

**The Gambling Commission's
Welsh language scheme**

**Cynllun Iaith Cymraeg Comisiwn
Hapchwarae**

Revised 11 February 2014

1 Introduction

- 1.1 Under the Welsh Language Act 1993 (the Act) every public body providing services to the public in Wales has to prepare a scheme setting out how it will provide those services in Welsh.
- 1.2 This is the Gambling Commission's (the Commission) scheme.
- 1.3 It describes how we will give effect, so far as is both appropriate in the circumstances and reasonably practicable, to the principle established by the Act that, in the conduct of public business and the administration of justice in Wales, the Welsh and English languages should be treated on a basis of equality.
- 1.4 The scheme covers the services that we provide to the public in Wales. In this scheme, the term 'public' means individuals, legal persons and corporate bodies. It includes the public as a whole, or a section of the public, as well as individual members of the public. The term includes voluntary organisations and charities. Directors and others representing limited companies are also within the meaning of the term 'public'. It does not, however, include persons who are acting in a capacity which is representative of the Crown, Government or the State. Consequently, persons who fulfil official functions of a public nature, even though they are legal persons, do not come within the meaning of the word public when they are fulfilling those official functions.
- 1.5 Our primary communications are targeted at those organisations and individuals involved in the provision of gambling within Great Britain, at players of the National Lottery and other stakeholders with an interest in gambling.
- 1.6 Further information about the scope and purpose of Welsh language schemes can be found in the Welsh Language Commissioner's website - www.comisiynyddygyymraeg.org. The Welsh Language Commissioner superseded the Welsh Language Board.
- 1.7 This scheme was prepared under Section 14 of the Act - and in accordance with guidelines issued by the then Welsh Language Board under Section 9 of the Act. It came into effect on 29 January 2010 and was revised in November 2013 (see paragraph 2.2).

2 Background to the Gambling Commission

- 2.1 The Commission was set up under the Gambling Act 2005 to regulate all commercial gambling in Great Britain. Our remit under that Act covers arcades, betting, bingo and casinos as well as lotteries and online operators.
- 2.2 On 1 October 2013 the Gambling Commission took over the responsibilities of the National Lottery Commission to regulate the National Lottery under the National Lottery etc. Act 1993.
- 2.3 Almost all our activity is governed by the licensing objectives set out in the Gambling Act and the National Lottery Act. Through effective regulation and public engagement we permit gambling and ensure:
 - it is crime free
 - it is fair and open
 - children and vulnerable people are protected
 - the National Lottery is run with all due propriety
 - the interests of every participant in the National Lottery are protected
 - and subject to the last two, to maximise returns to National Lottery good causes.We work closely with the gambling industry and the National Lottery operator Camelot to ensure compliance with these objectives and consult closely with a wide range of stakeholders including gambling operators, faith groups, gambling charities and lawyers on policies that support these objectives. We also consider best practice both in Great Britain and overseas, talking to colleagues in other jurisdictions in Europe, the US and Australia and the Far East.

2.4 We fulfil our remit through four strategic objectives:

- **Regulating gambling in the public interest:** by delivering a proportionate regulatory regime which delivers best practice licensing and enforcement and ensures compliance by licensees.
- **Providing authoritative advice on gambling and its regulation:** by building the Commission's knowledge base through knowledge management, intelligence and research.
- **Engaging with stakeholders:** to ensure that the Commission is accountable, properly balanced and informed in its work.
- **Developing its employees and organisation:** to deliver professional, responsive, accountable and fair regulation.

2.5 Our policies and procedures can be found on our website at:

www.gamblingcommission.gov.uk. These include licence conditions and codes of practice (LCCP) which gambling operators must follow. Policies and procedures regarding the regulation of the National Lottery can be found on our website:

www.natlotcomm.gov.uk. This includes the licence to operate the National Lottery.

2.6 The Commission is based in Birmingham and has around 215 employees with approximately 30 being field based.

3 Promotion and delivery of the Commission's Welsh language scheme

Policies, legislation, services and initiatives

- 3.1** Our policies, initiatives and services will be consistent with this scheme. They will support the use of Welsh and, whenever practical, help the public in Wales to use Welsh as part of their day-to-day lives.
- 3.2** When practical, our consultation documents will discuss the relationship between the Welsh language and the policies under development.
- 3.3** When we contribute to the development or delivery of policies led by other organisations we will do so in a way that is consistent with this scheme.
- 3.4** We will publish this scheme on our intranet to ensure that all employees, particularly those involved in formulating policy, are aware of the requirements of the Act and this Welsh language scheme.

Delivering services

- 3.5** We will ensure that as many as possible of our services are available in Welsh – and we will let the public know when they are available.

Standards of quality

- 3.6** Services provided in Welsh and English will be of equal quality and will be provided within the same timescale.

Training our employees

- 3.7** In order to promote the Welsh language scheme, we will support employees by offering Welsh language training to those who wish to develop or further their spoken or written Welsh language skills in support of their role at the Commission. Priority will be given to front line employees who work with people in Wales.

4 Dealing with the Welsh speaking public

- 4.1 When we know that an individual wishes to communicate with us in Welsh we will annotate the record on our customer relationship management system accordingly.

Correspondence

- 4.2 Our normal practice will be as follows:

- When we initiate correspondence with an individual, group or organisation, we will do so in Welsh only when we already know that they would prefer to correspond in Welsh.
- When someone writes to us in Welsh we will issue a reply in Welsh (if a reply is required). We will normally acknowledge an enquiry or a complaint within three working days.
- If the Welsh and English versions of any correspondence have to be published separately, our normal practice will be to ensure that both versions are available at the same time.
- Enclosures sent with bilingual letters will be bilingual, when available.
- Enclosures sent with Welsh letters will be Welsh or bilingual, when available.

- 4.3 The above will apply to e-mail correspondence as well as paper correspondence.

Telephone

- 4.4 Because of our location (the Commission is based in Birmingham) it is not practicable for us to conduct telephone conversations in Welsh. However, if we set up a telephone help-line or similar facility to provide information to the public in Wales we will provide a Welsh language service. This will be advertised alongside the English language service. Both services will share the same telephone number.

Meetings with the public in Wales

- 4.5 Contributions from the public will be welcome in either Welsh or English.
- 4.6 For open meetings/consultations in Wales, a translation service will be available.
- 4.7 All publicity for meetings in Wales will be bilingual and attendees will be invited to notify the Commission as to their choice of language in advance.
- 4.8 In meetings where the Welsh language is used, leaflets and presentations will be bilingual, if available.

5 Our public face

Publications

- 5.1 We will normally publish material made available to the public in Wales bilingually, subject to the conditions laid out at Appendix 1, with the Welsh and English versions together in one document whenever possible.
- 5.2 If the Welsh and English versions have to be published separately (for instance, where a single document would be too lengthy or bulky), both versions will be of equal size and quality - and our normal practice will be to ensure that both versions are available at the same time and are equally accessible. Each version will note clearly that the material is available in the other language.
- 5.3 If not available free of charge, the price of a bilingual document will not be greater than that of a single language publication - and the price of separate, Welsh and English versions will be the same.

- 5.4** The above will also apply to material made available electronically on our website, on CD or otherwise.

Forms and associated explanatory material

- 5.6** We will ensure that all forms and their guidance notes for use by the public in Wales will be fully bilingual, subject to the conditions laid out at Appendix 1. This will include interactive forms published on our website.
- 5.7** If the Welsh and English versions have to be published separately (for instance, where a single document would be too lengthy or bulky), both versions will be of equal size and quality - and we will ensure that both versions are available at the same time and are equally accessible. Each version will note clearly that the material is available in the other language.
- 5.8** When we enter information on Welsh versions of forms that are sent to the public, we will do so in Welsh.
- 5.9** When we enter information on bilingual forms that are sent to the public, we will do so bilingually unless we know that the recipients would prefer to receive the information in Welsh or English only.
- 5.10** When other organisations distribute forms on our behalf, we will ensure that they do so in accordance with the above.

Official notices, public notices and employee recruitment notices

- 5.11** Official notices, public notices and employee recruitment notices placed in English language newspapers (or similar media) distributed mainly or wholly in Wales, will be bilingual, or appear as separate Welsh and English versions. Notices will be in Welsh in Welsh language publications.
- 5.12** The Welsh and English versions will be equal in terms of format, size, quality and prominence – whether produced as a single bilingual version, or as separate Welsh and English notices.
- 5.13** Recruitment notices placed in English language journals (and other publications) with a UK-wide distribution may be in English, unless the post is one where the ability to speak Welsh is essential, in which case the notice may be fully bilingual, or in Welsh with a brief explanation in English.
- 5.14** Any official notices, public notices or employee recruitment notices placed elsewhere in Wales will be bilingual.

Press releases and contact with the media

- 5.15** Press releases to the Welsh language press and broadcasting media in Wales will be issued in Welsh where deadlines permit.
- 5.16** We will post Welsh language versions of press releases on our website, if available.

Websites

- 5.17** Our website will include pages in both Welsh and English. A Cymraeg button is available on the toolbar on the home page of our website to allow for easy access to Welsh language versions of documents.
- 5.18** When designing new websites, or redeveloping our existing websites, we will take into account the Welsh Language Commissioner's guidance with regard to developing websites.

- 5.19** Whenever we post English language publications on our websites, the Welsh versions will be posted at the same time, if available.

Player communication

- 5.20** As a commercial body, there is no requirement for Camelot to follow the stipulations of the Welsh Language Act. However, the Commission does accept that as a UK-wide institution, efforts should be made to ensure that in Wales, player facing documents should be available in both languages. The licence to operate the National Lottery states that where a retail outlet is “situated in Wales or the distributor offers tickets on sale to participants in Wales the [player facing] documents...shall be available in Welsh as well as in English.”
- 5.21** If the Commission found that Camelot was not meeting this requirement, we have the power to apply regulatory sanctions ranging from officially recording a breach to financial penalties.

6 Implementing the scheme

- 6.1** We have no offices in Wales. Even so, we will seek information about the Welsh language skills of job applicants and existing employees.

Recruitment

- 6.2** For any posts having extensive and regular contact with the public in Wales we will consider whether fluency in Welsh should be a desirable or essential skill – and this will be stated in job competencies and advertisements.

Information and communications technology

- 6.3** The need to provide information and services in Welsh, in accordance with this scheme, will be catered for as we develop, design and purchase information and communications technology products and services.
- 6.4** As we develop or procure ICT systems we will take into account the appropriate Welsh Language Commissioner guidance'.

Internal arrangements

- 6.5** The measures in this scheme carry the full authority, support and approval of our organisation.
- 6.6** Managers will have the responsibility of implementing those aspects of the scheme relevant to their work.
- 6.7** The Corporate Affairs Manager will coordinate the work required to deliver, monitor and review this scheme.
- 6.8** We continuously update a detailed action plan to be agreed with the Welsh Language Commissioner, setting out how we will ensure that we will operate in accordance with this scheme. The action plan came into effect on the date on which the scheme came into effect. The plan will include targets, deadlines and a report on progress against each target. The overall aim of the action plan will be to ensure that we deliver the commitments set out in this scheme as soon as possible.
- 6.9** The scheme will be publicised on our website.
- 6.10** We will produce guidance for our employees to ensure that they know how to implement the measures contained in this scheme.

- 6.11 We will arrange briefings and training for our employees to increase awareness of this scheme - and to explain how it will affect their day to day work. Not operating in accordance with the scheme will be a disciplinary issue.
- 6.12 We will ensure that we use only qualified translators or interpreters for translation of electronic and printed material – and for simultaneous translation. We will expect those translators to be members of the Association of Welsh Translators or a similar organisation.
- 6.13 Any form of contact with the public in Wales, which is not specifically dealt with by this scheme, will be undertaken in a manner which is consistent with the general principles enshrined in this scheme.

Freedom of Information Act and the Environmental Information Regulations

- 6.14 We will operate in accordance with the Welsh Language Commissioner's advice on the Freedom of Information Act.
- 6.15 When we release information under the Freedom of Information Act or the Environmental Information Regulations, we will translate it into Welsh where reasonably practical. If we decide that we are not able to provide the information in that format then we will write to the applicant and give the reasons.

7 Monitoring the scheme

Reviewing and amending the scheme

- 7.1 We will monitor our progress in delivering this scheme against the targets in the action plan agreed by the Welsh Language Commissioner. We will report to our management board on progress.
- 7.2 Our existing monitoring and reporting procedures will include reference to progress in delivering this scheme, as appropriate.
- 7.3 We will report to the Welsh Language Commissioner on our progress in delivering this scheme, when requested by them.
- 7.4 We will review this scheme within four years of its coming into effect and at any other time as appropriate because of changes to our functions, or to the circumstances in which we undertake those functions, or for any other reason.
- 7.5 No changes will be made to this scheme without the Welsh Language Commissioner's approval.

Complaints and suggestions for improvement

- 7.6 Complaints related to this scheme, or suggestions for improvement, should be directed to:
 - The Corporate Affairs Manager
 - The Gambling Commission
 - Victoria Square House
 - Victoria Square
 - Birmingham B2 4BP

Or by e-mail to: cymraeg@gamblingcommission.gov.uk

- 7.7 We will cooperate with the Welsh Language Commissioner in order to resolve complaints - and during any investigations held under Section 17 of the Act.

Appendix 1: Gambling Commission publications and forms specification for translation into Welsh

The purpose of guidance is to help the Commission decide whether or not to publish material in Welsh, either as bilingual documents or separate Welsh and English versions. The guidance is intended to be flexible and not prescriptive. As indicated in the Welsh language scheme guidance “benefits of each measure as to the use of Welsh can be considered against the cost of taking it in terms of money or other resources”.

The majority of the Commission’s material is published directly onto our website at www.gamblingcommission.gov.uk.

The points below should be considered for all the material we publish. In the following examples T = translate or provide a Welsh summary, N = no translation required:

1. **The target audience or status**
For example,
 - the general public N
 - a particular sector representing Welsh speaking individuals T
 - individuals representing specific Welsh speaking groups T

2. **Subject matter**
For example, would publishing the document or form in English specifically exclude access to the information by Welsh speakers? T

3. **Media interest**
For example, is the publication likely to attract considerable media attention from Welsh language-only media? T

4. **Consultation documents**
Is the publication a consultation document? If so:
 - Is the document only relevant to stakeholders in Wales? T
 - Is the document relevant to a wide audience, particularly stakeholders in Wales? T
 - Is the document relevant to the general public? N

In addition, in every case the following must be taken into account to ensure that it is economically practical to provide a Welsh version of a form or document:

- the number of copies to be printed each year for use in Wales and how these would be effectively distributed.
- the number of pages/words in a single language version of the publication or form and therefore the cost of production of bilingual or separate Welsh and English versions.
- the timescale required in translation, typesetting, proofing and sign-off for Welsh versions. Lead times must be included in the planning process to ensure publication deadlines are met for both English and Welsh versions
- the life span of the document. For example, a guidance publication that has limited longevity and is likely to be superseded frequently.

A record should be kept of the decision taken with regard to each publication or form produced or amended. This is the responsibility of the owner/author of the publication/form.

Gambling Commission February 2014

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