

Update on progress with Welsh Language Policy Action Plan

The Law Commission published its Welsh Language Policy in September 2017. After one year I have personally reviewed the effectiveness of the policy. My findings are contained in the table below.

In summary, the main issue is to ensure that awareness of the policy remains high across all staff in the Commission. Because of the turnover of staff, together with the pressure swiftly to commence work on a large number of projects simultaneously (following approval of the 13th Programme), we need continually to ensure that there are mechanisms in place to highlight the policy, for example through new staff induction processes.

Overall, however, I am satisfied that the Policy is embedded into our ways of working.

Phil Golding, Chief Executive

September 2018

Action	Method of Action	Updated position as at August 2018
The Commission is to make a corporate statement of the Law Commission's commitment to the principle that English and Welsh are treated on an equal basis when conducting public business in Wales.	Publication of this Welsh Language Policy, provision of a press release once the policy is approved and the direct stakeholders in Wales must be informed.	Complete
	Reference to be made to this Welsh Language Policy in the next Law Commission business plan	Complete – was referenced in 2017 Business Plan, with progress reported on in the 2018 Plan.
	Reference to be made to this Welsh Language Policy in Law Commission Annual Report	Complete

	Provide copies of this policy to all Commissioners and members of staff, as well as making it available on the Commission's intranet site and webpage.	Complete
	A staff training programme will be developed so that all existing staff will receive training on how to comply with this policy and all new members will receive the same training as part of their induction to the Commission.	Staff training was undertaken in 2017 and the policy is referred to in both the RA induction as well as the induction checklist for all staff.
	Existing staff will receive training on how to comply with this policy and all new members will receive the same training as part of their induction to the Commission. A record will be kept of all staff training conducted.	Existing staff have been trained and new staff are also informed of the policy. On the basis that all new staff are informed of the policy it is not felt necessary to maintain records.
The Commission is to present a fully bilingual corporate identity when that identity is used in Wales.	Provide bilingual business cards to be used by Commissioners and staff who are likely to use these in Wales.	Complete. Cards for new Chair have been ordered.
	Produce bilingual name badges to be used by Commissioners and staff who are likely to use these in Wales.	Complete, although use of name badges is reducing.

<p>All public notices and publicity the Commission uses in Wales to be produced fully bilingually. When produced bilingually, the following order shall be used: Welsh, followed by English.</p>	<p>When producing posters or flyers publicising an event in Wales, these should be presented bilingually in the way described.</p>	<p>Complete but ongoing requirement.</p>
<p>When designing new websites, or redeveloping existing websites, the Commission will take into account the Welsh Language Commissioner's Bilingual Software Guidelines and Standards and any other guidance issued by the Welsh Language Commissioner.</p>	<p>All staff should consult the guidelines and other guidance when changes are made to the Welsh language sections of current the website.</p>	<p>The Law Commission is currently considering its external website provision and will ensure Welsh language is a key part of our considerations.</p>
<p>When the Commission issues a press release in both England and Wales via the national press and broadcasting media it will consider whether its duty to act in accordance with section 7 of the Welsh Language Act 1993 requires the release to be issued in both English and Welsh. Press releases made to the Welsh language press and broadcasting media in Wales will be issued in Welsh and English.</p>	<p>The communications manager should issue press releases made to the Welsh language press and broadcasting media in both languages, using the relevant translation services.</p>	<p>Complete but ongoing requirement.</p>
	<p>The communications manager should record each decision made as to whether or not a release is translated into Welsh, in order to ensure that the Commission complies with its duty to act in accordance with s 7.</p>	<p>A two-way discussion between the Head of Communications and the relevant legal team determines whether translation is required. These discussions will be saved in JustStore, our online document storage system.</p>

<p>The Commission is to ensure that staff involved in policy formulation, and the preparation of instructions for new legislation, take into account this policy and the responsibilities under the Welsh Language Act 1993.</p>	<p>As part of the staff training programme to be developed, on the application and use of this Welsh Language Policy, staff should be informed of the need to use the Welsh Language Impact Assessment Framework, found at Appendix E, and trained how to use this.</p>	<p>Complete, but ongoing requirement</p>
<p>The Commission is to offer members of the public the right to choose between English or Welsh when corresponding with the Commission and record the preferred language choice of Commission contacts and act accordingly.</p>	<p>The Commission should create a process for recording the preferred language choice of its contacts, record such choices where expressed and act upon those choices, making use of a proposed stakeholder database.</p>	<p>The Kahootz stakeholder database records Welsh language preference and teams will be advised of the need to record this information where appropriate.</p>
<p>The Commission is to ensure that any correspondence addressed to a member of the public in Wales will be on bilingual headed paper, regardless of whether the letter is written in Welsh or not.</p>	<p>All staff to use the bilingual headed paper already available.</p>	<p>Complete, but ongoing requirement.</p>
	<p>Where written correspondence is received in Welsh then all staff will reply in Welsh in the same timescale as for any other correspondence.</p>	<p>Complete, but ongoing requirement.</p>
<p>The Commission is to use bilingual email signatures when emailing someone in Wales.</p>	<p>Translation of a template email signature to be obtained, which can be used by all staff (subject to a change of name, telephone number and email address) when emailing someone in Wales.</p>	<p>Complete, but ongoing requirement.</p>

Where the Commission organises closed or public events in Wales, publicity will be in Welsh and English and contributions will be welcomed in both languages.	Notices of and invitations to planned events in Wales should be publicised in Welsh, as well as English and make it clear that contributions are welcomed in Welsh or English. They should invite attendees to let the Commission know what language they intend to contribute in, at least 14 days prior to the event date.	Complete, but ongoing requirement.
Where notice is provided of an intention to contribute in Welsh to an event, the Commission will provide translation services at the event and translation of materials prepared by the Commission for the use of attendees at the event.	Where contributions in Welsh are to be made translation services and materials are to be made available. The method and form of the translations services to be provided at events should be decided by staff after consideration of the guidance at Appendix A.	Complete but ongoing requirement.
	Even where no notice is received of an intention to contribute in Welsh at an event, staff still need to consider guidance at Appendix A of the WLP to determine whether it is nonetheless appropriate and reasonably practicable to offer translation services and/or translation of materials.	Complete but ongoing requirement.

	Where the guidance in Appendix A suggests that translation is required in a particular method/form, those services are to be provided and a corporate record kept of that decision.	Complete but ongoing requirement.
	As part of the staff training programme to be developed, on the application and use of this Welsh Language Policy, staff should be informed of the need to use the translation services guidance found at Appendix A.	Complete but ongoing requirement.
Where the Commission organises public events in England (and are specifically publicising them in Wales), where no equivalent event is to be held in Wales, so that members of the public in Wales would be obliged to leave Wales to obtain that service, then their publicity will be bilingual and make it clear that contributions are welcomed in either Welsh or English.	Notices of and invitations to planned events in Wales should be publicised in Welsh, as well as English and make it clear that contributions are welcomed in Welsh or English. They should invite attendees to let the Commission know what language they intend to contribute in, at least 14 days prior to the event date.	From 04 Sept and when required

<p>Where notice is provided of an intention to contribute in Welsh to an event in England, the Commission will consider the guidance found at Appendix A to determine whether it is appropriate and reasonably practicable to provide both or either translation services at the event and translation of materials prepared by the Commission for the use of attendees at the event.</p>	<p>Where a notification of an intention to contribute in Welsh is received the guidance in Appendix A should be considered to determine whether it is nonetheless appropriate and reasonably practicable to offer translation services and/or translation of materials.</p>	<p>Complete but ongoing requirement.</p>
	<p>Where the guidance in Appendix A suggests that translation is required in a particular method/form, those services are to be provided and a corporate record kept of that decision.</p>	<p>Complete but ongoing requirement.</p>
	<p>As part of the staff training programme to be developed, on the application and use of this Welsh Language Policy, staff should be informed of the need to use the translation services guidance found at Appendix A.</p>	<p>Complete but ongoing requirement.</p>
<p>The Commission is to use the categorisation system at Appendix B to determine whether publications should be translated into Welsh, and the format the translated publication should take.</p>	<p>All staff must use the categorisation system at Appendix B to determine whether publications should be translated into Welsh, and the format the translated publication should take.</p>	<p>Complete but ongoing requirement.</p>

	Where the guidance in Appendix A suggests that translation is required, translation in the appropriate form should be undertaken and a corporate record kept of that decision.	Complete but ongoing requirement.
	As part of the staff training programme to be developed, on the application and use of this Welsh Language Policy, staff should be informed of the need to use categorisation system at Appendix B.	Complete but ongoing requirement.
	The Welsh or bilingual version of the final publication shall be available in the same time frame as the English version would be.	The Commission has achieved this on all but one occasion where delays with translation resulted in a short delay in publishing the Welsh version.
When advertising for new Commissioners and staff members, the Commission will use additional promotional materials in bilingual format where that role will require involvement in a Welsh specific project.	When advertising for new Commissioners and staff members in these circumstances, additional promotional materials will be published bilingual format.	We are currently working on revised job descriptions for staff and will ensure these are translated into Welsh when complete. We will seek to provide links to these from the generic Civil Service recruitment adverts. We already ensure promotional materials for RAs are available bilingually.
The Commission is to use additional promotional materials in bilingual format in its annual recruitment of RAs	When advertising for new RAs, additional promotional materials will be published bilingual format.	Complete, but ongoing requirement.

The Commission is to identify any positions that may arise where the ability to speak Welsh is essential or desirable, and identify the level of proficiency required.	All staff should keep under review the need to recruit Welsh speaking staff members to specific positions.	Complete. Such requirements are considered as part of the annual recruitment for RAs and on an ongoing basis by the Head of the Public Law and Law in Wales Team.
The Commission is to encourage any member of staff who wishes to learn Welsh.	The corporate services team should publicise opportunities for staff to learn Welsh as and when they become aware of them.	Complete, but ongoing requirement. Responsibility for this action is shared with the Head of the Public Law and Law in Wales Team.
	All team managers should encourage staff who wish to learn Welsh to do so as part of their personal development plan.	Complete, but ongoing requirement.
The Commission is to ensure that all arrangements and contracts with third parties that relate to the provision of services to the public in Wales are consistent with the terms of this policy and are implemented accordingly.	The corporate services team should, when entering into contractual arrangements with third parties that relate to the provision of services to the public in Wales, ensure that the third party in question is familiar with the terms of this policy and its obligation to provide such services in a manner that is consistent with those terms.	Complete, but ongoing requirement. No such circumstances have, however, yet arisen.
	The Law Commission's Wales group should monitor the compliance of third parties with this policy.	Complete, but ongoing requirement. No such circumstances have, however, yet arisen.

The CEO of the Commission is to oversee the implementation and monitoring of this policy.	The Commission's Wales Group should monitor compliance with the policy bi-annually and report to the CEO.	The CEO has personally conducted the review of the Policy after one year, but the Wales Group will continue to monitor compliance bi-annually.
The CEO of the Commission is to consider any complaints received regarding non-compliance with the policy and take appropriate action where necessary to ensure compliance is achieved.	All complaints received should be directed in the first instance to the head of CST.	Complete, but ongoing requirement. No such complaints have been received.
	All such complaints should be drawn to the CEO's attention (within 5 working days) and addressed by the CEO (within 20 working days) and the CEO must keep a record of all complaints received regarding non-compliance with the WLP, together with a record of the decision and any action taken following consideration of the complaint by the CEO.	Complete, but ongoing requirement. No such complaints have been received.
The Commission is to ensure that all team managers take responsibility for implementing and monitoring the policy in relation to the work of their team.	Team Managers should implement and monitor the operation of this policy within their teams.	Complete, however, this review has found that it is time to refresh awareness of the policy with <u>all</u> staff. These findings will therefore be shared.
	In the third year of the policy's implementation, to prepare an evaluation report. This will need to be published in both English and Welsh.	September 2020 – however, this update on our action plan will be published on our website.

<p>The Commission is to, in the third year of the policy's implementation, prepare an evaluation report, evaluating and assessing the progress of implementation and compliance with the policy.</p>	<p>Following this report, review and revise the policy as appropriate.</p>	<p>September 2020</p>
<p>The Commission is to contribute to and provide information to the Ministry of Justice Annual Monitoring Report to the Welsh Language Commission as and when required.</p>	<p>Contribute to and provide information to the Ministry of Justice Annual Monitoring Report to the Welsh Language Commission as and when required</p>	<p>Complete - already in process, annually</p>