Welsh Ministers’ response to the Welsh Language Commissioner’s standards reports and advice note

Date of issue: July 2014
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**Audience**
Welsh Government departments; public bodies in Wales; third sector bodies in Wales; private sector companies in Wales; educational organisations in Wales; organisations working to promote the use of Welsh; organisations working with families, children and young people, and communities; and other interested parties.

**Overview**
This Ministerial response responds to the themes and recommendations in the Welsh Language Commissioner’s standards reports and associated advice note.

**Action required**
None – for information only.

**Further information**
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**Additional copies**
This document is only available on the Welsh Government’s website at www.wales.gov.uk/welshlanguage

**Related documents**
Contents

1. Background 2
2. The Welsh Language Commissioner’s standards investigation 3
3. Sector reports 4
4. The Commissioner’s advice note and the recommendations of her standards investigation reports 5
5. The Commissioner’s recommendations 8
6. Next steps 10
Appendix: Welsh Language Commissioner’s standards investigation report 11
1. Background

1.1 The Welsh Language (Wales) Measure 2011, (the “Measure”), confirmed the official status of the Welsh language in Wales and created a new legislative framework for the language. A key step in the process of implementing the Measure will be developing standards that will allow the Welsh Language Commissioner to impose duties on organisations. These standards will take the place of the Welsh Language Schemes that were developed under the 1993 Welsh Language Act. These Welsh Language Schemes were approved and monitored by the Welsh Language Board until its abolition on 31 March 2012, with that work now the responsibility of the Welsh Language Commissioner (the “Commissioner”) until the standards become applicable to organisations.

1.2 Throughout the process of drafting the proposed standards we kept in mind the key principles of the Measure, as well as the commitments made during the Measure’s journey through the National Assembly to:
- establish clear rights for Welsh speakers
- provide clarity in terms of what organisations will have to do in order to comply with them, and in terms of what the public can expect from those organisations
- ensure consistency between organisations, particularly within sectors, in the context of Welsh Language service provision
- ensure that duties imposed on organisations are reasonable and proportionate
- enable the creation of an effective enforcement and monitoring system for the standards.

1.3 We expect the new standards regime to gradually replace the Welsh Language Schemes, sector by sector, according to a prioritisation system set by the Welsh Language Commissioner. This first set of standards has been prepared to impose duties on the Welsh Ministers, Local Authorities and National Park Authorities. There are several reasons for choosing these organisations in the first place, which include the wide range of services provided by them across Wales, both locally and nationally; their experience of reporting on their Welsh language provisions (through Welsh Language Schemes); and their status as the only cluster of organisations named under Schedule 6 of the Measure as those that would have Promotion standards imposed on them.

1.4 In drafting the proposed standards, the intention was to allow for as much detail as possible within the standards themselves. As a result, a menu system was developed, which offers standards graded under the same activity. In doing so, the aim was to offer the Commissioner a way of imposing specific and clear duties on organisations, according to what is agreed as reasonable and proportionate for them to achieve. The Measure refers to that process of imposing specific duties on bodies in the form of Compliance Notices. One of the Commissioner’s duties will be to administer and agree that procedure with the organisations.
2. The Welsh Language Commissioner’s standards investigation

2.1 The first set of proposed standards relating to the Welsh Language was published on 6 January 2014. These were prepared to enable the Welsh Language Commissioner to conduct a Standards Investigation with the Welsh Ministers, Local Authorities and National Parks.

2.2 Section 61 of the Measure gives the Commissioner power to conduct a standards investigation. The pre-investigation notice was served on the 22 local authorities, the three National Parks and the Welsh Ministers on 6 January 2014, indicating that the subject of the investigation was to determine which standards (if any) should be specifically applicable to those organisations. The investigation commenced on 27 January, and concluded on 18 April 2014.

2.3 Each of the 26 aforementioned organisations responded to the standards investigation. As specified by the investigation process, the majority of responses focused on the reasonableness and proportionality of the proposed standards. Their responses were based on commitments made in their existing Statutory Welsh Language Schemes and which standards it was reasonable and proportionate for them to comply with in their estimation.

2.4 409 members of the public responded to the Commissioner’s investigation. 182 of these were from an online questionnaire on the Commissioner’s website, while 227 responses followed the standard template published by Cymdeithas yr Iaith Gymraeg (the Welsh Language Society).

2.5 The Welsh Ministers acknowledge that the process of introducing the proposed standards and conducting the first standards investigation has been challenging at times, and that there are lessons to be learned before embarking on investigations 2 and 3. Prior to this, however, the Welsh Ministers are eager to build on the success of this investigation and, over the coming months, to discuss with the Commissioner how both organisations will explain the process to the public as well as the organisations which will be the subject of investigations 2 and 3.
3. Sector reports

3.1 On 2 June, the Commissioner submitted three standards reports to the Welsh Ministers relating individually to Local Authorities, National Parks and the Welsh Ministers themselves. These reports analysed evidence received in response to the standards investigation from the organisations, members of the public, and the Welsh Language Commissioner’s Advisory Panel. On the basis of this analysis, the Commissioner submitted conclusions and a total of 30 recommendations to the Welsh Ministers. The Commissioner’s main message was that the full series of standards should be made applicable to each of the 26 organisations.\footnote{Apart from helplines and call centres in the case of National Parks – see recommendation 2 in the Appendix.} She confirmed that decisions as to what extent an organisation would be expected to comply with a standard, and the timescale for reaching that standard, would be set out in the compliance notices.

3.2 The Measure’s Explanatory Memorandum states:

“The provisions set out in the proposed Measure are intended to build on and modernise the system of schemes created under the 1993 Act.”

3.3 In accordance with this, and the advice provided in the Commissioner’s advice note, the Commissioner emphasises that organisations will be expected to comply with standards which reflect as a minimum the commitments agreed upon in their existing language schemes. The Welsh Ministers support this aspiration.

3.4 Although this report does not refer to all the recommendations individually, each recommendation will receive due regard as the Welsh Ministers proceed to draft the Regulations.
4. The Commissioner’s advice note and the recommendations of her standards investigation reports

4.1 The Commissioner received responses from members of the public and interest groups relating to subjects beyond the scope of the standards investigation. Consequently, she decided to submit advice to the Welsh Ministers under section 4(2)(j) of the Welsh Language (Wales) Measure 2011, which confers power on the Commissioner to advise any person. She submitted the advice, as well as additional comments from respondents, based on 10 themes outlined by respondents, namely:
• the process of introducing standards
• consistency and clarity
• a proactive offer
• operational standards
• administrative standards
• building on commitments in Welsh Language schemes
• the limited scope of certain standards
• consultation and engagement with Welsh speakers
• simultaneous translation and consecutive interpretation
• third-party contracting

4.2 The Welsh Ministers are grateful to the Commissioner for preparing this additional advice. Welsh Government officials were aware of a considerable number of the points raised in the advice note as a number of organisations contacted the Welsh Government directly during the investigation. The Welsh Language Commissioner’s advice note will be given full consideration when drafting the regulations.

4.3 This response summarises how the Welsh Government will move forward to make the Standards.

The process for introducing the standards

4.4 The Welsh Ministers note that 409 responses were received from members of the public, and are grateful to the Commissioner for the detailed analysis of these responses in the standards reports. However the Welsh Ministers acknowledge that the limited subject matter of the Commissioner’s standards investigation made it difficult for the public to know how to express their opinion on the contents of the proposed standards. The Commissioner’s advice in this respect indicated:

"Welsh Ministers should ensure that those wishing to express their views on the proposed standards are given a legitimate and appropriate opportunity to do so by means of a full consultation on the standards once set out in regulations under sub-section 26 and before they are submitted for attention of the Senedd."

4.5 The Welsh Government has decided to follow the Commissioner’s advice and conduct a four week consultation on the draft Regulations to make standards under section 26 of the Measure.
4.6 In taking this decision, we acknowledged that not everyone was satisfied with the scope of the investigation on the Standards, and that what was expected of them when responding was not as clear as it could have been. We also acknowledge that the context could have been better explained, but we are content with the number and quality of the responses received.

4.7 This four-week consultation will be held later this year, and will be an opportunity for everyone to express an opinion on the draft regulations. This will also be an opportunity for the public, the organisations, and the Commissioner herself to see how the Welsh Ministers have responded to the Commissioner’s recommendations when drafting the regulations. We will of course give full consideration to the responses to this consultation before submitting the final Regulations for making standards to the National Assembly.

Building on the commitments in the Welsh Language Schemes

4.8 Although the organisations to whom the first set of standards will be relevant are similar in terms of their nature and the services they offer, they operate in areas of differing linguistic profiles. Throughout the process of drawing up the standards, the need for them to be reasonable and proportionate for all organisations was considered. In the case of certain categories of services, standards were developed which vary in terms of the level of provision. The aim in this respect was to ensure that no organisation would be required to comply with a standard that is weaker than the provision in their existing Welsh Language schemes. This permits the Commissioner to vary her compliance notices to ensure that any standard imposed on an organisation is reasonable and proportionate, and that it reflects as a minimum the current commitments in Language Schemes.

4.9 In the context of the Welsh Ministers, local authorities and national parks, the Commissioner recommends making all the proposed standards specifically applicable to every organisation. The Commissioner noted:

“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 is only in force if the Commissioner gives a compliance notice to the person, and that the notice states that particular standard.”

The limited scope of certain standards

4.10 Further consideration will have to be given to the creation of lists within standards and to whether the scope of that standard can be illustrated without limiting the range of possible services.

2 Apart from helplines and call centres in the case of National Parks – see recommendation 2 in the Appendix.
Simultaneous translation and consecutive interpretation

4.11 The Commissioner also notes the references to simultaneous translation and consecutive interpretation in the proposed standards. We note the Commissioner's request for clear guidance on this matter.

Simultaneous translation

4.12 In preparing the proposed standards, the Welsh Ministers were obliged to consider the wide range of services offered by the organisations which would be subject to the standards. We have considered the Commissioner's comments regarding simultaneous translation from English to Welsh, and recognise that it is not a common practice in meetings held in Wales. However, we are of the opinion that it is essential to offer this service to vulnerable people in personal meetings relating to services or social care. We will therefore consider how best to provide a service to this effect.

Consecutive interpretation

4.13 Consecutive interpretation is offered in the service provision standard in relation to personal meetings. The aim of the standards is to ensure that due provision is offered in every situation. The Welsh Ministers envisage that it may be more reasonable and proportionate in certain circumstances for an organisation to provide consecutive interpretation rather than simultaneous translation. This allows the Commissioner flexibility when drafting compliance notices.

Third party contracting

4.14 In the context of third party contracting, the intention of the Welsh Ministers in drafting the standards was to ensure that any organisations which have had standards in relation to specific services imposed on them, will ensure that any body contracted by them to undertake elements of those service(s) on their behalf, will be aware of the requirements placed upon the organisation under the standard. However, we will give further consideration to the Commissioner's comments on this issue.

4.15 The Welsh Ministers note the rest of the Commissioner’s advice, and we will consider all issues further before drawing up the draft Regulations.
5. The Commissioner’s recommendations

5.1 For ease of reference, the Welsh Government has included the Commissioner’s recommendations in an appendix to this report. The table includes all the recommendations arising from the three reports submitted to the Welsh Ministers, and includes any amendments or additional recommendations for specific organisations. There are 30 recommendations in total, 6 of which are general recommendations. There are also 19 recommendations on specific standards, and 5 recommendations referring to the Welsh Ministers only.

5.2 The Commissioner proposes 6 recommendations on specific standards, which focus on amending or strengthening the wording of standards. These mainly include service provision standards, with a reference to the criteria for visual materials similar to publications, advertisements, signage and forms. She also refers to promotional standards and the need to consider local and national strategies, as well as the need to make record keeping standards consistent.

5.3 Consideration will be given to those service provision standards in which there are categories, lists, criteria or definitions (see recommendations 7 and 8: the Welsh Language Commissioner’s Table of Recommendations). In some instances, it is recommended that some standards should be split, thus creating more than one standard in relation to the same activity. A good example of this is standard 43 in the proposed standards document, which deals with publications. The Commissioner notes organisations’ concern about their ability to produce the full list of publications immediately, with specific reference to agendas, minutes and other papers for meetings, conferences and seminars or (in the case of the Welsh Ministers only) advisory panels. To this end, the Commissioner recommends that a specific standard should be created which would include the above-mentioned elements (recommendations 9 and 25: the Welsh Language Commissioner’s Table of Recommendations) in order to ensure that standard 43 can be imposed in its entirety on organisations. In drafting the regulations, the Welsh Ministers will give due regard to this recommendation, as well as to each of the recommendations referring to the amending or strengthening of the proposed standards.

5.4 The Commissioner is introducing 16 further recommendations for additional standards. Five of these are relevant to the Welsh Ministers only, namely standards relating to inquiries and public hearings, research and legislation (recommendations 25 – 29: the Welsh Language Commissioner’s Table of Recommendations), and the Welsh Ministers will give them due regard. The other recommendations relate to service provision with regard to forms, publicity and advertising, awarding contracts, raising awareness and planning a joint-provision service. In the context of the latter theme, the Commissioner expresses concern that the proposed standards do not reflect the current situation throughout Wales. In her report she notes that:

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3 The Welsh Language Commissioner’s Standards Investigation Reports, including the recommendations, can be viewed on the Commissioner’s website: http://www.comisiynyddgymrcae.org/English/News/Pages/Welsh-Language-Commissioner-presents-standards-reports-and-advice-to-Welsh-Ministers.aspx
“Joint service planning takes place on a strategic and operational level and that it is expected practice in some areas in particular e.g. children and young people; care, health and welfare; education; the economy; community safety and the environment”

The Commissioner recommends that up to five additional standards should be introduced in order to ensure a joint-provision service which gives due consideration to the Welsh Language. Although we appreciate that partnerships have an increasing role in providing services to the public, this is an issue which the Welsh Ministers will need to consider when drafting Regulations. The Welsh Ministers will need to consider the legal status of existing partnerships, as well as the legitimacy and practicality of implementing standards where different standards have been applied to different members and where some members of those partnerships are not subject to standards at all.

5.5 The Commissioner’s reports states her concern about the Operational standards. Recommendation 19 (see the Welsh Language Commissioner’s Table of Recommendations) introduces the Commissioner’s general stance, namely that the operational standards have failed to represent adequately the linguistic context which exists in workplaces throughout Wales. The Commissioner provides examples of the language schemes of organisations which have chosen to include a commitment to use the language internally, even though this was not a statutory requirement. The Welsh Ministers have acknowledged the need to ensure that organisations do not fall below their current level of provision, and every effort will be made to ensure that this is reflected in those regulations where evidence refers to the need to strengthen standards.
6. Next steps

6.1 The Commissioner’s investigation findings and the responses of interested groups will be fully considered and will inform the making of regulations by the Welsh Ministers. This drafting process will take place over the summer with the aim of completing them by the Autumn.

6.2 As we have decided to follow the Commissioner's advice and proceed to consult on the regulations to make the proposed standards, this will result in a short delay in the process of laying the regulations. This will give members of the public an opportunity to view the regulations and to consider our response in the wake of the Commissioner’s investigations. By conducting the consultation in November 2014, we will be in a position to lay the standards before the Assembly in March 2015.

6.3 Alongside the standards investigation, the Welsh Ministers carried out a Regulatory Impact Assessment (RIA) on the 26 organisations as part of their subordinate legislation processes. The assessment focused on the linguistic, economic, social and environmental advantages of introducing standards, together with any additional costs which might arise in order for organisations to implement the standards effectively. We have already carried out an initial analysis of the responses, and the next step will be to consider the evidence in tandem with the Commissioner’s reports. The Welsh Ministers will be expected to introduce an Explanatory Memorandum which will include an analysis of the RIA as part of the Regulations package.
Appendix: Welsh language Commissioner’s Standards investigation report

Recommendations for the Welsh Ministers, Local Authorities and National Parks

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<tr>
<th>Nr</th>
<th>Standard</th>
<th>Comment</th>
<th>Welsh language Commissioner Recommendation</th>
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<tr>
<td>1</td>
<td>Service Delivery</td>
<td></td>
<td>The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to Welsh Ministers, all county councils and county borough councils and National Parks in Wales.</td>
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<tr>
<td>2</td>
<td>Service Delivery</td>
<td>This recommendation stems form the activities list in Schedule 9 of the Welsh Language (Wales) Measure 2011, and under point 4 and 5 of the Introduction to Service Delivery</td>
<td><em>(Welsh Government)</em></td>
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<td>The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to Welsh Ministers.</td>
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<td>• Courses</td>
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<td><em>(Variation for Local Authorities and National Parks)</em></td>
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| Standards. The Commissioner presents different versions of the same recommendation to Welsh Ministers, Local Authorities and National Parks. | If announcements (…) were to fall within the scope of the activity, the Welsh Language Commissioner has reached the conclusion that Welsh Ministers should secure that regulations provide for service delivery standards in relation to the activity below to be specifically applicable to all county councils and county borough councils and National Parks in Wales.  

- public address systems

No national park authorities carried out the activity below.

- helplines and call centres

The Welsh Language Commissioner has reached the conclusion that standards regarding the above activity should not be specifically applicable to national park authorities. |
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<td>3</td>
<td>Policy Making</td>
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<td>4</td>
<td>Operational</td>
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<td>5</td>
<td>Record Keeping</td>
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</table>

The Welsh Language Commissioner has reached the conclusion that Welsh Ministers should secure that regulations provide for policy making standards to be specifically applicable to Welsh Ministers, all county councils and county borough councils and National Parks in Wales.

The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for operational standards to be specifically applicable to Welsh Ministers, all county councils and county borough councils and National Parks in Wales.

The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for record keeping standards to be...
specifically applicable to Welsh Ministers, all county councils and county borough councils and National Parks in Wales.

|   | Promotion | The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for promotion standards to be specifically applicable to Welsh Ministers, all county councils and county borough councils and National Parks in Wales. |

**Recommendations concerning specific standards**

|   | Service Delivery | Standards 48,54,63,117 (Visual Materials) | Many of the proposed standards in relation to visual materials note the following criteria for defining what is meant by ensuring that the Welsh language is not treated less favourably than the English version:  
  - Font, format, colour, size, clarity and prominence.  
  
  The Welsh Language Commissioner has reached the conclusion that ‘quality’ and ‘timing’ should be added to that list. On some occasions the ‘publishing cost’ should also be included as a relevant criterion on the basis that not doing so would cause a regression. |

|   | Service Delivery | Standard 43. (Publications) | In order to avoid regression, the Welsh Language Commissioner has reached the conclusion that the list of categories should also include the following:  
  - guidelines  
  - cards  
  - codes of practice |
Similarly, the criteria for considering what other publications that should be produced in Welsh should not be less than what is contained in the guidelines issued by the Welsh Language Board as to the form and content of Welsh language schemes.

9 Service Delivery Standards 43-45 (Publications). Additional Standard Welsh Ministers should specify a particular standard for publications relating to agendas, minutes and other papers for meetings, conferences or seminars that are open to persons.

10 Service Delivery Standards 46-49 (Forms). Additional Standards Welsh Ministers should specify the following standards in regulations, in addition to standards 46-49.

- Organizations must give persons the right to complete a form in Welsh only, if that is their wish.
- A form must be equally as easy to obtain at distribution centres.
- Where separate forms are produced, a message must be included on each form stating that it is available in the other language.
| 11 | Service Delivery | Standard 47 (Forms). Additional Standards | Welsh Ministers should add the following considerations when specifying standard 47 in regulations:

- Forms aimed at the general public in Wales, to be bilingual
- In all other circumstances the following will be relevant: the size and nature of the audience, the nature of the forms and how widely it is proposed to distribute it, timing, the likely demand, importance, value for money. |
| 12 | Service Delivery | Standards 57 (Signage) | Welsh Ministers should specify the following standard in regulations:

*Any new, replacement, or temporary sign erected must contain the information to be conveyed by the sign in Welsh, and the Welsh language text must be positioned so as to be read first.* |
| 13 | Service Delivery | Standards 1-74 (Joint-Provision) Additional Standard | Welsh Ministers should specify the following standards in regulations:

- An organization must plan to deliver all services for which it is accountable so that they are, when operational, consistent with the standards to which it is required to comply with.
- When an organization leads a partnership or is part of another arrangement, whether strategic or financial, it will ensure that its linguistic conduct is consistent with the five standards to which it is required to comply with.
- When an organization joins a partnership or other arrangement which is led by another body, the organization's input to the partnership or arrangement will comply with the standards to which it is required to comply with, and it will encourage other parties to comply.
When an organization joins or forms a partnership or arrangement of any kind, it will ask the prospective partners for the standards to which it is required to comply with, and ensure that they operate in accordance with the highest requirements.

In commencing any collaboration arrangements, an organization must carry out an assessment in order to identify and agree the action to be taken in order to ensure that the collaboration itself does not lead to a reduction in the nature of the Welsh language service persons can expect to receive.

|   | Service Delivery Operational | Standards 26-29 and 97 – 100. (Personal meetings) Additional Standard | Welsh Ministers should specify the following standard in regulations:
|   |                            |                                         | When planning service delivery for persons, the service must be provided entirely through the medium of Welsh, without the use of a mediator, in circumstances where not doing so would detrimentally effect the welfare of the person.
| 14 |                            |                                         | Welsh Ministers should specify the following standard in regulations:
|   |                            |                                         | The organization must greet and welcome those attending meetings verbally in Welsh.
| 15 |                            | Standards 26-36. (Personal / Public meetings) Additional Standard | Welsh Ministers should specify the following standard in regulations on the basis that not doing so would lead to a
<p>| 16 | Service Delivery           | Standard 41. (Publicity and              |</p>
<table>
<thead>
<tr>
<th></th>
<th>Service Delivery</th>
<th>Marketing – response methods). Additional Standard</th>
<th>regression:</th>
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<td>Response methods for publicity campaigns that ensure persons are able to use the language.</td>
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<tr>
<td>17</td>
<td></td>
<td>Standard 41 (Publicity and Marketing, - public surveys). Additional Standard</td>
<td>Welsh Ministers should specify a standard in relation to conducting public surveys in Wales in regulations on the basis that not doing so would cause a regression:</td>
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<td></td>
<td>Conducting public surveys in Wales in Welsh.</td>
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<td>18</td>
<td></td>
<td>Standards 70 – 73 (Awarding Contracts). Additional Standard</td>
<td>In order to highlight the duty which is implicit in the Welsh language (Wales) Measure 2011, Welsh Ministers should specify the following standard in relation to awarding contracts:</td>
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<td>So that an agent or contractors carry out and deliver services in Welsh to the public on its behalf and under its supervision, an organization must ensure that the requirements upon it to comply with relevant standards are noted to contractors when making contractual arrangements and that the operational requirements of the contract are the same as the requirements upon the organization to comply with relevant standards, to the degree that they are applicable to the contract in question.</td>
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| 19 | Service Delivery | Standards 74-77. (Raising awareness of Welsh services) Additional Standard | The following requirements should be attached to standards 74-76 as that would strengthen the concept of the active offer. The Welsh Language Commissioner has reached the conclusion that the standards in question be revised on the basis of the evidence received by the public. The evidence pressed for Welsh language services being offered proactively. Some of the points set out below are based on the content of Welsh language schemes or duty in section 12 of the Welsh Language Act 1993.

The organization must:
- declare the format in which it will give publicity to the Welsh language services supplied by the organization.
- state publicly what the arrangements are for overseeing, encouraging, enabling, facilitating or supporting the use of the Welsh services provided
- give a public undertaking that it will deliver service of equal standard in the Welsh language as in the English language
- highlight the complaints procedure in respect of Welsh language standards and provide the name of a contact
- describe the actions the organization will take to seek feedback regarding experiences of Welsh medium service
- make it clear to persons, in written form and verbally, that Welsh services are available and that the responsibility for offering language choice lies with the provider every time persons come into contact with the organization. |
| 20 | Operational | Standards 95-120. Additional Standard | In addition to what is contained in the proposed standards, Welsh Ministers should specify operational standards which encompass and reflect the linguistic |
context found within all offices of the organization in question, ensuring that there is no reduction in benefit to Welsh language users in moving from language schemes to standards. Welsh Ministers should address the following issues with a view to specifying standards. The issues below reflect the range of evidence collected when analysing the content of their Welsh language schemes;

- internal administration: an official language policy of the workplace - with a range of policy scales associated with that e.g. Welsh only, Welsh as the main language, both languages being official languages;
- language commitments when dealing with schools;
- a policy on the language medium when dealing with elected members, by delivering and administrating in accordance with the language choice of that member;
- Vocational training in accordance with the organization's official language policy;
- guidelines noting the practical, operational expectations as an organization carries out internal administration (in terms of language); a scheme and targets in order to promote more opportunities to use Welsh at work;
- schemes to encourage and support staff to use the Welsh language and to foster a positive culture towards internal use of the Welsh language.

| 21 | Operational | Standards 95-120. Additional Standard | Welsh Ministers should specify the following standard in regulations:

The organization must provide a Welsh domain on the intranet which offers support materials to facilitate and support the use of the Welsh Language. |
<table>
<thead>
<tr>
<th>22</th>
<th>Promotion</th>
<th>Standard 124.</th>
<th>The Welsh Language Commissioner has reached the conclusion that promotion standard 124, which imposes a duty upon an organization to prepare and publish a strategy should also impose a duty to link that strategy with the organization's strategic and corporate schemes.</th>
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</table>
| 23 | Promotion | Standards 121-125 | The Welsh Language Commissioner concludes that Welsh Ministers promotion strategy must give attention to the following areas (without restriction) as these themes are included in a statutory national strategy:  
- language transfer within families;  
- children and young people;  
- education and skills;  
- promoting the Welsh language within communities;  
- working with other sectors or bodies;  
- infrastructure and research. |
| 24 | Record Keeping | Standard 126 | In respect of standard 126, the Welsh Language Commissioner has reached the conclusion that the standard should be specified in a form that is consistent with the other record keeping standards. Considering that Welsh Ministers may specify standards in respect of additional activities, a list of this kind should be avoided. The standard, as presented in the Welsh Government document, has omitted public events from the list. |
| 25 | Record Keeping | Standards 126-134, Additional Standard | Welsh Ministers should specify record keeping standards in respect of the following in regulations:  
- A record indicating that the duties to comply with standards that are in force and the associated arrangements to be implemented are noted at |
the organization's highest level and that they carry the organization's full authority when implemented.

- A record of those who bear the responsibility for co-ordinating all operational aspects of the organization's compliance with standards.
- A record of the qualifications of translators carrying out the work on behalf of the organization.

**Recommendations for the Welsh Government only**

<p>| 26 | Service Delivery | Standards 43-45. (Publications) Additional Standard | Welsh Ministers should specify a particular standard for publications relating to agendas, minutes and other papers for meetings, conferences or seminars that are open to persons. In the case of Welsh Ministers, the standards should also refer to advisory panels. |
| 27 | Service Delivery | Standards 30-33. (Public inquiries and Hearings). Additional Standard | Unless Welsh Ministers are of the opinion that standards 30-33 gives a citizen the opportunity to use Welsh in relation to public inquiries and hearings, a particular standard for doing so should be specified in regulations. |
| 28 | Service Delivery | Standards 26-29. (Courts and Tribunals). Additional standard(s) | Although it is possible to argue that standards 26-29 addresses partly the activities of Tribunals in Wales, it is also appropriate for Welsh Ministers to consider the relevance of Part III, Welsh Language Act 1993 (the Act) and specify standards which offers a consistent experience to an individual who is participating in proceedings held in a Tribunal, in the same way as if those proceedings were undertaken under the terms of Part III of the Act (22-24). |</p>
<table>
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<tr>
<th>Page</th>
<th>Policy Making</th>
<th>Standards 86-94. (Research). Additional Standard</th>
<th>Welsh Ministers should specify a particular standard in regulations for their research functions. This standard should reflect current commitments in the Welsh language scheme.</th>
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<tr>
<td>29</td>
<td>Policy Making</td>
<td>Standards 86-94. (Legislation). Additional Standard</td>
<td>Welsh Ministers should specify a particular standard in regulations for their legislative functions and legislation made in Wales, whilst also considering any legislation made jointly or concurrently with the UK Government.</td>
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