



Older People's Commissioner for Wales
Comisiynydd Pobl Hŷn Cymru

Welsh Language Scheme Monitoring Report

2013/14

An independent voice and
champion for older people.

1.0 Introduction

1.1 As an independent organisation funded by public monies, the Older People's Commissioner for Wales is required by law to produce a Welsh Language Scheme and report on progress on an annual basis. The Scheme, prepared under the Welsh Language Act 1993, received the approval of the Welsh Language Board on 16 August 2010.

1.2 This is the third report undertaken by the Older People's Commissioner for Wales on action and associated operation of her Welsh Language Scheme and progress against the timetable contained within the Scheme.

1.3 This report focuses on activities undertaken in the period 1 January 2013 to 31 December 2013.

1.4 The Older People's Commissioner for Wales has four main objectives as set out in the Commissioner for Older People (Wales) Act 2006.

These are to:

- Promote awareness of the interests of older people in Wales and of the need to safeguard those interests;
- Promote the provision of opportunities for, and the elimination of discrimination against, older people in Wales;
- Encourage best practice in the treatment of older people in Wales;
- Keep under review the adequacy and effectiveness of the law affecting the interests of older people in Wales;

1.5 The Older People's Commissioner for Wales' Welsh Language Scheme sets out the organisation's commitment to the Welsh Language and fully supports the principle behind the Welsh Language Act 1993 to ensure that when providing services to the public in Wales to those who wish to use Welsh, they will be treated to the same high quality services as those who wish to use the English language.

2.0 Summary and overview

2.1 The Older People's Commissioner and her staff are fully committed to treating the Welsh and English languages on an equal footing and take all possible steps to promote the pivotal role of the Welsh language through our work. The Older People's Commissioner for Wales has tackling discrimination at the heart of her legal duties and sees her work as being complimentary to the work of the Welsh Language Commissioner.

2.2 This annual report highlights action taken and progress made during the course of 2013. The Commissioner actively promotes bilingualism in action over and above compliance with our statutory obligations.

2.3 The Older People's Commissioner for Wales has continued to make good

progress in the implementation of her Welsh Language Scheme, ensuring that the scheme is embedded within the organisation and that all members of staff are fully informed of the requirements of the scheme. Clear monitoring of reporting procedures have been put in place to ensure compliance with the requirements of the Scheme, which are reviewed regularly.

2.4 In response to our 2012 monitoring report, the Welsh Language Commissioner asked for an update on progress on the following three issues to be included in the 2013 monitoring report:

- Review of procurement processes
- Review and evaluation of advertising policy
- Review of matters regarding branding

The report details actions taken on these points.

2.5 Our activities in 2013 and our plans for 2014 are summarised in the appendix.

3.0 Accountability and monitoring

3.1 The Commissioner has undertaken a full organisational restructure since the last monitoring report.

3.2 As part of the organisational restructure, a new strategic team of Directors were appointed:

- Director of Finance and Performance
- Director of Wellbeing and Empowerment
- Director of Protection, Scrutiny and Human Rights
- Director of Communications and Engagement

3.3 The Commissioner has delegated lead accountability for the delivery of the organisation's Welsh Language Scheme to the Director of Communications and Engagement, ensuring that it has a high profile within and across the organisation.

3.4 Within this framework of accountability, each Director is responsible for overseeing provision of Welsh Language services within their teams.

3.5 The Welsh Language Scheme has been distributed to all staff to detail Welsh Language requirements and is provided to all new staff at induction.

4.0 Core business

4.1.1 The Commissioner does not provide frontline services to older people other than through direct advice and support provided to older people by the Enquiries and Support team and the work led by the Communications and Engagement team in delivering events and producing publications. The majority of our business involves working with others to effect changes in policies and practices. We also

commission research and produce a range of publications.

4.1.2 The Commissioner has 28 employees across four core teams. At present, the Commissioner employs seven fluent Welsh speakers and three advanced Welsh learners, with all staff encouraged to develop their Welsh language skills.

4.2 Enquiries and support

4.2.1 The organisation records the language preference of all enquirers on our Business Management System (BMS) so we can correspond or engage in people's preferred language. Most of the correspondence and enquiries conducted through the medium of Welsh, or where the caller's desire to communicate in Welsh is identified early, relate to:

- Enquiries from older people and their advocates
- Contact from public authorities
- Media related enquiries
- Welsh speaking visitors to the office
- Face to face contact with stakeholders

4.2.2 All enquiries are managed through the Business Management System (BMS) by a Bilingual Administrator/Receptionist, who will then refer the caller to a member of the Enquiries and Support Team where all three members of staff are Welsh speaking. In addition, the Casework and Scrutiny Officer is also bilingual. The primary means of communication with older people is via letter, email, telephone and to a lesser extent face to face contact. The organisation is able to provide support for older people in their own language.

4.3 Procured services

4.3.1 The majority of services provided under contract to the Commissioner are direct services for the organisations own benefit rather than services provided as intermediaries to the general public. Procured services include:

- Tangible goods and services that enable the organisation to function effectively
- Advisory and intelligence gathering services
- Auditing and legal advice
- Translation, proofing, typesetting, design and printing services
- The organisation has a contract with two companies for a high quality and timely translation service, who provide all of our written translation needs.

4.3.2 Where contracted parties are undertaking work that directly impacts on the organisation's ability to carry out its interface with the general public, they are made aware of our Welsh Language Scheme and references are made to expectations in both the specification and subsequent contracts. Some of our contracts, depending on the relevant thresholds, are subject to formal tendering. Applications in the Welsh language are welcome and are processed in the same way and to time.

4.3.3 The office of the Commissioner continues to review our procurement procedures on a regular basis. We do not outsource any of our statutory functions as a public body. We include in our tender specifications reference to our Welsh Language Scheme and Equality Scheme to make potential suppliers aware of our service standards. Where the supplier is required to provide services in Welsh as part of a contract, undertaking research, for example, we would test their planned approach to this at shortlisting and interview.

4.4 Publications

4.4.1 All materials intended for the public in Wales are produced bilingually. This is controlled and monitored by the Director of Communications and Engagement.

4.4.2 Reports and leaflets that are printed and distributed in hard copy are produced using the tilt and turn method of design, except where the document size is deemed too large and therefore separate English and Welsh copies will be printed.

4.4.3 During 2013, all reports and leaflets that have been produced have been bilingual and tilt and turn in design. For example, Framework for Action 2013-2107, Impact and Reach Report 2012-13, A Thousand Little Barriers Report and Care Home Review leaflet.

4.4.4 The Commissioner produces four types of documents:

- Publications aimed at external audiences. These are always made available bilingually.
- Documents to inform the Commissioner's work but are not initially intended for sharing with the general public. The majority of such documents relate to raw research data that is commissioned from an academic source. If this document was shared with the public then it would be translated.
- Articles for media. These are produced in the original language of the media request. If the article is reproduced and made available on the website then the article will be translated into English / Welsh at that point.
- Internal documents that the Commissioner would deem exempt from FOI requests. The documents will only be available in their original language.

Any documents falling outside these categories will be dealt with on an individual basis by the Director of Communications and Engagement.

4.4.5 All briefings provided to politicians and key stakeholders are produced bilingually.

4.4.6 All consultation responses are also translated when uploaded to the website.

4.4.7 Bilingual accessible formats of documents for external audiences are available on request, e.g. Welsh audio and Braille version of our Impact and Reach Report 2012/13. Welsh language Braille is a new innovation and take-up is negligible amongst older people. Take-up of Welsh audio is also likely to be low and on

this basis we feel justified in providing an on request service. We have sought a producer who can produce copies at short notice when the need arises.

5.0 Dealing with the Public in Wales

5.1 Forms and surveys

5.1.1 All forms and surveys are issued in English and Welsh and can be completed in either language. Examples from 2013 include a questionnaire asking what are the best and worst things about growing older, information gathering for the 'A Thousand Barriers' Report, 'Dignified Care?' follow-up call for information and a questionnaire for the Residential Care Home Review.

5.2 Correspondence

5.2.1 In our service delivery, we ensure that equal status is given to the English and Welsh language. The same service standards for dealing with enquiries apply to English and Welsh correspondence in all formats.

5.2.2 To ensure parity of service in dealing with Welsh correspondence, we employ seven members of staff with English and Welsh written skills (representing a quarter of our workforce), including all three members of the Enquiries and Support Team and two out of the three members of the Administration and Support Team.

5.2.3 All correspondence, in whatever language, is processed in accordance with set performance targets and service standards. These are monitored through our Business Management System.

5.2.4 All formal correspondence with a range of bodies, e.g. notification about Reviews, is provided bilingually.

5.2.5 Any e-mails received in the Welsh language are processed to the same time standards as English language e-mails. All staff use bilingual e-mail signatures.

5.2.6 We have purchased a copy of Y Geiriadur Mawr and the Cysgliad software package has been provided for all Welsh speaking staff.

5.3 Telephone Calls

5.3.1 The first point of contact for people telephoning the office of the Commissioner is our receptionists. The two members of this team who answer the telephone are fluent Welsh speakers.

5.3.2 Our Enquiries and Support Team provide tailored advice to enquirers in English or Welsh. All three team members speak Welsh fluently.

5.3.3 As a result of these arrangements, a Welsh speaker is always available to deal with enquiries. Clear and documented practices are in place for calls to be transferred to a Welsh speaker in the event of a call being answered by a non-Welsh

speaker

5.3.4 Out of hours messages have been recorded bilingually on our answerphone.

5.3.5 Training has been provided to ensure all staff answer the phone bilingually and transfer calls to a Welsh speaking member of staff as required.

5.4 Public Meetings

5.4.1 When public meetings/conferences are organised, invitees are asked to inform the office of the Commissioner in advance if they require simultaneous translation on the booking form. Bilingual invitations and notices publicising the event are sent to delegates and simultaneous translation facilities are provided, as demonstrated at the launch of the Impact and Reach Report at the Senedd in June 2013. Information in packs is provided bilingually, as is any follow-up report from the event.

5.4.2 We follow the former Welsh Language Board's guidance on arranging/holding bilingual meetings.

5.4.3 A checklist is followed to support the planning and delivery of events that are organised. This checklist includes consideration of language requirements.

5.5 Personal Attendances

5.5.1 The office of the Commissioner offers face-to-face interviews primarily for those finding it impossible or unreasonably difficult to use the telephone. Personal callers who wish to have a pre-arranged face-to-face interview are able to do so in English or Welsh. This service is offered proactively in Welsh and members of the Advice and Support team are adept at identifying when such a face-to-face interview is necessary. No face-to-face interviews through the medium of Welsh were undertaken in 2013.

6.0 The Organisation's Corporate Identity

6.1 The Commissioner is committed to being a bilingual organisation and this is reflected in our bilingual corporate identity, which includes:

- Bilingual logo
- Bilingual headed paper
- Bilingual compliments slips
- All media releases are sent bilingually
- All published materials are bilingual
- Mirror Welsh/English website
- Mirror Twitter accounts
- Bilingual business cards
- Bilingual display materials

6.2 In February 2013, the Commissioner reviewed the branding messages of the

organisation. During this process, all key messages were developed and agreed in English and Welsh. It was also agreed that the organisation's bilingual logo would be used on all materials.

6.3 In March 2013, the Commissioner's office was redecorated with pictures of older people that we have met with as part of our Engagement Roadshow, as well as stencilling on the walls of the Commissioner's key messages. The key messages are stencilled in English and Welsh throughout the main office and in meeting rooms.

7.0 Publicity

7.1 Website

7.1.1 The organisation's website is fully bilingual with mirror sites in English and Welsh. Materials are published simultaneously in English and Welsh. A newly designed and refreshed website will be launched in March 2014.

7.1.2 The Commissioner has mirror Twitter accounts in both Welsh and English and encourages Welsh speaking staff to provide their original tweets in Welsh.

7.2 Press Notices and Advertising

7.2.1 All media releases are issued in English and Welsh and are published on our website bilingually. A Welsh speaking contact, the Director of Communications and Engagement, is provided on all releases. The newly appointed press and communications officer also speaks Welsh. The only exception to the issuing of bilingual copy is where we are providing a comment or response to an English only publication e.g. a comment in the Western Mail or a Welsh only publication e.g. a comment in Golwg. If this is then published on our website it will be available in both languages.

7.2.2 Where possible, we always undertake media interviews in English and Welsh when requested and proactively encourage media coverage through national and local Welsh language press.

8.0 Recruitment and Staffing

8.1 The Commissioner has an established protocol regarding recruitment advertising and welcomes applications from Welsh speakers for any vacancies within the organisation.

The Commissioner has procedures in place to identify which posts require desirable or essential Welsh language skills, including the review of existing roles when job descriptions are updated. In addition, all Directors are asked to consider the Welsh language skills required for each newly created post in the context of both the Welsh language skills required for the role, as well as those required within the wider team and organisation. During the last year, the Commissioner has recruited to a number

of positions, some of which were identified as Welsh essential and others with Welsh as desirable, based on the requirements of the job role and the needs of the wider organisation. The Commissioner has also conducted recruitment interviews through the medium of Welsh in part, where Welsh was identified as an essential requirement.

Recruitment adverts and job descriptions will indicate if Welsh language is essential or highly desirable. Where a post has identified the ability to communicate in Welsh as essential, recruitment adverts are placed in Welsh language media. However, all adverts are bilingual regardless of where they are published. Recruitment interviews are also conducted bilingually if the post has been identified as requiring Welsh language skills. In the last year the Commissioner has advertised vacancies in Welsh Language media, including *safle swyddi*, *lleon.net* and *Golwg* and received two recruitment applications completed in Welsh.

On the occasion that a post advertised as requiring Welsh language skills as essential does not lead to an appointment, the post is re-advertised with the same requirements but with Welsh language skills as desirable to enable non-Welsh speakers to apply. In this instance, if a non-Welsh speaker is appointed, they are encouraged and supported to develop their Welsh language skills once in post. During 2013 there have been two occasions that the Commissioner was unable to appoint to posts which were identified as Welsh essential, and subsequently made the decision to re-advertise the posts as Welsh desirable in order to enable non-Welsh speakers to apply. These two posts are both fixed term to enable the Commissioner to reassess the Welsh language requirements of the roles again in the future.

8.2 Guidance on recruiting Welsh speakers is contained in the recruitment policy.

8.3 Job adverts and recruitment packs are produced in English and Welsh. We ask applicants to declare their knowledge of Welsh language as part of our application process.

8.4 The Welsh Language Scheme is included as part of the induction for new members of staff. As a relatively young organisation where the majority of staff took up their posts from 2009 onwards, all staff undertake a managed induction process that has included strong reference to the Welsh language and our Scheme from the very outset.

8.5 The Commissioner employs seven Welsh speaking public facing staff including three members of the Enquiries and Support Team, a Casework and Scrutiny Officer and two Administration and Support Officers with English and Welsh written skills. In addition our Communities, Local Government and Wellbeing Lead is a fluent Welsh speaker. This ensures we can deal with English and Welsh telephone and written correspondence to the same standard. We also employ three members of staff who are advanced Welsh learners, two of whom have been attending Welsh language evening classes during 2013.

8.6 The organisation also held an event on 'Diwrnod Shwmae' on 15 October where employees were encouraged to use as much of the Welsh language that they knew, even if this was just saying shwmae instead of hello, or diolch rather than thank you. The event was arranged by a variety of Welsh language organisations to encourage people around Wales to embrace the Welsh language and start every conversation with Shwmae.

8.7 Operating in a bilingual environment is a core principle which has been supported by staff from the outset. This is reflected in the strong personal commitment to bilingualism amongst all staff and teams. In addition to induction and awareness refreshers, informal opportunities are also utilised to enable fluent Welsh speakers and learners to have an opportunity to speak Welsh in the workplace. Bilingual notice boards are provided and material is encouraged to be displayed in Welsh.

9.0 Implementing and Monitoring the Scheme

9.1 Overall accountability for delivering, monitoring and reviewing the Scheme rests with the Commissioner, delegated to the Director of Communications and Engagement.

9.2 Day to day responsibility for implementing the Scheme rests with each team linked to the provision of their work. External documents and the website are the responsibility of the Communications and Engagement Team.

9.3 The Welsh Language Scheme is available on the website at http://www.olderpeoplewales.com/en/news/news/11-04-01/Welsh_Language_Scheme.aspx

9.4 Members of the public are advised that any complaints about a failure to comply with the requirements of the Scheme should be addressed to the Commissioner's Complaint Manager. No formal complaints have been received to date and we have received praise about the high standard of our translated material.

Appendix

Ongoing actions

Director of Finance and Performance		
Ongoing actions	Target & progress	WLS Reference
Ongoing recruitment and retention of suitably qualified Welsh speaking staff	Initially March 2010 then ongoing. There are currently seven fluent Welsh speaking staff, and three advanced Welsh learners. Two permanent Welsh speaking staff and one advanced Welsh learner has been recruited in the reporting period.	5. Implementing and monitoring, a) recruitment
Develop bilingual job adverts and recruitment pack information	Initially by March 2010 then ongoing. Bilingual job adverts and recruitment packs are available as standard when posts are advertised.	5. Implementing and monitoring, a) recruitment
Ongoing audit of Welsh language skills in current staff	Audit completed in 2013. Seven staff members are fluent Welsh speakers and three further staff are advanced Welsh learners. This represents just over a quarter of all staff.	5. Implementing and monitoring, a) recruitment
Maintain and update central record of staff who can speak Welsh	Initially developed in May 2010 and updated subsequently	5. Implementing and monitoring, a) recruitment

Develop ongoing/ refresher Welsh language awareness training	External training provided for employees by Iaith on Introduction to the Welsh Language and Basic Linguistic Courtesy during 2013 to build on previous awareness training. The organisation also supported 'Diwrnod Shwmae' to promote use of the Welsh language in the workplace.	5. Implementing and monitoring, a) recruitment
Investigate provision of Welsh language training and make them available to staff	All staff are supported and encouraged to learn Welsh and provision is available to financially support training either inside or outside the workplace.	5. Implementing and monitoring, a) recruitment
Director of Communications and Engagement		
Actions	Targets & progress	WLS reference
Procedure to ensure that Welsh and English documents are uploaded onto website simultaneously	Initiated by March 2010 and adhered to subsequently.	4. Public face of the organisation, f) Website
Include update on WLS performance in Annual Report	Due to the annual report changing in structure to an Impact and Reach Report, this information will now be provided on the website	8. Publishing information on performance
Review scheme every four years	Ongoing – due in 2014	5. Implementation and monitoring, f) monitoring and day to day responsibility

2013 progress update		
Action	Progress	WLS Reference
Building on work completed in 2011/12, ensure Welsh language context is built into in all aspects of our work with older people	The Commissioner established an Equality and Welsh Language Advisory Board to support her Residential Care Review. The Welsh Language Commissioner is a member of this board.	2. The delivery of services through the medium of Welsh 3. Communication with the public
Ongoing monitoring and compliance with the scheme: through language 'champions' and formal monitoring	The organisation has restructured during 2013. The new Strategic Directors are responsible for ensuring that the Welsh Language Scheme is adhered due in their teams.	5. Implementation and monitoring, f) monitoring and day to day responsibility
Further refresher awareness training	Time allocated during team meeting in January 2014. New and ongoing training needs are identified during the annual performance appraisal cycle in April. The HR Adviser and Director of Finance and Performance will then source appropriate training for individuals/ teams – whether for new learners or Welsh speakers wishing to develop their skills. Funding is provided up to 100% by the employer.	5. Implementing & monitoring, c) welsh training

Review and evaluation of job advertising policy	Following recruitment activity during 2013 the recruitment advertising protocols have been reviewed and evaluated; this has included the Commissioner's approach to target Welsh speaking applicants.	
Brand development – OPC as a bilingual organisation	An Internal Branding session was held in February 2013 where all key messages were developed in English and Welsh.	4. the public face of the organisation, a) corporate identity
Seeking opinions from Welsh speakers on our services and products	Undertake a newsletter readership survey in 2013 to help inform new products Defer to 2014 due to the launch of a new website	8. Implementing and monitoring
Further work to analyse data on service usage by Welsh speakers	Benchmarking our approach with that of similar organisations by December 2013 Defer until 2014 due to the restructuring process	
Review support provided to ensure that we maintain an equivalent equal service in Welsh and expand provision where practical	As part of an organisational restructuring process in 2013 all roles were reviewed to ensure that an equivalent equal service in Welsh is provided where practical. This will continue to be reviewed at regular intervals.	

<p>Reviewing procurement procedures to ensure compliance with former WLB Contracting Guidance</p>	<p>We continue to review our procurement procedures on a regular basis.</p> <p>We do not outsource any of our statutory functions as a public body.</p> <p>We include in our tender specifications reference to our Welsh Language Scheme and Equality Scheme to make potential suppliers aware of our service standards. Where the supplier is required to provide services in Welsh as part of a contract we would test their planned approach to this at shortlisting and interview, an example might be to undertake research to contribute to the Commissioner's work programme.</p>	<p>5. Implementing and monitoring, e) Agreements and arrangements with third parties</p>
<p>Cross referencing between reporting on the Scheme and reporting around Equality Objectives</p>	<p>As the Commissioner's Equality Plan has been refreshed this year, this will now be ongoing from March 2014.</p>	<p>5. Implementation and monitoring, f) monitoring and day to day responsibility</p>

2014 Targets

Action	Target	WLS reference
Review scheme every four years	Full review undertaken with report produced detailing any changes to the scheme	5. Implementation and monitoring, f) monitoring and day to day responsibility
Seeking opinions from Welsh speakers on our services and products	Undertake a newsletter readership survey following the launch of our new website	8. Implementing and monitoring
Further work to analyse data on service usage by Welsh speakers	Benchmarking our approach with that of similar organisations	