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Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

AGENDA ITEM 4.10

31 July 2019

University Health Board Report

WELSH LANGUAGE ANNUAL MONITORING REPORTS AND STANDARDS

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Purpose of the University Health Board Report

In line with statutory Welsh language requirements, the Health Board must comply with a set of 119 standards. This report details the key risks and estimated costs associated with the implementation of the Welsh Language Standards.

Governance

Link to Health Board Strategic Objective(s)

The Board's overarching role is to ensure its Strategy outlined within 3 Year Integrated Medium Term Plan 2019-2022 and the related organisational objectives aligned with the Institute of Healthcare Improvement's (IHI) 'Quadruple Aim' are being progressed, these in summary are:

- To **improve** quality, safety and patient experience
- To **protect** and **improve** population health
- To **ensure** that the services provided are accessible and sustainable into the future
- To **provide** strong governance and assurance
- To **ensure** good value based care and treatment for our patients in line with the resources made available to the Health Board.

Supporting evidence

Please see attached letter from the Welsh language Commissioner **Appendix 1**.

Engagement – Who has been involved in this work?
The Welsh Language Services Manager and Director of Workforce and Organisational Development.
Information has been collated from Members of the Welsh Language Standards Working Group.

Health Board Resolution To;							
APPROVE		ENDORSE		DISCUSS	✓	NOTE	✓
Recommendation	Members of the Health Board are asked to; <ul style="list-style-type: none"> • DISCUSS and NOTE this report. • DISCUSS and NOTE the risks associated with the Welsh Language Standards. 						
Summarise the Impact of the Health Board Report							
Equality and diversity	The Health Board must not treat the Welsh language any less favourably than English when conducting its business. Bilingual service provision must be actively offered and provided to those whose language of need is Welsh.						
Legal implications	The Welsh Language Act 1993 and the Welsh Language Measure 2011 legislates that Health Boards must fulfil the requirements of its Welsh Language Scheme and the More Than Just Words Framework which will be monitored by the Welsh Language Commissioner and Welsh Government.						
Population Health	Welsh Language Schemes and Frameworks aim to improve bilingual healthcare provision for Welsh speaking service users which will have a positive impact upon their health and wellbeing. However, the costs of implementation may prevent public monies from being spent on other healthcare services and priorities which may bring more benefits to the wider population of Cwm Taf.						
Quality, Safety & Patient Experience	Providing bilingual services to those who need them will improve quality, safety and patient experience.						
Resources	There is a current lack of Welsh speaking staff to deliver bilingual services which could lead to possible financial resource implications in relation to the recruitment of Welsh speaking staff, staff Welsh language training provision, and external translation and interpretation costs. No additional funding is available to Health Boards to implement the Welsh Language Scheme and Framework.						

Risks and Assurance	The Health Board may be subjected to a formal investigation for non-compliance with the Welsh Language Scheme and future Welsh Language Standards. It is important for the service user to receive healthcare services in their language of need, but at present, there are insufficient Welsh speaking staff with the appropriate skills to provide these services.
Health & Care Standards	<p>The 22 Health & Care Standards for NHS Wales are mapped into the 7 Quality Themes:</p> <ul style="list-style-type: none"> Staying Healthy Safe Care Effective Care Dignified Care Timely Care Individual Care Staff & Resources <p>http://www.wales.nhs.uk/sitesplus/documents/1064/24729_Health%20Standards%20Framework_2015_E1.pdf</p> <p>The work reported in this summary and related annexes take into account many of the related quality themes</p>
Workforce	Refer to information in Resources section above
Freedom of information status	Open

WELSH LANGUAGE ANNUAL MONITORING REPORTS AND STANDARDS

1. SITUATION / PURPOSE OF REPORT

In line with statutory requirements, the Health Board must comply with the new Welsh Language Standards (67 standards by 30 May and 52 standards by 30 November). This report highlights the standards which will require additional funding in order to ensure the Health Board is fully compliant.

2. BACKGROUND / INTRODUCTION

The Health Board received its final compliance notice on the 30 November 2018. A Welsh Language Standards working group has been set up and includes Members of staff from across all Directorates and services. The focus is to lead and drive the Health Board's approach to the delivery of legislative Welsh language compliance across the organisation. The working group reports to the Equality and Welsh Language Forum.

Members of the working group were asked to submit action plans detailing how their service will comply with relevant standards. The meetings provide an opportunity to highlight standards which require more time and funding.

The Welsh Language Manager submitted applications for extensions for standards which have been highlighted by the Working Group as challenging. All applications have been accepted. **See Appendix 1.**

The following standards are under consideration for extensions:

Standard 4 – Communication to a group of people - this includes emails to a group of people. NHS Wales Informatics Service (NWIS) is currently working on a solution.

Standard 5 – Communication to individuals – this includes patient appointment letters and the text and remind service. Staffing and volume of translation is a key issue in complying with this standard.

Standard 19 – Telephoning individuals and noting language choice – this standard requires an all Wales approach with support from NWIS.

Standard 29 – Offering Simultaneous Interpretation at Meetings – this would be for all meetings where at least 10% of attendees are Welsh speaking. A caveat has been requested to ensure that a need for the interpretation is identified prior to the meeting to avoid unnecessary costs.

Standard 64 – Public announcement systems – Outpatients currently use an English only system. Funding is required to purchase a new system.

Standard 65 – Publish Primary Care services available in Welsh – time to survey all of primary care and create a webpage to publish the information.

Standard 82 – All Wales Policies – although these have been translated, the policies do not currently take into account the effects they would have on Welsh speakers. The Welsh Language Manager is currently working with NHS Wales Shared Services Partnership (NWSSP) and NHS Confederation.

The Welsh Language Commissioner is also aware that work on preparing the Bridgend area did not start until 1 April and will take this into consideration should the Health Board receive complaints regarding non-compliance in this area.

3. **ASSESSMENT / GOVERNANCE AND RISK ISSUES**

The Equality and Welsh Language Forum have concerns over the Health Board's ability to implement, monitor and comply with the Welsh Language Standards highlighted above from 30 May 2019. Although the Welsh Language Commissioner has accepted the applications for extensions as valid, there is no guarantee that extensions will be granted. Additional resource is required to ensure the Health Board complies with these standards. To manage the risk the Health Board has agreed to:

- Fund two additional translators and supporting translation software - translation costs continue to escalate as the demand for translation increases in line with statutory requirements. The Health Board must also offer translation services to primary care. This cost is ongoing and will not decrease as the standards are implemented. One of the translators will take responsibility for the translation for the Communications Department and the other will support the existing translator with general translation, primary care work and the translation of job descriptions.
- Purchase simultaneous translation equipment in order to comply with many of the Welsh Language Standards.
- Cover the cost of Welsh language training which will need to be offered free of charge and during working hours after the Standards are implemented.
- The Health Board's text and remind service needed to be bilingual from 30 May. A 12 month extension has been applied for (in line with patient letters above).
- Purchase new equipment to allow the outpatients department to comply with the standard in relation to recorded messages over a public address system.
- The bilingual skills strategy needs to be implemented across the Health Board in particular in child and elderly care services. It was highlighted in a recent primary care managers meeting that community dental practitioners are delivering presentations in English in Welsh primary schools. The same applies to School Nurses and any other service offered to Welsh schools.

Current practice opens the Health Board up to potential complaints as there are clear standards for public engagement, documents, leaflets and resources. It is vital that managers assess the Welsh language requirements of their services before advertising jobs and that they are advertised on Welsh recruitment sites – which is an additional cost to NHS Jobs.

- Public Surveys need to be bilingual. Many departments have their own survey monkey accounts (patient care and safety, communications, facilities, pharmacy and many others). These accounts do not provide the option to develop a survey which will allow a member of the public to choose between Welsh and English at the beginning of the survey. In order to provide this the Health Board will need to subscribe to one higher level survey monkey account.

The total cost of the additional investment to date is around £100k which is a mixture of recurring and non-recurring expenditure. Areas that remain to be addressed include:

- Telephone Voicemail systems across the Health Board are currently unable to offer language choice (press 1 for Welsh, 2 for English etc). Many departments have expressed concerns that a bilingual message on a telephone answering service is too long. Mental Health, Medicines Management call centre, managed Primary Care and Out of Hours services are particularly concerned about this. Additional funding is required to adapt the current telephone systems, however, further costing work would need to be undertaken in respect of this requirement.
- Welsh Language Standards in relation to patient communication including appointment letters are high risk areas for complaints from the general public. Although work has started, the Health Board was unable to comply with this standard by the 30 May imposition date and has applied for a 12 month extension as requested by the performance and information team.
- The demands of implementing the Welsh Language Standards are great and will not end at the 30 November imposition date. There is much to do to ensure the Health Board becomes compliant with all of the standards and continues to be compliant in the future. The work is undertaken within the Health Board by a small team and the capacity of the team will need to be kept under review to ensure Cwm Taf Morgannwg can offer quality Welsh Language services which will be equal to the services provided by RCT Local Authority and Hywel Dda and Betsi Cadwaladr Health Boards.

4. **RECOMMENDATION**

Members of the Health Board are asked to:

- **DISCUSS** and **NOTE** this report.
- **DISCUSS** and **NOTE** the risks associated with the Welsh Language Standards.

Freedom of information status	Open
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