To consider

**Welsh Language Standards Investigation**

**Issue**

1. In 2011, the Welsh Government introduced the Welsh Language Measure, which granted the Welsh language official status in Wales and established the office of the Welsh Language Commissioner. It also announced that Welsh Language Schemes, such as the GMC's, would need to be replaced by Welsh Language Standards.

2. In order to assess how the Standards will be applied, the Commissioner is conducting a series of investigations. The GMC is subject to Investigation Round 2. The Wales Office has worked with all directorates to coordinate a response to the investigation for review. The response must be submitted to the Welsh language Commissioner by 6 February 2015.

**Recommendation**

3. The Strategy and Policy Board is asked to agree the terms of the investigation response with reference to the Welsh Government draft regulations.
Welsh Language Standards Investigation

Issue
4 The GMC’s Welsh Language Scheme, prepared under the Welsh Language Act 1993, has been in place since 2005. It commits the GMC to offering services to the public in Wales in the language of their choice and to treating the English and Welsh languages on the basis of equality when conducting public business in Wales.

5 The current scheme states that:

‘The GMC will ensure that in the following areas the principles of equality with regard to Welsh and English speaking people in Wales will be applied:

- Service planning and delivery
- Dealing with the public
- The GMC’s public profile.’

6 When the Welsh Language Measure was introduced, the GMC sought legal advice in order to better understand its obligations.

7 Legal advice confirmed that the GMC falls within the category of person/entity that would be required by the 2011 Measure to comply with any compliance notice issued by the Welsh Language Commissioner pursuant to the 2011 Measure, once the relevant provisions of the 2011 Measure have entered into force (and assuming various conditions are satisfied).

8 In practice, this means that the GMC will be required to replace its existing Welsh Language Scheme with Welsh Language Standards.

The Standards
9 There are over 170 standards in the Welsh Government draft regulations that could be applied to the GMC. It is important to note that the Standards, unlike the Welsh Language Scheme, will be enforced, more prescriptive, applied across a range of organisations and could be applicable to all audiences/customers, not only the public.

10 The proposed Standards descriptors include requirements which, if adopted, would oblige us to, among other things

a Make all web pages available in Welsh.

b Make all publications available in Welsh (not just key documents).

c Ensure our switchboard can deal with including calls in Welsh.
In December 2014 a presentation on the proposed Standards was considered by the Chief Executive, Chief Operating Officer and Directors. It was agreed that a risk relating to the application of the Welsh Language Standards be added to the Corporate Risk Register given the potential financial, operational and reputational implications for all parts of the organisation.

The Director for Strategy and Communication has also been providing regular updates to the Performance and Resources Board on this matter.

The investigation

In order to assess how the Welsh Language Standards should be applied, the Commissioner is conducting a series of investigations. The first tranche of investigations was conducted for Welsh Government, Councils and National Parks.

The GMC is part of the second round of investigations, which began on 17 November 2014 and closes on 6 February 2015. The number of other organisations that are part of this round of investigation totals over 100, this includes other regulatory bodies, universities, health boards and police forces.

The investigation takes the form of a questionnaire, and the Wales Office has been working closely with all GMC directorates to complete a response, at Annex A. This response will be submitted, following approval by the Board, on 6 February 2015.

The Wales Office has also been working with the other UK Health and Social Care Regulators to ensure a coordinated approach to the investigation.

GMC investigation response headlines

The provision of a Welsh language contact centre service: In order to provide an equivalent Welsh language service we would need to be able to provide this service regardless of working patterns, leave and sickness absence. To do this we would need a minimum of four full time members of staff at a cost of approximately £92,000 (not including recruitment costs).

However, we have investigated an alternative service with our current translation provider which could enable ‘on the line’ translation on a charge per minute basis and will be recommending this alternative to the Commissioner.

The provision of a Welsh Language GMC website: Initial estimated costs to translate and maintain the entire website and associated micro-sites and mobile resources are in excess of £500,000. We will be recommending that pages that are relevant, or of interest, to patients and the public in Wales are translated, along with the pages that refer to ‘The GMC in Wales’.
20 The provision of some HR functions in Welsh: These Standards would require changes to the Agresso system. Initial estimates for the translation and maintenance of Agresso start at £38,500.

21 The response also discusses the general principle of focussing on the automatic translation of information for patients and the public (as per the existing Scheme) and recommends that additional Welsh Language provision should only be made available on request. Noting that the GMC will be more explicit about the Welsh Language services that are already available.

Next steps

22 The investigation response will be submitted on 6 February 2015. The Commissioner is due to issue a report on the investigation on 30 May 2015, which will then go to the National Assembly of Wales for consideration. It is then expected that the Welsh Government will publish draft regulations which are subject to a brief consultation.

23 The GMC is coordinating the submission of a joint letter from the Chief Executives of the nine UK Health and Social Care Regulators to the Commissioner, highlighting shared concerns and matters of interest relating to the investigation.

24 It is likely that the Welsh Language Commissioner will issue compliance notices, detailing which standards individual organisations are expected to meet, at the end of 2015 or early in 2016. It is at this point the GMC will know which standards will be applied to it and will need to decide whether or not an appeal against the notice is required.
Supporting information

How this issue relates to the corporate strategy and business plan

25 Strategic aim 4: Work more closely with doctors, medical students and patients on the frontline of care - The GMC continues to meet its responsibility under the Welsh Language Measure 2011. The GMC ensures that its services to, and engagement with, Welsh speaking patients and members of the public continues to meet their needs.

What engagement approach has been used to inform the work (and what further communication and engagement is needed)

26 Internal: An internal Welsh Language Group was set up in 2012 to monitor the progress of the Welsh Language Standards; it has representation from all directorates and has contributed to the response to the investigation.

27 External: The Wales Office has coordinated a group which includes the UK health and social care regulators in order to ensure a consistent approach to the investigation.

How the issues differ across the four UK countries

28 Wales: The GMC has proactively considered its responsibilities under the Welsh Language Measure 2011. It is working with the Welsh Language Commissioner and other UK Health Regulators to ensure that the Standards applied to the GMC are in the best interests of Welsh speaking patients and the public and are reasonably and proportionately applied.

If you have any questions about this paper please contact: Rachel Podolak, Head of Welsh Affairs, rpodolak@gmc-uk.org, 02920 495 363 ext. 5251.
7 - Welsh Language Standards Investigation

Questionnaire response
Welsh Language Commissioner
Standards Investigation:
Questionnaire
### Section 1 – General

1.1. Full name of the organization:

| General Medical Council |

1.2. Type of organization:

| Medical Regulator |

1.3. Which geographical area is served by the organization?

| The four countries of the UK |

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

<table>
<thead>
<tr>
<th>The General Medical Council (GMC) is an independent organisation that helps to protect patients and improve medical education and practice across the UK.</th>
</tr>
</thead>
<tbody>
<tr>
<td>We decide which doctors are qualified to work here and we oversee UK medical education and training.</td>
</tr>
<tr>
<td>We set the standards that doctors need to follow, and make sure that they continue to meet these standards throughout their careers.</td>
</tr>
<tr>
<td>We take action when we believe a doctor may be putting the safety of patients, or the public’s confidence in doctors, at risk.</td>
</tr>
</tbody>
</table>

Every patient should receive a high standard of care. Our role is to help achieve that by working closely with doctors, their employers and patients, to make sure that the trust patients have in their doctors is fully justified.

We are independent of government and the medical profession and accountable to Parliament. Our powers are given to us by Parliament through the *Medical Act 1983*.

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

| Manchester, London, Cardiff, Belfast and Edinburgh |

1.6. Does the organization have other administrative offices?

| Yes [ ] No [ x ] |

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.

1.9. How many employees work for the organization?

UK – 1020 Cardiff – 4
Correct as of 7 January 2015

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

In the Cardiff Office, we have one fluent member of staff and two members of staff with basic welsh language skills (3/4 members of staff).
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).

Staff based in the GMC Wales office are responsible for implementing and monitoring the scheme and report directly to the Director of Strategy and Communication and the GMC’s Strategy and Policy Board on any Welsh language issues. Our Senior Leadership Team is also kept informed about the Welsh language scheme through our monthly management report and horizon scanning procedures.

The Council is informed about any developments in the Chief Executives report at Council meetings; we have a council member who resides in Wales and is a fluent Welsh speaker. We have introduced an extra section to our template for papers to internal boards and GMC Council – the template now includes a section within which consideration must be given to different legislation in the four nations of the UK, including the Welsh language.

In addition, we inform staff about the Welsh Language Scheme at the GMC’s corporate induction – compulsory for all staff. Information is also available on our staff intranet and the GMC public website. Teams, which are regularly required to comply with the Scheme, such as our Editorial and Publications Team are fully briefed on the Scheme, but are welcome, and do, seek ad hoc advice from the Welsh Office as and when necessary.

We have established a group to monitor the transition from our Welsh Language Scheme to Welsh Language Standards; this has representation from all directorates of the GMC.

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

We currently comply with an agreed Welsh language Scheme and submit an annual report to the Commissioner. Examples of our commitment to our Welsh language Scheme include:

- All documents/guidance that are of interest to patients or the public, this includes relevant consultation documents
- An online complaints form
- An online patients help tool
- Information on the Wales Office pages of the website, including information about the Welsh Language Scheme
- The ability to apply for posts in our Cardiff Office
Section 2 – Service delivery standards [1-85]

2.1. Activity 1: Correspondence sent by a body
2.1.1. Does the organization carry out the activity in question?
Yes [x]  No [ ]

2.1.2. Does the organization carry out the activity in question in Welsh?
Yes [x]  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.

We currently:
- Respond in Welsh to all correspondence received in Welsh
- Issue circulars to patients and the public in Wales in English and Welsh
- Treat the Welsh language version the same as the English language version

We would be able to:
- Increase the prominence of text welcoming Welsh correspondence
- Improve our recording of an individual’s language preference

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 [x]

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.
Standard 4, we would be able to continue to comply with this standard for patients and the public in Wales.

Standard 5, requiring all correspondence to be issued in English and Welsh, where there has not been an indication of language preference, would be very difficult to comply with and in most cases unreasonable and disproportionate.

This is because correspondence issued by the GMC can be very detailed, complex, legal and tailored to the individual e.g. our Fitness to Practise Directorate sent over 3,700 tailored letters to addresses in Wales in 2015. We also correspond with people across all four countries of the UK. Automatic translation, without request, would be time consuming, costly and, in the vast majority of cases, without benefit to the recipient.

**Recommendation:** that this standard is only applicable to announcements/invites/information for a patient/public audience in Wales and on specific request for individual, tailored communications.

Standard 7, to ensure consistency and accuracy of Welsh language correspondence we use a professional translator - as they are not directly employed by the GMC we cannot guarantee that translation into Welsh will not lead to a delay.

**Recommendation:** that the standard be amended to incorporate this. Alternative suggestion - ‘every effort should be made to ensure that corresponding in Welsh will not lead to a delay’

### 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 [x]   No [ ]

2.3.2. Does the organization carry out the activity in question in Welsh?
Yes [ ]   No [ x ]

### 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.
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 [x ]

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.

We have a single UK wide contact centre that provides an English language service. It is based in Manchester alongside our operational units with which it integrates. The Contact Centre receives approximately 200,000 calls a year. The majority of calls received are from registrants from across the UK and outside Wales.

In order to provide an equivalent Welsh Language Service we would need to be able to provide this service regardless of working patterns, leave and sickness absence. To do this we would need a minimum of 4 full time members of staff at a cost of approximately £92,000.

We do not have a record of any Welsh language requests to our contact centre for 2014. Due to this level of demand we do not agree that it would be reasonable or proportionate to provide a directly equivalent service.

However, we have investigated an alternative service with our current translation provider which could enable ‘on the line’ translation by a third party. It could be facilitated so that a caller could indicate their language preference via Interactive Voice Response (IVR) prior to the call being answered. This would still incur a cost, but it would be far more reasonable and proportionate.

**Recommendation:** That Standard 15 is not applied to the GMC, but that the GMC, with the assistance of telephone translation services, moves towards the Standards in

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 [x ] No [ ]

2.5.2. Does the organization carry out the activity in question in Welsh?
Yes [x ] 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.

For meetings held in Wales, or with individual Welsh speaking patients or doctors, we currently:

- Provide translation services for those who request it

We would be able to:

- Increase the prominence of text welcoming meetings in Welsh

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 [ x ]

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.
Standards 23, 25, 27D & 28, that require meetings to be conducted in Welsh without the aid of translation services would be impossible to meet.

The GMC is a UK wide organisation, with only four staff based in Wales. We regularly host meetings with individuals/small groups that aren’t open to the public. Many of these meetings are complex and tailored to the individual. Many involve legal and medical terminology and are hosted by experts and specialists in the required area – this is particularly relevant to our meetings with patients when dealing with individual complaints about a doctor.

In order to offer an equivalent service to patients and the public in Wales it is essential that the meetings are attended by the relevant, appropriate and qualified staff member, who may need to travel from Manchester or London. It would be unreasonable and disproportionate to expect that all meetings be conducted without the assistance of a translator.

**Recommendation:** That all standards that include the term “without the assistance of translation services” should not be applied.

Standard 27c, with regard to meetings with more than one invited person, we believe that 30% of attendees wishing to speak Welsh is a reasonable minimum requirement for translation services to be available.

**Recommendation:** That Standards 27A (10%) & 27B (20%) should not be applied.

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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 [x] No [ ]

2.7.2. Does the organization carry out the activity in question in Welsh?
Yes [x] 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.

**For events held in Wales,** we currently comply with Standards 30, 31, 32 & 34 and would be able to continue to do so.

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?
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.

Standard 33 requires translation services to be available at all public events.

**Recommendation**: that there is a reasonable and proportionate minimum threshold for requests for translation services at public meetings. See 2.6.3 regarding percentage recommendations.

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 [ x ]   No [ ]

2.9.2. Does the organization carry out the activity in question in Welsh?
Yes [ x ]   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 currently for public events held in Wales,*

- Promote events in Welsh and English and treat the languages on the basis of equality

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 [ x ]

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.
Standard 36, for public events held in Wales, we would be able to treat Welsh no less favourably than English in relation to publicity and signage. However, for audio announcements and presentation translation this may prove unreasonable and disproportionate depending on attendees’ notification of translation needs.

**Recommendation:** that there is a reasonable and proportionate minimum threshold for requests for translation services/audio announcements at public meetings. See 2.6.3 regarding minimum percentage thresholds.
2.11. Activity 6: A body's publicity and advertising

2.11.1. Does the organization carry out the activity in question?
Yes [x]    No [ ]

2.11.2. Does the organization carry out the activity in question in Welsh?
Yes [x]    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 was to be made specifically applicable to them.

We currently comply with Standard 37 and would be able to continue to do so.

2.12.2. Do you consider that making the standard specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?
Yes [x]    No [ ]

2.12.3. If ‘No’, please explain which aspect(s) of the standard appears 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 standard specified in the draft regulations specifically applicable to your organization.
2.13. Activity 7: A body displaying material in public
2.13.1. Does the organization carry out the activity in question?
Yes [x] No [ ]

2.13.2. Does the organization carry out the activity in question in Welsh?
Yes [x ] 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.

For public exhibitions/events held in Wales, we currently:

- Display public/exhibition material in Welsh.
- The Welsh version is no less prominent or accessible than the English version, and treated no less favourably than the English version.

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 [ x ] 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.
2.15. Activity 8: A body producing and publishing documents
2.15.1. Does the organization carry out the activity in question?
Yes [x]  No [ ]

2.15.2. Does the organization carry out the activity in question in Welsh?
Yes [x]  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.

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 [x]

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.

Standards 41 & 44, to produce agendas, minutes, board papers, policies and strategies in Welsh, without request, would be time consuming, costly and, in the vast majority of cases, without benefit to the public. This is particularly relevant as a UK organisation where the vast majority of meetings are not held in Wales.

**Recommendation:** That agendas, minutes and papers are available in Welsh on request and that this is clearly stated on English versions.
2.17. Activity 9: A body producing and publishing forms
2.17.1. Does the organization carry out the activity in question?
Yes [x] No [ ]

2.17.2. Does the organization carry out the activity in question in Welsh?
Yes [x] 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.

We currently comply with standards 50-51 and would be able to continue to do so for forms for patients and the public.

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 [x] 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.
2.19. Activity 10: A body’s websites and online services
2.19.1. Does the organization carry out the activity in question?
Yes [x] No [ ]

2.19.2. Does the organization carry out the activity in question in Welsh?
Yes [x] 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.

We currently:
- Have a ‘Cymraeg’ link on our website homepage that links directly to Welsh language content, including our guidance, online complaints form and patients help tool.
- Have a right hand link on our concerns homepage to – ‘Our advice in other languages’ in case this is the first port of call for visitors.

We will:
- Improve navigation for Welsh language visitors as a result of our ongoing digital strategy work.

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 [x]

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.
Standards 52-56, suggest that the entire GMC website would need to be translated, including updates to the site.

The GMC is a UK wide body, which provides a service to UK and international doctors, education providers and employers, as well as patients and the public. Its website has over 5,000 pages, many of which are not relevant to patients and the public, or specific to our services in Wales. Initial estimated costs to translate and maintain the entire website and associated micro-sites and mobile resources are in excess of £500,000.

**Recommendation:** That pages that are relevant, or of interest, to patients and the public in Wales are translated and that where “website” or “homepage” is read, this refers to the “GMC in Wales” section of the website.

Standard 57 refers to apps published by a body; the only app the GMC currently has under construction is for doctors only.

**Recommendation:** That standard 57 refers only to apps for use by the public.
2.21. Activity 11: Signs displayed by a body
2.21.1. Does the organization carry out the activity in question?  
Yes [ x ]  No [ ]

2.21.2. Does the organization carry out the activity in question in Welsh?  
Yes [ x ]  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 currently, at our Wales Office, have signs:
- that have English and Welsh text displayed, where English and Welsh are treated on the basis of equality
- that have been checked for accuracy in terms of meaning and expression

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 [ x ]

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.

Standard 59 requires the Welsh text to appear first. Our signs do not currently do this; to replace them would incur unnecessary cost. Even if/when renewed, the vast majority of visitors to the GMC in Wales are not Welsh speaking; it would appear unreasonable and disproportionate to inconvenience the majority of readers by dictating that Welsh should appear first in this instance.
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 [ x ]

2.23.2. Does the organization carry out the activity in question in Welsh?
Yes [ ] No [ x ]

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.

We will be able to:

- Ensure a person arriving for a meeting in Welsh is greeted by a Welsh speaking staff member or translator on arrival to the building/office (Standard 64)

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 [ x ]

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.

We do not have a formal reception area at the GMC Wales Office and would be unable to comply with Standards 61 – 63 and 65-66.

Recommendation: That standards 61-63 & 65-66 are not applied to the GMC.
2.25. Activity 13: Official notices made by a body
2.25.1. Does the organization carry out the activity in question?
   Yes [ x ]  No [ ]

2.25.2. Does the organization carry out the activity in question in Welsh?
   Yes [ x ]  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 GMC currently:

- Ensures that Medical Practitioner Tribunal Service (MPTS) notices regarding issues relevant to the fitness to practice of doctors in Wales are translated into Welsh

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 [ x ]

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.

Standard 68 requires the Welsh text to appear first.

The vast majority of readers of the MPTS announcements are not Welsh speaking (they are published for a UK/media audience); it would appear unreasonable and disproportionate to inconvenience the majority of readers by dictating that Welsh should appear first in this instance.
2.27. Activity 14: A body awarding grants
2.27.1. Does the organization carry out the activity in question?
Yes [x]  No [ ]

2.27.2. Does the organization carry out the activity in question in Welsh?
Yes [ ]  No [x ]

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.

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.
2.29. Activity 15: A body awarding contracts

2.29.1. Does the organization carry out the activity in question?
Yes [x] No [ ]

2.29.2. Does the organization carry out the activity in question in Welsh?
Yes [ ] No [x]

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.

GMC procurement is not coordinated by the Cardiff Office, but by a central team. Any contracts that meet the threshold are advertised on www.mytenders.org

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 [x]

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.

As our procurement experts are not based in Wales, any tenders submitted in Welsh would be subject to translation. Due the legally binding and technical elements of the document there could be far reaching operational and financial consequences to a misinterpretation.

Recommendation: That these recommendations are not applied to the GMC.
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 [x]  No [ ]

2.31.2. Does the organization carry out the activity in question in Welsh?
Yes [x]  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.

We currently comply with standards 79-80.

In 2015, we will:

- Increase the prominence of text that raises awareness of 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 [x]  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 [x]  No [ ]

2.33.2. Does the organization carry out the activity in question in Welsh?
Yes [x]  No [ ]

2.34. Standards 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 was to be made specifically applicable to them.

When promoting the corporate identity of the GMC in Wales:

- We treat English and Welsh on the basis of equality e.g. our new logo and strapline is available in both languages, corporate letterheads and promotional material has been updated to reflect this.

We currently comply with standard 81 and would be able to continue to meet this standard.

2.34.2. Do you consider that making the standard specified in the draft regulations relating to this activity specifically applicable to your organization would be reasonable and proportionate?
Yes [x]  No [ ]

2.34.3. If ‘No’, please explain which aspect(s) of the standard appears 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 standard specified in the draft regulations specifically applicable to your organization.
2.35. Activity 18: Courses offered by a body
2.35.1. Does the organization carry out the activity in question?
Yes [ ] No [ x ]

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.

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.
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 [x]

2.37.2. Does the organization carry out the activity in question in Welsh?
Yes [ ] No [ ]

2.38. Standards 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 was to be made specifically applicable to them.

2.38.2. Do you consider that making the standard 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 standard appears 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 standard specified in the draft regulations specifically applicable to your organization.
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 specified in the draft regulations which deal with supplementary matters in relation to service delivery standards, if those standards were to be made specifically applicable to them.

We would be able to comply with Standards 158(a), 159 (a&b), 160 (a&b), 161(1,2, 3,4, 5a) 162 & 163

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 [ x ]

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.

Standards 158(b), 159 (c) 160(c) 161(5b), refer to the availability of documents at each office open to the public

Recommendation: That the above standards apply to the Wales Office of the GMC only
Section 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.

   All new policies and publications are subject to equality assessment and four country proofing, prior to release, including the use of Welsh language.

   We have introduced an extra section on our template for papers to internal committees and GMC Council – the template now includes a section within which consideration must be given to different legislation in the four nations of the UK, including the Welsh language.

   We also translate all public facing consultation documents.

   To ensure policy staff are aware of these requirements:
   The GMC has a structured induction process for all staff across the four nations of the UK; part of this induction includes attendance at our corporate induction. This one day workshop is mandatory for all new staff and develops staff understanding of the work of the organisation as a whole.

   Each induction has a thirty minute section on the work of the devolved offices; this presentation includes an introduction to the Welsh Office staff, its role and the requirements of the Welsh Language Scheme; including how to contact the Welsh Office with queries and where to find further details about the scheme on the GMC website. There are eight corporate inductions per year.

   For teams who have a direct interaction with the scheme, a follow up meeting can be arranged where the Head of Welsh Affairs holds a more detailed discussion about the Welsh Office, the Scheme and its requirements.

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 [x ]

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.
The current GMC consultation policy notes: We will publish information in Welsh in accordance with the GMC’s Welsh Language Scheme, which we prepare under the Welsh Language Act 1993.

Due to the nature of the consultations (either technical content or jurisdiction of the UK) the standards proposed may not always be an appropriate inclusion.

**Recommendation**: That this set of standards includes the words ‘where appropriate’
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 [ x]

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.

N/A

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.

N/A

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.
When conducting research the following question is currently asked:

“(If appropriate) How will the proposed study promote equality and diversity? For example, how will it seek to understand perceptions of, or impacts on diverse groups?”

We would be able to expand this question to include Welsh language considerations where appropriate.

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 [x ]

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.

We are concerned that the wording of the standards for commissioning research may have unintended consequences. We agree that where appropriate the impact on Welsh language speakers should be considered when making the policy decision and commissioning research but the text as it stands is inflexible

Recommendation: That this set of standards includes the words ‘where appropriate’

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.
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 [x ]

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.

We are able to comply with standards: 164(a), 165(a&b), 166(a&b), 167, 168, 169

**Recommendation:** that standards 164(b), 165(c), 166(c) and 167(5b) apply to the GMC Wales Office only

Standards 164(b), 165 (c) 166(c) 167(5b), refer to the availability of documents at each office open to the public

**Recommendation:** That the above standards apply to the Wales Office of the GMC
Section 4 – Operational standards [96-142]

4.1. Standards relating 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 [x ]

4.1.2. If ‘Yes’, has the organization published it on its intranet?
Yes [ ] No [ x ]

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.

4.1.4. Does the organization provide the following documents in Welsh if required by the employee or worker?
   I. contract of employment
      Yes [x ] No [ ]
   II. contract for services
       Yes [ x ] No [ ]
   III. paper correspondence relating to his or her employment and which is addressed to him or her personally
       Yes [ x ] No [ ]
   IV. documents that outline his or her training needs or requirements
       Yes [ x ] No [ ]
   V. documents that outline his or her performance objectives
       Yes [ x ] No [ ]
   VI. documents that outline or record his or her career plan
       Yes [x ] No [ ]
   VII. forms that record and authorise the following:
       annual leave Yes [ ] No [x ]
       absences from work Yes [ ] No [ x ]
       flexible working hours. Yes [x ] No [ ]
4.1.5. Does the organization ask an employee or worker regarding whether they would like to receive the above documents in Welsh?
Yes [x]  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.

As noted at the beginning of this response, the GMC employees over 1020 staff members, with only four members in the Cardiff Office.

In addition, the GMC would be happy to provide hard copy documents of any of the above forms (we have offered, but not received a request to date), however, we use an online system for learning and development and to record annual leave and absences. Initial estimates for the translation and maintenance of the annual leave system start at £38,500.

Recommendation: That standards 97-102 relate only to GMC employees in Wales.

4.1.7. By ticking the relevant boxes, please specify in which language the organization publishes policies in relation to the following. If the documents are available bilingually, both boxes should be ticked.

I. behaviour in the workplace
   Welsh [ ]  English [x]

II. health and well-being at work
    Welsh [ ]  English [x]

III. salaries and workplace benefits
     Welsh [ ]  English [x]

IV. performance management
    Welsh [ ]  English [x]

V. absence from work
   Welsh [ ]  English [x]

VI. working conditions
    Welsh [x]  English [x]

VII. work patterns.
     Welsh [x]  English [x]
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.

To date, we have offered, but not received a request to translate the above documents in to Welsh. Noting the proportion of GMC staff members (less than 0.01%) that are based in Wales, we would suggest that translating the above polices without request would be unreasonable and disproportionate.

**Recommendation:** That standards 103 to 109 be amended to replace ‘must’ with ‘on request’.

4.2. Standards 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?
- make complaints to the organization in Welsh
  - Yes [x] No [ ]
- respond in Welsh to any complaint made about him or her.
  - Yes [x] No [ ]

4.2.2. If ‘Yes’, does the organization inform each member of staff of the possibility of doing the above in Welsh?
- Yes [x] 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?
- offer to conduct the meeting in Welsh
  - Yes [x] No [ ]
- ask the member of staff whether he or she wishes to speak Welsh at the meeting
  - Yes [x] No [ ]
- conduct the meeting in Welsh (without the assistance of translation service)
  - Yes [ ] No [x ]
- provide a simultaneous translation service at the meeting (unless it is possible to conduct the meeting in Welsh without translation services).
  - Yes [x] No [ ]

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 [x] 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 would be able to facilitate the translation of the above information if requested by a member of staff. Staff in the Wales office of the GMC are aware that they can request this information in Welsh.

4.3. Standards 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 [x] No [ ]

4.3.2. If ‘Yes’, does the organization inform all members of staff of the possibility to do the above in Welsh?
Yes [x] No [ ]

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

I. offer to conduct the meeting in Welsh  
   Yes [x] No [ ]

II. ask the member of staff whether he or she wishes to speak Welsh at the meeting  
    Yes [x] No [ ]

III. conduct the meeting in Welsh (without the assistance of translation services)  
     Yes [ ] No [x]

IV. provide a simultaneous translation service at the meeting (unless it is possible to conduct the meeting in Welsh without translation services).  
    Yes [x] No [ ]

4.3.4. Does the organization inform a member of staff of its decision following a disciplinary process in Welsh?
Yes [x] 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.
We would be able to comply with all of the standards, for staff based in Wales, except for 115b, which requires the meeting to be held in Welsh without the assistance of translation service. We do not have a HR function based in Wales, the GMC’s HR function is based in Manchester and London, it would therefore be impossible to host the meeting without translation being provided.

Recommendation: That recommendation 115b should not be applied to the GMC.

4.4. Standards 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 [x ] No [ ]

4.4.2. Does the organization provide Welsh language interfaces for software where an interface already exists?
Yes [ ] No [x ]

4.4.3. Does the organization operate an intranet system?
Yes [x ] No [ ]

4.4.4. Are intranet pages available in Welsh, including the home page, the interface and menus?
Home Page Yes [ ] No [x ]
Interface Yes [ ] No [x ]
Menus Yes [ ] No [x ]

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.
4.5. Standards 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 [ x ]

4.5.2. By ticking the relevant boxes, please specify in which language the organization provides training in the following areas. If they are provided bilingually, both boxes should be ticked.

I. recruitment and interviewing
   Welsh [ ]  English [ x ]

II. performance management
   Welsh [ ]  English [ x ]

III. complaints and disciplinary procedures
   Welsh [ ]  English [ x ]

IV. induction
   Welsh [ ]  English [ x ]

V. dealing with the public
   Welsh [ ]  English [ x ]

VI. health and safety
   Welsh [ ]  English [ x ]

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

Standard 118: We have considered purchasing CySill, however, we have adopted a set procedure for official documentation that is designed to ensure consistency in Welsh language and grammar by using only approved translators. Any translated documents are then proof-read and approved by staff who are fluent Welsh speakers.

Staff have been consulted and are content to use freely available online translation services for unofficial/received documents. This decision is reviewed on an annual basis as part of our reporting to the Commissioner.

Standard 119 -124: As a UK wide organisation, with less than 0.01% of its staff based in Wales, that has not received a request for the intranet to be translated we believe it would be unreasonable and disproportionate to meet these standards. However, we will ensure that any translated policies, including the welsh language scheme, are available on the intranet for staff. (Please see 4.1.6 re technical translation costs)
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.

We produce individual professional development plans for every member of staff which are agreed in discussion between our Learning and Development staff, the line manager and the member of staff. If any of the above training courses were required, they would be funded by the GMC and conducted within working hours.

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

I. awareness of the Welsh language
   Yes [ x ] No [ ]

II. understanding of the obligation to operate in compliance with a Welsh Language Scheme
   Yes [ x ] No [ ]

III. understanding of how the Welsh language can be used in the workplace.
    Yes [ ] No [x ]

4.5.5. Does the organization provide information to new employees and/or workers to raise their awareness of the Welsh language?
    Yes [ x ] No [ ]

4.5.6. Please provide information and/or evidence on those arrangements below.
The GMC has a structured induction process for all staff across the four nations of the UK; part of this induction includes attendance at our corporate induction. This one day workshop is mandatory for all new staff and develops staff understanding of the work of the organisation as a whole.

Each induction has a thirty minute section on the work of the devolved offices; this presentation includes an introduction to the Welsh Office staff, its role and the requirements of the Welsh Language Scheme; including how to contact the Welsh Office with queries and where to find further details about the scheme on the GMC website. There are eight corporate inductions per year.

For teams who have a direct interaction with the scheme, a follow up meeting can be arranged where the Head of Welsh Affairs holds a more detailed discussion about the Welsh Office, the Scheme and its requirements.

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 [ x ]

4.5.8. Are the contact details of employees and/or workers included in e-mail messages provided in Welsh?
Yes [ x ] 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 [ x ] No [ ]

4.6. Standards 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.

All posts in the GMC Wales Office are advertised with Welsh language skills as desirable.

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.
4.6.3. Does the organization provide the following documents in Welsh?
   I. application forms
      Yes [x ] No [ ]
   II. job descriptions
        Yes [x ] No [ ]
   III. material that explains the procedure for applying for posts
        Yes [x ] No [ ]
   IV. information about the interview process or other assessment methods.
        Yes [x ] No [ ]

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 [x ] 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 [x ] No [ ]

4.6.6. If 'Yes', does the organization do the following?
   I. 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)
      Yes [x ] No [ ]
   II. conduct the interview or assessment in Welsh (without the assistance of translation services).
      Yes [ ] No [x ]

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 [x ] 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 [x ] No [ ]

4.7.2. If ‘Yes’, is the Welsh-language text positioned so that it is likely to be read first?
        Yes [ ] No [x ]

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

Number: 2
Percentage: 100% of posts advertised in Wales
### 4.8.1. Are announcements made in the organization's buildings via audio equipment?
- Yes [ ]
- No [x]

### 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 [x]

### 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.

Please see section 2.22.3 regarding signs displayed.

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### 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.

We are able to comply with standards: 170(a), 171, 172, 173, 174, 175

**Recommendation:** that standards 170(b) and 173 (5a) apply to the GMC Wales Office only
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 [x ] 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.

Section 5 – Promotion standards [143-144]

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.

5.1. Does the organization give consent to be potentially applicable to promotion standards?
Yes [ ] No [ x ]

If ‘No,’ please proceed to Section 6 of the questionnaire.

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.

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.
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.

Section 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 it can implement some of the record keeping standards, relevant information and/or evidence on the reasons why should be provided.

We will be able to comply with standards 145 - 157

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

Due to the low numbers of staff in the GMC Wales Office this information is recorded by the Head of Welsh Affairs on recruitment and discussed as part of the learning and development process for all staff members.
All roles in the Wales Office are advertised with Welsh as desirable
Two posts were advertised in 2014, both requested Welsh Language as desirable
Please see section 1.11
No welsh language training courses were requested/required in 2014
Zero in 2014
Zero in 2014
N/A
Please see section 1.11

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

We will be able to comply with the standards 178 (in the form of the annual report) and 179.

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 [x] 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.
Section 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.

N/A

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.

N/A

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

N/A
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.

N/A

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 [ x ]

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

Progress in 2014 includes:

- Translation of our online complaints form – approx. £9,000
- Translation of publications including *How we will protect patients in 2014*, approx. £5,000
- Introduction of bilingual eMail signatures for Wales Office staff
- Full analysis of current Welsh language provision through Standards Investigation.

Plans for 2015 include:

- Improve our recording of a doctor’s language preference
- Investigate Welsh language accessibility for our online list of medical registered practitioners (searching the medical register)
- Continue investigation into ‘on the line’ translation for the contact centre
- Increase the visibility of our Welsh Language web content
- Increase the visibility of our Welsh Language services
- Continue to work with UK Health and Social Care Professional Regulators and the Welsh Language Commissioner throughout the implementation of the Standards