

**Welsh Language Standards for healthcare regulators and the Professional Standards
Authority: Royal Pharmaceutical Society response**

General Thoughts

The Royal Pharmaceutical Society welcomes these proposed standards that further strengthens the right of people to use the language of their choice when interacting with the health service. Of course, the public's interaction with bodies who regulate healthcare professionals is far less frequent than their interaction with Local Health Boards and NHS Trusts. However, when a member of the public does interact with these bodies, they should be empowered to use the Welsh language. We believe the proposed standards will help to achieve this aim.

We are also pleased that these proposed standards have struck the right balance between supporting people to live their lives through the medium of Welsh and being in proportion to the functions and structures of the regulatory bodies. In the 2016 consultation on the draft Welsh Language Standards Regulations for health sector bodies which initially included these bodies we did express our concern that those standards were not proportionate to the public facing activity undertaken by regulators. We were pleased that regulatory bodies were excluded from those standards and that these tailored separate and more appropriate standards have been developed in their place.

Question 1: Do you have any comments on the service delivery standards proposed in the regulations?

The RPS wholeheartedly agrees with the principle with the main objective of this group of standards; to ensure individual members of the public are able to use Welsh when dealing with these bodies.

We welcome the clarity in the definition of 'individuals' as members of the public "acting in their personal capacity". Whilst we would encourage all regulators to integrate the Welsh language as much possible into their activities, we would fear that expanding the definition of individuals to registrants in this context would be too challenging when considering the typical structures and staffing levels of regulatory bodies. In this context we feel the regulations strike the right balance and would not negatively affect the regulators ability or capacity to carry out their main functions.

We generally agree and are supportive of all the standards in this section. We do however have some minor concerns or comments on specific standards or groups of standards, listed below:

Standards relating to telephone calls made and received by a body (Standards 5-7)

On the whole, we're supportive of these standards and of the principle of these organisations dealing with telephone calls in Welsh for as long as is possible if a request to do so is made. We do however note that the majority of these regulatory bodies are mainly based outside of Wales and may only have a handful or possibly only a single member of staff based in Wales who may not be a Welsh speaker. The caveat that a call can be conducted in English when a Welsh speaking member of staff is not available is therefore welcomed and all important to ensure that the public can still effectively contact a regulatory body.

Standards relating to a body holding meetings that are not open to the general public & standards relating to meetings arranged by a body that are open to the public (Standards 8 - 12)

Again, the RPS is broadly supportive of these standards and agree that organisations should ask individuals beforehand whether they wish to use Welsh at an upcoming meeting and, if so, arrange for a simultaneous translation service to be available at the meeting. However we would suggest that the final standards include a clear definition of 'meetings'. At present, the draft standards seem to be referring to be referring to 'in person' or 'face to face' meetings. We are conscious that in the short to medium term, face to face meetings are limited and that the majority of meetings for these organisations will be virtual. We suggest that the final standards take account of this and include details on what is expected of organisations when conducting virtual meetings, taking into account potential added complexity for simultaneous translation during virtual meetings.

Standards relating to a body's use of social media question (Standard 28)

As previously mentioned, limited Wales-based staff and potentially lack of Welsh language skills among them, can create difficulty for these bodies to fully comply with all standards whilst also performing their main functions. Therefore, whilst we are supportive of the standard that necessitates a reply in Welsh to any contact made to the organisation's social media through the medium of Welsh, we would recommend that similar caveats to which applied to phone calls in earlier on Standard 5 are added to Standard 28:

Question 2: Part 3 of Schedule 1 to the Regulations includes interpretations for some of the Service Delivery Standards. Paragraphs 16-37 explains how some of the standards work and if what circumstances they apply. Do you have any comments on the interpretation of standards as set out in Part 3?

No comments.

Question 3: Do you have any comments on the policy making standards proposed in the regulations?

We are supportive of all of the policy making standards and are confident that they will prove effective in:

- preventing any unintended instances of the Welsh language being treated less fairly
- or Welsh language speakers being denied opportunities to use the Welsh language as a result of policies developed by these organisations.

Our only comment would be to suggest that resources and examples of best practice are made available to help support organisations to comply with these standards.

Question 4: Do you have any comments on the operational standards proposed in the regulations?

As discussed in the consultation document, we fully take into account the difficulty of creating operational standards for these organisations that are effective but also take into account that the vast majority of staff work outside of Wales and that Welsh language skills among staff may well be very limited. With those considerations in mind, we believe that the right balance has been struck.

Our only comment on these standards relate to standards 43 and 44 which discuss the need to provide employee training and have induction processes in place that raise awareness and understanding of the Welsh language in Welsh society. Whilst we are wholly supportive of the aims of these standards, we would be concerned that compared to bodies such as local health boards and NHS trusts that expertise to provide such training may not be present within these organisations at present. We would therefore hope that support materials are developed and made available.

Question 5: Do you have any comments on the record keeping standards and standards dealing with supplementary matters proposed in the regulations?

No Comments.

Question 6: We would like to know your views on the effects that these regulations would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Whilst public interaction with these organisations are generally infrequent, when there is contact it will generally relate to an important, and often very stressful, matter for members of the public. The standards will serve to empower the public so that they have rights when interacting with regulatory bodies and will instigate a greater understanding of the importance of the Welsh language within these organisations. Therefore, these standards are a positive development that have our full support.

Question 7: Please also explain how you believe the regulations could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We are satisfied with the Standards as they stand.