

## Welsh Language Commissioner Standards Investigation

### 1. General

#### 1.1. Full name of the organization:

The Health and Care Professions Council (HCPC)

#### 1.2. Type of organization:

Health and Care Regulator

#### 1.3. Which geographical area is served by the organization?

UK-wide organisation

#### 1.4. Provide a description of the organization's main duties.

The HCPC is a statutory regulator of 16 health and care professions. Its main objective is to safeguard the health and wellbeing of persons using or needing the services of our registrants and achieve this by:

- setting and maintaining standards for professional skills and conduct;
- maintaining a register of professionals who meet these standards;
- approving and monitoring education programmes leading to registration; and
- taking action when a registrant's fitness to practise falls below the standards.

The HCPC regulates each of its 16 health and care professions on the basis of protection of title (with the exception of hearing aid dispensers, where there is also a protected function). It is a criminal offence for someone to use a protected title or claim to be registered with the HCPC when they are not, and we can take action against those who do so. Further information on the HCPC is available here: [www.hcpc-uk.org/](http://www.hcpc-uk.org/)

#### 1.5. What is the location of the organization's headquarters and main regional offices?

Park House, 184 Kennington Park Road, London, SE11 4BU.

#### 1.6. Does the organization have other administrative offices?

Yes [ ]

No [✓]

**1.7. If 'yes', where are the organization's other administrative offices located?**

**1.8. Apart from the administrative offices previously noted, list all other public buildings within the organization's boundaries and responsibilities which are open to the public or a section of the public.**

Apart from its main offices in Kennington, London, the HCPC does not maintain any other public buildings which are open to the public or a section of the public in the UK.

**1.9. How many employees work for the organization?**

As of January 2015, the HCPC currently employs over 230 full-time staff in our London offices. We also currently employ approximately 20 additional staff on a temporary basis.

**1.10. How many of those employees have Welsh language skills? (note fluency levels if known)**

As evident from our Welsh Language Scheme (the Scheme), previous checks have indicated that the HCPC has no Welsh speaking employees. However, this information is not currently captured by our Human Resources (HR) department on a regular basis and there is scope to carry out further checks on this. Our HR department will need to further consider what steps would be reasonable and proportionate in order to collect and record employees' current Welsh language skills.

**1.11. Please provide information and/or evidence regarding the institutional arrangements the organization has in place to support and lead the work of planning Welsh language services and to comply with the current Welsh language scheme's requirements (if relevant).**

Employees and their responsibility: Our current Scheme details our implementing and monitoring arrangements under section six. The chief executive is ultimately responsible for the provision of services in Welsh. However, one of the policy officers in the Policy and Standards department oversees the Scheme's day-to-day implementation. Moreover all managers have a responsibility to implement those aspects of the Scheme which are relevant to their individual departments. This includes meeting any induction requirements for new employees. Third party contractors: All third party contractors are made aware of our Scheme and any specific obligations. Where the work involves communicating in Wales, any third party contracts refer to our Scheme, and specify the service in Welsh that is required. Particular attention is drawn to the relevant parts of the Scheme which contractors are expected to implement. Performance against contract is monitored against compliance. To date we have not undertaken a specific project which has focused solely on communicating in Wales. Monitoring the Scheme: The HCPC prepares an internal progress report on the implementation of our Scheme which is submitted to the monitoring group (the HCPC Council) annually. To date we have completed three internal progress reports. These progress reports are subsequently forwarded to the Welsh Language Commissioner's (the Commissioner's) office. Details of the scheme can be found here: [www.hcpc-uk.org/aboutus/welshlanguagescheme/](http://www.hcpc-uk.org/aboutus/welshlanguagescheme/)

**1.12. Please provide information and/or evidence regarding any facility the organization has to support the use of the Welsh language.**

These provisions are dealt with under section two – service delivery standards.

**2. Service delivery standards**

**2.1. Activity 1: Correspondence sent by a body**

**2.1.1. Does the organization carry out the activity in question?**

Yes []

No []

**2.1.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

**2.2. Standards specified in the draft regulations for correspondence sent by a body [1-7]**

**2.2.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC is committed to dealing with any written enquiries in either Welsh or English. This commitment is stated on any communications intended for distribution in Wales. The phrase 'Correspondence is welcome in English or Welsh/Gallwch ohebu yn Gymraeg neu Saesneg' is included at the foot of HCPC email signatures. Letters received in Welsh are answered with a signed reply in Welsh and within the same service delivery levels as correspondence received in English. For correspondence sent to more than one member of the public in Wales (excluding information sent to registrants on their registration requirements, such as renewal notices), this information is provided in both English and Welsh. We would therefore be able to comply with standards one and six.

**2.2.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.2.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

Some of the commitments outlined in the additional correspondence standards could be achieved over the medium term. However, this would require additional resources and appropriate timescales. The issue of proportionality for a UK-wide organisation needs to be considered by the Commissioner. We have only recorded three Welsh registrants to date who have indicated a preference for receiving Welsh written correspondence from our Registration department. We estimate that if the new record keeping requirements were assigned to the HCPC we would have to update our electronic record keeping facilities in at least three core departments. These include: our Registration, Fitness to Practise (FTP) and Partners departments. We estimate the costs for upgrading our electronic record keeping systems for these three departments alone would amount to £170,000. For standards two and three, our Registration department can record a registrant's preferred language for correspondence. However, due to block mailing requirements (for example, for registration renewals) a separate report needs to be run for registrants who wish to receive Welsh correspondence and this is completed manually. We do not have the ability to record a registrant's email language requirements on our registration system. Such a facility would require significant resources and investment, while there has been minimal demand evident among registrants to date. We rely on registrants to inform us of their individual language requirements for correspondence and do not consider it reasonable or proportionate for a UK-wide organisation to specifically request a registrant's individual communication preferences (including in Welsh) in the first instance. For standard four, we remain committed to ensuring that letters received in Welsh are answered with a signed reply in Welsh and within the same service delivery levels as correspondence received in English. However, in some instances we may need to issue a letter at short notice in English to several persons which cannot await translation into Welsh. This could be in relation to a registrant's fitness to practise (FTP) and to safeguard the public. Thus, we would have difficulty meeting aspects of standard four which would be unreasonable and disproportionate. We would not consider it reasonable or proportionate to provide a Welsh version of all correspondence sent to registrants or members of the public in Wales (standard five). This could include renewal application forms which are tied to our registration renewal cycle. This would require significant resources where very limited demand has been evident to date. If a registrant or individual required a Welsh version of any such correspondence we would translate the required document upon request. If this standard was to be made applicable to us, we would suggest that it refer only to public and patient facing audiences as opposed to our registrants. We would consider elements of standard seven to be reasonable and proportionate. As referred to above, we rely on individual registrants to inform us of their language requirements, and we welcome correspondence in Welsh when dealing with registrants or the public in Wales; we consider this to be proportionate for a UK-wide organisation. We do not consider it reasonable or proportionate to include a statement that we welcome correspondence in Welsh in all correspondence and in all publications sent by us throughout the UK.

### **2.3. Activity 2: Telephone calls made and received by a body**

#### **2.3.1. Does the organization carry out the activity in question?**

Yes

No

#### **2.3.2. Does the organization carry out the activity in question in Welsh?**

Yes

No

### **2.4. Standards specified in the draft regulations for telephone calls made and received by a body [8-22]**

**2.4.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC currently has no Welsh-speaking employees. If an employee receives a call in a language other than English, we do provide a bilingual telephone translation service using Language Line. We therefore would be able to meet standard 18.

**2.4.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes

No

**2.4.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

For the reasons outlined above, we would not be able to transfer a telephone call which we receive to a Welsh-speaking employee and could not meet standards 10, 11 and 19. We need to consider further the proportionality of stating on our website (and other mediums) that our Registration department welcomes calls in Welsh and may be able to meet aspects of standards twelve, 13 and 14. However, we would not consider it reasonable or proportionate to amend all our publications to highlight this provision due to the high costs involved and very limited demand evident to date. With regard to standard 13, we currently do not offer a Welsh language service in an automated message that callers hear when

ringing our Registration department, but we can translate any call received in a language other than English. The same telephone number is used for all calls received to our Registration department and main switchboard number (although the latter does not utilise an automated message). Our previous telephone system upgrade (including updating any automated telephone services) cost £39,950. We do not utilise an answering machine service for our main telephone numbers and would not consider standard 16 to be applicable. We would not consider standard 21 to be reasonable or proportionate for a UK-wide organisation, i.e. issuing a specific invitation when making a call as to the person's preferred language. The majority of calls we make are to individuals located outside of Wales. Also we would encourage the Commissioner to consider that some of the standards as worded would indicate that if a person indicated any preference for Welsh that all accompanying forms of communication should be carried out in Welsh. This may not be the case whereby some persons may wish to converse in Welsh but may not necessarily wish to receive correspondence in Welsh. Additionally, as referred to above any changes to our record keeping facilities for individual communication preferences on our Registration and other key department's record keeping systems would require significant investment and resources. The impact of these requirements for self-financing bodies such as ourselves needs to be considered by the Commissioner when stipulating the standards that should be made applicable to us. The HCPC currently only operates an automated telephone system for our Registration department. This service is provided in English only. The vast majority of our calls are in English. We would not consider it reasonable or proportionate for a UK-wide organisation to provide a Welsh automated service due to the significant cost implications (referred to above) and thus would have difficulty in meeting standards eight, nine and 22. As referred to above, we currently utilise a telephone translation service and we would not consider standard 17 to be applicable. The HCPC currently has no Welsh-speaking employees and would not be able to meet standard 20. Our Registration department currently records performance indicators for dealing with telephone calls. This system does not provide a breakdown of telephone calls received in English or in a language other than English. We typically receive hundreds of calls per day during busy registration renewal periods. The vast majority of these telephone calls are in English and we would not consider it reasonable or proportionate to record the number of Welsh calls received on a daily, weekly, monthly or annual basis as per standard 15, due to the high operational costs involved (including IT changes – our existing telephone performance indicators system cost £20,000), and the very limited number of calls received in Welsh. Our Registration department staff may also find it difficult to meet similar key performance indicators (KPIs) for calls received in Welsh as opposed to English.

## **2.5. Activity 3: A body holding meetings that aren't open to the general public**

### **2.5.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.5.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.6. Standards specified in the draft regulations for a body holding meetings that aren't open to the general public [23-29]**

**2.6.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC organises a number of private meetings with key stakeholders on a daily basis in carrying out our statutory role. These stakeholders include: education providers; health and care service users; professional bodies; employers; members of the media; and registrants, among others. If one of our stakeholders indicated specific communication requirements, for example, a desire to speak Welsh at a private meeting, we would attempt to meet as many of these requirements as possible. In the majority of cases, we would achieve this by offering a simultaneous translation service to the visitor. Therefore we would consider the following standards to be reasonable and proportionate: 24A, 26A, 27A, 27B, 27C, 27E and 29A. With regard to standard 29B the availability of a translator to provide a consecutive translation service in a London based office needs to be considered by the Commissioner.

**2.6.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.6.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

As referred to above, the HCPC would endeavour to meet as many of the individual communication requirements for our visitors at a private meeting as possible. However, for London based organisations, it may be more difficult and resource intensive to arrange consecutive translation services upon request and we may have difficulty in meeting standards 24B, 26B and 29B. We do not refer to any arrangements for private meetings on any of our public facing material. We do not consider it reasonable or proportionate to request the communication requirements for each visitor at a private meeting in our London offices. We might not necessarily be aware of whether the visitor is from Wales or speaks Welsh. Therefore we would have difficulty in meeting standards 24, 26, 27 and 29. As the HCPC has no Welsh-speaking employees we would be unable to conduct any private meetings in Welsh without the assistance of translation services. It would be unworkable for us achieve the requirements outlined in standards 23, 25, 27D and 28 even over the longer term.

## **2.7. Activity 4: Meetings arranged by a body that are open to the public**

### **2.7.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.7.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.8. Standards specified in the draft regulations for meetings arranged by a body that are open to the public [30-34]**

**2.8.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

We understand this question refers to meetings and / or events which the HCPC holds in Wales which are open to key stakeholders including registrants, employers and education and training providers. For public events in Wales, we send bilingual invitations to the events, use bilingual signage, provide bilingual versions of any documentation (for example, PowerPoint presentations) and have English / Welsh interpreters present to allow for the asking and answering of questions in either language (simultaneous translation facilities). Therefore the HCPC would be able to comply with the following standards specified in draft regulations for meetings arranged by a body that are open to the public in Wales: 31, 33 and 34.

**2.8.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.8.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

The HCPC would need to consider the reasonableness and proportionality of investigating further ways of promoting our bilingual provision at public meetings in Wales as per standard

30. This could potentially include further highlighting this provision on the 'Events' section of our website for events held in Wales. However, we would not consider it reasonable or proportionate to provide an online registration process for all public events in Wales due to the high IT costs and very limited demand evident among attendees to date. Furthermore if a Welsh speaker wished to signal their attendance at one of our events they could email us in Welsh and we would respond in Welsh. In relation to standard 32, a simultaneous translation service is available at all public meetings held in Wales. The vast majority of speakers are HCPC employees, none of whom can currently speak Welsh; therefore we would not consider it necessary to ask each employee whether they wish to speak Welsh at such a meeting. However, for external speakers who are invited to attend such meetings we could potentially seek this information in any invitation issued. The HCPC undertakes a number of other public meetings which are predominantly held in our offices in London, including meetings of our various committees and Council; FTP hearings etc. If one of our stakeholders who wished to attend such a meeting indicated their individual communication requirements to us, we would attempt to meet as many of these requirements as possible. Members of the public are not typically allowed to contribute to discussions at such meetings whether they take place in London or elsewhere. We also would not consider it reasonable or proportionate to provide Welsh translations of documents relating to our Council or committees in Welsh except upon request due to high translation costs. We have estimated the translation costs into Welsh for all of our papers considered at our two day Council meeting in December 2014 would have amounted to £20,976.02. We also wish to highlight that the standards in this section do not refer to any thresholds which attendees or speakers need to meet before a simultaneous translation service is offered.

## **2.9. Activity 5: Public events organised or funded in its entirety by a body**

### **2.9.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.9.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.10. Standards specified in the draft regulations for public events organised or funded in its entirety by a body [35-36]**

**2.10.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

We understand this question refers to public events which the HCPC holds in Wales which are open to key stakeholders including registrants, employers and education and training providers. Our Welsh language service provision for such public events in Wales has been referred to above. Therefore the HCPC would be able to comply with standards 35 and 36.

The HCPC would need to consider the reasonableness and proportionality of investigating further ways of promoting our bilingual provision at public meetings in Wales as per standard 35. This could potentially include further highlighting this provision on the 'Events' section of our website. However, we would not consider it reasonable or proportionate to provide an online registration process for all public events in Wales.

**2.10.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.10.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

N/A

**2.11. Activity 6: A body's publicity and advertising**

**2.11.1. Does the organization carry out the activity in question?**

Yes []

No []

**2.11.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

**2.12. Standards specified in the draft regulations for a body's publicity and advertising [37]**

**2.12.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standard specified in the draft regulations, if that standard were to be made specifically applicable to them.**

We understand this question refers to publicity and advertising for events and / or meetings which the HCPC holds in Wales and which are open to our key stakeholders. The HCPC would need to consider the proportionality of bilingual advertising for public events. This could include issuing bilingual promotional materials on the relevant 'Events' section of our website. The HCPC would be able to comply with aspects of standard 37. We currently produce Welsh language advertisements which are targeted to Welsh audiences. For

example, we recently launched an advertising campaign to recruit new members of our Council. The Council must have representation from all four countries, so we sent a bilingual press release to highlight the vacancies to specifically targeted Welsh media. We also placed a Welsh language advert for the vacancies on the Jobs Wales and Public Appointments Wales websites.

**2.12.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.12.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

We would not consider it reasonable or proportionate for standard 37 to apply to publicity and advertising for events and other issues which are focused on our regulatory functions outside of Wales.

**2.13. Activity 7: A body displaying material in public**

**2.13.1. Does the organization carry out the activity in question?**

Yes [✓]

No [ ]

**2.13.2. Does the organization carry out the activity in question in Welsh?**

Yes [✓]

No [ ]

**2.14. Standards specified in the draft regulations for a body displaying material in public [38-39]**

**2.14.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

We understand this question refers to public meetings and / or events which the HCPC holds in Wales and which are open to key stakeholders. We currently use bilingual signage and

provide bilingual versions of relevant information and materials (for example, PowerPoint presentations). Therefore the HCPC would be able to comply with aspects of standards 38 and 39.

**2.14.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.14.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

The HCPC would not consider it reasonable or proportionate for standards 38 and 39 to apply to displayed material for public meetings and / or events which take place outside of Wales.

**2.15. Activity 8: A body producing and publishing documents**

**2.15.1. Does the organization carry out the activity in question?**

Yes [✓]

No [ ]

**2.15.2. Does the organization carry out the activity in question in Welsh?**

Yes [✓]

No [ ]

**2.16. Standards specified in the draft regulations for a body producing and publishing documents [40-49]**

**2.16.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC publishes a number of documents related to our regulatory functions. We offer Welsh translations of core standards, guidance and other technical or specialised material aimed at registrants and other stakeholders upon request. This commitment is clearly stated in all our publications and we would be able to meet standard 49. The HCPC would be able

to comply with aspects of standards 40, 43, and 48. Public facing material which is produced for distribution in Wales, such as brochures, is published bilingually.

This includes:

- press releases (where these relate to specific issues or audiences in Wales);
- Who regulates health professionals? (brochure); and
- How to raise a concern (brochure).

**2.16.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.16.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

As referred to above, we produce a large number of documents in fulfilling our statutory functions including standards and guidance, consultation documents, Council and committee documents, and certificates of registration. As a UK-wide organisation all the documentation referred to above is published in English in the first instance. We would not consider it reasonable or proportionate to produce Welsh versions of these documents in the first instance due to very limited demand and high translation costs. However, upon request we would consider producing such documentation in Welsh. We could also look into the feasibility of including standard content in all documentation (including Council papers etc.) that they are available in Welsh upon request. With regard to our registration certificates if an individual registrant was to request a Welsh version of this document we would provide it in Welsh. Therefore we would be able to meet some, but not all aspects of standards 41, 42, 44 and 45. We hold numerous Council, committee and other executive meetings throughout the year. One estimated cost for translating all our Council documentation (including agenda, minutes and papers) for its December 2014 meeting into Welsh came to £20,976.02 alone. If we had issued a Welsh version of all our published standards, guidance and reports last year, our estimated translation costs for these publications would have been £33,077.02. Under our existing Scheme, we are committed to issuing bilingual press releases and statements to the media in Wales where they relate to relevant issues or to a professional practising in Wales -- for example, the outcome of relevant fitness to practise (FTP) hearings. The Communications department have produced formal guidelines for issuing Welsh press releases. However, on occasion where it is not possible to organise translation of an urgent press release before issuing it we endeavour to produce a Welsh translation as soon as possible. We would not consider it reasonable or proportionate to issue a Welsh version in the first instance of every press release that we issue which relates to our regulatory functions outside of Wales. Therefore we would not be able to meet standard 46 for the reasons outlined above. Last year, our Communications department issued over 100 press releases. We have estimated the possible translation costs for these

press releases alone as being £6,000. Under our existing Scheme we are committed to providing bilingual versions of any public facing publications which are relevant to Wales. However, we consider the criteria detailed in standard 47 to be very wide and requires further clarification.

## **2.17. Activity 9: A body producing and publishing forms**

### **2.17.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.17.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.18. Standards specified in the draft regulations for a body producing and publishing forms [50-51]**

**2.18.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC produces a variety of forms for registrants, with the majority of these relating to our registration requirements. As we are a UK-wide organisation these forms are provided in English in the first instance. However, upon request we would provide a Welsh version of any registration forms to an individual registrant. This requires a significant commitment on our behalf as our bulk mailings processes are completed off-site. We also currently need to manually remove a registrant who signals this requirement from our bulk mailing list in order to send a Welsh version of the required document. We would need to consider the proportionality of including standard content in all forms that they are available upon request in Welsh, as per standard 50A. We would not treat a form received in Welsh less favourably than one received in English and would consider standard 50B to be reasonable. With regard to standard 51, the majority of our registration renewal processes now take place online. We do not have a Welsh version of this electronic interface. The renewal forms contain pre-entered information which relates to the registrant in both the off-line and online versions. Therefore we could only meet the commitment to provide a Welsh version of such documents which contain pre-entered information via our paper-based processes and could only meet standard 51 in this respect.

**2.18.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.18.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

We are a UK-wide regulator which currently regulates over 328,000 registrants. The majority of our registrants work and reside outside of Wales. We would not consider it reasonable or proportionate to produce Welsh versions of the forms mentioned above in the first instance. We also do not consider it reasonable or proportionate to provide a Welsh version of our online renewal interface system due to the very limited demand for such a service to date and the very high cost of changing our IT systems. We have estimated that the cost of providing an online bilingual registration renewal system would be £100,000. Therefore we would have difficulty with meeting aspects of standard 50. We recommend that the Commissioner restricts the requirement for forms to be produced bilingually in the first instance to forms which are public facing rather than for our registrants. This could include forms on how to make a complaint against a registrant.

## **2.19. Activity 10: A body's websites and online services**

### **2.19.1. Does the organization carry out the activity in question?**

Yes []

No [  ]

### **2.19.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No [  ]

## **2.20. Standards specified in the draft regulations for a body's websites and online services [52-57]**

**2.20.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC's website is one of our principal communication tools for informing stakeholders and the general public about our statutory role and regulatory functions. Our website caters for a UK-wide audience and our home page receives 200,000 hits per month. We have already ensured that core public facing material on our website is available bilingually and any future requirements for bilingual provision on our website should be restricted to core public and patient facing material. This content is accessed via the 'Cymraeg' section of our website and contains key information on our functions and how to make a complaint. We

also publish Welsh translations of relevant press releases and publications on our website. We remain committed to increasing the bilingual provision and accessibility of our website and have recently published an additional Welsh webpage which lists all of our publications which are available in Welsh. However, to date we have received a very limited number of hits on our Welsh webpages. For example, for the period September 2013-September 2014, we only received 1,514 hits (many of which were from HCPC employees ensuring that the content was correct). The content of our Welsh webpages is currently provided in both English and Welsh therefore we do not consider standard 55 to be applicable.

**2.20.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.20.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

We do not consider it reasonable or proportionate to provide a bilingual version of our homepage as per standard 53. To date we have received very limited demand for such provision. The content of our homepage changes frequently and meeting standard 53 would require very high translation costs. We already provide a link on our homepage to the relevant Welsh sections of our website together with our Welsh Language Scheme and could meet this aspect of standard 53. We do not consider it reasonable or proportionate to offer a fully bilingual website due to the very limited demand evident to date and the resultant high costs associated with providing such a website (including IT, translations etc). In order to provide a bilingual version, we would need to produce a completely new website (due to the technology currently used). The estimated cost for providing a new website (excluding a bilingual function) is £250,000. Therefore we would not be able to meet standards 52, 54 and 56. We have ensured that our current (and any future) Welsh language webpages are fully functional and would be able to meet this aspect of standards 52 and 54. We currently have two mobile apps which can be downloaded from our website. These are My HCPC (registrant facing) and Check the Register and are currently only available in English. We consider that it would be more cost effective to develop two new Welsh apps than trying to create a bilingual function on any existing apps. The estimated costs for this is £70,000. However, this cost does not include the cost of ensuring that all the content which feeds into these apps would be in Welsh and ongoing maintenance costs. We would consider that standard 57 as drafted is unreasonable and disproportionate for a UK-wide organisation.

## **2.21. Activity 11: Signs displayed by a body**

### **2.21.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.21.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.22. Standards specified in the draft regulations for signs displayed by a body [58-60]**

**2.22.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

We understand that the above standards refer to signage erected at public events and meetings in Wales as opposed to signage in our offices in London or for any other meetings or events which take place outside of Wales. As stated above, we currently utilise bilingual signage for all public events and meetings in Wales. Therefore we already meet standards 58 and 60. We would consider it reasonable and proportionate in some circumstances to provide bilingual signs which have the Welsh text displayed first as per standard 59, especially in predominantly Welsh-speaking areas.

**2.22.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.22.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

N/A

## **2.23. Activity 12: A body receiving visitors at its buildings**

### **2.23.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.23.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.24. Standards specified in the draft regulations for a body receiving visitors at its buildings [61-66]**

**2.24.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC is a UK-wide organisation and currently only has one office located in London. We have no Welsh speaking employees. We utilise a telephone translation service via Language Line for all calls received in a language other than English and already meet aspects of standard 63.

**2.24.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.24.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

The HCPC has experienced very limited demand for a Welsh reception service to date and we would consider that such provision would be unreasonable and disproportionate due to significant cost implications. Reception staff may not be aware of whether an individual visitor is from Wales and / or can speak Welsh; therefore we would not consider standard 62 to be reasonable or proportionate for a UK-wide organisation. We would also be unable to meet standards 61, 62A, 64, 65 and 66. If a visitor specifically requested a face-to-face reception service in Welsh in advance of their visit we would consider their request and

could possibly meet aspects of standard 62A. However, in general we believe that the requirements for a Welsh language reception service should only be required for organisations who have an office located in Wales as opposed to a London-based organisation.

## **2.25. Activity 13: Official notices made by a body**

### **2.25.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.25.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.26. Standards specified in the draft regulations for official notices made by a body [67-68]**

**2.26.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC publishes official notices for service delivery activities or changes to service delivery activities in a variety of forums. This includes service delivery activities for processing completed registration application forms, responding to feedback etc. These service delivery timescales are displayed on our website and / or automated email responses. The vast majority of enquiries received are in English. We would need to further consider the reasonableness and proportionality of ensuring that we provide an accompanying Welsh version of any official notice. This could potentially include notices of upcoming meetings relating to our statutory functions including Council meetings and fitness to practise hearings. We already respond to Welsh correspondence within the same service delivery timescales as English correspondence. We would be willing to maintain this commitment in all relevant forums where we welcome correspondence or enquiries in both English and Welsh and can meet this aspect of standard 67.

**2.26.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.26.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide**

**relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

As referred to above, the overwhelming majority of enquiries that we receive where our service delivery standards are applicable are in English. We therefore would not consider it reasonable or proportionate for a UK-wide organisation to be required to ensure that the Welsh text is read first in any bilingual notices, as per standard 68.

## **2.27. Activity 14: A body awarding grants**

### **2.27.1. Does the organization carry out the activity in question?**

Yes [ ]

No [✓]

### **2.27.2. Does the organization carry out the activity in question in Welsh?**

Yes [ ]

No [✓]

## **2.28. Standards specified in the draft regulations for a body awarding grants [69-73]**

**2.28.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC as an independent statutory regulator does not award grants to third parties in order to carry out our regulatory functions. Therefore we do not consider standards 69-73 to be applicable to us.

**2.28.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.28.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be**

**unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

We do not carry out the activities referred to in standards 69-73 as referred to above.

## **2.29. Activity 15: A body awarding contracts**

### **2.29.1. Does the organization carry out the activity in question?**

Yes []

No []

### **2.29.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

## **2.30. Standards specified in the draft regulations for a body awarding contracts [74-78]**

**2.30.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC carries out a number of activities which involve awarding contracts to third parties. These contracts usually relate to projects which have an impact on our operational processes. Under our Scheme we are committed to making relevant third party contractors aware of our Scheme and any specific obligations. Where the work involves communicating in Wales, any third party contract includes reference to our Scheme, and specifies the service in Welsh that is required. Particular attention is drawn to the relevant parts of the Scheme the contractor is expected to implement. Performance against contract is monitored against compliance. Therefore we consider standards 75, 75A and 78 to be reasonable and proportionate as they are similar to existing commitments under the Scheme. For standard 75, we will need to consider the proportionality of including standard content in invitations to tender stating that we welcome tenders to be submitted in Welsh. We would not as a matter of course treat a tender received in Welsh less favourably than one received in English and would be able to adhere to standard 75A. Any correspondence received in Welsh is answered in Welsh, as required by standard 78. Moreover, if we were to receive a tender in Welsh which required an interview we would be able to conduct such an interview in Welsh by utilising a simultaneous translation service and could meet standard 77. However, we would reserve the right to also assess the interviewees' English language competency.

**2.30.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.30.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

There are a number of additional standards specified in the draft regulations for a body awarding contracts which we would consider to be unreasonable and disproportionate for a UK-wide organisation. These standards, including standards 74 and 76, would place an undue burden on our resources where limited demand for such provision has been evident to date. We do not consider it reasonable to publish all our invitations to tender for a contract in Welsh but would consider whether any contracts pertaining specifically to Wales should be published in Welsh in the first instance. It is unlikely that we would ever need to issue such a contract; however, this would allow us to meet standard 74 only in part. As referred to above, the HCPC does not have any Welsh speaking employees and would be unable to meet standard 76 under any circumstances.

**2.31. Activity 16: Raising awareness of Welsh language services provided by a body**

**2.31.1. Does the organization carry out the activity in question?**

Yes [✓]

No [ ]

**2.31.2. Does the organization carry out the activity in question in Welsh?**

Yes [ ]

No [✓]

**2.32. Standards specified in the draft regulations for raising awareness of Welsh language services provided by a body [79-80]**

**2.32.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

Our current promotion requirements for raising awareness of our Welsh language services are detailed in our Scheme. In the main we consider standards 79 and 80 to be reasonable

and proportionate. We promote our Welsh language translation provision in all our publications. We would be willing to investigate further ways we could promote our Welsh language services.

**2.32.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.32.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

### **2.33. Activity 17: A body's corporate identity**

**2.33.1. Does the organization carry out the activity in question?**

Yes []

No []

**2.33.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

### **2.34. Standard specified in the draft regulations for a body's corporate identity [81]**

**2.34.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standard specified in the draft regulations, if that standard were to be made specifically applicable to them.**

The HCPC offers a bilingual version of corporate identity materials under our current Scheme. This has included the development of a bilingual logo, the provision of bilingual headed paper and the inclusion of the phrase 'Correspondence is welcome in English or Welsh/Gallwch ohebu yn Gymraeg neu Saesneg' at the foot of our email signatures. We believe these commitments are reasonable and proportionate and would comply with requirements under standard 81.

**2.34.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**2.34.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

Based on our understanding of the standard, we believe the standard to be reasonable and proportionate in terms of our current bilingual corporate identity. However, if the standard required a wider bilingual application to our corporate identity we would not consider this to be reasonable or proportionate due to the significant cost implications and limited demand from our stakeholders to date. We believe that only organisations which have an office in Wales should be required to comply with further requirements for a bilingual corporate identity.

## **2.35. Activity 18: Courses offered by a body**

**2.35.1. Does the organization carry out the activity in question?**

Yes []

No []

**2.35.2. Does the organization carry out the activity in question in Welsh?**

Yes []

No []

**2.36. Standards specified in the draft regulations for courses offered by a body [82-84]**

**2.36.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

The HCPC organises a number of information events as part of carrying out our statutory function. These are generally organised by our Communications department and are

targeted at key stakeholders. These courses are not education courses and are not open to the general public. Therefore we do not consider standards 82-84 to be applicable to us.

**2.36.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.36.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

See response to 2.36.1 above.

**2.37. Activity 19: Public address systems used by a body**

**2.37.1. Does the organization carry out the activity in question?**

Yes [ ]

No [✓]

**2.37.2. Does the organization carry out the activity in question in Welsh?**

Yes [ ]

No [✓]

**2.38. Standard specified in the draft regulations for public address systems used by a body [85]**

**2.38.1. If the organization carries out the activity in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standard specified in the draft regulations, if that standard were to be made specifically applicable to them.**

The HCPC does not have an internal public address system; therefore standard 85 is not applicable to us.

**2.38.2. Do you consider that making the standards specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.38.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

We do not use a public address system and therefore do not consider this standard to be applicable to us.

**2.39. Standards specified in the draft regulations which deal with supplementary matters in relation to service delivery standards [158-163]**

**2.39.1. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards which deal with supplementary matters in relation to service delivery standards, if those standards were to be made specifically applicable to them.**

We believe that many aspects of the proposed standards 158, 159, 160 and 162 are similar to the current monitoring and reporting commitments under our Scheme and would be reasonable and proportionate. We would also provide the Commissioner with information on our compliance requirements for our service delivery standards under standard 163. However, a reasonable time period would need to be provided by the Commissioner in order for us to respond to such a request.

**2.39.2. Do you consider that making the standards specified in the draft regulations, concerning the supplementary matters relating to service delivery standards, specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**2.39.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

In the main we believe that standard 161 is reasonable and proportionate. We already produce an annual report on our Scheme and can meet most of these commitments. However, one aspect which will be challenging for our larger departments, such as our

Registration department, are the general record keeping requirements outlined in the standard. The challenges involved in recording the required information stipulated in standard 161-2(a-c) for individual departments in a UK-wide organisation have already been referred to above.

### **3. Policy making standards [86-95]**

**3.1. Please provide information and/or evidence demonstrating to what extent the organization assesses and monitors the effects of a new or reviewed policy, or revising an existing policy, whether positive or adverse, on:**

*a) opportunities for persons to use the Welsh language*

*b) treating the Welsh language no less favourably than the English language.*

We are committed to carrying out an assessment of the impact of any new policy or proposal under our current Scheme. To date we have not formalised an assessment procedure for this, but in practice an assessment is carried out on any new policies and initiatives undertaken by relevant departments such as the Policy and Standards department. We have raised awareness amongst staff who develop policy about our commitments in this area and our responsibilities under relevant legislation including the Welsh Language Act 1993 – for example, by publishing articles on our Intranet. Our Council ensures that any new policies and initiatives are consistent with the Scheme and oversees the formulation, implementation and on-going monitoring requirements of the Scheme. We have produced three annual monitoring reports to date, two of which have been formally signed off by our Council. Our latest internal progress report was submitted to the Commissioner on 26 November 2014. We understand that we need to further formalise our processes for carrying out an assessment of any new policies and their impact on our Welsh language service provision and therefore we would be able to meet some, but not all aspects of standards 86-88.

**3.2. Having considered the requirements of standards 89-91 specified in the draft regulations, does the organization consult on any policy decisions?**

Yes []

No []

**3.3. Please provide information and/or evidence to demonstrate to what extent the organization discusses and asks for opinions on the effect, if any, whether positive or adverse, a policy would have on the following:**

*a) opportunities for persons to use the Welsh language*

*b) treating the Welsh language no less favourably than the English language.*

In general we believe that many aspects of standards 89-91 are consistent with our current commitments. We consult our stakeholders including registrants on a variety of policy decisions and enable respondents to consultations to call attention to any aspects or implications of the relevant policy changes. These include reviews of core standards and changes to our Rules. However, there are aspects of standards 89-91 which we would consider as unreasonable and disproportionate for a UK-wide organisation. For example, we would not consider it a reasonable expectation for each consultation to:

- expressly consider and seek views on the effects that the policy decision under consideration would have on opportunities for persons to use the Welsh language;
- increase the positive effects for such provision; and / or
- consider how the policy could be formulated or altered so that it would not have adverse effects on the Welsh language.

The vast majority of our stakeholders are not Welsh speakers and would not be best placed to provide input into this. We also carry out consultations on issues or policy changes that are UK-wide and we would not consider it reasonable or proportionate to consider the impact on the use of the Welsh language in these. We would need to consider the reasonableness and proportionality of devising specific equality impact assessment toolkits for UK-wide consultations on policy decisions which would affect Welsh registrants. We consider that these standards have not differentiated between the responsibilities of a Wales-based public body (such as a Government department) as opposed to a self-financing UK-wide body in this area.

**3.4. Having considered the requirements of standard 92 specified in the draft regulations, please note whether the organization has a policy on awarding grants?**

Yes [ ]

No [✓]

**3.5. Please provide information and/or evidence to demonstrate to what extent the organization assesses the effect, if any, whether positive or adverse, awarding a grant would have on:**

*a) opportunities for persons to use the Welsh language*

*b) treating the Welsh language no less favourably than the English language.*

As referred to in section two above, we do not award grants to third parties to carry out our regulatory functions. Therefore this standard is not applicable to us.

**3.6. Please provide information and/or evidence to demonstrate to what extent the organisation, when commissioning or conducting research to assist with the policy decision, considers the effects, if any, (whether positive or adverse) that policy decision would have on:**

*a) opportunities for persons to use the Welsh language*

*b) treating the Welsh language no less favourably than the English language.*

The HCPC oversees a range of research projects to assist with policy decisions which are relevant to its regulatory functions. This includes commissioning third party organisations to carry out research. When commissioning or conducting research we operate a fully open and transparent tender process and welcome applications from research bodies in either English or Welsh. The call for proposals and other tendering documents can be provided in Welsh upon request. We would not treat a research brief / tender document received in Welsh any less favourably. We consider aspects of standards 93-95 to be reasonable and proportionate for a UK-wide organisation, particularly in treating the Welsh language no less favourably than the English language when we conduct and / or commission research. However, there are aspects of standards 93-95 which are unreasonable and disproportionate for a UK-wide organisation. For example, it is not a reasonable requirement

for each body which conducts research on our behalf to: • expressly consider in their research the effects that the policy decision under consideration would have on opportunities for persons to use the Welsh language; • consider how the policy decision could be made to increase the positive effects for such opportunities; and / or • consider how the policy could be formulated or altered so that it would not have adverse effects on persons to use the Welsh language. We commission research teams based on their expertise in areas relating to the relevant policy decisions. They would not be best placed to address these issues. We consider that the standards in question have not differentiated between the responsibilities of a Welsh-based public body (such as a Government department) as opposed to a self-financing UK-wide body in this area.

**3.7. Please provide information and/or evidence to demonstrate to what extent the organisation, when commissioning or conducting research to assist with the policy decision, considers how that policy decision could be made so that it has positive effects or increased positive effects on:**

*a) opportunities for persons to use the Welsh language*

*b) treating the Welsh language no less favourably than the English language.*

Please see our response to section 3.6 above where the issue of the HCPC commissioning or conducting research with third parties on our behalf has been answered collectively.

**3.8. Do you consider that making the policy making standards specified in the draft regulations specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**3.9. If 'No', please explain which aspect(s) of the standard(s) appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the proposed standard(s) specifically applicable to your organization.**

As referred to above, we believe that some aspects of the policy making standards are reasonable and proportionate for a UK-wide organisation such as the HCPC. However, we believe that other aspects such as the requirement to ensure that consultations and / or commissioned research include additional considerations / assessments in respect of the Welsh language, are an unreasonable expectation.

**3.10. Standards specified in the draft regulations which deal with supplementary matters in relation to policy making standards [164-169]**

**3.10.1. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

Once the new standards are agreed, we believe that we will be able to meet standards 164-169 and that they are reasonable and proportionate. We currently complete an annual

monitoring report on our compliance against our Scheme. We are committed to ensuring that all complaints regarding the implementation of the Scheme are investigated thoroughly. Complaints can be received in Welsh and in English and are dealt with in the same service delivery timescale. To date we have not received any complaints on our Scheme.

**3.10.2. Do you consider that making the standards specified in the draft regulations, concerning the supplementary matters relating to policy making standards, specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**3.10.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

#### **4. Operational standards [96-142]**

##### **4.1. Standards specified in the draft regulations in relation to the use of the Welsh language within a body's internal administration [96-109]**

**4.1.1. Does the organization operate a policy on using the Welsh language internally for the purpose of promoting and facilitating the use of the language?**

Yes []

No []

**4.1.2. If 'Yes', has the organization published it on its intranet?**

Yes []

No []

**4.1.3. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with standard 96 specified in the draft regulations if that standard were to be made specifically applicable to them.**

We are a UK-wide-organisation, our sole office is located in London and there are currently no Welsh-speaking employees. Given these circumstances, we would not consider it a reasonable expectation to develop a specific policy on promoting and facilitating the use of the Welsh language internally. We remain committed under our Scheme to ensuring that any person interacting with the public and wishing to learn Welsh is encouraged and supported as appropriate to their job role and in the context of their overall goals and objectives and those of the HCPC.

**4.1.4. Does the organization provide the following documents in Welsh if required by the employee or worker?**

	Yes	No
<b>contract of employment</b>		✓
<b>contract for services</b>		✓
<b>paper correspondence relating to his or her employment and which is addressed to him or her personally</b>		✓
<b>documents that outline his or her training needs or requirements</b>		✓
<b>documents that outline his or her performance objectives</b>		✓
<b>documents that outline or record his or her career plan</b>		✓
<b>forms that record and authorise annual leave</b>		✓
<b>forms that record and authorise absences from work</b>		✓
<b>forms that record and authorise flexible working hours</b>		✓

**4.1.5. Does the organization offer an employee or worker a choice regarding whether they would like to receive the above documents in Welsh?**

Yes [ ]

No [✓]

**4.1.6. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with standards 97 - 102 specified in the draft regulations if those standards were to be made specifically applicable to them.**

At present there are no Welsh speakers employed at the HCPC and it would be disproportionate to be required to ask each staff member if they wished to receive personal correspondence or other documentation relating to their employment in Welsh. At present we have no plans to open a separate office in Wales. Thus we consider standards 97 – 101 to be reasonable or proportionate in such circumstances. We also have no plans to open a separate office in Wales. Employee annual leave and absence from work forms are provided using an online electronic platform. This platform is provided in English and we would not consider it reasonable to meet standard 102, due to no demand for Welsh versions of these forms and the resultant high operational costs (including IT) for meeting this standard.

**4.1.7. By ticking the relevant boxes, please specify in which language the organization published policies in relation to the following.**

	Welsh	English	Bilingually
behaviour in the workplace		✓	
health and well-being at work		✓	
salaries and workplace benefits		✓	
performance management		✓	
absence from work		✓	
working conditions		✓	
work patterns		✓	

**4.1.8. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with standards 103 - 109 specified in the draft regulations if those standards were to be made specifically applicable to them.**

We publish all our internal human resources policy documents referred to in standards 103-109 in English in the first instance. In general we believe that many of these particular operational standards should only pertain to any future HCPC staff who may be required to solely work in Wales. At present we have no plans to open a separate office in Wales. However, if in the future we do have employees in a Welsh speaking role and based solely in Wales, we would provide these policy documents in Welsh upon request.

**4.2. Standards specified in the draft regulations in relation to complaints made by a member of a body's staff [110-113]**

**4.2.1. Does the organization allow each member of staff to do the following?**

	Yes	No
make complaints to the organization in Welsh		✓
respond in Welsh to any complaint made about him or her		✓

**4.2.2. If 'Yes', does the organization inform each member of staff of the possibility of doing the above in Welsh?**

Yes [ ]

No [ ]

**4.2.3. When the organization receives a complaint from a member of staff or a complaint about a member of staff, and a meeting is required with that member of staff, does the organization do the following?**

	Yes	No
<b>offer to conduct the meeting in Welsh</b>		✓
<b>ask the member of staff whether he or she wishes to speak Welsh at the meeting</b>		✓
<b>conduct the meeting in Welsh (without the assistance of translation service)</b>		✓
<b>provide a simultaneous translation service at the meeting (unless it is possible to conduct the meeting in Welsh without translation services)</b>		✓

**4.2.4. Does the organization inform a member of staff of its decision in Welsh following a complaint made by or about him or her?**

Yes [ ]

No [✓]

**4.2.5. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with standards 110 - 113 specified in the draft regulations if those standards were to be made specifically applicable to them.**

We are a UK-wide organisation, whose sole offices are located in London, with no Welsh-speaking employees. Thus standards 110-113 are not reasonable or proportionate, including the expectation of offering an internal complaints procedure in Welsh. We would not be able to meet standard 111 under any circumstance. As a general observation we believe that many of these particular operational standards should only pertain to any future HCPC staff who may be required to work solely or primarily in Wales. At present we have no plans to open a separate office in Wales.

**4.3. Standards specified in the draft regulations in relation to a body disciplining staff [114-117]**

**4.3.1. Does the organization allow all members of staff to respond in Welsh to allegations made against them as part of any internal disciplinary process?**

Yes [ ]

No [✓]

**4.3.2. If 'Yes', does the organization inform all members of staff of the possibility to do the above in Welsh?**

Yes [ ]

No [ ]

**4.3.3. When the organization organises a meeting with a member of staff regarding a disciplinary matter that relates to his or her conduct, does the organization do the following?**

	Yes	No
<b>offer to conduct the meeting in Welsh</b>		✓
<b>ask the member of staff whether he or she wishes to speak Welsh at the meeting</b>		✓
<b>conduct the meeting in Welsh (without the assistance of translation services)</b>		✓
<b>provide a simultaneous translation service at the meeting (unless it is possible to conduct the meeting in Welsh without translation services).</b>		✓

**4.3.4. Does the organization inform a member of staff of its decision following a disciplinary process in Welsh?**

Yes [ ]

No [✓]

**4.3.5. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with standards 114 - 117 specified in the draft regulations if those standards were to be made specifically applicable to them.**

As referred to above, the HCPC would ask that the Commissioner considers the proportionality of requiring a London-based organisation to comply with these internal operational standards. We consider that standards 114-117 would not be reasonable or proportionate including the expectation of offering an internal disciplinary procedure in Welsh, and we would not be able to meet standard 115 under any circumstances. As a general observation we believe that many of these particular operational standards should only pertain to any future HCPC staff who may be required to solely work in Wales. At present we have no plans to open a separate office in Wales.

**4.4. Standards specified in the draft regulations in relation to a body's information technology and about support material provided by a body, and in relation to the intranet [118-124]**

**4.4.1. Does the organization provide computer software for checking spelling and grammar in Welsh for employees and workers?**

Yes []

No []

**4.4.2. Does the organization provide Welsh language interfaces for software where an interface already exists?**

Yes []

No []

**4.4.3. Does the organization operate an intranet system?**

Yes []

No []

**4.4.4. Are intranet pages available in Welsh, including the home page, the interface and menus?**

	Yes	No
Home Page		✓
Interface		✓
Menus		✓

**4.4.5. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with standards 118 - 124 specified in the draft regulations if those standards were to be made specifically applicable to them.**

We would not consider standards 119, 120, 121, 122 or 124 with regard to provision of a Welsh language Intranet to be reasonable or proportionate for reasons already referred to above, i.e. no demand amongst employees as well as the associated high IT costs. We would need to further consider the feasibility of reserving a section of our Intranet to provide information and support services to employees for meeting our service delivery commitments and could potentially meet this aspect of standard 123. We have estimated that upgrading our Intranet (excluding any bilingual provision) would cost £40,000. With regard to standard 118, we receive very limited Welsh correspondence, which is

subsequently translated by a third-party service. Therefore it is not a reasonable expectation for us to provide specialised software for checking spelling and grammar in Welsh.

**4.5. Standards specified in the draft regulations in relation to a body developing Welsh language skills through planning and training its workforce [125-133]**

**4.5.1. Does the organization assess the Welsh language skills of its employees?**

Yes [ ]

No [✓]

**4.5.2. By ticking the relevant boxes, please specify in which language the organization provides training in the following areas.**

	Welsh	English	Bilingually
recruitment and interviewing		✓	
performance management		✓	
complaints and disciplinary procedures		✓	
induction		✓	
dealing with the public		✓	
health and safety		✓	

**4.5.3. Please provide information and/or evidence to demonstrate to what extent the organization does the following:**

*I. provide training in Welsh on using Welsh effectively in meetings, interviews and complaints and disciplinary procedures*

*II. provide opportunities during working hours for its employees and workers to receive basic Welsh language lessons*

*III. provide opportunities during working hours for its employees and workers who manage others to receive training on using the Welsh language in their role as managers*

*IV. provide opportunities for its employees and workers who have completed basic Welsh language training to receive further training free of charge to develop their language skills.*

- I – The HCPC currently has no Welsh-speaking employees and there is no training regularly provided for using Welsh effectively in meetings, interviews, complaints and disciplinary procedures. We have not identified any need to conduct meetings, interviews or other proceedings in Welsh. If an individual wished to use Welsh in a meeting or interview for any future Welsh-speaking role in Wales we would attempt to meet as many of these requirements as possible. However, in all job roles we require the ability to speak and write English as a core requirement. This is assessed as part of any interview offered. We don't have any roles based in Wales and have no current plans to recruit for any such roles.

- II-IV – We are committed under our Scheme to ensuring that any person interacting with the public and wishing to learn Welsh is encouraged and supported in the context of their job role, overall goals and objectives and those of the HCPC. To date no employees have indicated a need or preference for learning Welsh either for development reasons or because their role required it. The HCPC has not identified any roles where the ability to speak Welsh is essential. However, we will consider further ways in which we can promote the existing commitment in our Scheme to all relevant employees.

**4.5.4. Does the organization provide training for its employees and/or workers for the purpose of raising their awareness of the following?**

	Yes	No
<b>awareness of the Welsh language</b>		✓
<b>understanding of the obligation to operate in compliance the Welsh language Scheme</b>		✓
<b>understanding of how the Welsh language can be used in the workplace</b>		✓

**4.5.5. Does the organization provide information to new employees and/or workers to raise their awareness of the Welsh language?**

Yes [✓]

No [ ]

**4.5.6. Please provide information and/or evidence on those arrangements below.**

Raising awareness of our Welsh Language Scheme is a requirement of the induction process for all new employees. This includes calling attention to our commitments under the Welsh Language Act 1993 and related legislation whereby we have adopted the principle that in the conduct of public business in Wales, we will treat the English and Welsh languages on the basis of equality.

**4.5.7. Does the organization provide text or a logo to include in its employees' and/or workers' e-mail signatures which will enable them to indicate whether they speak Welsh fluently or whether they are learning the language?**

Yes [ ]

No [✓]

**4.5.8. Are the contact details of employees and/or workers included in e-mail messages provided in Welsh?**

Yes [ ]

No [✓]

**4.5.9. Are the e-mail messages of the organization's employees and/or workers which inform others that they are unavailable to respond to e-mail messages provided in Welsh?**

Yes [ ]

No [✓]

**4.6. Standards specified in the draft regulations in relation to a body recruiting staff [134-138]**

**4.6.1. Please provide information and/or evidence of the methodology used by the organization in order to come to a decision on the Welsh language skills required when advertising a vacant or new post.**

Our Human Resources (HR) department carries out a systematic analysis of the skills set required for each new post by liaising with the relevant manager in the department where the vacancy has occurred. Our Scheme provides an overview of our recruitment provisions for Welsh-speaking roles and related procedures. All job descriptions are reviewed on an annual basis and as required throughout the year. If Welsh was needed it would be added to the job description as a desirable or essential requirement for the role. However, to date our HR department have not identified any job roles where Welsh language skills would be an essential or desirable characteristic in the role description. If we were to receive an application in Welsh for any advertised post, we would not treat it less favourably than an English application and would attempt to meet as many of the linguistic requirements as possible for an individual candidate for any future Wales-based role. However, for a UK-wide organisation we would consider aspects of standards 135-138 to be unreasonable and disproportionate. This includes the expectation that all recruitment documentation is provided bilingually in the first instance (standard 135A) even for non-Welsh speaking posts and the ability to conduct an interview or assessment in Welsh with or without the use of a translation service (standards 136-137). The Commissioner needs to further consider that all of our posts to date have required the ability to speak fluent English and that we would need to assess this as part of any interview conducted. We don't have any roles based in Wales and have no current plans to recruit for any such roles. However, if in the future we needed to recruit for such roles we would provide a simultaneous translation service in interviews for such posts which required the ability to speak Welsh, however, we would reserve the right to also assess the candidates English language skills.

**4.6.2. Please provide information and/or evidence regarding the number and percentage of posts advertised with necessary Welsh language skills during the past year**

	.
<b>Number</b>	0
<b>Percentage</b>	0

**4.6.3. Does the organization provide the following documents in Welsh?**

	<b>Yes</b>	<b>No</b>
<b>application forms</b>		✓
<b>job descriptions</b>		✓
<b>material that explains the procedure for applying for posts</b>		✓
<b>information about the interview process or other assessment methods</b>		✓

**4.6.4. Does the organization state that persons are welcome to apply for a post in Welsh and that an application made in Welsh will not be treated less favourably than an application made in English?**

Yes [ ]

No [✓]

**4.6.5. Do application forms provide a space for applicants to indicate that he or she would like an interview or other method of assessment in Welsh?**

Yes [ ]

No [✓]

**4.6.6. If 'Yes', does the organization do the following?**

	<b>Yes</b>	<b>No</b>
<b>provide a simultaneous translation service at the interview or assessment (unless it is possible to conduct the interview or assessment in Welsh without translation services)</b>		
<b>conduct the interview or assessment in Welsh (without the assistance of translation services)</b>		

**4.6.7. When an applicant has applied for a post in Welsh, does the organization inform the applicant of its decision in Welsh?**

Yes [ ]

No [✓]

**4.7. Standards specified in the draft regulations in relation to signs displayed in a body's workplace [139-141]**

**4.7.1. Are the signs displayed inside the organization's buildings in Welsh?**

Yes [ ]

No [✓]

**4.7.2. If 'Yes', is the Welsh-language text positioned so that it is likely to be read first?**

Yes [ ]

No [ ]

**4.8. Standards specified in the draft regulations in relation to audio announcements and messages in a body's workplace [142]**

**4.8.1. Are announcements made in the organization's buildings via audio equipment?**

Yes [ ]

No [✓]

**4.8.2. If 'Yes', does the organization make these announcements in Welsh?**

Yes [ ]

No [ ]

**4.8.3. Do you consider that making the operational standards specified in the draft regulations specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**4.8.4. If 'No', please explain which aspect(s) of the standard(s) appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the proposed standard(s) specifically applicable to your organization.**

There are many elements of the proposed operational standards which we would consider to be unreasonable and disproportionate, as a UK-wide organisation, whose sole office is located in London with no Welsh speaking employees. There is an absence of demand for the majority of the internal Welsh operational requirements detailed in the draft regulations; and there would be high costs required to make significant changes to our internal operations including changes in technology (e.g. the Intranet); internal signage; internal disciplinary procedures etc. We consider that the following standards in particular would be very difficult if not impossible to comply with: 96 – 124 (with the exception of standard 123); 126 – 127; 132 – 133; 135A – 137; and 139 – 142.

**4.9. Standards specified in the draft regulations which deal with supplementary matters in relation to operational standards [170-175]**

**4.9.1. If the organization carries out the activities in question in Welsh, please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

Provided the individual operational standards that are assigned to the HCPC are reasonable and proportionate, we believe there should not be any undue difficulty in meeting the draft regulations which deal with supplementary matters in relation to the operational standards. We consider that the majority of these would be basic record keeping and compliance requirements.

**4.9.2. Do you consider that making the standards specified in the draft regulations, concerning the supplementary matters relating to operational standards, specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**4.9.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

## **5. Promotion standards [143-144]**

**5.1. Does the organization give consent to be potentially applicable to promotion standards?**

*If 'No,' please proceed to Section 6 of the questionnaire*

Yes [ ]

No [✓]

**5.2. If 'Yes,' please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

**5.3. Do you consider that making the promotion standards specified in the draft regulations specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**5.4. If 'No,' please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

As evident from our response to the above, it is not part of our statutory role or functions to promote use of the Welsh language or increase the number of Welsh speakers, therefore we do not consent to making the promotion standards potentially applicable to us.

**5.5. Standards specified in the draft regulations which deal with supplementary matters in relation to promotion standards [176-177]**

**5.5.1. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

N/A

**5.5.2. Do you consider that making the standards specified in the draft regulations, concerning the supplementary matters relating to promotion standards, specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**5.5.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

Please see response to section 5.4 above.

*Welsh Ministers may, by order, amend the table in Schedule 6 of the Welsh Language (Wales) Measure 2011 to make promotion standards potentially applicable to a person. Promotion standards are not potentially applicable to your organization at present. A person can give consent that promotion standards should be potentially applicable to them by giving written consent to Welsh Ministers.*

## **6. Record keeping standards [145-157]**

**6.1. Please provide information and/or evidence regarding the procedures the organization has in place to keep records of the steps taken to ensure compliance with the current Welsh language scheme. Organizations should identify any additional/new procedures that will be required, if at all, in order to comply with the record keeping standards specified in the draft regulations. If the organization does not feel that they can implement some of the record keeping standards, relevant information and/or evidence on the reasons why should be provided.**

Our Scheme details a number of different record keeping requirements. We prepare an internal progress report on the implementation of the Scheme which is submitted to our Council annually. To date we have completed three internal progress reports which cover issues including:

- service delivery and planning;
- communicating with the Welsh speaking public;
- the organisation's public face;
- fitness to practise hearings; and
- implementing and monitoring our Scheme.

These reports are then forwarded to the Commissioner's office. Our Human Resources department carries out a systematic overview of the general training requirements for the organisation on an annual basis by using data from the annual performance and development review. The resources for these training requirements are met on either an organisational or departmental basis. To date our HR department has not identified any

need for work-related training in Welsh. Our Scheme details how we will handle complaints about the implementation of the Scheme. This includes a commitment that any such complaint will be thoroughly investigated by our Customer Services Manager. However, to date we have not received any complaints on our Scheme. If we were to receive complaint in the future on the implementation of our Scheme this would be recorded in the same way as any other type of complaint received. We would not envisage different procedures for recording complaints on our compliance with the standards as stipulated in standards 149 and 151.

**6.2. Having considered the requirements of the record keeping standards, please provide information and/or evidence regarding the procedures the organization has in place to keep records of the following**

*I. employees' and workers' Welsh language skills II. assessments of the Welsh language skills requirements of vacant and new posts III. number and percentage of new posts where the need for Welsh language skills was identified IV. action taken to plan the workforce in order to ensure compliance with the current Welsh language scheme V. training offered through the medium of Welsh, and the numbers who attend the training VI. complaints received regarding your compliance with the Welsh language scheme VII. the number of calls to your main telephone number(s), to helpline numbers and call centre numbers, which were made by person who requested a Welsh language service VIII. the number of persons who wish to receive services through the medium of Welsh in response to an offer made by your organization IX. steps taken to ensure policies comply with your Welsh language scheme*

- I – V– Please see response to relevant human resources questions in section four.
- VI – Please see response to section 6.1 above.
- IX – Please see response to section 6.1 above.
- VII – As referred to above, we currently do not have the ability to record a registrant's individual telephone communication requirements on our registration system. In order to achieve this we would need to invest very significant resources including major IT changes where we have experience very limited demand to date.
- VIII – We believe that as a UK-wide organisation it is more reasonable and proportionate for stakeholders such as registrants to inform us of their individual communication requirements (including language) for correspondence instead of requesting this in the first instance. To date we have recorded three requests from registrants to receive correspondence in Welsh.

Beyond the record keeping processes carried out under our current Scheme as outlined above and elsewhere in this questionnaire, all other record keeping processes would need to be developed with accompanying IT changes which would have significant cost implications for a self-financing UK-wide organisation. This issue has been dealt with more broadly under the service delivery standards section.

**6.3. Do you consider that making the proposed record keeping standards specifically applicable to your organization would be reasonable and proportionate?**

Yes [ ]

No [✓]

**6.4. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

As a UK-wide organisation whose offices are based solely in London, we would not consider it a reasonable or proportionate expectation to record every assessment that we carry out in respect of Welsh language skills required for every new or vacant post (standard 145). We have not had any indication to date that there is a need for any employees to have Welsh language skills or to carry out their functions in Welsh. The HCPC currently has no Welsh-speaking employees and therefore standard 146 – which requires a record of attendance at courses which were conducted in Welsh – would not be applicable. We recognise that we would need to further formalise our procedures for complying with the standards for formulating policy (standard 147) including developing and distributing internal guidelines for implementing the policy making standards. However, we consider that the current wording of this standard may lead to the development of overly bureaucratic procedures in order to meet the standard's objective. We have concerns about our ability to meet standards 150, 152 and 154. As referred to above, we are only able to record a communication preference for written correspondence on our registration system. We would envisage significant difficulties in recording an individual's communication requirements via telephone and / or meetings in our larger departments. This would require significant investment in our internal IT systems including the development of an organisational wide electronic communication relationships management (CRM) system to record Welsh communication preferences. We have no current plans to develop such a system. In the absence of such a system we would have some concerns about the ability of staff to log all calls and other communication requirements across all our departments. We do not believe that such provision should be offered in the first instance on every occasion and would not agree with having to meet those aspects of standards 153 – 154. However, if an individual required such provision we would record this where possible and attempt to meet as many of these requirements as possible and appropriate. We do not consider standard 155 to be applicable, as the ability to speak Welsh has not been assessed as an essential or desirable skill for any job roles at the HCPC to date. For the same reasons we would not consider standard 156 to be reasonable or proportionate, and would not consider standard 157 to be applicable.

**6.5. Standards specified in the draft regulations which deal with supplementary matters in relation to record keeping standards [178-179]**

**6.5.1. Please provide information and/or evidence to demonstrate to what extent the organization would be able to comply with the standards specified in the draft regulations, if those standards were to be made specifically applicable to them.**

Provided the record keeping standards made applicable to the HCPC are realistic, we would be able to meet standards 178-179 and consider them to be reasonable and proportionate. However we believe that the availability of such documents on our website (rather than in hardcopy) for a London-based organisation should suffice in this instance. We would provide hardcopies to individuals upon request.

**6.5.2. Do you consider that making the standards specified in the draft regulations, concerning the supplementary matters relating to promotion standards, specifically applicable to your organization would be reasonable and proportionate?**

Yes []

No []

**6.5.3. If 'No', please explain which aspect(s) of the standards, or which standard(s) in particular, appear to be unreasonable or disproportionate in your opinion. Provide relevant information and/or evidence on the reasons why, in your opinion, it would be unreasonable or disproportionate to make the standards specified in the draft regulations specifically applicable to your organization.**

## **7. Further information**

**7.1. Please provide information and/or evidence of partnerships on which the organization leads either strategically or financially, for the purposes of delivering services.**

The HCPC has not entered into any partnerships with third party organisations, either strategically or financially, for the purpose of delivering services.

**7.2. Please provide information and/or evidence of partnerships which the organization is part of, either strategically or financially, for the purposes of delivering services.**

Please see response to section 7.1 above.

**7.3. Please provide information and/or evidence of any consortia which the organization is part of for the purposes of supplying services.**

Please see response to section 7.1 above.

**7.4. Please provide information and/or evidence of the services provided by the organization by a contractor or third party. Details should be provided regarding the organization's monitoring procedures for those contracts, stating how you ensure that third parties provide those services in accordance with the relevant sections of the current Welsh language scheme.**

The HCPC carries out a number of activities for awarding contracts to third parties. These contracts usually relate to projects which have an impact on our operational activities. We are committed to informing third party contractors of our obligations under the Scheme which include making relevant contractors aware of our Scheme and any specific obligations

therein. Where the work involves communicating in Wales, any third party contract includes reference to our Scheme, and specify the service in Welsh that is required. Particular attention is drawn to the relevant parts of the Scheme that contractors are expected to implement. Performance against contract is monitored against compliance.

**7.5. Are there any planned or proposed changes to the organization's services (e.g. outsourcing services) that will affect the answers to this questionnaire?**

Yes [ ]

No [✓]

**7.6. If 'Yes', please provide information and/or evidence of those services, in accordance with the proposed timetable below.**