

08 October 2014

**Welsh Language Board**

**Comments and Recommendations for development of Bridgend County Borough Council's Revised Welsh Language Scheme**

General Comments:-

- 1) We appreciate the time and effort invested in revising the scheme. It is clear that consideration has been given to the advice given by the Board for the revision of Welsh language schemes. The scheme shows a clear commitment on behalf of Bridgend CBC to further promote and facilitate use of the Welsh language during the next 3 years.
- 2) Frontline services - A survey conducted by Beaufort research company on behalf of the Welsh Language Board in 2005 revealed the importance of having Welsh speaking staff in frontline posts in order to aid growth in the use of Welsh language services. The scheme should include more ambitious measures and targets to develop the range and quality of frontline services delivered in Welsh, for example telephone services and within reception areas. A linguistic skills audit has recently been conducted (as stated on page 23 of the scheme) which will provide baseline data on Welsh language skill levels of frontline staff. Such data should be used to develop specific targets for the development of those skills (see recommended target in guideline 6 of the Board's Advice Note for Revision of Welsh Language Schemes). The arrangements for providing frontline services should be explained in greater detail, for example how are calls received and by whom? Does the Council provide helplines / call centres / one stop shops etc? What measures are needed in relation to such arrangements to ensure development of Welsh language services?
- 3) Welsh language Indicators - The Board, in consultation with all local authorities in Wales, developed a range of Welsh language indicators to facilitate the monitoring of Welsh language schemes. Work has been conducted recently on defining these indicators which was presented to local authority Welsh language / equality officers in a recent meeting in Rhaeadr. Final definitions will be circulated shortly to all local authorities in Wales.

The scheme submitted does not refer to the indicators which have been developed. A report provided to the Board by the Council this year stated that clear definitions of the indicators were required. As this work has now been completed we expect the indicators developed to be included within the scheme as one method of managing performance.

- 4) Welsh language training - Data provided following the recent linguistic skills audit and included within the scheme shows a clear need for development of the Welsh language skills of staff. This should be achieved partly through recruitment and also through training. The scheme shows a clear commitment to providing staff with the required Welsh language skills and awareness training. The scheme should also explain the arrangements for providing such training. For example, when, where and by whom will Welsh language skills and awareness training be provided?

- 5) Website - No mention of the Council's website is made in the scheme. The Council's current website falls short of the 'Bilingual Software Guidelines and Standards' provided by the Board and does not compare favourably with the websites of other local authorities in Wales in terms of bilingual content. Measures and targets should be included within the scheme to ensure significant progress in the development of a bilingual website during the life of the scheme, in accordance with guideline 6(v) of the Board's statutory guidance for preparation of Welsh language schemes. Technical information required to develop a bilingual website is provided within the above mentioned document.
- 6) Public and official notices and recruitment advertising – Policies and commitments contained within the scheme in relation to public and official notices and recruitment advertising do not comply with the measures required under guideline 7(xi) of the Board's statutory guidance for the preparation of Welsh language schemes. We appreciate that the policies contained in the scheme do constitute progress from those which are currently implemented. We also appreciate that due to available resources, a commitment to achieve the Board's requirements will need to be realised over time. However the revised scheme will need to include targets to meet the Board's requirements within an agreed period of time.
- 7) Targets - The scheme includes a timetable of targets which should ensure effective realisation of the schemes' commitments. Target dates for achievement of these targets should be more specific. Some target dates are noted as 'in place and ongoing'. Such targets should be developed to be more SMART in order to facilitate monitoring of the scheme by the Council and the Board. For the same reason, a target date should be included for all individual targets included within the timetable.

Specific Comments:-

| Ref    | Recommendation / Comment   |
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| Page 4 | The statement of principle should be worded exactly as stated in guideline 1 of the Board's statutory guidance for preparation of Welsh language schemes. The words added to the statement should be deleted or included elsewhere.  |
| Page 6 | The table included which explains the Council's organisational structure is very useful. As stated in guideline 2 of the Board's advice note for revision of schemes, an explanation of how services are generally delivered should be included also e.g., <i>are they provided from 3 regional offices; are calls answered by a call centre, etc?</i> |
| Intro  | It would be useful to refer to the main achievements of the current scheme, as well as areas in need of improvement, in order to set a context for the scheme. (please refer to guideline 1 of the Board's advice note for revision of schemes.  |

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| 1.6                             | The commitment to develop a Corporate Language and Accessible Communications Policy and Action Plan should be included as a target within the scheme's timetable.   |
| 2.2.1                           | <p>We appreciate that there are many demands on the Council from a service delivery perspective. However to start this section of the scheme with this statement does not benefit the scheme and could be perceived as a rather negative opening statement. The Welsh Language Act requires that Welsh language services are delivered equally in Welsh as in English. This should be the ultimate aim of the scheme, despite present demands on the Council. In order to achieve this aim, this section should include a commitment to employ Welsh speakers in all departments, service areas, field and specialist teams etc</p> <p>Some useful information is included here explaining how the Welsh language will be mainstreamed into the Council's operations. It would be useful to note that the Council will make use of the Welsh language mainstreaming guidance recently distributed by the Board.</p> |
| 2.2.3                           | How will executive Directors ensure that third party contractors are aware of their responsibilities under the scheme? It would be useful to include examples of methods used to ensure compliance by 3 <sup>rd</sup> parties e.g send a summary of the scheme to contractors, site visits etc  |
| 2.2.4                           | This section should state that Council input to any partnership work will comply with the scheme.   |
| 2.2.4                           | Is there an opportunity for the Council to influence the work of the LSP to ensure that use of the Welsh language is promoted as an aim and objective of the community strategy, as well as being seen as part of the equalities agenda?  |
| 2.2.5                           | Some measures to ensure consideration of the Welsh language within the administration of funding and grants is included within guideline 4c of the Board's advice note for revision of schemes. These measures should be included within the scheme. Some tasks may need to be undertaken in order to implement these measures, for example preparation of relevant guidance. Such tasks should be included as targets within the scheme's timetable.   |
| 2.2.6                           | The scheme should include examples of specific actions the Council could undertake to ensure consideration of the language when performing regulatory functions e.g send a summary of relevant parts of the scheme to licence holders.  |
| 2.3 – final paragraph           | Conducting this review should prove useful for the purpose of prioritising specific Welsh language services in need of development. It would be useful to state that priority will be given to those services dependent upon effective communication in the chosen language e.g care services. Development of frontline services, which are also dependent upon effective communication, should be a priority also. Development of such services in Welsh should be achieved partly through preparation and implementation of a linguistic skills strategy.   |
| 3.1 – 3 <sup>rd</sup> paragraph | The Council should initiate correspondence in Welsh with <u>organisations</u> who are known to prefer using Welsh, as well as individuals.  |
| 3.1 – 5 <sup>th</sup> paragraph | When preparing the protocol of data management and information sharing, you may find it useful to refer to the Board's guidance on the relationship   |

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|                       | <p>between the Welsh Language Act, the Freedom of Information Act and the Environmental Information Regulations. This guidance can be found on the Board's website by clicking on the following link – <a href="#">Guidance</a></p>   |
| 3.2                   | <p>The scheme states that a review of frontline services was conducted earlier this year under the 'Access to Services Strategy'. It would be useful to note here the findings of the review from a Welsh language perspective and what targets are needed in light of those findings. Please include the target noted in guideline 6 of the Board's advice note for revision of schemes, using the findings of the review to formulate the target.</p> <p>Please refer to guideline 6(ii) of the Board's statutory guidance which states that all staff should answer the telephone with a bilingual greeting, giving as a minimum the name of the Council bilingually.</p> <p>Measures included in paragraph 2 of this section should be noted as temporary measures, to be implemented only until such time as an adequate number of Welsh speakers are employed in all departments and service areas to offer immediate Welsh language telephone services without exception.</p> <p>Are there any plans to develop a call centre / one stop shop or similar arrangement to deal with telephone enquiries? If so, the advice provided in the guidance recently distributed by the Board entitled 'Advice on setting up and implementing help lines' should be reflected within the scheme.</p> |
| 3.4 – paragraph 5     | <p>The commitment to prepare such advice and guidance should be included as a target within the scheme's action plan.</p>   |
| 3.4 – paragraph 6     | <p>Conducting this exercise should prove very useful. Specific targets and target dates should be included within the action plan in relation to this commitment. A target to identify specific face to face services to develop is included. In order to identify such services a review of services will be required. A target date for undertaking such a review is needed. Also, having identified services to develop, a target should be included to develop those services within the 3 year lifetime of the scheme.</p>   |
| 3.5                   | <p>As noted in general comment 5 above, measures should be included here to ensure significant development of a bilingual website within the lifetime of the scheme.</p>  |
| 4.2 – paragraph 3     | <p>As stated in guideline 7 of the Board's advice note for revision of schemes, all forms produced by the Council should be bilingual. In order to achieve this, it may be useful to include as a target within the scheme's action plan that all departments will conduct an audit of forms.</p>   |
| 4.5 – paragraph 3     | <p>It is unclear what is meant by "...given the subject material, the means to be used and the target audience." Any campaigns aimed at the public in general should be conducted bilingually. If certain circumstances will lead the Council to conduct campaigns in Welsh or English only, those circumstances should be clearly explained here.</p>  |
| 4.5 – final paragraph | <p>This section may not provide clear guidance to staff on whether or not to conduct a specific consultation exercise bilingually. Cardiff Council has adopted an effective arrangement for conducting consultation exercises whereby correspondence is sent to all consultees requesting their language</p>  |

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|                       | of choice, prior to distributing documents. This arrangement proves cost effective and provides for an effective bilingual service.   |
| 4.6 / 4.7             | Please refer to general comment 6 above.  |
| 5.1 – bullet points   | These options should be listed in order of priority. Making an appointment which carries an undertaking to learn Welsh should be the last option to follow. An additional option is to make a temporary appointment until a Welsh speaker can be found to fill the post. This option is preferable to the option of appointing a non-Welsh speaker on a permanent basis.  |
| 5.1 – final paragraph | Development of a linguistic skills strategy should prove extremely useful for the development of the Council's Welsh language services. A target date for producing the strategy should be specified within the action plan.  |
| 5.2                   | <p>Please refer to general comment 4 above. In addition, please explain what arrangements will be in place to assess the progress of those members of staff receiving Welsh language training.</p> <p>It would be useful to note here that the Council will take advantage of the Welsh language learning resource 'Sounds Good' produced by the Board, which would enable any member of staff to learn a very basic level of Welsh in order to respond appropriately to enquiries received in Welsh.</p> <p>Several organisations, such as South Wales Police, have developed Welsh language mentoring programmes which have proved successful. Such programmes allow fluent Welsh speaking members of staff to support learners, a cost effective method of improving the Welsh language skills of the workforce. It would be useful to consider including development of such a programme as a target within the scheme.</p> |
| 5.4                   | This section includes arrangements for ensuring effective implementation of the scheme throughout the Council's directorates. It would be useful to explain who has responsibility for co-ordinating implementation of the scheme on a day to day basis.  |
| 5.5                   | Should this section be moved to 2.2.6?  |
| 5.7                   | As stated in guideline 8 of the Board's advice note for revision of schemes, this section should note that the Council will comply with inspections carried out by the Board and implement recommendations where relevant. As discussed with all local authorities previously, regular inspections will be carried out in the form of risk assessments and self assessments.  |
| 5.8                   | As stated in guideline 8 of the Board's advice note for revision of schemes, the Council's performance in relation to implementation of the Welsh language scheme should be addressed within the Annual Improvement Plan, which should be noted here.   |
| 5.9                   | We appreciate the commitment to "...inform the public what services are available through the medium of Welsh and where and when they can be accessed." It would be useful to note that the Council will cooperate with the Board to conduct joint marketing and promotional campaigns for Welsh language services as mentioned in guideline 8 of the Board's advice note for revision of schemes.  |
| Action Plan – 2.2.3   | External contractors delivering services on behalf of the Council should comply with the scheme, as well as good practice.  |