

Shan Morgan
Ysgrifennydd Parhaol
Permanent Secretary



Llywodraeth Cymru
Welsh Government

Huw Vaughan Thomas
Auditor General Wales
Wales Audit Office
24 Cathedral Road
Cardiff
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Dear Auditor General,

30 July 2018

Welsh Government Response to AGW report – ‘Speak my language: Overcoming language and communication barriers to public services’

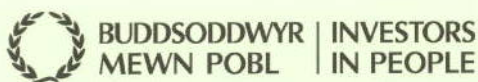
I refer to the above report published on 26 April 2018.

We have considered the three recommendations contained in the report and our response is attached in Annex 1.

Yours,
Shan Morgan

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Ysgrifennydd Parhaol/ Permanent Secretary
Llywodraeth Cymru/ Welsh Government

cc: Tracey Burke, Director General for Education and Public Services Group
Andrew Goodall, Director General for Health and Social Services, Andrew Slade,
Director General for Economy Skills and Natural Resources, David Richards,
Director of Governance, Cabinet Mailbox, PAC Chair, CGU Mailbox



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Welsh Government Response to the AGW 'Speak My Language: Overcoming Language and Communication Barriers to Public Services' Report

Recommendation 1

Ensuring that people who face language and communication barriers can access public services

Public bodies are required to ensure that people can access the services they need. To take account of the requirements of the 2010 Equality Act and other legislation, we recommend that public bodies regularly review the accessibility of their services to people who do not speak English or Welsh as a main language including Deaf people who use sign language. This assessment can include using our checklist.

Welsh Government Response:

Accept

Equality is central to the work of the Welsh Government and our vision for Wales, as set out in Prosperity for All. Our Strategic Equality Plan 2016-20 sets out the steps we will take to achieve our Equality Objectives.

The Welsh Government remains fully committed to fulfilling its international human rights obligations, including the implementation of the UN Convention on the Rights of Disabled People, and the application of the Social Model of Disability which underpins them.

We have asked Welsh public bodies that are subject to the Equality Act 2010, and the Welsh Specific Duties, how they ensure people have access to the services they need.

It is clear that they are aware of their responsibilities and have put in place training on British Sign Language (BSL) as well as other suitable arrangements, for example, published external documents contain commitments to provide copies in alternative formats upon request, including large print, braille, audio, Easy Read and British Sign Language. In some cases toolkits are provided for developing deaf audiences and public bodies offer to provide the specific interpretation service requested by individuals, which can include BSL or a palantypist. This involves buying in the expertise.

In term of the NHS, Health Board Equality Leads have highlighted the checklist to NHS organisations as an example of best practice.

The Welsh Government is committed to creating an inclusive education system so all learners can access common opportunities in ways relevant to their individual needs. Where sign language is essential to enable a pupil to access the curriculum then, under Special Education Needs (SEN) legislation, local authorities must provide it.

The Additional Learning Needs and Education Tribunal (Wales) Act 2018 will create an improved system for children with ALN, including those with a hearing impairment. The Act has fairness and equity at its core and aims to ensure all learners are supported to

reach their full potential. As part of our Additional Learning Needs Transformation Programme, we have made £352,000 available to local authorities over two years to support professional training of the local authority based sensory workforce. This funding can also be used to train local authority based sensory staff in British Sign Language.

Recommendation 2

Developing interpretation and translation services in Wales

Our work with public bodies, interpretation and translation service providers and service users has identified some challenges for interpretation and translation services. We recommend that the Welsh Government work with public bodies, representative groups and other interested parties to make sure that:

- the supply of interpreters is sufficient especially for languages in high demand such as BSL and Arabic;
- interpreters with specialist training are available to work in mental health services and with people who have experienced trauma or violence; and
- quality assurance and safeguarding procedures are in place.

Welsh Government Response:

Accept

We would expect public bodies to consider the requirement of their population when commissioning interpreters and/or translation services, and this would include consideration of suppliers' abilities to provide sufficient resource to meet demand. We will clarify this expectation with our NHS organisations as a result of this report alongside our expectation that health bodies have sought evidence of the quality/safeguarding procedures of the organisations from which they commission services.

The Welsh Government is working closely with the third sector and other key stakeholders to develop guidance for Local Authorities on fulfilling their duties under the Social Services and Well-being Act. This will form the basis on which we can develop a Social Care Pathway and we shall consider how the All Wales Accessible Communication and Information Standards relate to this.

Whilst ensuring we have sufficient interpreters is an important aspect when it comes to foreign languages (not BSL) our priority is to invest in English for Speakers of Other Languages (ESOL) provision to ensure individuals develop the skills to enable them to have the confidence and freedom to represent themselves in these circumstances. We will also be reviewing our current provision of BSL – both within the workplace and more generally, to ensure that our approach meets the needs of individuals and their families. This will include further study of both the availability and training of BSL interpreters, but also the access to BSL learning provision. More information on this will be available in the autumn.

Recommendation 3

Accessible Information Standard

The NHS Wales Accessible Communication and Information Standards for People with Sensory Loss published in 2013 apply only to the health service. Similarly, the new Accessible Information Standard requires GP surgeries to ask about, collect and flag the communication needs of patients with sensory loss. From March 2018, information

can be shared in an e-referral within NHS Wales. We recommend that the Welsh Government consider:

- widening the scope of both the 2013 All Wales Accessible Communication and Information Standards for People with Sensory Loss and the new Accessible Information Standard to:
 - patients whose main language is not English or Welsh;
 - patients who have language and communication barriers due to disability, learning difficulties or autism; and
 - parents and carers who have language or communication barriers.
- if the 2013 All Wales Accessible Communication and Information Standards could be adapted to cover other public services.

Welsh Government Response:

Accept

We are already considering how to drive progress on ensuring NHS organisations are complying with the 2013 All Wales Accessible Communication and Information Standards for People with Sensory Loss and that needs are being appropriately met for the groups for which they were originally intended. As part of our diagnosis we will look to consider the standards as drafted and, as a result of this recommendation, whether they should be widened to include the other groups referred to in the recommendation.

Welsh Ministers will be writing to the public bodies that sit within their portfolios highlighting this report, asking for information on the specific actions they are taking now and any new actions they propose to take as a result of the report. They will also be asked to consider signing up to the new Accessible Information Standard, because we acknowledge the benefit of increasing the awareness of Welsh public sector staff to individuals' requirements in terms of accessing services.