Informatics Service stated that they did not currently make official notices and considered that it would not be reasonable and proportionate to make these standards specifically applicable to them.

An 'official notice' is defined in the Welsh Language Standards Regulations (Number 1) 2015 as

*any notice that a body publishes to inform persons about service delivery activities or changes to the body's service delivery activities.*¹⁴

To this end, it is considered that this activity is part of the present operation of NHS Wales Informatics Service. It is also noted that there is a commitment within its current Welsh language scheme, whether partly or in full, to 50% of the standards relating to this activity. The Welsh Language Commissioner will give further consideration to this evidence when determining the content of compliance notices under section 44 of the Measure.

Conclusion 4: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to NHS Wales Informatics Service:

- a body making official notices

NHS Wales Informatics Service confirmed that they did not currently award grants.

Conclusion 5: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to NHS Wales Informatics Service, to the extent that they have the power and function to do so:

- a body awarding grants.

NHS Wales Informatics Service stated that they do not raise awareness regarding Welsh language services provided by them, and thus are of the opinion that these standards are not relevant to them.

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

Conclusion 6: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to NHS Wales Informatics Service:

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

¹⁴ Part 3, Schedule 1, Welsh Language Standards Regulations (Number 1) 2015.

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NHS Wales Informatics Service noted that they did not provide courses. However, it should be noted that Part 3, Schedule 1, Welsh Language Standards Regulations (Number 1) 2015, refers to educational courses and defines them as:

any seminar, training, workshop or similar provision which is provided in order to educate or improve the skills of members of the public.

Considering the above definition and the nature of the work of NHS Wales Informatics Service, the Commissioner is of the opinion that a wide range of the person's activity may be relevant. Considering the above, the Welsh Language Commissioner concludes that this may be a relevant activity for NHS Wales Informatics Service.

The Welsh Language Commissioner will give further consideration regarding to what extent the organization provides courses when determining the content of compliance notices under section 44, Welsh Language (Wales) Measure 2011.

Conclusion 7: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to NHS Wales Informatics Service:

○ Courses offered by a body

NHS Wales Informatics Service noted that they did not currently announce messages over a public address system. However, the Welsh language Commissioner is of the opinion that the person may undertake other service delivery activities that are likely to have public address systems associated with them: for example meetings that are open to the public or public events. Therefore, the Welsh Language Commissioner concludes that this may be a relevant activity for NHS Wales Informatics Service. It should be noted that flexibility is granted under section 44 of the Measure to the Welsh Language Commissioner to note the circumstances in which persons will be expected to comply with the standard.

Conclusion 8: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to NHS Wales Informatics Service:

○ public address systems used by a body.

The Service in question noted that they do not use self service machines. In addition, none of the commitments within their Welsh language scheme corresponded to the standard for this activity. With this in mind, and due to the fact that no other evidence that the relevant person carried out this activity was apparent, it is concluded that this activity is not currently of relevance but that it could be provided at some point in the future. The Welsh Language Commissioner will consider the degree to which the

relevant person provides this sort of service when consulting on the compliance notice under section 47 of the Measure.

Conclusion 9: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for making service delivery standards in relation to the following activity to be specifically applicable to NHS Wales Informatics Service to the extent that they are of the opinion that the activity may be provided by the relevant person in the future:

- self service machines.

Policy making standards

The required measures which form the basis for the content of Welsh language schemes can be seen in the form of statutory guidelines approved before the House of Commons (Guidelines for the Form and Content of Language Schemes were approved by the UK Parliament on 19 July 1995). Those guidelines state that organisations should be required to specify the measures they propose to take when assessing the impact of new policies, strategies and initiatives and their implementation.

The Commissioner believes that organizations that operate in Wales should consider the effect their policies may have on the Welsh language, and how policies can be created that aspire towards the aim of ensuring one or more of the following outcomes.

- That the person making the policy decision considers what effects, if any, (whether positive or adverse) the policy decision would have on —
- (a) opportunities for other persons to use the Welsh language, or
 - (b) treating the Welsh language no less favourably than the English language.

- The second of those results is that the person making the policy decision considers how the decision could be made so that the decision has positive effects, or increased positive effects, on —
- (a) opportunities for other persons to use the Welsh language, or
 - (b) treating the Welsh language no less favourably than the English language.

- The third of those results is that the person making the policy decision considers how the decision could be made so that the decision does not have adverse effects, or has decreased adverse effects, on —
- (a) opportunities for other persons to use the Welsh language, or
 - (b) treating the Welsh language no less favourably than the English language.¹⁵

Having conducted this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that the policy decisions of NHS Wales Informatics Service should enhance the opportunities available for persons to

¹⁵ Section 29 Welsh Language (Wales) Measure 2011.

use the Welsh language and ensure that Welsh is not treated less favourably than English.

The Commissioner's reasons for reaching this conclusion is that this relevant person is already expected to assess the linguistic implications of new policies and initiatives during the process of creating and reviewing them, by means of its Welsh Language Scheme. All of this was confirmed in the evidence received from the relevant person as part of this standards investigation.

It is acknowledged that matters have been highlighted regarding the ability of NHS Wales Informatics Service to comply with all the requirements of the policy making standards. It was noted that they did not have a policy on awarding grants. The Welsh Language Commissioner will give further consideration to these circumstances when determining the content of compliance notices under section 44, Welsh Language (Wales) Measure 2011.

Conclusion 10: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for policy making standards to be specifically applicable to NHS Wales Informatics Service.

Operational standards

Section 30 of the Welsh Language (Wales) Measure 2011 states that an operational standard means:

a standard that is intended to promote or facilitate the use of the Welsh language

- (i) by A in carrying out A's relevant activities,
- (ii) by A and another person in dealings between them in connection with A's relevant activities, or
- (iii) by a person other than A in carrying out activities for the purposes of or in connection with, A's relevant activities.

The Welsh Language Commissioner acknowledges that some elements attached to the operating standards are new to NHS Wales Informatics Service, which come within this standards report. In the same vein, some examples were received where no arrangements currently exist to ensure full compliance with the requirements. The Welsh Language Commissioner will give further consideration to this when determining the content of compliance notices under section 44, Welsh Language (Wales) Measure 2011.

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

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Despite the above, it should be noted that a number of the requirements are things which NHS Wales Informatics Service is expected to carry out under its Welsh language scheme. These include specifying measures to ensure that workplaces which have contact with the public in Wales try to ensure a sufficient number of Welsh speakers with appropriate skills; measures to earmark those posts where the ability to speak Welsh is considered essential and those where it is considered desirable, together with measures to assess the need for training and to provide such training to employees.

If NHS Wales Informatics Service carries out any relevant activity found in the operational standards, be that in Welsh or in English only at present, it is concluded that the standards associated with those activities should be specifically applicable to them.

To this end, and based on the evidence received, the Commissioner concludes that it is reasonable and proportionate for NHS Wales Informatics Service to enable their workers to carry out their relevant activities through the medium of Welsh.

Conclusion 11: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for operational standards in relation to the matters below to be specifically applicable to NHS Wales Informatics Service:

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

NHS Wales Informatics Service noted that they did not make audio announcements and messages in the workplace. This was reinforced in their current Welsh language scheme, where no commitment to provide this was noted. However, considering the broad nature of this kind of activity, the Welsh Language Commissioner concludes that this may be a relevant activity for NHS Wales Informatics Service to undertake. The Welsh Language Commissioner will give further consideration to this when determining the content of compliance notices issued under section 44, Welsh Language (Wales) Measure 2011.

Conclusion 12: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for operational standards in relation to the matters below to be specifically applicable to NHS Wales Informatics Service:

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

Record keeping standards

In submitting evidence as part of this standards investigation, NHS Wales Informatics Service noted that they would be reasonable and proportionate to make these standards specifically applicable to them.

Under Welsh language schemes, the organization is required to stipulate the action to be taken in terms of publishing information on the organization's performance against the statutory requirements. The evidence received confirmed this, with NHS Wales Informatics Service, on the whole, noting that the record keeping standards, in principle, and operational to a considerable extent, were current practice.

Having undertaken this standards investigation, and on the basis of the evidence received, the Welsh Language Commissioner concludes that NHS Wales Informatics Service should keep a record of how they adhere to the standards with which they are expected to comply, along with complaints relating to compliance with the standards and skills in the Welsh language for the workplace.

Conclusion 13: The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for record keeping standards to be specifically applicable to NHS Wales Informatics Service.

Standards that deal with supplementary matters

Other provisions in the Measure concern the monitoring arrangements and reporting requirements for the standards regime (Section 27 - Supplementary Provisions). Following approval of the 'Welsh Language Standards (No. 1) Regulations 2015'¹⁶ at a National Assembly for Wales Plenary Session on 24 March 2015, standards that deal with supplementary matters were specified under section 26 of the Measure.

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

The Welsh Government's policy document, 'Inspection, Audit and Regulation'¹⁷ explains that the role of inspectors is to 'independently verify, using professional expertise and legal power'. This is supported by the Crerar Report on inspection in Scotland which states that the role of external inspectors is to secure independent assurance that services are well managed and fit for purpose. According to Crerar, the five main principles of inspection are the need to focus on the public; independence; proportionality; transparency and accountability. Crerar's proposals are consistent with the Hampton principles which state that inspection should be based on risk; that inspections should not be conducted without reason and that regulators should be able to provide accessible and authoritative advice. Similarly, it

¹⁶ <http://www.legislation.gov.uk/cy/wsi/2015/996/made/welsh/data.pdf>

¹⁷ <http://gov.wales/docs/dpsp/publications/inspectionpolicystatement/090930inspstatementcy.pdf>

is also recognized that inspection bodies cannot supervise everything service providers do. That is, service providers are increasingly expected to have robust internal audit and scrutiny arrangements in place. Furthermore, self-assessment plays an increasingly important part in external inspection arrangements.

NHS Wales Informatics Service confirmed that it would be possible for it to comply with the standards that deal with supplementary matters in relation to the policy making, operational and record keeping standards and that they were reasonable and proportionate in principle.

They did not consider that making the standards that deal with supplementary matters in relation to the service delivery standards specifically applicable to them would be reasonable and proportionate, as NHS Wales Informatics Service does not consider itself to be an organization that has direct contact with the public and its offices are not open to the public. It appears there is a lack of clarity regarding the exact definition of the term “persons” in the regulations, and whether this would extend beyond the public as defined in the Welsh Language Act 1993. The Commissioner considers that the supplementary matters in relation to the service delivery standards are relevant to NHS Wales Informatics Service, to the extent that service delivery standards are imposed upon it in a compliance notice under section 44 of the Measure.

Conclusion 14: Having carried out this standards investigation, and in considering the above, the Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for standards that deal with supplementary matters to be specifically applicable to NHS Wales Informatics Service.

Additional standards that should be specified and made specifically applicable to NHS Wales Informatics Service

The following is noted in section 64(3) Welsh Language Measure (Wales) 2011:

If -

- (a) the conclusions of the standards investigation are (in whole or in part) that any standards should be specifically applicable to a person, and
- (b) any or all of those standards are not specified by the Welsh Ministers under section 26 (1), the standards report must set out the standards that are not specified.

The Welsh Language Commissioner concludes that additional standards to those published by the Welsh Government on 31 March 2015 should be specified. This view was reached after receiving evidence from the public and from the relevant persons as part of the standards investigation.

Activity: providing support services for National Health Service Wales

The provision of excellent customer services is the central to supplying services to individuals and communities. The structure of the service has changed with some functions transferred from Boards and Trusts to NHS Wales Informatics Service.

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NHS Wales Informatics Service is a national organization that provides the information and technology services used by NHS Wales to support patient care¹⁸. It operates under a contract with the Velindre NHS Trust.

It should be noted that the Welsh Language Commissioner's monitoring work has highlighted challenges in relation to the implementation of the Welsh language schemes of NHS Health Boards and Trusts. Also, there is a risk to services for Welsh speakers if the processes of NHS Wales Informatics Service, together with the services provided under contract comply with the duties imposed upon the health bodies.

Conclusion 15: The Welsh Language Commissioner concludes that Welsh Ministers should specify standard(s) in relation to the matters below, and make them specifically applicable to NHS Wales Informatics Service:

1. in providing any relevant service and/or support function provided for NHS Wales or other persons, it must be ensured that the Welsh language is not treated less favourably than the English.

¹⁸ http://www.wales.nhs.uk/sitesplus/documents/956/NWIS_ServiceGuide_Welsh_WebVersion.pdf

8 The next steps

In preparing this standards report, the Welsh Language Commissioner has considered all the responses submitted to the standards investigation. This report will be submitted to the following in accordance with section 64(4) of the Measure:

- the relevant person
- Advisory Panel to the Welsh Language Commissioner
- all persons who participated in the Commissioner's consultation in accordance with section 63
- Welsh Ministers.

Alongside the standards investigations of the Welsh Language Commissioner, Welsh Ministers are expected to carry out regulatory impact assessments in respect of relevant secondary legislation they intend to create, using their own secondary legislation powers.

The Government of Wales Act 2006 notes that a regulatory impact assessment is as follows:

A regulatory impact assessment is an assessment as to the likely costs and benefits of complying with relevant Welsh subordinate legislation.¹⁹

In this respect, a regulatory impact assessment may be considered:

- a process to help Welsh Ministers to consider the effect of the proposed regulation on the interests of individuals, groups, organizations etc
- a means of enabling Welsh Ministers to weigh up the costs and benefits of all the options available to them before implementing a policy; and
- a means of submitting the relevant evidence on the positive and negative effects of such interventions for the purposes of scrutinizing that evidence.²⁰

Welsh Ministers will be expected to consider the evidence they collected for the purposes of the regulatory impact assessment, alongside the Welsh Language Commissioner's conclusions in a standards report in deciding whether or not to exercise the powers granted to them under Part 4 of the Measure.

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

¹⁹ Section 76(2)(a) Government of Wales Act 2006.

²⁰ <http://gov.wales/docs/legislation/guidance/091020riacodeen.doc>

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

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

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

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

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

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

Some responses were received from members of the public expressing general opposition to language duties.

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

- The need to consider the current economic climate and how public money is spent in Wales.
- Prioritise other policy areas over the Welsh language.
- The relevance of the Welsh language in Wales.
- Disagreement with the requirement that Welsh should appear or be published first.
- The bureaucracy of the requirements.

Service delivery standards

A number of responses were received stating that all of the organizations in round 3 should correspond with the public in Wales in Welsh. Some respondents went on to

state the importance of ensuring that Welsh addresses and forms are used when corresponding with an individual in Welsh. They believed that this would be a significant step towards promoting the language and encouraging citizens to use the Welsh place names.

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

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

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

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

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

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

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With regard to websites and on-line services provided by round 3 organizations, there was broad support in general for bilingual websites, given the increase in services offered through this medium by now, with some cases where those services are only available through that medium. Specific attention was drawn to the websites of organizations operating on a British level e.g. UK government departments operating within the gov.uk system.

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

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

Policy making standards

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

Operational standards

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

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

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

Record keeping standards

A number of comments were received supporting the need for organizations to keep records, in order to be able to monitor and examine compliance with the other

standards. However, some believed that elements of the requirements were bureaucratic for organizations that are administrated internally through the medium of Welsh, whilst others felt that record keeping is not an effective way to improve the quality and range of Welsh medium services.

Promotion standards

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

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

Appendix B – List of the respondents to the standards investigations

Below is a list of the relevant person in respect of which a standards investigation was carried out, the Advisory Panel, together with the members of the public who were willing for us to publish their comments.

Relevant person

- NHS Wales Informatics Service

Members of the public

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

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

Organizations / Movements

- Cymdeithas yr Iaith Gymraeg
- Dyfodol i'r Iaith

Welsh Language Commissioner's Advisory Panel

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