

# Eryri National Park Authority's Welsh Language Standards: 2023/24 Monitoring Report

#### 1. Introduction

- 1.1 On the 30<sup>th</sup> of September 2015, the Welsh Language Commissioner issued the Authority with a Compliance Notice in accordance with section 44 of the Welsh Language (Wales) Measure 2011, which confirmed the Welsh Language Standards that the Authority is subject to.
- 1.2 As is required on an annual basis, this Monitoring Report looks back over the financial year 2023-24, and reports on how the Authority has complied with, and performed against each of the 162 Standards given to it.
- 1.3 This Annual Report is presented for approval to the Annual General Meeting of the Authority in June each year, before being published on the Authority's website. Publicity is given to the Annual Report via the Authority's social media channels.
- 1.4 The Head of Administration and Customer Care has the day-to-day responsibility over implementing the standards, and contact should be made by sending an e-mail to <a href="mailto:Bethan.Hughes@eryri.llyw.cymru">Bethan.Hughes@eryri.llyw.cymru</a> or by telephoning 01766 772530 to discuss any matter relating to this report.

#### 2. Executive Summary

- 2.1 The 2023-24 financial year has seen continued staff turnover, with 33 new or vacant posts being advertised during the year. On the 31<sup>st</sup> of March 2024, the Authority had 149 staff, of which 142 were able to undertake the duties of their post bilingually, which is 95.3%.
- 2.2 It has been noted in the annual reports over the last few years that staff recruitment and retention is a major issue for the Authority, and although it is acknowledged that this is a national problem, with all kinds of sectors experiencing difficulties in recruiting positions at all levels, it nonetheless remains a risk for the Authority.

- 2.3 The Authority recognises that certain specialist work areas are particularly vulnerable to recruitment difficulties nationally, and with the added language requirements that we have, the recruitment pool is limited. Due to this, the Authority has this year invested in creating a Graduate Trainee Planning Officer post specialising in the Historical Environment.
- 2.4 The recruitment process was extremely encouraging with a high number of good quality applicants applying for the position. This has shown us that there is a pool of talented Welsh speaking young people out there who are eager to work for the Authority.
- 2.5 Over the coming year, it is hoped that at least one other Graduate Trainee position can be created in the planning service, which will go some way to improving future resilience within the team. Official confirmation of this will be subject to a positive financial assessment.
- 2.6 Staying on the topic of staff recruitment; although the test case that was due to be held in the previous financial year which challenged the Welsh language skills level requirements of certain posts as being discriminatory, was settled out of court; we continue to mindful of the need for our assessments to remain robust.
- 2.7 Following further guidance from the Welsh Language Commissioner's Office which included a seminar with a Solicitor from Darwin Gray, the Authority reviewed its use of its Welsh Language Skills Framework. Although the framework was robust and that assessments were consistent, it became apparent that language requirements were set too high for some posts, which could not be justified.
- 2.8 As a result, the Head of Administration and Customer Care produced a detailed guidance document for Heads of Service and other key staff who are responsible for assessing language needs for posts. This new guidance document now enables staff to look in greater depth at the requirements of each post through a series of questions. This enables staff to more accurately identify the skill level required for each of the 4 elements listening, speaking, reading and writing.
- 2.9 The Head of Administration and Customer Care continues to moderate each assessment to ensure consistency. The revised process now gives us greater confidence on the robustness of our assessments, should we ever receive a legal challenge.
- 2.10 Another assessment that was reviewed this year was the process for assessing the impact on the Welsh language of our policy decisions. The Authority had been conducting these assessments as part of an integrated impact assessment which included equality and socio-economic considerations.

- 2.11 Following attendance at 2 seminars with Gwion Lewis, KC of Landmark Chambers, which was again organised by the Welsh Language Commissioner's Office, it became clear that the Authority's assessment process was not adequate.
- 2.12 The Authority's process involved going out to public consultation prior to conducting a full impact assessment so that responses could be incorporated. However, the advice was clear that this approach is no longer sufficient. A full impact assessment should be made prior to the consultation so that the public can see what effects there may be on a policy decision. This assessment can then be revised further after the consultation process if further impacts and mitigation measures are identified.
- 2.13 Although not a necessity, the Welsh language impact assessment has now been separated from the integrated assessment, and will be a standalone document with more in depth assessment and analysis for each policy decision.
- 2.14 And finally, it is a pleasure to note that the first full year of different work streams and projects outlined in the Authority's Welsh Language Promotion Strategy for 2022 27 have been completed. The Authority continues to integrate the promotion of the language into all aspects of its work, which we hope will contribute to strengthening the Welsh language in Eryri over the coming years.

#### 3. Service Delivery Standards

- 3.1 <u>Correspondence (Standards 1-7)</u>: The Authority sends out correspondence in the language of choice of the recipient, or in cases when this is not known a bilingual version of the correspondence is sent.
- 3.2 When bilingual correspondence is sent out, the Welsh and English language is treated equally by appearing side by side (where this is possible), with the same font and size used in both languages. On rare occasions when separate Welsh and English correspondence is produced, both versions are identical in terms of font and size, including contact details, signatures etc.
- 3.3 <u>Telephone Calls (Standards 8-22)</u>: All staff who work at the Authority's main receptions and Information Centres are fully bilingual and accordingly are able to deal with all enquiries through the medium of Welsh at the first point of contact.
- 3.4 The Authority has an automated menu on the main contact number, which gives a choice to proceed in Welsh or English. Menu choices are then given in the language chosen. The pre-recorded message for out of hours is bilingual with the message in Welsh being transmitted first.

- 3.5 When contact is made through a direct line telephone number, staff are instructed to greet the caller with a bilingual greeting (with the Welsh first) or with a neutral greeting, ensuring that the Welsh language is not treated less favourably that the English language.
- 3.6 When contact is made through a direct line telephone number, staff are instructed to set a bilingual message on their voice mail, with the Welsh message playing first. For those who have not set a voicemail message, a standard Welsh greeting, recorded by one of the reception staff, asking the caller to leave a message is played instead.
- 3.7 As the majority of the Authority staff are bilingual, any calls from Welsh speakers are dealt with at the first point of contact. For the staff that are not fully able to carry out a full conversation in Welsh confidently, they will transfer the call to a colleague without any delay.
- 3.8 Meetings (Standards 23-38): All meetings arranged with an individual have and will continue to be conducted in the language of choice of the individual. For meetings that have been arranged for a group of individuals, they will be conducted in Welsh with simultaneous translation being arranged for any non-Welsh speakers in attendance (unless none of the invited individuals are able to communicate in Welsh, in which case the meeting will be conducted in English).
- 3.9 All public meetings of the Authority have and will continue to be conducted in Welsh with simultaneous translation available for those who cannot communicate through the Welsh language.
- 3.10 The Authority's committees are all hybrid, giving Members and staff the choice of whether to attend in person or online. For members of the public, they also now have the choice of observing these committees in person or through the live webcast for the Authority and Planning and Access Committee or later through the YouTube channel.
- 3.11 All publicity, written materials and any documentation produced by the Authority and handed out at public events or meetings are fully bilingual, with the Welsh and English languages treated equally.
- 3.12 Public Documentation (Standards 40-51): All the Authority's public documents, including forms are either bilingual with the Welsh appearing first or on the left hand side of the document or are two separate Welsh and English documents. The Welsh and English languages are treated equally, with the same font and size of text used for both languages. The Welsh and English language versions are usually in a separate document when they are published on the website, and a sentence is included on the English version, stating that a Welsh version is available.

- 3.13 <u>Website, Apps and Social Media (Standards 52-59)</u>: The Authority's website and apps are fully bilingual with the user being able to choose their preferred language on the home page. Every single page of the new website has a toggle button which can be used to access the other language. All pages correspond fully between both languages.
- 3.14 The Authority has corresponding Welsh and English or bilingual versions of its social media accounts. All messages from the Authority are replicated identically on the Welsh and English versions of the various social media sites, or bilingually in some instances. Any messages received in Welsh through social media are always answered in Welsh.
- 3.15 <u>Self-service Machines (Standard 60)</u>: All the Authority's pay and display machines in the car parks are able to provide the service in Welsh and English. On older machines, the initial screen displays a language choice before proceeding whilst newer machines change language every 3 seconds.
- 3.16 Signs (Standards 61-63): All signs erected by the Authority are fully bilingual, with the Welsh appearing first or on the left hand side. The Welsh and English languages are treated equally, with the same font and size of text used for both languages.
- 3.17 Reception Services (Standards 64-68): As previously stated all staff who work at the main reception areas or at Information Centres are fully bilingual. Each reception has the 'laith Gwaith' logo on display to indicate that a Welsh service is available and all reception staff have been given 'laith Gwaith' badges.
- 3.18 Official Notices (Standards 69-70): When the Authority publishes or displays an Official Notice they are always fully bilingual, with the Welsh appearing first or on the left hand side. The Welsh and English languages are treated equally, with the same font and size of text used for both languages.
- 3.19 <u>Grant Schemes (Standards 71-75)</u>: The Authority has several grant schemes, namely
  - Cronfa Partneriaeth Eryri Partnership Fund;
  - Building grants in Dolgellau through the Dolgellau Townscape Heritage Initiative:
  - Cronfa Cymunedol y Carneddau which is funded by the National Heritage Lottery Fund; and
  - Celtic Rainforest Fund which is funded by the EU LIFE.
- 3.20 For each of the grant schemes, all documentation including application forms and guidance notes are fully bilingual, and correspondence is carried out in the language of choice of the applicant or bilingually.

- 3.21 In addition, for those grants which are for community based projects, events and activities; conditions are set upon the grant to ensure that all activities and documentation funded by the grants are fully bilingual. The Authority has a formal Policy in place on Awarding Grants in relation to the Welsh language implications.
- 3.22 <u>Contract Tenders (Safonau 76-80)</u>: All Public Notices for Invitations to Tender or to Express an Interest are produced bilingually and usually published on the Authority's website. They are also published on the Sell2Wales website bilingually.
- 3.23 All submissions received in Welsh have been processed and treated in the same way as submission in English, and correspondence is carried out in the language of choice of the applicant or bilingually.
- 3.24 Corporate Identity and Promoting Services (Standards 81-83): The Authority's corporate identity has been fully bilingual since its inception, with the Welsh and English language being treated on the basis of equality. Any future changes or rebranding of the corporate identity will either adhere to this founding principle or will use Welsh only in relation to the name Eryri (Snowdonia).
- 3.25 The Authority does not provide the same services separately in Welsh and English, but rather offers a bilingual service with one point of contact. The promotion of any services is therefore done bilingually, unless using some social media channels, in line with the Authority's corporate identity, ensuring that the Welsh and English language is treated on the basis of equality.
- 3.26 <u>Education Courses (Standards 84-86)</u>: The Authority no longer runs its own public education courses at Plas Tan y Bwlch. This standard is therefore no longer applicable to the Authority.
- 3.27 <u>Public Address System (Standard 87)</u>: The Authority currently does not have any public address systems in place across its buildings.
- 3.28 Complaints relating to Complying with the Service Delivery Standards

  During the year no complaints were received relating to the way in which the Authority complied with the Service Delivery Standards.

#### 4. Policy Making Standards

- 4.1 <u>Policy Formulation and Associated Consultation (Standards 88-93)</u>: With every new policy\* that is developed (or if a present policy is revised and updated) an Equality and Welsh Language Impact Assessment screening process is undertaken as part of the process. This integrated assessment process has been extended to include the socio-economic duty.

  \*Policy is defined in its wider context to include plans and strategies
- 4.2 However, during the year this process has been reviewed and adapted following further information received by the Welsh Language Commissioner. Following 2 online events in which both legal and practical advice was received from a Barrister, officers have now got a much better understanding of how best to conduct meaningful and comprehensive Welsh language impact assessments when developing new policies. As a result, the Welsh language impact assessment is no longer integrated with the equality and socio-economic impact assessment, but is rather a stand alone impact assessment.
- 4.3 The biggest change to the process is that the impact assessment is conducted in full prior to any public consultation. It is then further revised if consultation responses highlight further impacts and their effects. As has always been the case, Members of the Authority will also have an opportunity to scrutinise the proposed policy at various points through this process. If any negative impacts are identified, further work is done to identify mitigating measures. Members would have full involvement on the decision of whether the mitigation measures are likely to be sufficient and to decide whether to proceed with the policy.
- 4.4 A Guidance Document for staff is in place outlining the requirement to ask specific questions regarding the impact (either positive or negative) of any proposal on the Welsh language, opportunities to use the Welsh language and opportunities to promote the language, which goes out with a copy of the impact assessment. The document also includes examples of appropriate wording to use in different consultation documents, which has been circulated to all services within the Authority.
- 4.5 Awarding Grants and Commissioning Research and Projects (Standards 94-97): The requirement to take into consideration the effect (both positive or negative) on the Welsh language has been fully integrated into Cronfa Eryri, the commissioning fund. Additional conditions on the use and the promotion of Welsh, and to ensure equality for the Welsh language will continue to be part of the fund's requirements.

4.6 Complaints relating to Complying with the Policy Making Standards

During the year no complaints were received relating to the way in which the Authority complied with the Policy Making Standards

#### 5. Operational Standards

- 5.1 On the 31<sup>st</sup> of March 2024, the Authority employed 149 staff of which 142 are bilingual, representing 95.3%.
- 5.2 <u>Using Welsh internally (Standard 98)</u>: Since its inception, the Authority has established through custom and practice that the main language of internal communications is Welsh, with English being used as required. A policy is now in place on the use of Welsh internally. This formalises the custom and practice and to assist new staff of operational expectations.
- 5.3 <u>Staff Documentation (Standards 99-104)</u>: The Authority has a fully bilingual policy in place for all human resources matters. In practice, this means that all documentation relating to the employment of an individual is produced in Welsh as standard and given to all staff members. Staff can request an English version of any document if they wish. Any correspondence that is sent out periodically from the human resources service to individual staff members is also usually produced in Welsh only and occasionally bilingually.
- 5.4 <u>Human Resources Policies (Standards 105-111)</u>: All human resources policies are produced bilingually as standard.
- 5.5 <u>Grievance and Disciplinary Procedures (Standards 112-119)</u>: Staff are welcome to correspond in the language of their choice. Both Welsh and English are treated equally and there would be no delay in responding to correspondence received in either language. Disciplinary or appeal hearings are all conducted in the language of choice of the staff member, as well as all related documentation and correspondence.
- 5.6 <u>Computer Software (Standard 120)</u>: Every staff computer and laptop has Cysgliad installed for checking spelling and grammar in Welsh, as standard.
- 5.7 <u>Staff Intranet (Standards 121-126)</u>: All policies and documents uploaded to the Authority's intranet are bilingual or have separate Welsh and English versions.
- 5.8 <u>Skills Assessment (Standard 127)</u>: Data from the staff skills assessment is set out in Appendix 1.
- 5.9 <u>Training (Standards 128-133)</u>: General training courses are always provided in Welsh where possible. During 2023-24, 25 members of staff attended a course entirely through Welsh.

- 5.10 Employees who cannot fully communicate in Welsh or who need to improve their skills in order to meet the post requirements are given assistance to attend Welsh language courses and training, which can be undertaken in work time. Two members of staff attended Welsh / Improving Welsh courses during the year and other one employee undertook online training.
- 5.11 <u>E-mail Signatures and Contact Details (Standards 134-135)</u>: The Authority uses the 'laith Gwaith' badge for Welsh language speakers and learners to place within their e-mail signature. All contact details provided as part of an e-mail signature are fully bilingual, as required in the Authority's 'Clear Communications' booklet, the guide for staff on customer service standards and house style.
- 5.12 <u>Vacant Posts and Recruitment (Standards 136-140)</u>: During 2023-24, 33 vacant posts were advertised. Of these, all were classed as Welsh essential.
- 5.13 A Welsh language skills framework was developed at the start of 2020, which classifies the required skill level for each post from 0 to 5+ in for categories, namely listening, speaking, reading and writing. Each Head of Service now scores each new or vacant post, with the scoring being moderated by the Head of Administration and Customer Care, before receiving final approval from the Management Team. Applicants are now aware before applying, the exact skill level required for the position.
- 5.14 During the year a new more comprehensive template for assessing skill levels of each post was produced along with a detailed guidance document. The aim of this is to give Heads of Service more information about the various aspects to consider when assessing an appropriate skill level, and to have more detailed justification for each score which gives a clear audit trail.
- 5.15 All recruitment advertisements are promoted on different social media channels. Depending on the channel, the posts are either bilingual or are produced in Welsh and English separately but are always posted together without exception. The Authority uses Webrecruits to accept and process applications, which allows applicants to submit their applications online. All documentation is available bilingually e.g. application form, job description, person specification and equality monitoring form. Job interviews are conducted in Welsh.
- 5.16 The Webrecruits system sends out an e-mail to job applicants if they have been unsuccessful in their application and have not been selected for interview. This e-mail is in Welsh and English. Letters or e-mails sent to job applicants informing them of the outcome of their interview are sent out in Welsh only or bilingually.

- 5.17 Internal Signage and Announcements (Standards 141-144): All signs erected by the Authority are fully bilingual, with the Welsh appearing first or on the left hand side. The Welsh and English languages are treated equally, with the same font and size of text used for both languages. The Authority doesn't currently have an internal address system.
- 5.18 Complaints relating to Complying with the Operational Standards

  During the year no complaints were received relating to the way in which the Authority complied with the Operational Standards.

#### 6. Promotion Standards

- 6.1 <u>Promoting the Welsh Language (Standards 145-146)</u>: On the 22<sup>nd</sup> of March 2023 the Authority's Performance and Resources Committee adopted a new Strategy for Promoting the Welsh Language for the next five year period.
- The strategy includes a target to "at least maintain the current number of Welsh speakers in Eryri, and to work with our public sector partners on increasing the numbers over the next 5 years".
- As our previous Strategy demonstrated, although we cannot link the effect of our Welsh language promotion activities directly on the number of Welsh speakers in Eryri, there is still plenty of positive work we can undertake to influence the overall number. With this in mind, we have also set a second target of increasing the number of opportunities to use the Welsh language in Eryri. This target is both meaningful and measurable and within the control of the Authority.

#### 7. Record Keeping and Supplementary Standards

- 7.1 Keeping Records of Compliance with the Standards (Standards 147-176): A document titled 'Eryri National Park Authority Welsh Language Standards' has been produced, which is available in the Authority's offices and on the website. The document outlines all the Standards that the Authority is subject to and sets out how members of the public can make a complaint about the Authority's compliance with the Standards or any aspect of the Welsh language service offered by the Authority.
- 7.2 The Authority has kept records of how it complies with the Standards in accordance with the requirements of the Welsh Language Commissioner.
- 7.3 The Authority always responds promptly to all requests from the Welsh Language Commissioner's Office for evidence when compliance audits are undertaken.

#### **APPENDIX 1**

# 1. Staff Skill Levels - Overview

The number and % of staff within the Authority's services which are able to speak Welsh according to directorate			
	No. of Staff	No. of Welsh Speakers	%
Corporate Planning and Land Management	76 73	74 68	97% 93%

The number and % of staff within the speak Welsh according to post grade	•		
Management Team Heads of Service Grade 7+ Up to Grade 6	3	3	100%
	12	12	100%
	77	72	93%
	57	55	96%

The number and % of staff within the speak Welsh according to workplace	No. of No. of Welsh %		
Head Office	98	92	94%
Information Centres	11	11	100%
External Staff	30	30	100%
Plas Tan y Bwlch	10	9	90%

# 2. Staff Skill Levels by Service

# **Corporate Directorate**

The number and % of staff within the service which are able to speak W  Section No. of No. of				
	Staff	Welsh		
		Speakers		
Management Team	3	3	100%	
Finance	4	4	100%	
Human Resources	4	4	100%	
Administration & Customer Care	9	9	100%	
Information Systems	5	4	80%	
Property	7	7	100%	
Legal	1	1	100%	
Cyfathrebu	6	6	100%	
Plas Tan y Bwlch	10	9	90%	
Wardens	27	27	100%	

Number and % of staff within the service, by post grades, which are able to speak Welsh			
Section	No. of	No. of	%
	Staff	Welsh	
		Speakers	
Chief Executive	1	1	100%
Director	1	1	100%
Heads of Service	7	7	100%
Grade 7+	32	31	97%
Up to Grade 6	35	34	97%

# **Planning and Land Management**

The number and % of staff within the service which are able to speak Welsh			
Section	No. of	No. of	%
	Staff	Welsh	
		Speakers	
Director	1	1	100%
Development Management &	13	10	77%
Compliance			
Planning Policy	4	4	100%
Cultural Heritage	14	14	100%
Conservation, Trees and Agriculture	22	20	90%
Information Centres	11	11	100%
Partnerships	8	8	100%

Number and % of staff within the service, by post grades, which are able to speak Welsh			
Section	No. of	No. of	%
	Staff	Welsh	
		Speakers	
Director	1	1	100%
Heads of Service	5	5	100%
Grade 7+	45	41	91%
Up to Grade 6	22	21	95%

#### 3. Staff Skill Levels - Reception

The number and % of posts in the main reception areas that have been designated 'Welsh essential' and that were filled by bilingual staff.

Section	No. of Staff	No. of Welsh Speakers	%
Head Office	6	6	100%
Plas Tan y Bwlch	1	1	100%
Information Centres	8	8	100%