Regulatory Impact Assessment of the proposed standards relating to the Welsh language for the health sector.

Name of the body: Public Health Wales

Are there benefits to the body in complying with the draft Welsh language standards proposed in this document?

Yes

If yes, what are these benefits?

Type of benefit	Description of the benefit of complying with the proposed standards
Economic Benefit	We currently procure external translation services to meet the requirements of our Welsh Language Scheme. The Welsh language standards will increase the overall need for translation which will increase current expenditure. We are considering how best to balance the need for provision of timely, translation expertise to the organisation with keeping costs to a minimum. By developing the Welsh language skills of our workforce, and by establishing an in-house translation service we may be able to reduce our dependence on external translation services to some extent in the long term, thus reducing some translation costs. However, this will require investment in terms of recruitment of translators, and external training provision to develop staff translation skills. It would also require the establishment of internal quality control systems to monitor, review and amend translations undertaken by staff members as they develop competence.
Social Benefit	Implementing these standards will contribute to the achievement of our strategic commitments, which include: • achieving a happier, healthier and fairer Wales • improving health and wellbeing and reducing health inequalities • improving the quality, equity and effectiveness of healthcare services Services tailored to the individual Improved Health Literacy in some parts of the population

Environmental Benefit	Improved bilingual working environment for staff The impact of additional translation costs on service budgets may help to focus attention on assessing cost/benefit with regard to the content and production of printed material. This provides an opportunity to reduce environmental impacts in terms of the quantity of paper used and wider global impact on tree felling and demand for paper products.
Linguistic Benefit	**Employees:** • potential increase in the number of Welsh speaking employees through recruitment and training • enhanced well-being of Welsh speaking individuals who will have access to certain job related materials and training in Welsh, which will support them to perform their duties in Welsh with Welsh speaking service users • enhanced sense of well-being of Welsh speaking individuals who will have access to certain materials in Welsh, meaning that they may live a greater proportion of their working hours through the medium of Welsh • employees will have access to Welsh language training to develop their Welsh language skills • access to some vocational training through the medium of Welsh may be possible **Service Users:** • By developing the Welsh language skills of our workforce our Welsh speaking service users will have greater and improved access to Welsh medium services • Our Welsh speaking service users may feel more comfortable when using our services, thus increasing the quality of communication between healthcare professional and service user, potentially improving the health outcomes of the service user, and reducing health inequalities **Stakeholders:** • Potential enhanced well-being of Welsh speaking stakeholders as they will be able to participate in meetings in Welsh, meaning that they may live a greater proportion of their working hours through the medium of Welsh

What is the annual cost of complying with the current Welsh Language Scheme?

	Number of staff equivalent to full-time	Cost (to the nearest £'000) *salary costs and contracting costs if applicable.
Staff* with a specific role in implementing your Welsh Language Scheme	1 x Welsh Language Officer	£44,000
Training:		
Welsh language courses	We do not have an in-house training budget.	Some known expenditure but no identifiable figure available
Courses to raise awareness of the Welsh language	Some awareness raising work is undertaken as part of the Welsh Language Officer role.	£0
Translation		
In-house translators	0	0
External Translators We do not employ translators. We contract with external translators – costs for previous years shown below. Costs are increasing every year, as shown below: 2014-15 £168,000 2015-16 £186,000 2016-17 £210,000 (estimate for year based on £88,000 expenditure in months 1-5).		£210,000
Welsh speaking staff Some Welsh speaking staff undertake translation work.	Not known	There is a cost to the organisation in terms of staff time, but it is not currently identifiable.
Administration Staff Staff in services across the organisation liaise with external translators directly with regard to any translation requirements.	Not known	There is a cost to the organisation in terms of staff time, but it is not currently identifiable.

Publicising/marketing:		
Specifically regarding complying with the Welsh Language Scheme	Undertaken as part of the Welsh Language Officer role	£0
Printing bilingual documents		
The cost of printing a bilingual document is higher than that of printing a monolingual document.	0	An analysis of the additional cost has not been undertaken
Meetings		
Interpretation at meetings open to the public	0	The cost has not been identified as it is included in overall expenditure on translation.
Monitoring compliance		
Service staff monitor WLS compliance and completing monitoring returns	There is a cost to the organisation in terms of staff time.	There is a cost to the organisation in terms of staff time, but it is not currently identifiable.

Service delivery standards

Are the duties in the draft service delivery standards likely to have an effect on your resources?

Service delivery includes:
Correspondence, phone calls, , personal meetings, meetings open to the public meetings, clinical consultations, case conferences, public events, publicity, advertising, public exhibitions, publications, forms, websites and online services, social media, signage, reception of visitors, official notices, awarding grants, awarding contracts, raising awareness of the Welsh services which are available, corporate identity, courses offered by the body, public address systems and standards relating to primary care.

Yes

If yes, what effect are they likely to have on your resources?

	Number of staff equivalent to full-time	Cost (to the nearest £'000)
Staff* with a specific role in implementing your Welsh Language Standards	1 x Welsh Language Officer / Lead	£44,000
	1 x Welsh Language Officer (new role)	£44,000
Document Translation To continue to translate that which we currently translate	1 x Senior Translator 3 x Translators	£44,000 £105,000
We currently procure the services of external document translators. If we establish an in-house translation service, it is likely that we would need to continue to procure external translation to some extent.		Not possible to quantify at this point in time
Centralise and streamline translation ordering, scheduling and invoice payment	1 x Translation Administrator / Co-ordinator	£28,000
Document Translation: Software to support central recording and scheduling of translation work		Not possible to quantify at this point in time as this could be internal development of a system or procurement of a system

Document Translation: Translation Memory Software		Approximately £2000
Standards 2-7: Correspondence Implementation of these standards by our screening division could cause an increase in the weight of screening invitation letters, thus tipping them into the post office's next weight category. The annual postage cost would increase by £139,670.		Not possible to quantify as this is a new requirement. We estimate a minimum of £140,000 per annum
Document Translation: Correspondence, Standard 5 There will be a new requirement to correspond bilingually with persons such as colleagues in health boards, local government, etc. If that is their wish, or where the language preference is unknown.	Not possible to quantify at this point in time, but we estimate the need for a 0.5 Translator	Not possible to quantify at this point in time, but we estimate £18,000 per annum
Meetings – Standard 23 – 24 Meetings with 'persons' There will be a requirement to facilitate the use of the Welsh language in meetings with colleagues in health boards, local government, etc. This means that there will be an increased need for us to engage the services of external simultaneous translators. This has additional cost implications. One of our services has calculated that it has approximately 120 hours of business meetings with partners /stakeholders per week in screening premises. If translation is required for 6 hrs per week (312 hours per year) the annual cost for interpretation would be £15,000 -£30,000 plus administrative costs. If every service has similar costs, the total cost would be substantial		Not possible to quantify as this is a new requirement. We estimate a minimum of £50,000 per annum
Standard 25: Clinical Consultations There will be a requirement to provide Welsh language support		Not possible to quantify at this point in time, but we estimate

in face to face meetings with service users. Given the language profile of our workforce this means that there will be an increased need for us to engage the services of external simultaneous / consecutive translators. This has additional cost implications.		that we would initially need to set aside £12,000 and review annually
Standard 30: Meetings open to the public We would need to engage the services of external simultaneous translators to meet this standard. This has additional cost implications. We have considered the likely impact on our 1000 Lives Improvement Service and the estimated annual costs for providing simultaneous translation for every meeting could be approximately £50,000 per annum. Other services have similar arrangements but we have not yet costed these areas.		Not possible to quantify as this is a new requirement. We estimate £50,000 per annum
Standards 49-53: Websites Public Health Wales has over 30 websites, many of which are intended for health professionals rather than the general public. We also have websites which are divided into sections, one for the public and the other for health professional. In some cases the pages / websites intended for health professionals are not bilingual. We have calculated the cost of translating such material on our screening programme websites. There are over 3000 pages and on average there are 300 words per page, giving a total of 920,000 words. Taking an average translation cost of £70 per 1000 words, it would cost £64,400 to translate our screening pages alone. We have also calculated that it would take 418 working days to translate this material alone. This is one of		Minimum £250,000 to translate existing English only content on pages intended for health professionals

four divisions in our Public Health Services Directorate. If each division has similar content, then the cost for **one directorate** could be in excess of £250,000 (1672 working days to translate). We have seven directorates. Additional staff would need to be appointed to maintain these websites, at further cost to Public Health Wales.	Not possible to quantify at this point in time	Not possible to quantify at this point in time
Standard 55: Social Media We currently translate scheduled tweets but do not translate ad-hoc tweets posted at events as we have few or no fluent Welsh speakers, and no in-house translation. It would be an additional cost to provide ad hoc Welsh tweets by hiring a Welsh translator for each event of which there are hundreds every year.		Not possible to quantify at this point in time
Standard 69: Meetings with grant applicants We would need to engage the services of external simultaneous translators to meet these standards. This has additional cost implications.		Not possible to quantify as this is a new requirement but we estimate that we would need to set aside £2000 initially and review annually.
Standards 71-73: Contracts This is a new requirement. A typical Public Health Services Directorate tender invitation comprises approximately 30,000 words, so £1,785- £2,666 depending on what the external translator charges. This directorate alone has over 50 such procurements per year which gives an annual cost of £89,250-£133,320 to translate the initial tender invitations. Translating tenders submitted in Welsh would be a further cost to the organization		Not possible to quantify as this is a new requirement but we estimate a minimum of £200,000 per annum Not possible to quantify at this point in time

Standard 74: Meetings with potential contractors We would need to engage the services of external simultaneous translators to meet these standards. This has additional cost implications.		Not possible to quantify as this is a new requirement but we would initially need to set aside £5,000 and review annually.
Standards 79-81: Courses If the term 'the public' includes members of the wider public health workforce from health boards, local government, etc., this standard would apply to the 'courses' we provide. We do not have sufficient Welsh speakers to deliver courses in Welsh. To meet this standard our only option would be to provide simultaneous translation from English to Welsh as an alternative for those wishing to receive the course in Welsh. This would incur additional costs.	**0**	Not possible to quantify as this is a new requirement but we would need to set aside £20,000 initially and review annually.

Policy-making standards

Are the duties in the draft policy making standards likely to have an effect on your resources?

Yes

If yes, how are they likely to affect your resources?

	Number of staff equivalent to full-time	Cost (to the nearest £'000)
Staff* with a specific role in implementing the policy making standards Undertaken as part of the existing Welsh Language Officer role Undertaken as part of a new Welsh Language Officer role	See Service Delivery Standards	See costs of these roles in Service Delivery Standards
Training:		
Courses specifically related to implementing the policy making standards Undertaken as part of the existing Welsh Language Officer role Undertaken as part of a new Welsh Language Officer role	See Service Delivery Standards	See costs of these roles in Service Delivery Standards
Translation		
Translation of Consultation Documents		Not possible to quantify as this is a new requirement.

Operational standards

Are the duties in the draft operational standards likely to affect your resources?

Yes

If yes, how is this likely to affect your resources?

	Number of staff equivalent to full-time	Cost (to the nearest £'000)
Staff* with a specific role in implementing the operational standards Undertaken as part of existing Welsh Language Officer role Undertaken as part of new Welsh Language Officer role	See Service Delivery Standards	See costs of these roles in Service Delivery Standards
Standard 109 – 122, 125 – 126A, 129, 148A, 149A, 152-153 New requirements which will incur document translation costs.	1 x Translator	£40,000 per annum
Standards 124, 128, 151: Interpretation at meetings with staff and job applicants: New requirements which will require procurement of external interpreters	0	Not possible to quantify but would need to set aside at least £2,000 per annum
Standard 130: Computer software Procurement of software to facilitate the use of Welsh when using technology, e.g. spelling and grammar checkers, bilingual interfaces, etc.	0	Not possible to quantify at this point in time
Standards 131 – 136: Intranet New requirement so would require procurement of intranet site rebuild which is currently English only Translation of intranet content Additional staff member to maintain bilingual intranet	1 x Translator Not possible to quantify at this point in time but we estimate 0.6	Not possible to quantify at this time £40,000 per annum Not possible to quantify at this time but we estimate £22,000

Standard 137: Assessing language skills of employees New requirement. No means to undertake assessment in-house so we would have to engage the services of external contractor to undertake this work	0	Not possible to quantify at this point in time, but we estimate initial £10,000 plus ongoing costs as we assess new recruits
Standard 138-40 We have few internal subject matter experts who can provide the courses stated in these standards in Welsh. We would have to contract external training providers who can deliver these courses in Welsh.	0	Not possible to quantify at this point in time
Standard 141 – 142: Welsh language skills courses: Procure external language skills training	0	Not possible to quantify at this point in time but we estimate £30,000 per annum
Standard 143-144: Welsh Language Awareness courses Undertaken as part of existing Welsh Language Officer role Undertaken as part of new Welsh Language Officer role	See Service Delivery Standards	See costs of these roles in Service Delivery Standards

Record keeping standards

Are the duties in the draft record keeping standards likely to have an effect on your resources?

Yes

If yes, how are they likely to affect your resources?

	Number of staff equivalent to full-time	Cost (to the nearest £'000)
Staff* with a specific role in implementing the policy making standards Undertaken as part of existing Welsh Language Officer role Undertaken as part of new Welsh Language Officer role	See Service Delivery Standards	See costs of these roles in Service Delivery Standards
Development of IT system to record and monitor implementation of standards	Not possible to quantify at present	Not possible to quantify at present
Staff time in terms of recording and monitoring implementation of standards		Not possible to quantify at present