

Welsh Language Standards: Implementation Plan

March 2018



1 Introduction

The Welsh Language (Wales) Act 2011 established the framework for developing new Welsh language standards, which give individuals in Wales the right to receive certain services in Welsh. Within that framework, the Welsh Language Commissioner prepared a series of standards, tailored to the activities of various categories of organisation. The Higher Education Funding Council for Wales (HEFCW) is covered by the *Welsh Language Standards (No 6) Regulations 2017*.

The Commissioner also provided each organisation with a compliance notice, setting out the specific standards from the Regulations that apply to that organisation. We received our compliance notice in September 2017 and have published a copy on our website.

This is our **Implementation Plan**, which sets out how we intend to comply with the standards applicable to us.

Throughout the document, where we say that we provide services to:

- an **individual**, this normally means a **member of the public or a student**.
- a **person**, this normally means **anyone**, including members of university staff.

2 Service standards for the Welsh language

2.1 The service standards for the Welsh language (referred to throughout as the service standards) apply only to specific, designated activities carried out by HEFCW:

- **Complaints**
- The awarding of **grants** and provision of **financial assistance** to individuals
- **Calls** to a main telephone number
- **Signs** on the building.

Correspondence

2.2 We welcome emails, letters and other written correspondence in Welsh and English.

2.3 When we receive correspondence in Welsh, we will respond in Welsh. (Standard 1.)

2.4 When we initiate correspondence with an **individual** in relation to one of the activities covered by our service standards (2.1 above), we will ask if they wish to receive correspondence in Welsh or English. If they wish to receive correspondence in Welsh, we will keep a record of this and will send correspondence to them in Welsh. (S2.)

2.5 When we send the same correspondence relating to activities covered by our service standards to several **persons**, we will send a Welsh language version of the correspondence at the same time as we send any English language version. (S4.)

2.6 If we don't know whether a person wishes to correspond in Welsh, we will provide both Welsh and English versions of correspondence relating to activities covered by our service standards. (S5.)

2.7 If we produce a Welsh language version and a corresponding English language version of correspondence, the Welsh language version will not be treated less favourably than the English language version. (Eg, if the English version is signed, or if we provide contact details on the English version, the Welsh version will be treated in the same way.) (S6.)

2.8 All email correspondence from HEFCW includes a bilingual footnote stating that we welcome correspondence in Welsh and English. Our templates for letters and circulars include a similar message. (S7.)

2.9 In terms of the practicalities of producing or receiving correspondence in Welsh:

- HEFCW contracts with external Welsh language translators and all members of staff have been informed how to access these services.

- Welsh-speaking HEFCW staff are usually available to advise on the content of correspondence received in Welsh; otherwise correspondence can be sent directly to external translators.
- 2.10 Current staff are informed these requirements as part of our training on the Welsh language standards. New staff will be informed of the requirements through their induction process. A copy of the Implementation Plan is available on the Welsh language resources section of the staff Intranet for easy reference.

Telephone Calls

- 2.11 The members of staff responsible for answering HEFCW's main switchboard number greet callers in Welsh and English. (S8.)
- 2.12 Switchboard staff will transfer a caller who wish to speak in Welsh to a member of staff who is able to speak Welsh and can provide a service on that specific matter. If no Welsh-speaking member of staff is available to provide a service on the relevant subject, our switchboard staff will explain the situation and transfer the call to a member of staff who will deal with it in English, as permitted by our compliance notice. (S11.)
- 2.13 Our internal telephone list flags Welsh speakers so that switchboard staff can readily identify staff who can respond to telephone calls in Welsh.
- 2.14 The contacts pages on our website state that we welcome calls in Welsh, and our out-of-hours answerphone message informs callers that they are welcome to leave a message in Welsh. (S14, S16.)
- 2.15 If a caller contacts a member of staff on a direct line telephone number in Welsh, the member of staff will respond in Welsh if they are able to do so. If that staff member is unable to speak Welsh they will transfer the call to a Welsh-speaking colleague to provide a service on that matter. If no Welsh-speaking member of staff can provide a service on the relevant matter, the member of staff who took the call will deal with it in English, as permitted by our compliance notice. (S19.)
- 2.16 All staff are instructed to greet callers to their direct line telephone numbers bilingually. (S20.)
- 2.17 When we initiate telephone contact with an **individual** for the first time about an activity covered by our service standards (2.1, above), we will ask if they wish to receive telephone calls in Welsh. We will keep a record of those who wish to speak in Welsh. We will conduct telephone calls with them in Welsh from then on, except (as permitted in our compliance notice) when a non-Welsh speaking member of staff needs to provide a service on a specific subject and where no Welsh-speaking member of staff can do so. (S21.)

Meetings not open to the public

- 2.18 If we invite **one person** only to a meeting about an activity covered by HEFCW's service standards, we will ask whether they wish to use the Welsh language. If staff involved in the meeting cannot conduct the meeting in Welsh, we will make a simultaneous interpretation service available (S24, S24A.)
- 2.19 If we invite **more than one person** to a meeting about an activity covered by our service standards, we will ask whether they wish to use the Welsh language at the meeting. If at least 10% wish to use Welsh, we will make a simultaneous interpretation service available (unless all attendees can conduct the meeting in Welsh.) (S27, S27A.)

Meetings open to the public and public events

- 2.20 From time to time, we run meetings and events that are open to the public. These include our annual public meeting and occasional events to showcase university activities. Meetings involving only university staff to discuss issues relevant to HEFCW policy are not classed as public meetings.
- 2.21 For all meetings or events that are open to the public, we will produce invitations and material advertising the meeting in both Welsh and English. The invitations and advertising material will state that those attending are welcome to use the Welsh language. The response form will include a section for respondents to indicate their language choice. (S30, S31.)
- 2.22 We will ask all speakers at meetings or events that are open to the public whether they wish to use the Welsh language, and we will provide a simultaneous interpretation service accordingly. (S32.)
- 2.23 Those attending meetings or events that are open to the public are welcome to contribute in Welsh or English, and we will provide simultaneous interpretation at the meeting. At the start of the meeting or event, we will inform those present, in Welsh, that they are welcome to use the Welsh language, and that a simultaneous interpretation service is available. (S33.)
- 2.24 The written material that we display at meetings or events open to the public will be in Welsh and English. This includes our annual report, any publication produced specifically for the event, and promotional banners. (S34.)
- 2.25 We will ensure that Welsh language requirements are met in any public events for which we provide at least 50% of the costs. (S35, S36.)

Publicity and Advertising

- 2.26 Our publicity and advertising materials will be produced in Welsh and English. We will not treat Welsh language versions less favourably than English language versions. (S37.)

Displaying Material in Public

- 2.27 Any material that we display in public will be displayed in Welsh and English. We will not treat Welsh language versions less favourably than English language versions. (S38.)

Producing and publishing documents

- 2.28 All documents produced for public use will be available in Welsh and English. These include the annual report, corporate strategy, and equality and diversity report. Any documents produced for student use will be available in Welsh and English. HEFCW policy circulars are intended for use by small target audiences within universities, rather than public use, and are produced in English. We will publish circulars in both Welsh and English if they deal with a matter covered by our Welsh language service standards. (S43.)
- 2.29 Where we publish material bilingually, Welsh and English versions will appear together in a single document unless their size makes this impractical. Any separate Welsh and English versions will be issued simultaneously and will be equally accessible. Each will contain a message stating that the document is available in the other language. (S51, S52.)
- 2.30 We issue press releases in Welsh and English.

Producing and publishing forms

- 2.31 We produce all forms for public or student (ie individual) use in Welsh and English. They include job application forms, application forms for committee membership, and external travel and subsistence forms. (S53.)
- 2.32 If we produce separate Welsh and English language forms, each will state that a form in the other language is available. The Welsh language version will be treated no less favourably than the English language version. (S53A and 53B.)
- 2.33 Pre-entered information on a Welsh language form will be in Welsh. (S54.)

Website and online services

- 2.34 The text on each page of our website is available in Welsh and English. The Welsh language pages are fully functional and the Welsh language is not treated less favourably than the English language. (S55.)
- 2.35 Each English language page on our website has a link labelled *Cymraeg*, which connects directly to the corresponding Welsh language page. (S58.)
- 2.36 The interface and menus on all Welsh language website pages of the website are in Welsh. (S59.)

Social Media

- 2.37 Social media (Twitter and LinkedIn) posts are in English and Welsh, and we will not treat the Welsh language less favourably than English. (S62.)
- 2.38 When a person contacts us by social media in Welsh, our communications section will reply in Welsh if a response is required. (S63.)

Displaying Signs

- 2.39 Our external and internal signs are bilingual. The text in Welsh and English on bilingual signs is equal in format, size, legibility and prominence. (S65.)
- 2.40 The Welsh language text on new bilingual signs will be positioned so that it is likely to be read first. We will review existing signs to check that that is the case. (S66.)
- 2.41 The Welsh language text on signs is checked by a translator or other suitable person before installation in order to ensure that it is accurate in terms of meaning and expression. (S67.)

Receiving Visitors

- 2.42 HEFCW is a tenant in a building managed by Welsh Government, which provides reception services for the whole building, and is responsible for ensuring compliance with the standards. (S68, S72.)
- 2.43 Welsh Government displays a sign on reception, which states (bilingually) that a Welsh language reception service is available, and that visitors are welcome to use the Welsh language at the reception. (S71.)

Notices

- 2.44 All HEFCW notices are bilingual Welsh and English, with each language equal in format, size, legibility and prominence. We will ensure that Welsh language text on new notices is positioned so that it is likely to be read first. (S73, S74.)
- 2.45 When HEFCW displays notices that are provided by other organisations, we will obtain and display Welsh and English language versions, where available.

Awarding Grants and Providing Financial Assistance

- 2.46 For any schemes for which we award grants or financial assistance to individual applicants (students or individual members of academic staff), we will publish the documentation relating to applications in Welsh and English. We will also state that applications can be submitted in Welsh, and would be treated no less favourably than applications submitted in English. (S75, S76, S76A.)
- 2.47 We can interview individual applicants for grants or financial assistance in Welsh for applicants who applied in Welsh, using simultaneous interpretation if required. (S78.)
- 2.48 If an application for a grant or financial assistance is submitted in Welsh, we will inform the applicant of the outcome of our decision in Welsh. (S79.)

Awarding Contracts

- 2.49 As required in our compliance notice, we will publish any invitation to tender for a contract in Welsh and English if the subject matter of the contract suggests that it should be published in Welsh too, or if the anticipated audience or their expectations suggest that it should be published in Welsh. Our Procurement Authorisation Form specifies that, before a tender can proceed, our Procurement Manager must check whether the tender's subject matter or anticipated audience suggest that the invitation to tender should be published in Welsh. (S80.)
- 2.50 When we publish invitations to tender for any contract, we will state in the invitation that tenders may be submitted in Welsh, and that a tender submitted in Welsh will be treated no less favourably than a tender submitted in English. (S81, S81A.)
- 2.51 If we receive a tender in Welsh and it is necessary to interview the tenderer as part of the assessment process, we will offer to conduct the interview in Welsh and, if required, will provide the necessary translation facilities to do so. (S83.)
- 2.52 Tenderers who have submitted in Welsh will be informed of the outcomes in Welsh. (S84.)

2.53 Our procurement policy, purchasing procedures, and instructions to tenderers documentation incorporate the above requirements and ensure that they are embedded in our processes.

Corporate Identity

2.54 We are committed to a bilingual corporate identity, as expressed through our name, address, logo and other standard information as they appear on our stationery, internal and external signs at our office, advertisements, website and banners and displays. (S87.)

2.55 The acronym of our name (HEFCW) appears in English only in our logo in recognition of how English and Welsh speakers have historically referred to us. While this is permitted under the terms of our compliance notice, we will review this in future if we re-design our logo or revise our corporate identity. (S87.)

3 Policy-making standards

Considering the effects of policy decisions on the Welsh language

- 3.1 When we formulate a new policy, or review or revise an existing policy, we will consider:
- i) what effect (if any), positive or adverse, the policy would have on: (a) opportunities for persons to use the Welsh language; and (b) treating the Welsh language no less favourably than the English language.
 - ii) how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would have positive effects, or increased positive effects, on: (a) opportunities for persons to use the Welsh language; and (b) treating the Welsh language no less favourably than the English language.
 - iii) how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would not have adverse effects, or so that it would have decreased adverse effects, on: (a) opportunities for persons to use the Welsh language; and (b) treating the Welsh language no less favourably than the English language.
- 3.2 We use an impact assessment screening form, which includes the questions above, to assess the potential effects of new or revised policies on a range of issues, including the Welsh language. The Welsh language section of the template for Council and Committee papers also incorporates this requirement. (S94, S95, S96.)
- 3.3 When we publish a consultation paper relating to a policy decision, we will include a section seeking views on the above questions. The template for HEFCW circulars prompts staff to do this when they prepare consultation circulars. (S97, S98, S99.)
- 3.4 When we commission or undertake research that is intended to assist us to make a policy decision, we will ensure that the research considers the above questions. (S101, S102, S103.)
- 3.5 We will produce a policy on awarding grants or financial assistance if we introduce any such funding schemes that individuals (students, the public) to apply. (S100.)

4 Operational standards

Use of the Welsh language within internal administration

- 4.1 Our policy on promoting and facilitating the use of Welsh internally is available on our Intranet.
- 4.2 Our Human Resources (HR) procedures include the provision that when we make a new offer of employment, our HR section will ask the new staff member if they wish to receive their contract of employment in Welsh and. (S106.)
- 4.3 The procedures provide for staff to receive any paper correspondence which relates to their employment and which is addressed to them personally in Welsh if they wish. Our HR section has notified current staff of this entitlement, and will inform new staff as part of the appointment process. (S107.)
- 4.4 The standards state that staff should be able to receive the following documents in Welsh if they wish:
- training needs and requirements
 - performance objectives
 - any career plan documents
 - forms which record and authorise annual leave, absences from work and flexible working.

This documentation is provided electronically through our MySite system. We will produce a Welsh language version of MySite in order to provide this material to staff in Welsh. Our compliance notice grants an extension to April 2019 for compliance on this issue. (S108, S109, S110, S11.)

- 4.5 We will produce Welsh language versions of the following workplace policy documents, and will publish them on our Intranet alongside the English language versions:
- behaviour in the workplace
 - health and well-being at work
 - salaries and benefits
 - performance management
 - absence from work
 - working conditions
 - flexible working patterns.

The Welsh language versions will be updated in parallel with the English language ones. (S112, S113, S114, S115, S116, S117.)

Complaints made by a member of staff

- 4.6 Our HR procedures state that staff can make complaints to HEFCW in Welsh, and that they can respond in Welsh to any complaint made against them. Our HR section has informed staff of this. (S119, S119A.)

- 4.7 If a meeting is required with a member of staff about a complaint, we will ask the member of staff if they wish to use the Welsh. We will provide simultaneous interpretation if we are unable to conduct the meeting in Welsh following a request. We will inform the member of staff in Welsh of the decision reached on the complaint if any part of the process has been conducted in Welsh, as outlined in our HR procedures. (S121, S122.)

Disciplining staff

- 4.8 Staff can respond in Welsh to any allegations made against them, and are informed of this right at the start of any disciplinary procedures relating to them. (S123, S123A.)
- 4.9 If a meeting is required with a member of staff about a disciplinary matter, we will ask the member of staff if they wish to proceed in Welsh, and we will provide simultaneous interpretation if we are unable to conduct the meeting in Welsh. We will inform the member of staff of the decision reached on the disciplinary matter in Welsh if any part of the process has been conducted in Welsh, as outlined in our disciplinary procedures. (S125, S126.)

Information Technology and Support Material

- 4.10 Staff have access to Cysill for checking spelling and grammar in Welsh, and Welsh language interfaces for software are available. We have highlighted the availability of this software and interfaces on the Intranet page that provides services and support material to promote the Welsh language. We will keep this material under review, and add any relevant new software packages and interfaces as appropriate. (S127.)
- 4.11 We have a bilingual splash page for our Intranet. The buttons and titles on the homepage are available in Welsh and English, and the interfaces and menus for the remainder of the Intranet are available in Welsh and English. (S129, S133.)
- 4.12 We keep under review the section of our Intranet which provides services and support material to assist staff to use Welsh, and includes links to: dictionaries and glossaries; our translation procedures; information about the Welsh language standards; information about computer software to support the Welsh language; our policy on using Welsh internally; Welsh language training courses; wording for our bilingual email signature and out of office messages. (S132.)

Developing Welsh language skills through workforce planning and training

- 4.13 We run an annual online survey of the Welsh language skills of all our staff. (S134.)
- 4.14 We encourage staff to learn Welsh and provide opportunities at a number of different levels:
- Free, basic Welsh language lessons during working hours. (S138.)
 - Free language skills development for staff who have completed basic Welsh language training. (S139.)
 - We arrange for staff who are suitably proficient in Welsh to attend externally-provided courses to help them to use the language in meetings and other professional activities. (S136.)
- 4.15 The standards specify that we should provide training courses on:
- awareness of the Welsh language;
 - the requirements of the Welsh language standards; and
 - an understanding of how the language can be used in the workplace.
- We have provided initial training on the Welsh language standards, and will continue with these training and development activities throughout the year. S140.)
- 4.16 We have noted the requirements to provide training in Welsh in relation to various aspects of line management, and we will have regard to that requirement in planning training for any staff who undertake line management responsibilities in Welsh. (S135.)
- 4.17 We will expand our existing Welsh language induction session for new staff to cover the implications of the Welsh language standards as they apply to HEFCW. (S141.)
- 4.18 We have provided logos (below) for staff to include in email signatures, which enable them to indicate whether they speak Welsh fluently or whether they are learning Welsh. As part of our training on the Welsh language standards, we will encourage Welsh speakers and learners to use these logos. (S142.)



4.19 We provide wording for staff to have bilingual versions of their email signature and out-of-office message. Staff are reminded to use them during our training on the Welsh language standards. (S143.)

4.20 We have a supply of badges denoting the ability to speak Welsh and encourage Welsh-speaking members of staff to wear them. We also have a supply of lanyards which denote the ability to speak Welsh or which denote Welsh learners, which we encourage staff to use. (S144, S144A.)

4.21 We assess the need for Welsh language skills as part of assessing the requirements for new or vacant posts. Our HR procedures specify that, in future, this assessment must be undertaken against the four categories of Welsh language skills set out in the standards:

- a) essential
- b) need to be learned when appointed to the post
- c) desirable
- d) not necessary. (S145.)

4.22 Our HR procedures specify that when we:

- categorise a post as one where Welsh language skills are essential, desirable or need to be learned, we will specify that requirement when advertising the post, and will advertise the post in Welsh. (S145A.)
- advertise any post, we will state that applications can be submitted in Welsh, and that an application submitted in Welsh will not be treated less favourably than one submitted in English. (S146.)
- inform an individual of our decision in relation to an application for a post, we will do so in Welsh if the application was made in Welsh. (S149.)

4.23 We will provide the following in both Welsh and English:

- application forms for posts
- material explaining the procedures for applying for posts
- information about the interview process
- job descriptions. (S146A.)

4.24 The HEFCW application form for vacancies:

- provides a space for applicants to indicate whether they wish to use the Welsh language at interview.
- explains that, if an applicant wishes to use the Welsh language at interview, we will provide simultaneous translation facilities, unless the staff involved are able to conduct the interview in Welsh without translation services. (S148.)

Signs displayed in the workplace

- 4.25 When we erect or renew a sign in our offices, the text will be displayed in Welsh and English, and the Welsh and English text will be equal in format, size, legibility and prominence. (S150.)
- 4.26 Welsh-language text on new bilingual signs in our offices will be positioned so that it is likely to be read first. We will review existing signs to check that that is the case. (S151.)
- 4.27 Welsh language text on signs displayed in our offices will be checked by a suitably qualified Welsh speaker or a translator before installation in to ensure that it is accurate in terms of meaning and expression. (S152.)

5 Record-keeping standards

Keeping Records

- 5.1 We will keep a record, in relation to each financial year, of the number of complaints we receive relating to our compliance with the standards. Such complaints will be handled in accordance with HEFCW's standard complaints procedures. We keep records, by financial year, of the number of complaints relating to compliance with the standards. (S154, 155.)
- 5.2 We will keep a copy of any written complaints that we receive that relate to our compliance with the standards or any other aspect of the Welsh language. Any such complaints will be handled in accordance with HEFCW's standard complaints procedures, and we keep copies of all written complaints that we receive. (S156.)
- 5.3 We will keep copies of the impact assessment screenings of new and revised policies, in order to ensure compliance with the policy-making standards. (S157.)
- 5.4 We will keep an annual record of the Welsh language skills of staff, based on the outcomes of the annual online survey which we undertake. (S158.)
- 5.5 Our HR section will keep an annual record of the number of staff who undertake training in Welsh on aspects of line management activity. (S159.)
- 5.6 Our HR section will keep copies of every assessment of Welsh language skills requirements carried out for new and vacant posts. (S161.)
- 5.7 Our HR section will keep a record, in relation to each financial year, of the number of new and vacant posts categorised in accordance with each of the levels identified in standard 145. (S162.)

6 Supplementary matters

Publicising standards

- 6.1 As the standards specify that we must make available a document which records the service delivery, policy-making, operational and record-keeping standards with which we are under a duty to comply, we have published a copy of HEFCW's compliance notice from the Welsh Language Commissioner on our website. (S163, S169, S175, S181.)

Publicising how we intend to comply with the standards

- 6.2 This current document, our Implementation Plan, explains how we will comply with the service delivery standards, policy making standards, operational standards and record-keeping standards with which we are under a duty to comply. We will publish the Implementation Plan on our website. (S167, S173 S179.)

Publishing arrangements for oversight, promotion etc

- 6.3 We will ensure that we have procedures for overseeing the way in which we comply with the service delivery, policy-making and operational standards with which we are under a duty to comply, and for promoting and facilitating the use of those services. We will publish the document on our website. (S165, S171, S177.)

Complaints procedures

- 6.4 We will handle any complaints about our compliance with the service delivery, policy making and operational standards in accordance with the procedures laid down in HEFCW's existing complaints procedure. Our complaints procedure, which is on our website, specifies that it applies to any complaints about our compliance with the standards. (S164, S170, S176.)

Annual Report

- 6.5 We will produce an annual report, in Welsh and English, in relation to each financial year which deals with how we have complied with the service delivery, policy-making and operational standards. The annual report will also include information about:
- The number of complaints received in relation to our compliance with the service delivery, policy-making and operational standards.
 - The number of employees who have Welsh language skills at the end of the financial year, based on our annual online survey.

- The number of staff who have undertaken training in Welsh on aspects of line management activity.
 - The number of staff who wear a badge denoting their ability to speak Welsh.
 - The number of new and vacant posts which we advertised during the year which were categorised as posts where the Welsh language skills were essential, needed to be learnt following appointment, were desirable or were not necessary.
- 6.6 We will publish the annual report on our website not later than six months after the end of the financial year to which it relates, and will publicise the fact that we have done so. (S166, S172, S178.)

Providing information to the Welsh Language Commissioner

- 6.7 We will provide the Welsh Language Commissioner with any information that the Commissioner requests about our compliance with the service delivery, policy-making and operational standards. We will also provide the Welsh Language Commissioner with any records which we have kept in accordance with the record keeping standards, if the Commissioner asks for those records. (S168, S174, S180, S182.)