



Primary Care Welsh Language Policy

(in accordance with Welsh Language Standard 78)

Policy Number:	1036	Classification	Corporate		
Supersedes					
Version No	Date of EqIA:	Approved by:	Date of Approval:	Date made Active:	Review Date:
V1	14/12/2021	People, Organisational Development and Culture Committee (PODCC)	13/10/2021	14/12/2021	13/10/2026

Brief Summary of Document:	In accordance with Welsh Language Standard 78, this policy sets out the process involved to assist Primary Care managers to identify and consider the impact on the Welsh language when planning and making decisions in relation to providing Primary Care services.
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Scope:	<p>This policy has been developed on the values enshrined in the More than Just Words Framework that all users should be treated with dignity and respect and should receive accurate assessments and appropriate care, and as such the Health Board is committed to mainstreaming Welsh language services into all aspects of service planning and delivery.</p> <p>Primary Care Contractors (General Medical Services, Community Pharmacies, Dentists and Optometrists) are not subject to the Welsh Language Standards. They are subject to the National Health Service (Welsh Language in Primary Care Services) (Miscellaneous Amendments) (Wales) Regulations 2019. Further information can be found here.</p> <p>As such this policy will not apply to decisions made within the relevant Primary Care Contractor contracts or frameworks, but will apply to any decisions made</p>
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	by the Health Board regarding services which are delivered within Primary Care Contractor settings outside of the relevant contract or framework. Such Primary Care services will include, but are not limited to, Primary Care Cluster projects, Community Dental Service provision, Managed Practices, Pacesetter projects, seasonal schemes such as winter initiatives and Hywel Dda University Health Board directed (e.g. Local Enhanced Services) and funded schemes.
To be read in conjunction with:	333 Bilingual Skills Policy 175 Freedom of Information Act Policy
Patient information:	Include links to Patient Information Library

Owning Committee/ Group	People, Organisational Development and Culture Committee
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Executive Director:	Jill Paterson	Job Title	Director of Primary Care, Community and Long-Term Care
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Reviews and updates		
Version no:	Summary of Amendments:	Date Approved:
1	New Policy Reuploaded 8.5.2024 with corrected review date (five years)	22/11/2021

Glossary of terms

Term	Definition

Keywords	Welsh; Welsh Language; Standards; policy; Primary Care.
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1. Introduction

The Welsh Language Measure 2011 gives the Welsh language official status in Wales. The Measure also created duties on organisations, including health boards, in the form of Welsh Language Standards (“the Standards”). The Standards mean that organisations should not treat the Welsh language less favourably than the English language and should promote and facilitate the use of the Welsh language, making it easier for people to use in their day-to-day-life.

To comply with Welsh Language Standard 78, this policy sets out that a Welsh Language Impact Assessment will be conducted to assist Primary Care managers to identify and consider the impact on the Welsh language when planning and making decisions in relation to providing Primary Care services.

2. Policy Statement

Welsh Language Standard 78 places a duty on health boards to:

You must publish a policy on providing a primary care service which requires you to take the following into account when you make decisions in relation to providing a primary care service—

(a) what effects, if any (and whether positive or negative), the decision would have on—

- (i) opportunities for persons to use the Welsh language, and
- (ii) treating the Welsh language no less favourably than the English language;

(b) how that decision could be taken or implemented so that it would have positive effects, or increased positive effects, on—

- (i) opportunities for persons to use the Welsh language, and
- (ii) treating the Welsh language no less favourably than the English language; and

(c) how the decision could be taken or implemented so that it would not have adverse effects, or so that it would have decreased adverse effects on—

- (i) opportunities for persons to use the Welsh language, and
- (ii) treating the Welsh language no less favourably than the English language.

This policy has been developed to give full consideration to how developing and/or implementing specific decisions will affect the availability and accessibility of Welsh language provision in Primary Care services, to maximise opportunities to use the Welsh language, and ensure that the Welsh language is treated no less favourably than the English language.

This policy further demonstrates Hywel Dda University Health Board’s commitment to ensuring that members of the public may express their views and needs better in their preferred language and encourages other users and providers to use and promote the Welsh language within the health sector in the health board’s area.

3. Scope

This policy has been developed on the values enshrined in the More than Just Words Framework that all users should be treated with dignity and respect and should receive accurate assessments and appropriate care, and as such the Health Board is committed to mainstreaming Welsh language services into all aspects of service planning and delivery.

Primary Care Contractors (General Medical Services, Community Pharmacies, Dentists and Optometrists) **are not** subject to the Welsh Language Standards. They are subject to the National

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Health Service (Welsh Language in Primary Care Services) (Miscellaneous Amendments) (Wales) Regulations 2019. Further information can be found [here](#).

As such this policy will not apply to decisions made within the relevant Primary Care Contractor contracts or frameworks, but will apply to any **decisions made by the Health Board** regarding services which are delivered within Primary Care Contractor settings **outside of the relevant contract or framework**. Such Primary Care services will include, but are not limited to, Primary Care Cluster projects, Community Dental Service provision, Managed Practices, Pacesetter projects, seasonal schemes such as winter initiatives and Hywel Dda University Health Board directed (e.g. Local Enhanced Services) and funded schemes.

4. Aim

The aim of this document is as follows:

- To ensure that the Welsh language is considered throughout the planning and decision-making process in relation to providing Primary Care Services.
- To ensure a Welsh Language Impact Assessment Tool is used by Primary Care Services as a means to identify and consider the impact on the Welsh language.
- To ensure that patient language choice is considered throughout all planning.
- To ensure that the Welsh language is given equal status to the English language not treated any less favourably
- To eliminate discrimination, advance equality of opportunity and foster good relations with the Welsh speaking community that we serve
- That any policy making decisions would have a positive impact on a person's opportunity to use the Welsh language.

5. Objectives

The aims of this Policy will be achieved through the following objectives:

- Ensure that the Welsh Language Impact Assessment tool is communicated effectively with all Primary Care Managers.
- Provide Primary Care Managers with practical support and advice on undertaking the Welsh Language Impact Assessments.

6. Procedure

6.1 To comply with Standard 78, this policy sets out that a Welsh Language Impact Assessment (see [Appendix 1](#) for copy) will be conducted to assist Primary Care managers to identify and consider the impact on the Welsh language when planning and making decisions in relation to providing Primary Care services, which will address:

(a) what effects, if any (and whether positive or negative), the decision would have on—
(i) opportunities for persons to use the Welsh language, and
(ii) treating the Welsh language no less favourably than the English language;

(b) how that decision could be taken or implemented so that it would have positive effects, or increased positive effects, on—
(i) opportunities for persons to use the Welsh language, and
(ii) treating the Welsh language no less favourably than the English language; and

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(c) how the decision could be taken or implemented so that it would not have adverse effects, or so that it would have decreased adverse effects on—

- (i) opportunities for persons to use the Welsh language, and
- (ii) treating the Welsh language no less favourably than the English language.

6.2 Welsh Language Impact Assessment Tool

The Welsh Language Impact Assessment Tool is to be used to assess any potential positive or negative effects a decision made in relation to providing a Primary Care service may have on opportunities for persons to use the Welsh language. The Assessment must also consider how the decision can be implemented so that it would have positive effects, or increased positive effects on opportunities, for persons to use the Welsh language. All decisions will need to reflect the main aim of the Welsh Language Standards; to ensure that the Welsh language is treated no less favourably than the English language.

One of the key aims of this policy is to eliminate discrimination, advance equality of opportunity and foster good relations with the Welsh speaking community that we serve. Managers will need to evidence within the Assessment what information has been used to assess how this decision might impact on the opportunities for persons to use the Welsh language through the use of various sources such as the Office of National Statistics and latest Census information. During the Assessment process it is important to also consider an area's demographic and linguistic profile in particular, based on the Welsh Language Use Survey 2018.

A copy of all completed Welsh Language Impact Assessment Tools will need to be sent to the responsible Primary Care Officer and Welsh Language Services Team and will be held by both teams.

The completed Welsh Language Impact Assessment form will be fully considered as part of the decision-making process for the service to which it relates. Where negative impacts remain, advice and support will be provided by Hywel Dda University Health Board's Welsh language team to identify if and how the negative impacts can be addressed.

7. Legislative and NHS Requirements

7.1 Welsh Language Measure 2011

The Welsh Language (Wales) Measure 2011 modernised the existing legal framework regarding the use of the Welsh language in the delivery of public services. It includes provision about the official status of the Welsh language and establishes the office of the Welsh Language Commissioner which has replaced the Welsh Language Board.

7.2 Welsh Language Standards - Compliance Notice – Section 44 Welsh Language (Wales) Measure 2011 on 30 November 2018

The Standards place duties on organisations in Wales to deliver services through the medium of Welsh, consider the language when making policies, encourage more Welsh language use in the workplace, promote the language and keep records of how they are performing their duties.

Standard 78 and 78A are relevant to this policy and can be found [here](#).

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7.2 More than Just Words Action Plan 2019-2020 - Delivering the Active Offer

The Active Offer continues to be a core element of the new Action plan. It is important that staff offer Welsh language services to patients, rather than expect patients to have to ask for them. Information and guidance can be found [here](#).

7.3 The Well-Being of Future Generations (Wales) Act 2015

The Act states that the Welsh language should be given due consideration as part of setting and delivering well-being objectives reflecting its official status in Wales and the national well-being goal of “a thriving Welsh language”. Where specific outcomes are identified as priorities e.g. promoting or protecting the language, or ensuring the adequate bilingual provision of services that meets local need, these should be considered in the setting of well-being objectives. Further information can be found [here](#).

7.4 Freedom of Information Act 2000

This policy is open and published on the Hywel Dda University Health Board website [here](#).

7.5 Cymraeg 2050 Strategy

The Cymraeg 2050 Policy sets out the Welsh Government’s long-term ambition and approach to see the number of people able to enjoy speaking and using Welsh reach a million by 2050. Hywel Dda University Health Board is committed to delivering a Bilingual Skills Policy as part of the Health Board’s Workforce Planning process to deliver bilingual healthcare which will contribute to the aim of the Cymraeg 2050 Strategy.

7.6 Bilingual Skills Policy

Hywel Dda University Health Board Bilingual Skills Policy can be found [here](#).

The Policy is not only published to ensure compliance with legislation, but to ensure a culture shift towards a recognition of the benefits that an increasingly bilingual workforce can contribute to the delivery of excellent healthcare services.

8. Training

There are no specific training needs for the implementation of the policy. Any support needed to implement the policy will be provided by the Welsh Language Services team.

9. Review, Monitoring and Audit Arrangements

A review is required five years after publication in order to comply with Standard 78A:

On the expiry of 5 years after publishing the policy in accordance with standard 78 (whether or not revisions have been made to that policy) and on the expiry of each subsequent period of 5 years you must —

(a) assess to what extent you have complied with the policy; and

(b) publish that assessment on your website within 6 months of the end of the period.

This policy will be reviewed by a working group consisting of staff from the Welsh language Services team and Primary Care team. The Welsh Language Services Manager will liaise with Primary Care team leading up to the five year review period.

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10. Responsibilities

10.1 Assistant Director of Primary Care

The Assistant Director of Primary Care will take overall responsibility for implementing and monitoring this policy.

10.2 Heads of Services

Operational responsibility for ensuring that that relevant Primary Care team members are aware of their responsibilities in relation to implementing this policy lays with the heads of services for General Medical Services, Community Pharmacy, Dental and Optometry.

10.3 Primary Care Managers

Responsible for conducting the Welsh Language Impact Assessments.

10.4 Designated Primary Care Officer & Welsh Language Services Manager

Will ensure the policy is reviewed after five years, support Primary Care Managers if queries or issues arise and hold copies of Welsh Language Impact Assessments.

10.5 Overall Accountability

Although the Chief Executive is accountable for the overall Welsh Language Standards in the Health Board, the Director of Primary Care, Community and Long-Term Care will be accountable for this policy.

11. Consultation process

This policy was developed in consultation with the Welsh Language Services team and Primary Care team members in Hywel Dda University Health Board. It has also been shared for comment via the Global email to other health board staff.

The following parties were invited to comment on the draft policy: Dyfed Powys Local Medical Committee, Community Pharmacy Wales, Dyfed Powys Local Dental Committee, South West Wales Regional Optical Committee, Hywel Dda Community Health Council, Primary Care Locality Leads, Primary Care clinical directors and advisers, heads of services and managers.

12. Retention / Archiving

This policy will be published on Hywel Dda University Health Board's website

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13. References

[Welsh Language Standards No 7 2018](#)

[Hywel Dda University Health Board Standards Compliance Notice 2018](#)

[Follow on Strategic Framework for Welsh Language Services in Health, Social Services and Social Care 2016-2019](#)

[Welsh Government More than Just Words Action Plan 2019-2020](#)

[The Well-Being of Future Generations \(Wales\) Act 2015](#)

[My Language, My Health Report 2014](#)

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14. Appendix 1 Welsh Language Impact Assessment Tool

Welsh Language Impact Assessment

Before completing this Impact Assessment please ensure you have read the Welsh Language and Primary Care Services Policy – [INSERT LINK](#)

Please return all completed to your responsible Primary Care Officer at HDDUHBPrimary.Care.HDD@wales.nhs.uk

Organisation prepared for			
Version		Date Completed	
Description of what Primary Care service is being impact assessed			
Evidence			
What data/information have you used to assess how this decision might impact on the opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language? Sources such as the Office of National Statistics , Staff and/ or area profiles , should be detailed here			
Who have you consulted with to assess possible impact of this decision/s in relation to providing a Primary Care Service? If you have not consulted other people, please explain why?			

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Analysis of impact on Welsh Speaking Service Users				
The Welsh Language and Primary Care Services Policy requires us to eliminate discrimination, advance equality of opportunity and foster good relations with the Welsh speaking community that we serve. Consider how this service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against the aim of the Welsh Language and Primary Care Services Policy. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.				
Aim	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
<p>What effects, if any, the decision would have on –</p> <p style="margin-left: 20px;">(i) Opportunities for persons to use the Welsh language, and</p> <p style="margin-left: 20px;">(ii) treating the Welsh language no less favourably than the English language</p>	<ul style="list-style-type: none"> • 	□	□	□

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Positive outcomes action plan

You are required to consider how the decision can be taken or implemented so that it would have positive effects, or increased positive effects on –

- (i) opportunities for persons to use the Welsh language, and
- (ii) treating the Welsh language no less favourably than the English language. Please detail below the actions that you intend to take.

Negative outcomes action plan

Where you have ascertained that there will potentially be negative outcomes and decreased negative effects on –

- (i) opportunities for persons to use the Welsh language, and
- (ii) treating the Welsh language no less favourably than the English language, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>

If negative impacts remain, please provide an explanation below.

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Completed by:	
Date:	
Signed off by:	
Date:	
Manager sign off date:	
To be reviewed by: (officer name)	
Review date:	

15. Appendix 2 Guidance for completing Welsh Language Impact Assessment Tool



Guidance for completing Welsh Language Impact Assessment Tool – Hywel Dda University Health Board

A Welsh Language Impact Assessment will be conducted to assist Primary Care managers to identify and consider the impact on the Welsh language when planning and making decisions in relation to providing Primary Care services.

The Welsh Language Impact Assessment Tool is to be used to assess any potential positive or negative effects a decision made in relation to providing a Primary Care service may have on opportunities for persons to use the Welsh language

Managers will need to evidence within the Assessment what information has been used to assess how this decision might impact on the opportunities for persons to use the Welsh language

Here are some factors to consider when completing the Welsh Language Impact Assessment.

National policies

1. Would the decision contribute to, or damage, the aims and objectives of language strategies nationally and in specific policy areas (e.g. Welsh Government strategies for the Welsh language and laws or subordinate legislation relating to the Welsh language)?

Cymraeg 2050: A million Welsh speakers

2. Would the decision contribute to, or damage, the following aims:

- successful transmission of the Welsh language within the family
- increasing the number of Welsh speakers in the context of early years, statutory education age and post-compulsory education
- increase the number of the education workforce who can speak and use Welsh in their work

3. Would the decision contribute to, or damage, the following aims:

- increasing the use of Welsh within the context of the workplace
- increasing the use of Welsh language services
- increasing the social use of the Welsh language

4. Would the policy decision contribute to, or damage, the following aims:

- supporting the socio-economic infrastructure of Welsh-speaking communities
- ensuring that the Welsh language is protected as an integral part of contemporary Welsh culture
- ensuring that the Welsh language is at the heart of innovation in digital technology to enable the use of Welsh in all digital contexts

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- ensuring that linguistic infrastructure (dictionaries, terminology, the translation profession) continues to develop and is an integral part of the implementation of Cymraeg 2050
- establishing language planning and promotion of the language nationally, regionally and locally as essential elements, with better understanding and supporting bilingualism and the needs of Welsh speakers Linguistic profile and opportunities to use the Welsh language.

5. Would the decision:

- increase (or decrease) the number of Welsh speakers moving from / to a particular area?
- impact on opportunities and number or percentage of people who use Welsh?
- lead to an increase (or decrease) in the number of individuals learning the language?

Viability of the Welsh language

6. To what extent would the decision positively or adversely affect safeguarding the Welsh language in a specific area

- the sustainability of areas where the Welsh language is part of the fabric of that community
- taking steps to promote the Welsh language
- the prosperity of Welsh as the language of family, community, or the workplace.

Staffing

7. Would the decision:

- lead to an increase (or decrease) in the number of jobs requiring Welsh language skills?
- encourage / make it easier (or harder) to recruit Welsh speakers?
- reduce understanding and / or awareness at a strategic level?
- mean that a body loses an advocate or an advocate for Welsh speakers?

Activities

8. Beyond the statutory duties of service delivery standards, would the decision have a positive or adverse effect on

- making the Welsh language more visible?
- result in the activity/activities being compromised?
- mean that accessibility and access to the Welsh language activity is restricted?

Please return all completed to your responsible Primary Care Officer at HDDUHBPrimary.Care.HDD@wales.nhs.uk

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16. Appendix 3: Equality Impact Assessment



SUMMARY EQUALITY IMPACT ASSESSMENT

Organisation:	Hywel Dda University Health Board
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Proposal Sponsored by:	Name:	Jill Paterson
	Title:	Director of Primary Care, Community & Long-Term Care
	Department:	Primary Care, Community & Long-Term Care

Policy Title:	Primary Care Welsh Language policy (in accordance with Welsh Language Standard 78)
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Brief Aims and Objectives of Policy:	<p>The aim of this document is as follows:</p> <ul style="list-style-type: none">• To ensure that that the Welsh language is considered throughout the planning and decision-making process in relation to providing Primary Care services.• To ensure a Welsh Language Impact Assessment Tool is used by Primary Care services as a means to identify and consider the impact on the Welsh language.• To ensure that patient language choice is considered throughout all planning.• To ensure that the Welsh language is given equal status to the English language not treated any less favourably.• To eliminate discrimination, advance equality of opportunity and foster good relations with the Welsh speaking community that we serve.
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- That any policy making decisions would have a positive impact on a person's opportunity to use the Welsh language.

The aims of this Policy will be achieved through the following objectives:

- Ensure that the Welsh Language Impact Assessment tool is communicated effectively with all Primary Care Managers.
- Provide Primary Care Managers with practical support and advice on undertaking the Welsh Language Impact Assessments.

Was the decision reached to proceed to full Equality Impact Assessment?:	Yes	No ✓
	<p>To comply with Welsh Language Standard 78, this policy sets out that a Welsh Language Impact Assessment will be conducted to assist Primary Care managers to identify and consider the impact on the Welsh language when planning and making decisions in relation to providing Primary Care services.</p> <p>The procedure has therefore been assessed as having a low relevance to equality duties. It will uphold Human Rights and UNCRC in facilitating the preservation of life, dignity and freedom from torture.</p> <p>There is no evidence at this stage of potential adverse impact in relation to equality, diversity or human rights. A full EqIA will be undertaken at any stage where evidence to the contrary may arise.</p>	
	Yes	No

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If no, are there any issues to be addressed?	Nil.
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Is the Policy Lawful?	Yes ✓	<p>The Welsh Language Measure 2011 gives the Welsh language official status in Wales and this policy has been developed with reference to the following guidance:-</p> <p>Legislative and NHS Requirements Welsh Language Measure 2011 Welsh Language Standards - Compliance Notice – Section 44 Welsh Language (Wales) Measure 2011 on 30 November 2018 More than Just Words Action Plan 2019-2020 - Delivering the Active Offer The Well-Being of Future Generations (Wales) Act 2015 Freedom of Information Act 2000 Cymraeg 2050 Strategy Bilingual Skills Policy</p>
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Will the Policy be adopted?	Yes ✓	<p>Any complaints received in relation to equality, diversity or human rights will be addressed on an individual basis and appropriate action taken.</p>
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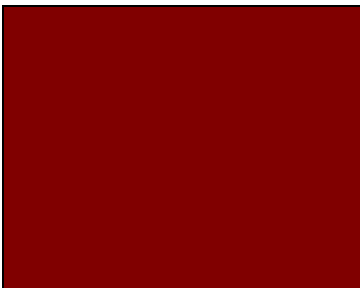
If no, please record the reason and any further action required:		

Are monitoring arrangements in place?	Yes ✓	Any complaints received in relation to equality, diversity or human rights will be addressed on an individual basis and appropriate action taken.

Who is the Lead Officer?	Name:	Rhian Bond
	Title:	Assistant Director of Primary Care
	Department:	Primary Care
Review Date of Policy:	A review is required in 3 years after publication in order to comply with Standard 78A	

	Name	Title	Signature
Signature of all parties:	Emma Evans	Senior Welsh Language Officer	14/12/2021

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	Alan Winter	Senior Diversity and Inclusion Officer	14/12/2021

**Please Note: An Action Plan should be attached to this Outcome Report prior to signature
N/A at this stage**