



Welsh Language Standards Annual Report 2020–21

Foreword

We have recently been through some of the most extraordinary times most of us will ever know; the upheaval of the Coronavirus pandemic is still continuing as this report is being written, during our third wave. During the period covered by this report, Public Health Wales has been at the forefront of the battle against COVID-19, providing urgent and life-saving health information as well as services to the track-and-trace and vaccine campaigns, and increasing the capacity of our microbiology laboratories in order to be able to process more than 1.3 million Coronavirus tests over the year. This is on top of an enormous range of backroom work to support the emergency response that won't have found its way into the public consciousness.

During this time, our commitment to the Welsh language has not wavered; we have recognised, from the very start, that the information and services we provide to the public need to be bilingual, not just to meet the obligations placed on us by the Welsh Language Standards and other statutory instruments (such as the Well-Being of Future Generations Act, and the *More Than Just Words* initiative), but because that is a very real need of the populace that we serve.

When we set up a National Contact Centre right at the start of the pandemic to provide help, information and support to our professional colleagues across Wales, we ensured that all recorded messages were bilingual, that call handlers were briefed to greet callers in both languages, and that Welsh speakers were redeployed from other areas of the business to be able to deal with calls in Welsh. When our Policy team rapidly set up a public engagement survey to be able to monitor the public response to infection control measures (which went on to provide invaluable information to enable the Welsh Government to judge which interventions would be most effective), from the outset steps were taken to ensure that anyone taking part in the survey would be able to do so in the official language of their choice. During the year, our staff gave 87 interviews to the press through the medium of Welsh (compared to 180 in English), to help educate the public on all aspects of the virus and its transmission; the press office was staffed by Welsh speakers who were able to respond directly to Welsh-speaking journalists. Throughout the pandemic, our public health messaging has been unwaveringly bilingual – not because that is our legal obligation, but because we know it is the right thing to do.

The Public Health Wales described in this report is, in many ways, a very different organisation from that described in our first Welsh Language Standards Annual Report. There will be some aspects of our compliance that will inevitably have slipped back as our attention has all been focused on the pandemic response, and it is important that we are honest about these and seek to rectify them at the earliest opportunity. But we feel very proud of the way that the systems introduced during 2019–20 in response to the imposition of the Welsh Language Standards have proved themselves to be robust, and of the commitment and good will shown by all our staff whether or not they are Welsh speakers themselves.

As we begin to move towards our recovery mode, and once again restructure our activities and remobilise our staff, we will continue to mainstream Welsh language considerations as part of whatever our ‘new normal’ turns out to be – not as a bolt-on or an afterthought, but as a core function of being an organisation that serves the public of Wales.

Introduction

The requirement for Public Health Wales to comply with the Welsh Language Standards (No.7) Regulations 2018 came into effect on 30 May 2019; the standards with which Public Health Wales must comply are set out in a

Compliance Notice issued by the Welsh Language Commissioner in accordance with the Welsh Language (Wales) Measure 2011.

Our first Annual Report, as required by Standard 120, was published in September 2020 to cover the period 30 May 2019 to 31 March 2020. This second Annual Report takes a similar format, and covers the period 1 April 2020 to 31 March 2021.

Implementing the Welsh Language Standards

Arrangements for facilitating implementation of the standards

The Director of People and Organisational Development has lead responsibility for the Welsh language in Public Health Wales; the Equality, Diversity and Inclusion Manager is responsible for the strategic and operational planning of the Welsh language agenda. They are supported by a Welsh Language Officer and a Diversity, Inclusion and Welsh Language Support Officer (post currently vacant).

The NHS Wales Health Collaborative (NHSWHC), an organisation hosted by Public Health Wales, also employs a full-time Welsh Language Support Officer who works across National Clinical Networks, National Programmes and teams within the organisation to embed the Welsh language. The Public Health Wales and NHSWHC Welsh Language Officers work closely together and they also have close working relationships with the Welsh Language Officers of other health boards and trusts, and the Welsh Language Unit within the Welsh Government's Department for Health and Social Services. These relationships help to facilitate joint working and sharing experiences and learning with the aim of improving Welsh language provision.

The Public Health Wales staff intranet includes a Welsh language section entitled 'Hwb', the purpose of which is to promote Welsh language services and to provide support, guidance and information in relation to implementing the Welsh Language Standards.

Public Health Wales procures translation and interpretation services through the Welsh Translation and Interpretation Framework Agreement, which is managed by the National Procurement Service (NPS). We also have a Service Level Agreement with the NHS Wales Shared Services Partnership for document translation services. We are currently considering how we will meet our future translation needs. Public Health Wales sits on a national

Translation Forum consisting of translators from NHS Wales health boards and trusts.

Self-regulation

Individual directors are responsible for putting arrangements in place in their own directorates, which provide them with assurance that Welsh language requirements are being met in full. For example, our Screening Division has a Welsh language group chaired by a Public Health Consultant and attended by managers from each of the screening programmes; there are action plans, minutes and action logs, and progress is monitored closely and reported to the division's senior management team. The NHSWHC has its own Welsh Language Implementation group, which is chaired by the Assistant Director of Finance and has representatives across all areas of the organisation. This group supports the Welsh Language Officer to gather information in order to monitor and report progress to the senior management team while also enabling collaboration across the organisation to find opportunities for improvement and share best practice.

Directorates are required to self-assess their compliance with each standard and to submit exception reports to the Director of People and Organisational Development. The reports should highlight only the implementation challenges they are experiencing, confirmation of the standards with which they are not compliant and the reasons for non-compliance. Any standards not mentioned in directorate reports indicate full compliance.

The Board's People and Organisational Development Committee receives quarterly reports on Welsh language matters. The Executive Team receives regular updates on Welsh language matters. The Welsh Language Group, comprising representatives from every directorate and the NHSWHC, meets quarterly to consider performance issues.

Many of these monitoring, reporting and governance arrangements had to be put on hold during the COVID-19 pandemic as resources were focused on the urgent response (including many staff being mobilised into different roles). As we begin to return to the 'new normal' these arrangements will be reviewed.

Handling concerns

Public Health Wales welcomes feedback from service users, the public and employees on the implementation of the Welsh Language Standards. We want to learn from their experiences, good or bad, and we will make improvements where there are deficiencies.

We deal with concerns from service users and the public regarding the implementation of the Welsh Language Standards in accordance with our

corporate 'Putting Things Right' procedures. We deal with concerns from our employees in accordance with the All Wales Respect & Resolution policy.

Service Delivery Standards (1–64)

Correspondence and telephone (Standards 1–20)

We have developed an organisation-wide Language Preference Database to facilitate corresponding with colleagues in other organisations in accordance with their language preference. The database was populated following a mailing to all our stakeholders to ask them for their language preference, and is available for all staff to access, consult and add to.

A statement that Public Health Wales welcomes the use of the Welsh language by others has been shared with directorates with the instruction that it must be included in all correspondence. Our Service Level Agreement with the NHS Wales Shared Services Partnership ensures that we can access timely translation of correspondence.

We are still unable to issue correspondence from our screening and other programmes using an address in Welsh on a Welsh letter and an address in English on an English letter, for the reasons laid out in last year's Annual Report. We will continue to seek solutions to this operational challenge (which arises from the way in which we receive the necessary demographic data from external data sources over which we have no control).

The requirement of Standard 17 (that all calls to direct dial lines be dealt with in Welsh until the caller needs to be transferred to someone to deal with a specific subject matter) continues to be a challenge. At the time of writing, that challenge is theoretical rather than practical given that the majority of our staff are still working from home. Technological telephony solutions are being sought and mainstreamed into our general planning for returning to the 'new normal'. It is noted that many of our teams are working on Health Board premises (rather than on estates owned or managed by PHW) so some of the telephony issues will be beyond our control and dependent on Health Boards themselves meeting their obligations under the Standards.

Meetings, events and documents (Standards 21–38)

During 2020–21 lockdown restrictions prevented our holding face-to-face meetings, and the organisation went through a process of change to move all meetings onto Microsoft Teams. The inability of this software to support simultaneous interpretation has proved a challenge, and we have sought ad hoc solutions as and when the need arose. We welcome the promise of an

improvement in the software to accommodate interpretation services, scheduled to happen in summer 2021.

We have prepared a tool to help our staff to identify easily whether a document should be made available in Welsh, and this is available to all on the Welsh 'Hwb' page of the intranet.

Electronic communication (Standards 39–46)

Our corporate website can be found at <https://phw.nhs.wales> (English) and <https://icc.gig.cymru> (Welsh), on which we publish new Welsh and English content simultaneously. We ensure that we regularly audit our webpages and digital content, and if we discover that any English and Welsh pages do not correspond, this is rectified with the help of Welsh language officers and digital editors.

During the pandemic, every effort was made to ensure that vital information was made available in Welsh at the same time as it was released in English. For example, the daily updates from our communicable disease consultants were uploaded bilingually as a matter of course. Where it wasn't possible to do this – if waiting for translation would have incurred a dangerous delay in urgent health messages – the Welsh was released as soon as possible after the English (waiting only for the short delay from seeking urgent translation).

During summer of 2020 it was recognised that one of the contributory factors to the inequalities in health outcomes from COVID-19 was timely access to health information for those individuals who did not speak English or Welsh well enough to access our resources. We organised for the ReciteMe machine-translation plug-in to be enabled on our website, initially on the Coronavirus pages but eventually across the whole website. This software, among other things, enables machine translation of website text into over 120 languages. It is to be noted that from the outset we were very clear that this was *not* to be relied upon for any Welsh text, which must always be translated by a human (or drafted first in Welsh and then translated to English).

Signage and reception services (Standards 47–53)

All new signs are displayed in Welsh and English. The vast majority of our signs that pre-existed the Welsh language standards are bilingual. Where they are in English only, we will replace them with bilingual signs when they require replacement due to poor condition or require amendment. Coming

out of the pandemic, we will audit our compliance once again and our employees will be reminded that all notices must be bilingual.

The Welsh Language Commissioner's 'Work Welsh' signage is used in our reception areas, offices and laboratories, and bilingual staff have been issued with 'Work Welsh' badges and lanyards, all of which convey to service users that they are welcome to use the Welsh language with Public Health Wales.

We had made good progress during 2019–20 with increasing our capacity to provide service in Welsh where reception services exist on our estate. During 2020–21, the majority of our staff were instructed to work from home, and many staff were mobilised into different teams to meet the strategic needs of the pandemic response. A number of the reception services ceased to exist as services were temporarily paused; others were operating on a skeleton staff. This will all have had an impact on our ability to provide that bilingual reception service. As we return to our 'new normal' during 2021–22 we will be mainstreaming Welsh considerations into our 'repatriation' activities to ensure that we can return to the capacity we had before the pandemic and continue to build on it.

Procurement and contracts (Standards 54–64)

We continue to use the NHS Wales standard terms and conditions in our contracts with third parties, which include the following clause:

'The Contractor warrants and undertakes that it will not perform this Contract in such a way as to render the Authority or any Beneficiary in breach of its obligations in respect of the Welsh language including but not limited to its obligations under the Government of Wales Act 2006, the Welsh Language Act 1993 or the Welsh Language (Wales) Measure 2011.'

There was work planned for this year to strengthen our procurement arrangements and support by issuing guidance for staff and delivering training in relation to including Welsh language requirements in tender specifications and contracts. This had to be paused because of the pandemic response, but we will be returning to it as soon as capacity allows.

Policy Making Standards (65–77)

The Public Health Wales 'Policy and Written Control Documents' procedures require an Equality and Health Impact Assessment (EHIA) to be undertaken and submitted before a policy can be approved. Questions regarding the effect of a decision on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English have

been mainstreamed into this process, which also stipulates the need to seek views relating to the Welsh language in consultation exercises.

In January 2020, our Board agreed to publish all new policies bilingually on our website. With the advent of the pandemic, policy development and renewal was paused but will restart during 2021–22.

Operational Standards (79–114)

Internal language use (Standards 79–95)

Public Health Wales prepared a draft policy and procedure on the use of the Welsh language within Public Health Wales. The policy and procedure has been a natural progression for Public Health Wales in terms of increasing and advancing the status of the Welsh language within our operational arrangements. We consulted with staff in relation to the draft policy and procedure throughout September 2019 and the original documents were amended in the light of the feedback received. The final draft was considered by the Welsh Language Group in February 2020 but the final stages of the process had to be put on hold (along with all other policy development) when the pandemic hit. The Executive Team will consider the draft policy and procedure when normal business resumes.

The Welsh language has prominence in our 'People Strategy 2020–30: Our Workforce to achieve a healthier future for Wales'. It identifies that Public Health Wales needs to:

- attract subject specialists with high level Welsh language skills in front-line roles
- prioritise identification of skills gaps, recruitment and learning of Welsh to ensure that we have sufficient Welsh speakers in front-line roles
- support the users of diversity and Welsh language data to help monitor the take-up of services and review health inequalities and Welsh language provision
- support our employees to use Welsh language interfaces and software
- understand the impact of Welsh language requirements on our ability to attract and recruit
- attract a rich pool of applicants for every vacancy including sufficient numbers of Welsh speakers
- increase capability and capacity in relation to Welsh language skills
- make available to employees a clear, sustainable and targeted offering for acquiring, developing and supporting Welsh language skills based on identified service needs and outcomes

There has also been radical change throughout the organisation in our technical systems, involving a wholesale move to Office 365 and to Teams as a primary method of communication. This has presented both challenges and opportunities. The Welsh Language Officer has been working with the Head of Information Management and Technology to capture these and to mainstream Welsh considerations into the organisation's new Digital Strategy. We have taken the opportunity to 'push install' the Windows language pack for Welsh onto all computers as part of the regular update programme; we are also currently investigating the potential of the Welsh to English translation function within the Office suite to enable staff to use Welsh naturally as part of their role when conversing with non-Welsh-speakers within the organisation.

The home page on the Public Health Wales staff intranet is fully bilingual, as is the section entitled 'Hwb', the purpose of which is to promote Welsh language services and to provide support, guidance and information on all aspects of the Welsh language. 'Hwb' also contains clear and easy to use guidance for staff on implementing the Welsh Language Standards. A new intranet site is planned for summer 2021; the migration process will present us with an additional opportunity to confirm that all the necessary pages are available bilingually.

Staff training (Standards 96–103)

Public Health Wales has continued to promote learning Welsh during this time via the National Centre for Learning Welsh (NCLW) 'Work Welsh' scheme, however the exceptional circumstances have meant that many staff did not feel that they could commit to a course. All employees are encouraged to complete the online courses offered by the NCLW in work time or in their own time. During 2020–21, 53 staff members registered for courses offered by the NCLW. Table 1 shows the number of employees who have registered for each course.

Table 1: PHW registration on NCLW courses

Course	Number of registrations
Welcome / Croeso 1	18
Welcome / Croeso 2	4
Welcome Back / Croeso Nôl 1	11
Welcome Back / Croeso Nôl 2	5
Healthcare Sector 1	4

Healthcare Sector 2	2
Social Care	1
Improving Your Welsh 1	6
Improving Your Welsh 2	1
TOTAL	53

Most additional learning opportunities (Work Welsh residential courses, classroom-based lessons, informal practice groups and one-to-one support) had to cease with the arrival of the pandemic, although two of our staff continued to learn with Say Something in Welsh. A new learning offer will be launched in 2021 as part of the repatriation activities.

With the advent of remote working, the regular in-person induction programme ('Welcome, Engage, Network, Develop') had to be paused. However, a new approach was trialled for the mass recruitment to our Microbiology laboratories in the autumn of 2020 which involved a dedicated micro-site containing videos from different areas of the business. Among these was a video from the Welsh Language team giving an introduction to the language (history, geography, general context, Welsh as a living and community language, the importance of bilingual services); information on statutory requirements such as the Welsh Language Standards, and the *Cymraeg 2050* and *More Than Just Words* strategies; introduction to the PHW Welsh culture and what the new employee can expect to see and hear; and signposting to support available within the organisation, such as the internet 'Hwb' and the contribution of the Welsh Language Officer. This format proved to be successful, so has been rolled out to all new employees until in-person induction can recommence.

Additionally, all Public Health Wales employees are required to complete the NHS Wales Welsh Language Awareness e-learning module. As of 31 March 2021, 2025 staff members (94.01% of the organisation) were compliant with this module. During the year 2020–21, 331 new starters completed this module, equating to 82.13% of the newly recruited staff (this will not capture the new staff who started before the end of March but had not yet had time to complete the module when the stats were recorded). These percentages are slightly lower than the 2019–20 figures (95.09% for the organisation as a whole and 86.47% for new starters), which could be

attributable to the upheaval of the pandemic. We have set ourselves the target to once again raise this compliance during 2021–22.

Recruitment (Standards 106–109)

Alongside developing the Welsh language skills of our employees, recruiting bilingual staff is part of our workforce planning approach to ensure the delivery of Welsh-medium services. A Welsh language skills assessment tool is now an integral part of the managers' recruitment process for each job, and the Welsh Language Officer regularly works with managers to make sure their Welsh-essential vacancies are targeted and marketed towards Welsh-speaking communities.

We are taking a phased approach to the publication of bilingual job descriptions and advertisements, starting with those relating to brand new roles. Work to create an internal library of standard and translated job descriptions had to be paused during the pandemic but will be restarted as soon as capacity allows.

Remaining Operational Standards (Standards 110–114)

Previous to the pandemic, there had been considerable work completed on drafting a Clinical Consultation Plan (Standard 110) to set out objectives and actions to increase Public Health Wales' ability to offer and undertake clinical consultations in Welsh. As with everything else not central to the emergency response this work had to pause, and the original draft will need to be considerably revised in 2021–22 because of the upheaval that has been experienced by our public-facing services. Further clarification from the Welsh Language Commissioner's office on the intended structure and use of the plan has been received informally, with more formal guidance promised, which will mean it can be streamlined and simplified.

Record Keeping Standards (119–121)

Complaints procedure (Standard 119)

Public Health Wales has a complaints policy and procedure, published on the Public Health Wales website. Both documents reflect the requirements of the Welsh Language Standards. We have also published a document on the website relating specifically to concerns about complying with Welsh language standards.

All complaints must be recorded on Datix, which is the NHS Wales healthcare risk management, incident reporting and adverse event

reporting system. When complaints relating to the Welsh language are recorded on the system, the Welsh Language Officer receives an email notification, and these complaints are also reported to the Welsh Language Group and to the Board Quality and Safety Committee.

Number of complaints received (Standard 115)

Public Health Wales received three complaints during 2020–21. Two of these came via our own Putting Things Right procedure; one was a complaint made directly to the Welsh Language Commissioner.

Nature of the complaints

Complaint 1 related to self-help mental health videos that were produced by Improvement Cymru and made available for free on our website. While the complainant welcomed the fact that the resource was made available for free, she felt that the standard of the presentation and editing on the Welsh videos was not as high as on the English ones. The complainant was invited to give further input to help improve the videos, and assured that the videos would be improved with the support of the Welsh Language team.

Complaint 2 related to the standard of Welsh language and grammar and the combination of Welsh and English on a Welsh Government information sheet posted on Blaenau Gwent Council's Facebook page. The material in question was produced by Welsh Government with support from PHW. Welsh Government investigated the incident and concluded it was likely that the Council had made an error in posting the information sheet as it had not been officially published by Welsh Government.

Complaint 3 was submitted to the Welsh Language Commissioner. It concerned the 'How Are You Doing?' telephone survey being administered during 2020 by DJS Research Ltd on behalf of PHW; the complainant felt that they had been denied the opportunity to take part in the survey through the medium of Welsh, as is their right under the Welsh Language Standards. Public Health Wales confirmed to the Commissioner that they were responsible for the survey and received the Commissioner's Terms of Reference for an official investigation in December 2020. The formal request for evidence had not been received by March 2021 and the Commissioner's investigation was still ongoing at this point.

Employees' Welsh language skills (Standard 116)

1867 employees (87.5% of the workforce) have recorded their ability to speak Welsh on the Electronic Staff Record (ESR). Table 2 shows the number and percentage of these employees who are proficient at each level;

218 employees (11.7% of those declared) have Welsh language skills at Levels 4 and 5 (10.2% of the total workforce).

This constitutes a small drop in the percentage of staff recording their ability to speak Welsh on ESR, attributable to the rapid recruitment of staff undertaken during the pandemic and the institutional focus on that event. However, we have also seen a rise in both the number and percentage of staff overall recording Welsh skills and particularly in those recording higher-level skills; we attribute this to the focused efforts of our front-line services in recruiting staff to Welsh essential posts

Table 2: PHW Welsh skills declaration rates

	<i>Number</i>	<i>Percentage</i>
Public Health Wales headcount as at 31/03/2021	2133	100%
Employees who have recorded their Welsh speaking skills as at 31/03/2021	1867	87.5%
Employees who have not recorded their Welsh speaking skills as at 31/03/2021	266	12.5%
Level 0	1103	59.1%
Level 1	388	20.8%
Level 2	90	4.8%
Level 3	68	3.6%
Level 4	83	4.4%
Level 5	135	7.2%
TOTAL	1867	99.9%*

** Total not 100% due to rounding*

Welsh language skill requirements of new and vacant posts (Standard 117)

Standard 106 requires Public Health Wales to categorise every new and vacant post by its Welsh language skill requirements. During 2020–21,

Public Health Wales advertised 537 posts. Table 3 shows the number and percentage of posts advertised by each language category.

Table 3: Welsh skills in PHW recruitment

Categorisation of posts	Number	Percentage
Welsh language skills are essential	14	2.6%
Welsh language skills need to be learnt when appointed to the post	1	0.2%
Welsh language skills are desirable	446	83.1%
Welsh language skills are not necessary	76	14.2%

The number of posts advertised as 'Welsh Essential' has decreased from 30 in 2019–20 to 14 in 2020–21 (from 5.5% in 2019–20 to 2.6% in 2020–21). However, when considered in conjunction with the ESR data from Table 2 showing an increase in our Welsh-speaking staff, this would suggest that a more honest appraisal of Welsh skill needs and a more targeted recruitment strategy are producing the desired results.

Priorities for 2021–22

We will focus on the following areas:

- Re-engagement with services across the organisation to ensure their awareness and understanding of (and compliance with) the Welsh Language Standards as part of the priorities identified in our organisation's Operational Plan: reactivation of programmes and services, and effective organisational recovery.
- Targeted activity focused on upskilling existing members of staff in key areas (e.g. supporting unconfident Welsh speakers in front-line services, enabling staff to draft written texts in Welsh first).
- Work to capitalise on the opportunities being presented by the new Digital Strategy for facilitating the use of the Welsh language and for addressing the outstanding challenges in our compliance with the Welsh Language Standards.
- Scrutiny of existing systems (e.g. procurement, translation services) to identify opportunities for improvement in terms of both Welsh language provision and business efficiency.