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Comisiynydd y Gymraeg
Welsh Language Commissioner

Delivering change together

An overview of compliance with Welsh language duties 2023–24

August 2024

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Foreword

In my first report as Welsh Language Commissioner last year, I set out a clear and firm challenge for organisations to raise the bar and increase compliance levels in the year ahead. This was especially true for the health sector – a sector of particular importance to me, given the difference that the Welsh language can make to the quality of care individuals receive.

I am therefore pleased to be able to report that compliance amongst public sector organisations implementing the Welsh language standards has improved over the last year, with an increasing number of organisations always delivering high-quality Welsh language services. It is also encouraging that the health sector, after several years of under-performance, is making good progress in a number of key services.
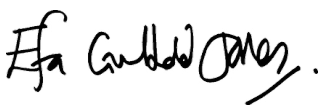
Whilst progress has been made, there is further work that needs to be done if we are to deliver the regulatory outcomes that we have set, and thereby deliver on our vision for a Wales where people can live their lives in Welsh.

One crucial element which often determines success is momentum. This is the force that drives us forward and helps us to build on our actions, learn from experience and use that knowledge to improve. **Organisations need to continue to improve if we are to reach the high levels of compliance that we all want to see.**

At the beginning of the year, I announced my intention to adopt a more proactive approach to 'co-regulation'; an approach which is a natural extension of my general desire to work closely with organisations to increase opportunities to use Welsh.

Open and sustained dialogue throughout the coming year will help me to develop a better understanding of the challenges and opportunities facing you as organisations in developing and delivering Welsh language services. It will also form the basis of working together to consider solutions, seize opportunities, and promote new ideas. I am certain that, through this collaborative approach, we will see further progress over the next 12 months as we continue on our collective journey towards delivering our regulatory outcomes.

Therefore, while my commitment to work with you as organisations is unwavering, my high expectations of you remain. We must eliminate the uncertainty that remains a barrier for Welsh language users by guaranteeing quality Welsh language services at all times and continuing the vital work to increase the opportunities available for people to use the Welsh language.

Efa Gruffudd Jones
Welsh Language Commissioner

1. The main conclusions of the report

Outcome 1: Organisations with the capacity to deliver high-quality Welsh language services at all times

1.1 Public organisations compliance with the Welsh language standards is improving and there is a high level of assurance that a number of organisations are delivering high-quality Welsh language services.

1.2 We are pleased to note that the health and education sectors have responded positively to the challenge set out for them last year, with a general increase in their compliance levels. Our monitoring work has also identified those organisations have invested time and resources to change their arrangements for the better.

1.3 However, a great deal remains to be done over the coming years if we are to see these organisations delivering high-quality Welsh language services, and guaranteeing a Welsh language experience for users at all times.

Conclusion

The health sector needs to continue to take purposeful and specific action to increase capacity and create workplaces that are more responsive to the needs of Welsh language users.

Health boards and NHS trusts need to move forward with the work of producing achievable operational plans to increase their ability to offer clinical consultations in Welsh for the next 5 year period.

If we are to see our young people maintain their Welsh language skills and become confident users, universities and further education colleges need to address the shortfalls that remain in relation to some services.

1.4 Significant confusion and inconsistency remains in the way in which organisations designate the Welsh language skills required for vacancies during recruitment.

1.5 Staff involved in the recruitment process have a mixed awareness of the requirement to determine skill levels and how to do so. This means that organisations often fail to comply with the specific requirements of the relevant standard.

1.6 Whilst there is good work and progress in some places, compliance is generally lower for those organisations that continue to implement Welsh language schemes. This demonstrates that the enforceable regime of the Welsh language standards is far more effective and leads to improved services and a genuine increase in opportunities to use Welsh.

1.7 If we are to see the same pattern of progress as evidenced with the introduction of the standards, it is essential that these organisations are also brought under the standards regime.

Outcome 2: Welsh language users have an understanding and awareness of the Welsh language services available to them

1.8 The range of services now available in Welsh is greater than ever before. However, purposeful and specific action to promote them is needed by organisations in order if we are to raise awareness and change user habits.

1.9 Organisations are failing to deliver the simple promotion duties to change behaviour. For example, including a short statement promoting the availability of corresponding Welsh language services or making it clear that the organisation encourages and receives correspondence or calls in Welsh.

Conclusion

Every organisation needs to do more to highlight the Welsh language services available, ensuring that the Welsh language is visible and offered with ease. As a minimum, we expect organisations to take purposeful action to improve compliance with the associated 'promotion' standards.

Outcome 3: Organisations give due regard to the potential impacts of their policy decisions on the Welsh Language

1.10   A consistent feature of our findings in relation to policy decisions is that the arrangements put in place by organisations are not followed. That can be due to uncertainty about when the standards apply, with organisations often unsure whether a decision is a policy decision or an operational decision.

1.11   In those cases where procedures are followed, it is very rare that we find that an organisation has considered all the obvious relevant factors. Even where all those factors have been considered, more often than not, that consideration is not detailed or perceptive enough to allow the organisation to make an informed decision about the real effect on opportunities to use the Welsh language.

1.12   More needs to be done, therefore, in order to raise organisations' awareness of the requirements of the policy making standards and how to comply with them.

Conclusion

Following the Commissioner's further work on impact assessment arrangement, organisations will need to act on subsequent advice or recommendations.

Outcome 4: Organisations increase the use of Welsh in their workplace, enabling staff to work in Welsh on a day-to-day basis

1.13   Our monitoring work suggests that organisations report high levels of compliance with the range of requirements in relation to the internal administration of the organisation; for example, providing intranet and computer interfaces, or policies and contracts of employment in Welsh.

1.14   Whilst organisations have policies in place on using Welsh internally in accordance with the relevant standard, there is a lack of vision in relation to how these policies are intended to increase the opportunities available for people to use Welsh within their workplaces over time.

1.15   In general, policies do not elaborate on any specific intentions or plans to facilitate or support an increase in the use of Welsh by staff. Often, policies are limited to statements confirming what is required under the Welsh language standards, including the Welsh medium provision for staff required under the other operational standards.

1.16   In summary, they are simply policy documents that describe the status quo, rather than documents that set out a clear strategic direction for the organisation for the coming years.

Conclusion

All organisations need to consider whether their current policy on the internal use of Welsh is likely to drive the positive change needed to enable staff to increasingly live their working life through the Welsh language.

Alongside our project work in this area, and as part of our work to promote compliance, we will work with organisations to identify potential opportunities to work towards achieving this outcome.

Outcome 5: Organisations promote the Welsh language so that people can use the language naturally in their daily lives

1.17   It appears that every county council and national park authority has a strategy in place to promote, protect and nurture the Welsh language in their areas.

1.18 Most of the organisations include the basic information required under standard 145, therefore complying with the statutory requirements. However, it is concerning that a small number of organisations are still failing to set targets to increase or maintain the number of Welsh speakers in their area, and others have failed to make a statement setting out how they will reach those targets.

1.19 It is also concerning that 10 of the 25 organisations have failed to comply with standard 146 as they have not published a list of the activities that they have arranged to promote the use of the Welsh language.

1.20 We will contact those organisations whose strategies do not comply with the requirements of the standards to discuss the steps that need to be taken to rectify the situation.

Conclusion

Organisations need to ensure that their promotion strategies not only comply with the minimum requirements of the standards, but reach their full potential in terms of their contribution to the goal of one million Welsh speakers by 2050. The Commissioner will take a more proactive role in providing advice and guidance to organisations on the next versions of those strategies.

Outcome 6: Organisations protect and promote the interests of Welsh language users by having effective governance and complaints arrangements

1.21 We expect the people of Wales to receive high-quality Welsh language services from organisations and for corrective action to be taken when things go wrong. When things do go wrong, Welsh language users should have access to transparent and effective complaints procedures.

1.22 As we move increasingly towards co-regulation, we want to encourage Welsh language users to raise concerns and issues directly with the organisation in question where possible.

1.23 However, it is important that organisations' procedures give users a strong voice and enable the organisations themselves to understand their performance better so they can make changes and improve continuously.

1.24 We will be working with organisations in the coming year to ensure that accessible and appropriate procedures are in place for dealing with complaints, advising them on how to strengthen their arrangements where necessary.

Conclusion

When dealing with language complaints, organisations should be open to discussing concerns and to encourage continuous feedback from users.

Organisations should make it clear how to complain, what arrangements are in place to deal with complaints, and to commit to change when things have gone wrong.

1.25 Our monitoring work shows that some organisations have sound self-regulation arrangements in place and that they oversee compliance consistently. This work also shows that organisations perform better where there are strong structures and accountability in place.

1.26 However, many organisations fail to comply fully with some of the relevant standards. This is especially the case in relation to the requirements to publish documents outlining their arrangements for oversight and how they intend to comply with the standards.

1.27 If we are to see a meaningful increase in the ability of organisations to self-regulate and to put firm arrangements for oversight in place, it is important that the standards relating to supplementary matters are given due consideration.

Conclusion

Some time has passed since the first organisations started working under the standards. It is therefore timely for organisations to consider what adaptations are needed to strengthen governance arrangements for the benefit of Welsh language users.

2. Regulatory outcomes

2.1 To ensure that our work regulating compliance with the Welsh language standards is set in the context of the national vision to increase the number of Welsh speakers and increase the use of the language, we have developed and set out the following regulatory outcomes.

Outcome 1: Organisations with the capacity to deliver high-quality Welsh language services at all times

Outcome 2: Welsh language users have an understanding and awareness of the Welsh language services available to them

Outcome 3: Organisations give due regard to the potential impacts of their policy decisions on the Welsh language

Outcome 4: Organisations increase the use of Welsh in their workplace, enabling staff to work in Welsh on a day-to-day basis

Outcome 5: Organisations promote the Welsh language so that people can use the language naturally in their daily lives

Outcome 6: Organisations protect and promote the interests of Welsh language users by having effective governance and complaints arrangements

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2.2 Our intention when introducing these outcomes is that they, amongst other things:

- set the Welsh Language Standards and our regulatory work in the context of the national vision to increase the number of Welsh speakers and increase the use of the language

- provide transparent public statements of what we intend to achieve, and how we will demonstrate that it has been achieved

- ensure that our regulatory activities focus on outcomes for Welsh language users and have the greatest impact on opportunities to use the Welsh language, and

- mitigate the risk that organisations focus on strict compliance rather than good outcomes for Welsh language users.

2.3 In accordance with our co-regulation approach, our intention is for these outcomes to represent the common aims and objectives of the Welsh Language Commissioner, public organisations and Welsh language users, and that we can all take ownership of them.

2.4 The purpose of this report is, of course, to give the Welsh Language Commissioner's views on organisations' compliance with their language duties. This was done for the first time this year by considering organisations' compliance in the context of the regulatory outcomes that we have set, assessing the extent to which current levels of compliance are likely to lead to achieving these outcomes.

3. Progress against outcomes

Outcome 1: Organisations with the capacity to deliver high-quality Welsh language services at all times

Overall picture

3.1   Our regulatory work over the past year shows that, overall, the compliance levels of public organisations implementing Welsh language standards are improving.

3.2   There is now greater assurance that Welsh language services are available to the public and our monitoring of services show that an increasing number of organisations from all sectors, and across Wales, are able to provide a quality service at all times.

3.3   Furthermore, organisations subject to Regulations No. 1, namely local authorities, Welsh Ministers and the National Parks, have a 90% compliance with the main requirements for 9 of the service areas monitored.

3.4   The only service where compliance levels remain lower is telephone calls, with 78% of enquiries answered in Welsh. However, this is also an increase on last year's performance (2022–2023) where 63% of calls were answered in Welsh.

Effective practice

Two councils where performance in relation to telephone services was historically low achieved 100% compliance during the 2023–2024 surveys. This is because both authorities recruited more staff with Welsh language skills.

3.5   With more services being delivered online, it is positive to note that our surveys found that 90% of web pages across all the organisations monitored this year are available in Welsh. It is worth noting that the percentage for organisations subject to Regulations No. 1, 2 and 4 is 99%.

3.6   89% of posts on the social media accounts 'Facebook' and 'X' of organisations were available in Welsh. In keeping with the overall findings last year, those sectors that have been implementing the Welsh language standards for longer publish 96% of their posts bilingually.

3.7   An general overview of the compliance of organisations surveyed with other service delivery standards is found at Appendix 1 of this report.

Technology, digital services and the Welsh language

3.8   It is also positive to note the innovation happening in digital services, to ensure that organisations' capacity and ability to deliver services in Welsh continue as practices evolve. You can read about the Wales Millennium Centre's experience of moving to using bilingual web chat methods here: Effective practice – using a Welsh chat bot.

3.9   Technological advancements, including the emergence of Artificial Intelligence (AI) for general purposes, raise several new considerations for regulating the Welsh language standards effectively in the future. While such technological advancements offer new opportunities to support the delivery of high-quality services, there is also a risk that the Welsh language will not be embedded in such advancements.

3.10   In accordance with our commitment to co-regulation, and acknowledging the collective benefits of mutual understanding and managing any potential risks to compliance as technology evolves and innovates, we will work with organisations, Welsh Government and other stakeholders to better understand the implications of technology for the delivery of public services. We will also consider how we as a regulator can support organisations as they trial new ways of working before implementing them more widely.

3.11   The above work will form a sound basis for us to develop a policy position on regulating AI in relation to the Welsh language during the coming year.

Responding to the challenge: Heath and Education Sectors

3.12   In our previous assurance reports 'Welsh as a way of working' (2021–22) and 'Raising the Bar' (2022–23), concerns were raised about the performance levels of organisations subject to the Welsh Language Standards Regulations No. 6 (Further Education Colleges and Universities) and No. 7 (Health Boards and NHS Trusts) noting that they were consistently lower than those of organisations who have been implementing the Welsh language standards for longer.

3.13   Receiving services in Welsh, especially when people are at their most vulnerable, is an integral part of person-centred care. It is therefore crucial that people, in their engagement with the health sector, are offered the opportunity to receive services in their preferred language. This is the only way in which they will receive the care they need and deserve.

3.14 Similarly, it is crucial that our young people – those who will use the Welsh language at work, in the community and when using services in the future – can engage freely and easily in Welsh with our colleges and universities.

3.15 These sectors in particular were challenged to raise the bar and actively eliminate the uncertainty facing Welsh language users.

Regulations No. 7 – Health Boards and NHS Trusts

3.16 It is encouraging to note that we have seen an overall increase in compliance amongst Health Boards and NHS Trusts over the past year.

3.17 The graph below shows an increase in all areas. However, it is important to note that compliance remains generally lower than other sectors.

Improvements in percentage compliance in key services
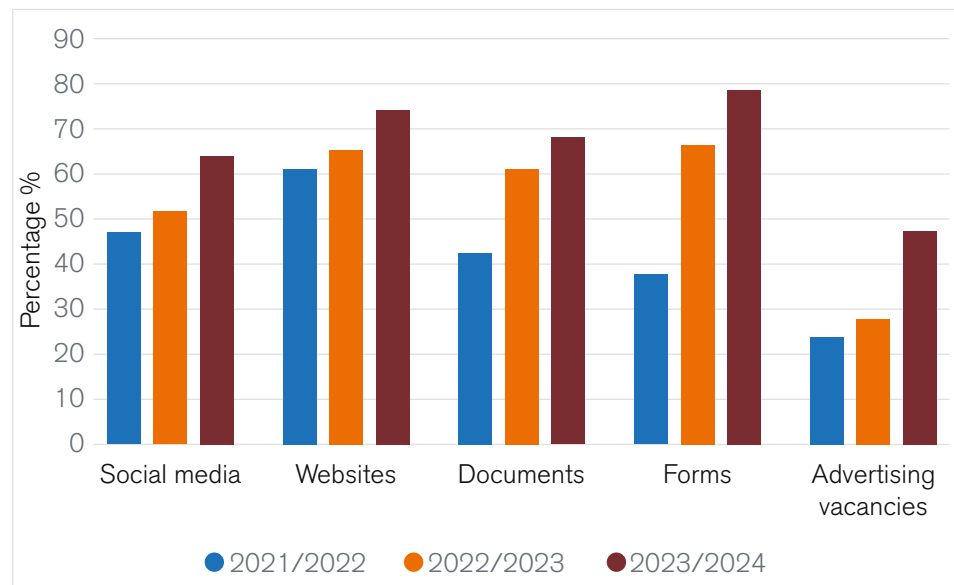
3.18 Turning to telephone services in the health sector during the same period, the graph below shows the increase and improvement in organisations' ability to greet callers in Welsh (standard 8) and informing callers that a Welsh language service is available (standard 9).

Health boards and NHS Trusts' telephone services
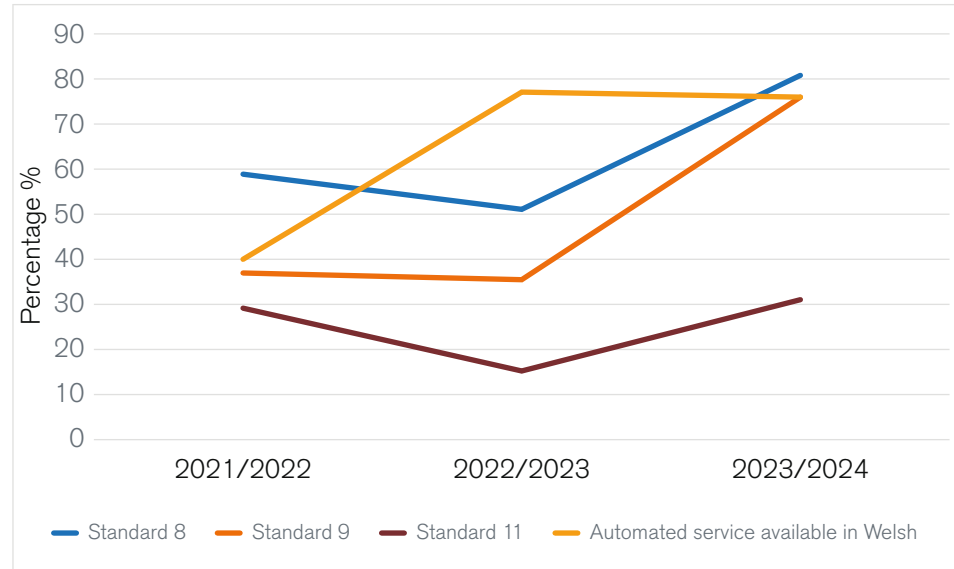
3.19 However, as the graph above shows, the ability of Health Boards and NHS Trusts to deal with calls fully in Welsh (standard 11) remains a challenge.

Case study

Through the Commissioner's monitoring work and a complaint from a member of the public, it was suspected that a health board was not meeting all the requirements of the standards in relation to telephone services.

Following an investigation, we found that call handlers greeted callers in English only and that they could not continue with the call in Welsh. Furthermore, automated elements of the telephone service were only available in English. The health board also failed to promote its Welsh language telephone services, with a lack of information on its website stating that it welcomed telephone calls in Welsh.

In response to these findings, the health board had to take steps to rectify the situation. These steps included ensuring that staff responsible for dealing with Welsh language calls possessed the necessary language skills to deliver a bilingual service. Furthermore, the health board was required to revise its automated telephone services to be fully bilingual and to update its website to inform the public that Welsh language services are available on its switchboards.

Preliminary evidence from the health board demonstrates that measures have already been put in place to address these compliance issues. These measures include updating telephone message systems to include Welsh language options and providing training for staff on delivering Welsh language telephone services.

3.20 Over the last 12 months, we have seen several projects undertaken in organisations to transform performance in key services, including telephone services and websites. Our most recent discussions with sector leaders have been positive, and it is encouraging to see the commitment and willingness to invest time and resources to address the situation and continue to improve compliance.

3.21 However, if we are to guarantee a Welsh medium experience for users, and always offer high-quality Welsh language services, the sector needs to continue to take purposeful and specific action to increase capacity in order to create workplaces which are more responsive to the needs of Welsh language users.

3.22 Another priority for health boards and NHS trusts for the coming year is to ensure that they have achievable operational plans to increase their ability to carry out clinical consultations in Welsh. We will work closely with the sector during the next period to provide support for this vital work.

3.23 We therefore expect the sector to build on the momentum it has managed to generate over the past year, and ensure that progress continues into the next period.

## Regulations No. 6 – Further Education (FE) Colleges and Universities

3.24 Our surveys of the telephone services delivered by further education colleges and universities demonstrate a mixed picture in terms of compliance.

3.25 It appears that they have arrangements in place to enable users to record their preferred language through automated systems – systems that have proved effective and contributed to an increase in the number of calls that can be handled in Welsh (an increase from 29% in 2021–22 to 44% during the 2023–24).

3.26 However, situations arise where callers' wishes to receive a Welsh language service are not fulfilled. After choosing to receive a Welsh language service, 45% of the calls sampled were not answered at all and 32% were answered by a member of staff who could not speak Welsh.

3.27 Once again, although organisations use systems to record language choice, the above figures suggest that some of them lack capacity and resources to transfer callers to Welsh-speaking staff and deliver a service in their preferred language. This level of compliance clearly falls far short of providing assurance in relation to Welsh language services for users. The likely outcome is that we will not see an increase in language use in this area.

3.28 Turning to documents available in Welsh in the sector, we see that compliance has increased annually since the 2021–22 surveys, increasing from 66% to 86% by 2023–24.

3.29 Although these documents continue to treat the Welsh language less favourably than the English language at times, the surveys demonstrate that the situation is improving. We have found that colleges and universities have stricter quality assurance processes in place to check documents before publication.

3.30 Several of them have also invested in new websites. This has had a positive impact on the content of documents – for example, they have separate Welsh and English pages and unique URLs can be used to take users to the Welsh language information within the organisation's documents. This gives users a better experience as they can access information in Welsh more easily.

3.31 It is those young people who are acquiring and developing Welsh language skills today that will use Welsh at work, in the community and when using services in the future. Their attitudes towards Welsh and their habits in using Welsh now will affect their use of Welsh in the future.

3.32 If we are to see an increase in the opportunities available for young people to use Welsh naturally, to see them maintain their Welsh language skills and become users, universities and colleges need to address these shortfalls during the coming year.

Service delivery capacity – The importance of recruitment processes and developing staff's Welsh language skills

3.33 We have stated consistently the importance of investing in developing firm arrangements for recruitment and assessing the Welsh language skills needs of the workplace in order to comply with the Welsh language standards and to deliver high-quality Welsh language services.

3.34 Quite simply, only by increasing the number of staff with Welsh language skills will organisations be able to guarantee high-quality Welsh language services for users.

3.35 It is encouraging to note that we have seen a further increase over the past year in the number of job advertisements available in Welsh. The percentages show the continued commitment by organisations to improving their recruitment practices and to attract applicants able to work through the medium of Welsh:

Job advertisements available in Welsh[1]
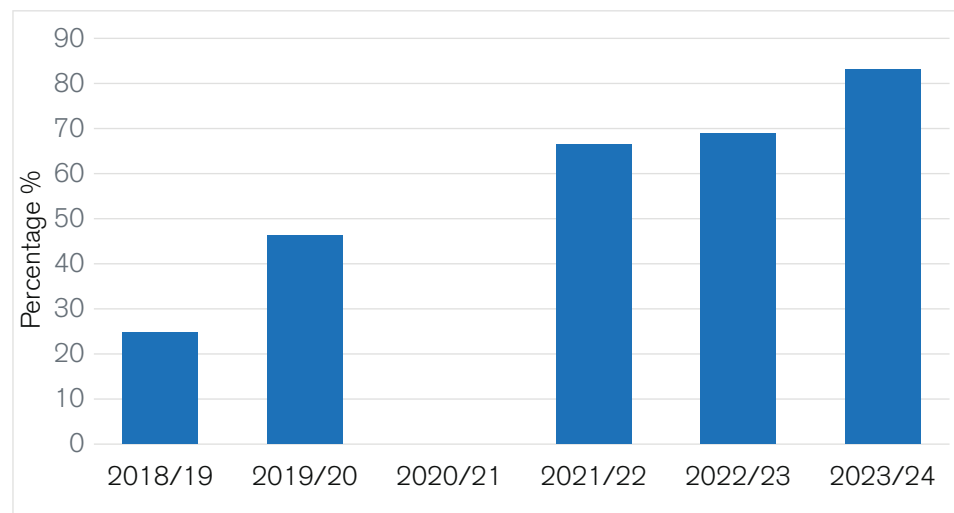
3.36 A report was commissioned from IAITH in 2023 to provide an independent evaluation of how organisations subject to the Welsh language standards assess the need for Welsh language skills for vacancies and new posts. The report also looked at how these assessments contribute to organisations' success in recruiting staff with Welsh language skills.

3.37 The findings and main messages of this independent evaluation are available on our website.

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1   No data for 2020/21 due to the pandemic period.

3.38 Although it is too early to say with any certainty that organisations have changed their practices following the publication of this report, it is fair to say that organisations have demonstrated a consistent willingness to discuss and change practices when shortcomings have been highlighted by our investigations.

3.39 For example, organisations that took part in the review, and where weaknesses in their arrangements were highlighted, have actively implemented a number of steps, including:

- adapting policies

- using a decision tree or flow chart

- piloting a process for sending applicants an assessment question before they attend an interview to be clear about how skills will be assessed

- assessing the different skills required for posts at all levels, not just posts where Welsh language skills are deemed essential.

3.40 However, it is unclear at this stage how much change there has been in terms of organisations determining the language requirements for posts, and whether that change is leading directly to an increase in the number of staff recruited with Welsh language skills. The anecdotal feedback we receive as part of our monitoring work suggests that organisations still face challenges in recruiting Welsh speakers, despite using more creative approaches as part of their recruitments processes.

3.41 Significant confusion and inconsistency also remains in the way in which organisations designate the Welsh language skills required for vacancies during recruitment.

3.42 The standards state that the need for Welsh language skills for any new or vacant post must be assessed and categorised using the following categories:

- Welsh language skills are essential

- Welsh language skills need to be learnt when appointed to the post

- Welsh language skills are desirable, or

- Welsh language skills are not necessary.

3.43 593 job advertisements were reviewed from across the organisations subject to the Welsh language standards, recording whether the advertisement used the categories above or stated clearly the level of skills required for the post.

Language skill category

●	Welsh language skills are essential
●	Welsh language skills are desirable
●	Welsh language skills need to be learned
●	No Welsh language skills required
●	Welsh language not referenced
●	Another designation of skills noted
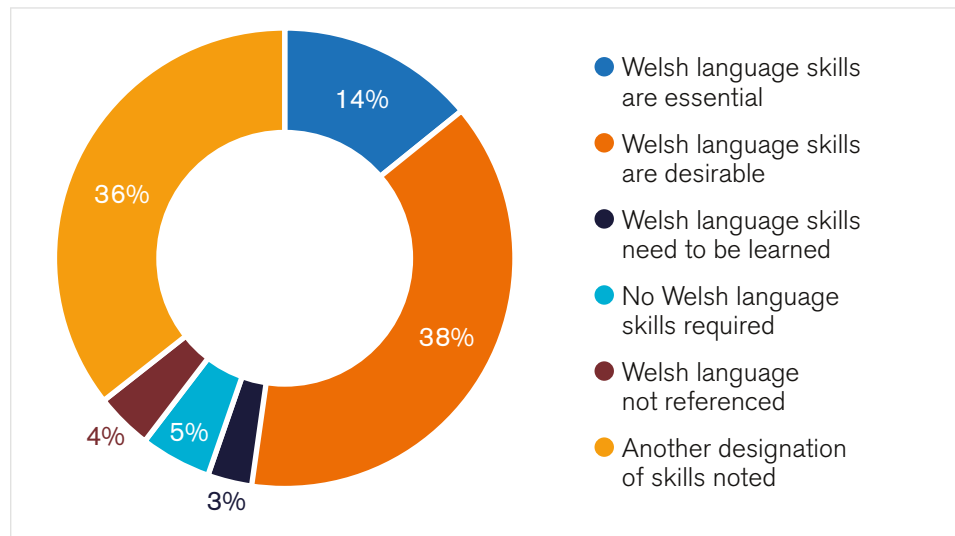
3.44 Staff involved in recruitment processes have a mixed awareness of the requirements when determining skill levels and how to do so. This means that organisations often do not correctly use the category required in the standards when describing the required skills for the role.

3.45 Situations where a mix of categories and skills are used in job adverts can lead to a lack of clarity and confusion for applicants and the wider public. This can lead, in turn, to complaints and most importantly, difficulties in recruiting the individuals with the skills desired.

3.46 As the chart above demonstrates, there is far too much inconsistency in the categories used by organisations – the highest percentage of advertisements (36%) did not designate skills in a way that complies with the requirements of the standards.

3.47 As part of our programme to promote compliance for 2024–25, we will work with all the organisations that we regulate to ensure greater consistency in the way Welsh language skills are determined. We would subsequently expect to see organisations implement changes that leads to better consistency and compliance as a result.

Welsh Language Schemes

3.48 As well as monitoring compliance with the Welsh language standards, we also survey and verify the services provided by organisations implementing Welsh language schemes under the Welsh Language Act 1993.

3.49 It should be noted that what organisations are expected to provide in Welsh varies from one organisation to another, based on the commitments agreed upon when producing their language scheme.

3.50 The table below shows the results of the Commissioner's verification surveys over the last three years, and provides a snapshot of service users' experiences in receiving services in Welsh when dealing with these organisations.

Survey[2]	Results 2021/22	Results 2022/23	Results 2023/24	Change
Telephone	47%	42%	38%	Consistent decline
Correspondence	62%	60%	58%	Consistent decline
Social media	30%	23%	20%	Consistent decline
Websites	52%	37%	54%	Improvement
Recruitment	5%	0%	20%	Improvement
Documents	44%	53%	61%	Consistent improvement
Forms	58%	54%	65%	Improvement
Corporate identity	59%	37%	64%	Improvement

3.51 An improvement was seen in organisations performance in relation to delivering the following services, with the biggest increase seen in organisations' corporate identity and websites:

- Websites
- Advertising posts
- Documents
- Forms
- Corporate identity.

3.52 Positive developments continued in terms of Welsh language services available on the gov.uk website. This year saw that more UK Government departments had control of their Welsh language content on the website. That has led to continued progress and improvement in Welsh language content and online services.

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2   Percentage of the sample that complied with the requirements.

Effective practice

Following an investigation and response to advice from the Commissioner, the Office of the Public Guardian has engaged widely with its Welsh language service users when developing a new digital service to enable individuals to apply online for a lasting power of attorney. Workshops have been held with service users to pilot the new digital service and to verify the accuracy and standard of the Welsh language service prior to launch.

3.53   However, our verification surveys demonstrate a steady decline in the performance of organisations implementing language schemes in the following areas:

- Telephone

- Correspondence

- Social media.

3.54   Given that the public are more likely to contact organisations directly via correspondence, telephone calls and, increasingly, social media, this is concerning.

3.55   Therefore, it is fair to say that the services delivered to the public by organisations implementing Welsh language schemes remain inconsistent.

3.56   The Welsh Language (Wales) Measure 2011 and the subsequent standards have signified a huge leap forward from the Welsh Language Act 1993 and the associated language schemes. The standards have provided a level of assurance for organisations and users alike and have created new opportunities for people to use the Welsh language in a wide range of day-to-day situations in Wales. The Commissioner also has wide-ranging powers to enforce them.

3.57   Although good work and progress has been made in some areas, it is clear from our findings this year that an inability to enforce the Welsh language duties in the same way as is possible under the standards regime means that delivery in some key services remains weak.

3.58   We cannot expect to see the same change in Welsh language services that have been seen in other sectors with the advent of the standards without also bringing the organisations that currently implement language schemes under that regime.

Outcome 2: Welsh language users have an understanding and awareness of the Welsh language services available to them

3.59 Promoting and facilitating the use of Welsh is one of the aims of the Welsh language standards, and the standards place a duty on an organisation to promote any Welsh language service it provides and to advertise that service in Welsh. Promoting the use of Welsh language services involves an effort by organisations to increase the use of Welsh language services.

3.60 Principles of behaviour change are central to a number of the standards that focus on an active offer. This gives an opportunity for organisations to promote the use of the Welsh language, for example by installing Welsh as default on self-service machines or staff computers or including the Welsh language before the English language in social media posts. These important principles contribute to ensuring that the Welsh language is visible and is offered conveniently to Welsh users.

3.61 It is therefore important that users are made aware of Welsh language services and that organisations creatively promote and publicise the services available to change service user practices.

Effective practice

In response to enforcement action in response to an investigation into a local authority's Facebook pages, the authority designed and implemented a project called 'Awareness of the Welsh Facebook Account'. As part of this project, a number of approaches were employed to increase both internal and external awareness of the Welsh language page – the number of new followers increased 80.6% within six months.

3.62 Every organisation now ensures that it is clear that a corresponding Welsh language page is available for every English language web page using a 'Welsh/English' toggle, allowing users to navigate seamlessly to the Welsh page if they wish.

3.63 However, as reported in our last assurance report Raising the Bar organisations' compliance with other associated 'promotion' standards, such as including a statement on a document that the document is also available in Welsh, is low. These standards build on principles or practices of behaviour change and are included in the Regulations to change the habits of Welsh language users who are maybe not used to having high-quality Welsh language services available to them.

Service promotion standards
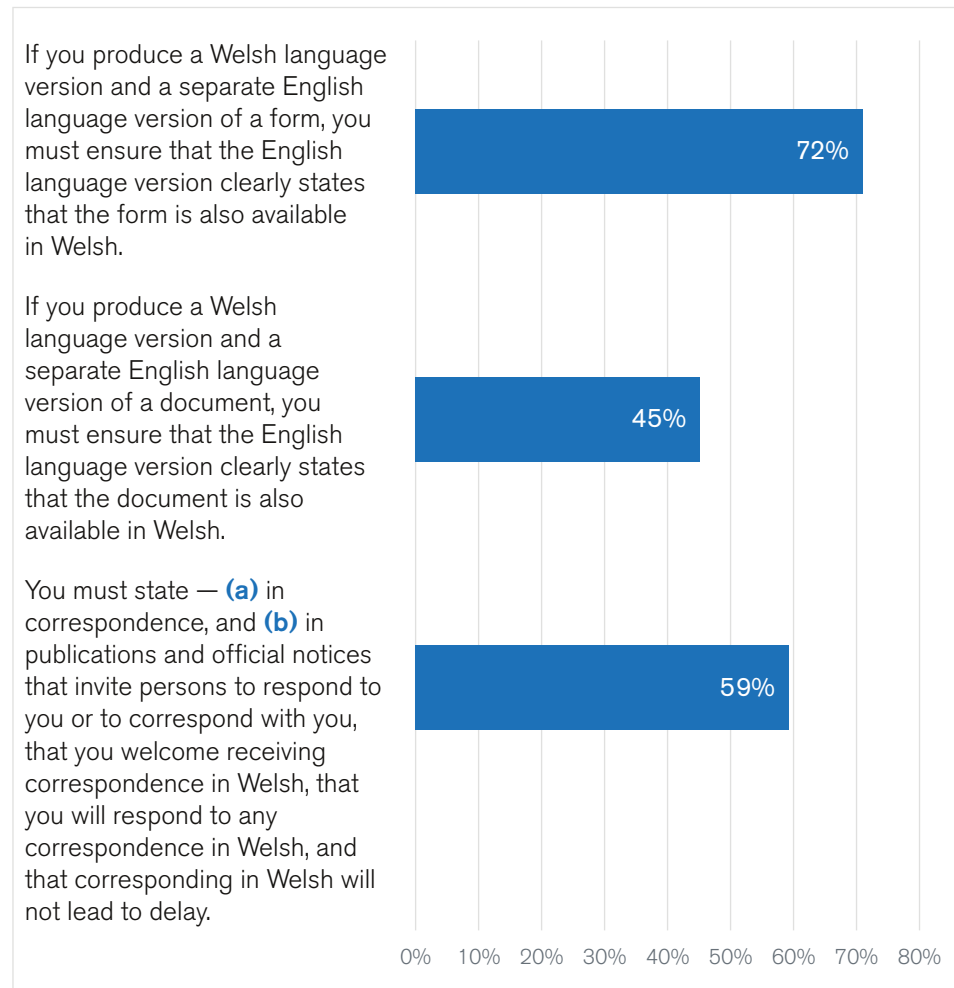
3.64 Given the relative simplicity of this requirement, it is disappointing and concerning that compliance remains relatively low again this year. Organisations are expected to take specific action to address this shortcoming during the coming year.

Welsh Speakers Survey: November 2023

3.65 We commission an annual survey of the views of Welsh speakers regarding the Welsh language services of public organisations and opportunities to use the Welsh language. The sample included 408 respondents across all local authorities in Wales, with a cross-section of ages, social classes and geographical locations.

3.66 In discussing respondents' preferred language for dealing with public organisations, 17% of the sample stated Welsh, 54% stated English and 29% stated that their choice varied. However, of those who identified as fluent speakers, 33% preferred to use Welsh.

3.67 Factors influencing users' language choice include:

- the subject matter or use of technical terminology (37%)

- personal confidence and comfort in using Welsh (16%)

- the availability of Welsh speakers (11%)

- the other person speaking Welsh first (7%).

3.68 The percentages below demonstrate the language respondents prefer to use in relation to some specific services.

	Welsh at all times	Mostly Welsh	Welsh and English equally	Mostly English	English at all times
Telephone	7%	11%	18%	29%	35%
Face to face	9%	14%	24%	29%	23%
Written	6%	4%	14%	36%	41%
Reading information	6%	6%	22%	34%	32%
Social media	5%	5%	17%	34%	36%

3.69 As the table above clearly demonstrates, people prefer to use Welsh when receiving face to face services. This is especially the case for 31% of respondents over 55 who prefer to mostly or always use Welsh. 46% of fluent respondents preferred to use Welsh face to face, mostly or at all times.

3.70 It is positive to note that 79% of respondents agreed that they can usually deal with organisations in Welsh if they wish to do so (increasing to 86% of fluent respondents).

3.71 74% also agree that the Welsh language services delivered by public organisations are improving and 75% agree that public organisations ask them in which language they would like to communicate.

3.72 65% of respondents agree that they are more likely to use Welsh language services if organisations make it clear that such services are available, with the percentage increasing to 85% of fluent respondents.

3.73 However, only 67% agreed that the quality of Welsh language services was just as good as English language services. The same percentage confirmed that they are aware of the Welsh language services that they are entitled to receive. This means that nearly a third of respondents are unclear and unsure of the Welsh language services available to them.

3.74 The above proves that organisations still need to do much more to proactively publicise Welsh language services and make them more accessible if we are to achieve this crucial outcome.

3.75 It also highlights the importance of the work we are undertaking this year with a range of public organisations from different sectors to adopt action plans for promoting Welsh language services. The purpose of this work is to encourage organisations to better plan and promote their Welsh language services with the aim of increasing the use made of those services.

3.76 The organisations involved will be expected to prepare a promotion plan for two specific Welsh language services using the theories and methodology covered in the joint seminars held with the Centre for Digital Public Services (see below).

3.77 The organisations will also be required to collate data on the use made of the promoted services, and that data will be analysed at the end of the project to measure the impact of the promotion campaigns.

3.78 Following a full analysis of the project, we will publish our findings and examples of effective practice to encourage public organisations to put similar measures in place to better promote their Welsh language services and encourage their use.

Language Matters

3.79 We worked with the Centre for Digital Public Services to deliver four practical workshops examining innovative approaches to better design and promote bilingual content in order to encourage the use of Welsh language services.

3.80 The seminars offered the opportunity to discuss and improve understanding of theories and methodology to better promote Welsh language services. One methodology discussed in detail by the Centre for Digital Public Services was Trio Writing – a collaborative approach to developing content in two languages which was acknowledged as effective practice in our assurance report last year. More information about Trio Writing can be found here: How to do trio writing | Centre for Digital Public Services (gov.wales).

3.81 243 people registered for these seminars and very positive feedback was received.

Feedback from the seminars

"Already attending this session has been a huge help for me. I'm not a Welsh speaker or Welsh but I'm the content designer on a project for Wales. I've tried really hard to adapt how I work to bring Welsh in sooner but I'd not considered how important it was to actually PROMOTE our Welsh service too. I'll definitely be taking that back to my team for us to think about."

"A huge thank you to the Welsh Language Commissioner for the session today on promoting Welsh language services and how to make information about them clear and accessible to service users. A very perceptive discussion which could lead to ideas for us as an office! #languagematters".

Outcome 3: Organisations give due regard to the potential impacts of their policy decisions on the Welsh language

3.82 The policy making standards are important in ensuring that the Welsh language is considered in policy decisions, and that any potential impacts on the language are identified. This involves considering how the policy could be formulated so that it has increased positive effects as well as decreased adverse effects on the Welsh language. It is essential that organisations have an effective approach to considering the impact of policy decisions on the Welsh language covering legal considerations, the needs of Welsh speakers, national and local strategies and specific policy areas relating to the Welsh language.

3.83 Over the past year, we have focussed specifically on supporting organisations to consider their arrangements for complying with the policy making standards.

3.84 We have drawn organisations' attention to the Welsh Language Tribunal's important judgement which gives clear guidance on the considerations required in policy decisions, including giving conscientious consideration to the effect of decisions on the Welsh language.

3.85 We have also published resources to further support organisations with this crucial work on our web pages on the policy making standards. Those include a series of frequent questions, a list of factors to consider as well as a case study in relation to a local authority consultation document in the field of education.

3.86 Some organisations, either voluntarily or in response to our investigations following complaints, have put new arrangements in place and it is encouraging to see good practice emerging.

Effective practice

An investigation was opened following a complaint about a consultation document on a local authority budget for 2023–24. The investigation considered whether the organisation was complying with the policy making standards when seeking views on, the potential effects on the Welsh language and opportunities to use the Welsh language. It was determined that there was a failure to comply with three standards as the document did not include any consideration of, or questions about, the policy's potential effects on the Welsh language.

Following the investigation, the organisation was required to take enforcement action to undertake a review of its process for producing consultation documents; produce guidance clarifying the requirements of the relevant standards; and deliver training to relevant staff on the standards in question.

We received a very positive response to the enforcement action, with the organisation stating that it had introduced a new approach to strengthen the policy development and consultation process. A group has been established to review Cabinet papers to identify those that require language impact assessments. The latest budget for 2024–25 was screened to identify which proposals would require a full impact assessment. Additionally, specific questions were added about the impact of the proposals on the Welsh language. The Council has established a new internal email address specifically for Welsh language policy matters, which is promoted as a source of support and guidance.

An internal advice note has been prepared clarifying the requirements of the standards and a new policy has been produced on policy making which clarifies the requirements of the standards fully. When draft impact assessments are submitted for the attention of the organisation's Welsh language department, the department will offer a briefing for that department when commenting on the impact assessment.

The organisation acknowledged that, due to the requirement for 'conscientious consideration', the impact assessment must be undertaken earlier in the policy making process to provide sufficient information to allow consultees to respond fully. Their policy states that Welsh language assessments must be completed prior to public consultations and that the effects and promotion/mitigation measures must be included in the consultation document.

3.87 However, we continue to receive a higher level of complaints and enquiries about policy decisions made by public organisations than was the case historically, with the vast majority relating to decisions around reorganisation in education and access to Welsh medium education.

3.88 A consistent feature of our findings when investigating complaint in relation to policy decisions is that the procedures and arrangements put in place by organisations are not followed. This is because there remains uncertainty about when the standards apply, with organisations often unsure whether a decision is a policy decision or an operational decision.

3.89   In those cases where procedures are followed, it is very rare that we find that an organisation has considered all the obvious relevant factors. Even where all those factors have been considered, more often than not, that consideration is not detailed or perceptive enough to allow the organisation to make an informed decision about the real effect on opportunities to use the Welsh language.

3.90   More needs to be done, therefore, to raise awareness within organisations of the requirements of the policy making standards and what needs to be done to comply with them.

Key Line of Enquiry

3.91   To have greater assurance that organisations are making conscientious efforts to consider the effects of policy decisions on the Welsh language, we are undertaking a key line of enquiry[3] in this area in 2024. This work is designed to give us a better understanding of the arrangements put in place by organisations and whether these arrangements are adequate.

3.92   The information collated will help us to better understand the matters and decide what further support is required by organisations.

3.93   We will publish our findings and set out any effective practices identified. We will also hold events to discuss the findings and disseminate effective practice.

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3   A 'key line of enquiry' is a detailed enquiry that asks organisations to provide detailed evidence of their compliance arrangements in relation to strategic or high-risk matters.

Outcome 4: Organisations increase the use of Welsh in their workplace, enabling staff to work in Welsh on a day-to-day basis

3.94 If we are to achieve our aim of enabling people to live their lives in Welsh, it is crucial that more workplaces in Wales support the use of the Welsh language in their day-to-day administration. Every workplace must also support and increase opportunities to use Welsh.

3.95 The Welsh Government's strategy, Cymraeg 2050, refers to the workplace as a key space for increasing the use of the Welsh language. It states that 'the workplace is central to our day-to-day lives and provides an important context for an individual's linguistic development', as it provides speakers of all levels the opportunity to use and practise the language. The strategy states that 'some bodies are already leading the way in this respect and use the Welsh language as the language of internal administration, subsequently increasing the demand for, and opportunities to use, Welsh language skills'.[4]

3.96 The Welsh Language Commissioner wants to see:

- more organisations using Welsh as their main language of internal administration and maintaining that position if that is already the case

- every organisation under the Welsh language standards increasing the use of Welsh internally and enabling staff to work fully through the medium of Welsh.

Using Welsh at work

3.97 The operational standards create the conditions for increasing the use of Welsh and organisations report high levels of compliance, such as by providing Welsh language computer interfaces and Welsh versions of policies and contracts and a high percentage provide their intranet in Welsh.

3.98 As well as duties, organisations also have an opportunity to develop the skills of their workplace both formally and informally. Organisations such as Coleg y Cymoedd create the conditions for promoting the Welsh language skills of their staff through the creation of a mentoring scheme. Read more about the mentoring project and increasing the use of Welsh.

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4   Page 49: Cymraeg 2050: Miliwn o siaradwyr (llyw.cymru).

3.99 All organisations subject to the Welsh language standards are subject to the following standard:

> You must develop a policy on using Welsh internally for the purpose of promoting and facilitating the use of the language, and you must publish that policy on your intranet.

3.100 During the year, we have established a project with strategic partners to consider how organisations can strengthen their policies on using the Welsh language within their organisations in order to increase the use made of Welsh at work.

3.101 Thus far, the project has worked at a strategic level to co-ordinate with members of the steering group and to discuss the challenges and opportunities in this area.

3.102 The group has met three times allowing discussion of the challenges and resources required by organisations when developing policies that can lead to change. These meetings have also been an opportunity to discuss practical ways of changing behaviour and increasing genuine opportunities for people to use Welsh at work.

3.103 Meeting as a steering group has also allowed organisations to take advantage of the support and resources available through projects of the various partners and to focus their efforts on increasing the use of Welsh within their organisations.

3.104 Three public organisations have committed to producing policies to increase the use of Welsh in their administration. To support this commitment, we will collaborate with partners to develop models for potential policies. The models will draw on experience and successful practice considering how best to create a policy infrastructure that can be replicated by others.

3.105 As well as the in-depth work to create a policy infrastructure, we will develop resources in specific areas to support all organisations to improve and strengthen their policies, sharing experiences and good practice on our web pages for this project.

3.106 Resources will examine potential developments in policy in relation to technology, leadership, training and skills development and behaviour change. This will provide practical opportunities for all organisations to increase staff's use of Welsh in their day-to-day work and with each other.

Policy review

3.107 During the year, a review was undertaken of a sample of organisational policies (14) on the internal use of Welsh to identify strengths and areas for further improvement and development.

3.108 In general, policies set out a general commitment to facilitating the ability of their staff to use Welsh where relevant under the operational standards, for example, by providing computer infrastructure or employment documents in Welsh.

3.109 However, the majority of the sample (85%) displayed a lack of vision regarding how these policies are intended to lead to an increase in opportunities to use Welsh in their workplaces in the longer term.

3.110 More often than not, these policies simply outline the requirements of the standards and the role of staff in their implementation. They do not clarify the action to be taken or set out measurable targets to increase the use of Welsh over time.

3.111 Additionally, there are some examples where content on internal use of Welsh has been incorporated in a wider policy or strategy relating to the Welsh language. This means that any examination of this specific area is often limited.

3.112 In response to this report, organisations should consider to what extent their policies on internal use of Welsh achieve the following, and take positive action where required to do so:

- sets out an ambitious, long-term vision

- establishes positive practice for language use, along with formal and informal opportunities to use Welsh in the workplace

- an inclusive policy which includes steps to promote and facilitate the use of Welsh amongst all members of staff e.g. providing opportunities for everyone to develop their Welsh language skills

- supports the use of Welsh without placing an extra burden on users – for example, using Welsh as default rather than opt-in options

- incorporates a specific timetable for achieving each objective

- states clearly who is responsible for the operation of the policy and undertake regular performance reviews.

Outcome 5: Organisations promote the Welsh language so that people can use the language naturally in their daily lives

Promotion Strategies

3.113 Standards 145 and 146 of the Welsh Language Standards (No. 1) Regulations are promotion standards. A 'promotion standard' means a standard involving any activity intended to promote or facilitate use of the Welsh language more widely.

3.114 To implement standard 145, county councils and national parks are required to produce a 5-year strategy that explains how they propose to promote and to facilitate the use of the Welsh language in their area.

3.115 All county councils and national parks must include in their promotion strategies (amongst other matters):

- a target (in terms of the percentage of speakers in their area) for increasing or maintaining the number of Welsh speakers in their area by the end of the 5-year period concerned, and

- a statement setting out how they intend to reach that target.

3.116 In addition, they must review their strategy and publish a revised version on their website within 5 years of publishing the strategy (or of publishing a revised strategy).

3.117 A study was commissioned in 2023–24 to evaluate the extent to which local authorities and national park authorities have adequately assessed the delivery of their 5-year strategies and prepared new strategies, in accordance with the advice published by the Commissioner in 2021.

3.118 As well as making a judgement on compliance with the standards, the study aimed to identify good practice and common weaknesses by using data in relation to assess the achievement and preparation of revised 5-year strategies, and their implementation. It was to also make recommendations about how organisations could strengthen and improve their arrangements to evaluate and prepare their 5-year strategies for the future.

3.119 25 organisations were invited to participate in this study, which included the 22 local authorities and the three national park authorities subject to the promotion standards (145 and 146).

3.120 Representatives from 23 organisations contributed to the study. 22 completed the survey and follow-up interviews were held with representatives from 21 organisations.

3.121 According to the survey data, the majority of participating organisations (19) have completed their first 5-year strategy and have progressed to their revised strategy. Of the 19 organisations who are now implementing their revised strategy, some of these (3) will finish doing so as early as 2026. Although organisations are required to undertake 5-year strategies, one organisation has decided to undertake a follow-up strategy lasting 10 years. This strategy will end in 2033.

3.122 County councils and national parks are required to include a target (in terms of the percentage of speakers in their area) for increasing or maintaining the number of Welsh speakers in their area by the end of the 5-year period concerned. According to the survey responses, 20 of the 22 organisations had included such a target but two organisations had failed to meet this requirement.

3.123 County councils and national parks are also required to include a statement in their 5-year strategy setting out how they propose to reach that target. 19 of the 22 organisations that completed that survey confirmed that they had included such a statement in the 5-year strategy. Three organisations had failed to comply with this requirement.

3.124 In order to implement standard 145, county councils and national parks are required to include a target (in terms of the percentage of speakers in their area) for increasing or maintaining the number of Welsh speakers in their area by the end of the 5-year period concerned. According to the survey responses, 20 of the 22 organisations had included such a target but two organisations had failed to meet this requirement.

3.125 Standard 145 also requires county councils and national parks to include a statement in their 5-year strategy setting out how they propose to reach that target. Nineteen of the 22 organisations that completed that survey confirmed that they had included such a statement in the 5-year strategy. Three organisations had failed to comply with this requirement.

3.126 According to the survey responses, 20 organisations had included information about the number and ages of Welsh speakers in their areas in their assessment of the operation and achievement of the promotion strategy. Two organisations had failed to comply with this requirement.

3.127 Only 15 organisations had listed the activities that they had arranged or funded to promote the use of the Welsh language in the assessment. Seven organisations had failed to comply with the requirements of standard 146.

3.128 In the survey, the majority of organisations reported that they had linked the revised strategy with the policy landscape (20); collaborated with a wide range of stakeholders (18); produced an up-to-date profile of the local area (17) and established a baseline for further action (17). 16 organisations had produced revised strategies with input from partners and stakeholders, created an annual action plan and created a scheme to monitor the implementation of the strategy.

3.129 The Welsh Language Commissioner's advice document refers to a number of qualitative data collection and presentation methods including surveys, focus groups, accounts of individual experiences etc. The survey demonstrates that organisations had not made as much use of qualitative data collection and presentation methods when assessing the achievement of their 5-year strategies.

3.130 The majority of organisations that responded to the survey (17) reported that they had adapted their arrangements for implementing the revised strategy. Five organisations had not changed their implementation arrangements.

3.131 The organisations who had adapted their arrangements for implementing the revised strategy gave a number of reasons for doing so, principally because they wanted to improve the evidence base to identify a baseline, set targets and monitor progress, change/strengthen monitoring arrangements, and reinforce the link between the objectives of the 5-year strategy and the organisations' other strategies (Welsh in Education Strategic Plan, Cymraeg 2050 and arrangements for monitoring corporate business planning).

3.132 In summary, therefore, it appears that every council and national park authority has a strategy in place to promote, protect and nurture the Welsh language in their areas. Most organisations include the basic information required under standard 145, therefore complying with the statutory requirements. However, it is concerning that a small number of organisations are still failing to set targets to increase or maintain the number of Welsh speakers in their area, and others have failed to make a statement setting out how they will reach targets. It is also concerning that 10 of the 25 organisations have failed to comply with standard 146 as they have failed to publish a list of the activities that they have arranged to promote the use of the Welsh language.

3.133 We will be contacting those organisations whose strategies do not comply with the requirements of the standards to discuss the steps that need to be taken to rectify the situation. We will consider in particular the need for the strategies to include:

- targets for increasing or maintaining the number of Welsh speakers, and a statement on how that will be achieved

- the number of Welsh speakers within their areas and the age of those speakers

- a list of the activities arranged or funded by the organisation.

3.134 The Commissioner wants to see these promotion strategies, not only complying with the basic requirements of the standards, but also reaching their full potential and making a meaningful contribution to the national aim of reaching a million Welsh language speakers.

3.135 In turning our sights to the next iterations of the promotion strategies, and in line with our commitment to increasingly working with organisations to ensure improvements the Commissioner will need to take a more proactive role in providing advice and guidance to the relevant organisations.

Outcome 6: Organisations protect and promote the interests of Welsh language users by having effective governance and complaints arrangements

3.136 We expect the people of Wales to receive high-quality Welsh language services from organisations and for corrective action to be taken when things go wrong. When things go wrong, Welsh language users should have access to transparent and effective complaints procedures.

3.137 Organisations are expected to have a complaints procedure in place outlining how they propose to address complaints received about their compliance and publish that procedure on their website. Similarly, Welsh language users can submit a complaint directly to us.

3.138 In our assurance report for 2021–22, Welsh as a Way of Working, we reported that not all organisations were meeting this duty, and challenged organisations to publish a complaints procedure as it was not entirely clear to users how they could complain directly to organisations.

3.139 While organisations have responded very positively to this challenge, and a number of them have now published a compliant complaints procedure, only 48% of respondents to our survey of Welsh speakers agreed that organisations made it clear how to complain about Welsh language services.

3.140 In a national awareness survey published by the Public Services Ombudsman for Wales some years ago[5], it was found that Welsh speakers seemed to be more dissatisfied on average with the outcome of their complaints to public service providers. This is likely to have had a negative impact on their confidence in organisations' ability to change practices and meant that we as a regulator have had to intervene increasingly over recent years.

3.141 The quality of the service delivered by organisations is very dependent on organisations' awareness and understanding of their own performance. Complaints are a way of learning about the experience of service users; it is therefore important that users have a voice that enables organisations to understand their performance better in order to make changes and improve continuously.

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5   https://www.ombudsman.wales/research-and-surveys/national-awareness-survey/

3.142 As we increasingly move towards co-regulation, we want to encourage Welsh language users to raise concerns and issues directly with the organisation in question where possible. This will not prevent us from investigating a complaint immediately, and taking appropriate enforcement action if this is required. However, by working in this way, we believe that there is the potential to deal with complaints more effectively and to restore compliance quickly in many cases.

Case study

A member of the public submitted a complaint to us in relation to the pages of a Council's youth service. The complaint related to English videos being uploaded to the website's Welsh language pages. When we presented information about the complaint to the Council, the Council responded and the videos were taken down immediately. Steps were taken to train staff again on the requirements of the standards in this context.

The Council responded proactively taking every step that the Commissioner would have enforced in the event of an investigation. By responding positively to the complaint, an effective solution was delivered, restoring compliance without the Commissioner's intervention.

A complaint was received from a member of the public that an organisation's website did not include a statement welcoming contact in Welsh and that the website's text to speech tool contained an error. As the organisation was clearly responsible for the website in question, we contacted the organisation highlighting the errors and asking it to rectify the issue.

The statement on welcoming contact in Welsh was changed that same day and the organisation contacted the third-party company responsible for the accessibility tool to seek a solution. Despite concern that the issue with the text to speech tool would be more difficult to resolve, the organisation informed us within a few days that the system provider had changed the settings.

By contacting and informing the body promptly, a full solution was secured in fewer than five working days.

3.143 We will consult on changes to our enforcement policy to support and facilitate this approach. However, for that to happen effectively, organisations must:

- have sound arrangements in place

- be willing to discuss concerns and complaints

- proactively encourage user feedback continuously

- be committed to the aim of improving the experiences of users when receiving Welsh language services.

3.144 We will work with organisations during the coming year to ensure that accessible and appropriate procedures are in place to address language complaints, and to advise them on how to strengthen their arrangements where necessary.

3.145 Many organisations are also subject to standards that require them to publish a document that clearly describes their arrangements for overseeing compliance.

3.146 One of the Commissioner's main objectives when regulating organisations' performance and compliance is to promote self-regulation.

3.147 Some organisations have sound self-regulation arrangements in place and oversee compliance arrangements consistently. Read about NHS Wales Shared Services Partnership's self-regulation practice on our website.

The Chief Constable of Gwent Police

Gwent Police have developed a simple but effective way of ensuring that they maintain governance and accountability for the Welsh language at all levels within the organisation. By creating a progress tracking document that gives each Police department the responsibility to report consistently on compliance levels they have a clear organisation-wide picture of the compliance levels of each place of work and department. Using a tool based on a traffic light system, senior managers and governors can identify assurance for each department and set clear objectives for continuous improvement, overseen at the highest level in order to secure progress.

3.148 Our monitoring work also shows that organisations tend to perform better in their service delivery or operational duties if there is a sound accountability structure in place. For example, compliance is higher amongst those organisations who have taken responsibility for implementing the Welsh language standards at a strategic level, including the standards in their corporate risk Registers and discussing them regularly at senior management level.

3.149 In simple terms, this means that significant work has been done to consider not only how to comply with duties but also how to oversee and measure success regularly.

3.150 This is equally the case for those organisations still implementing Welsh language schemes. For example, we can see that those organisations who have a particular member of staff or team with specific responsibility for the Welsh language and the implementation of the language scheme – deliver better Welsh language services Having a workplace or officers based in Wales also tends to lead to better awareness and understanding of the needs of Welsh speakers in general.

Standards that deal with supplementary matters

3.151 Across the sample of public organisations surveyed during 2023–2024, we found that many of them fail to comply fully with some of the standards that deal with supplementary matters. This is especially the case in relation to the requirements to publish documents outlining their arrangements for oversight (standards 151, 157 and 163) and how they intend to comply with the standards (standards 153, 159 and 165).

3.152 Although the majority of these organisations have documents in place, they often did not address all the requirements of the standards. For example, a number outlined their arrangements for oversight clearly, but failed to include information about how they also promote and facilitate the use of the Welsh language services delivered. This reinforces the message set out previously in this report – organisations need to do much more to promote Welsh language services and facilitate their use.

3.153 As the requirements of these standards are linked and often overlap, several organisations have chosen to consolidate the requirements in one document. Although this practice is very sensible for offering clarity and accessibility for users if produced successfully, it is generally seen that this approach often leads to gaps in information or an oversimplification of the position with the omission of accountability arrangements.

3.154 Many organisations also have difficulty distinguishing between the need to explain how they will comply in practice and how they will oversee that compliance. After discussing the requirements in greater detail with organisations as part of our monitoring work, a number have now identified shortcomings and proposed modifications, or have created new documents, to secure full compliance.

3.155 If we are to see a meaningful increase in organisations' ability to self-regulate and to put firm arrangements for oversight in place, it is important that the standards relating to supplementary matters are given due consideration by organisations.

3.156 Given that several years have passed since the first organisations were made subject to the Welsh language standards, there is an opportunity in the coming period to review and update some of the documents in question and to consider adaptations that can strengthen governance arrangements for the benefit of Welsh language users.

Appendix 1: Overview of general monitoring results

The table below shows the percentage of the sample that provided a Welsh language service for each of the activities described.

The percentages are based on the results for each of the organisations reviewed that are subject to Welsh language listed in Appendix 3.

Service	Percentage
Telephone services: dealing with the call fully in Welsh	56%
Welsh correspondence: answered in Welsh[6]	88%
Websites: pages available in Welsh	91%
Social media (Facebook and X): posts available in Welsh	89%
Publicity material available in Welsh online	70%
Documents available in Welsh	89%
Forms available in Welsh	83%
Corporate identity	83%
Job advertisements available in Welsh	84%

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6   When an answer was received.

Appendix 2: The evidence basis for the report

The report is based on sound and diverse evidence, including:

- Monitoring – undertaking surveys of user experiences (verifying services such as correspondence, telephone services, forms, documents, corporate identity, websites etc.)

- Verifying annual reports, supplementary documents and job advertisements

- Contact with organisations – the impressions of officers dealing with organisations to provide support for compliance, set out standards, and undertake investigations

- Meetings to gather evidence.

In terms of the surveys of user experiences, it should be noted that the results are based on verifying the services of all organisations subject to Regulations No. 1 and 7, and a sample of organisations subject to Regulations No. 2, 4, 5 and 6, as well as a selection of organisations implementing Welsh language schemes. A list of the organisations subject to surveys can be seen below. It should be noted therefore that the comparisons between the annual sample for some sets of regulations do not compare the same organisations. However, they represent the performance of the organisations subject to that particular set of regulations over time. Note also that monitoring services under language schemes consider the services delivered in line with Welsh language standards, even though the commitments are not the same in each instance.

The verification surveys were undertaken by the Commissioner's officers. Services were verified three times during the year in most cases using a clear methodology based on the requirements of the standards as regards to what constitutes compliance.

User experience is the principal aim of the verification work; however, the requirements of the standards were also taken into account fully and these are referred to where relevant in the report to identify the need for better planning etc.

Due to decisions made in light of the pandemic, field surveys have not been undertaken in recent years; this means that there is no performance data available in relation to services such as signage displayed by organisations, receptions areas or self-service machines as they were not verified.

Survey of Welsh Speakers

Beaufort undertook the survey on our behalf in November and December 2023. The sample included 408 respondents aged over 16 from all local authorities in Wales, with a cross-section of ages, social classes and geographical locations.

One hundred and eight six of the respondents identified as fluent Welsh speakers and 222 identified as non-fluent speakers.

Appendix 3: List of organisations surveyed for verification survey findings

Regulations No. 1

- Blaenau Gwent County Borough Council
- Brecon Beacons National Park Authority
- Bridgend County Borough Council
- Caerphilly County Borough Council
- Cardiff Council
- Carmarthenshire County Council
- Ceredigion County Council
- Conwy County Borough Council
- Denbighshire County Council
- Flintshire County Council
- Gwynedd Council
- Isle of Anglesey County Council
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- Neath Port Talbot County Borough Council
- Newport Council
- Pembrokeshire Coast National Park Authority
- Pembrokeshire County Council
- Powys County Council
- Rhondda Cynon Taf County Borough Council
- Snowdonia National Park Authority
- Torfaen County Borough Council
- Vale of Glamorgan Council
- Welsh Ministers
- Wrexham County Borough Council.

Regulations No. 2

- Colleges Wales
- Data Cymru
- Estyn
- Royal Commission on Ancient Monuments
- The Arts Council of Wales
- The British Broadcasting Corporation
- The Children's Commissioner
- The Commissioner for Older People
- The Electoral Commission
- The Learning and Work Institute
- The National Lottery Community Fund
- The Office of Communications
- The Student Loans Company
- Wales Council for Voluntary Action
- Welsh National Opera.

Regulations No. 4

- Education Tribunal for Wales
- Education Workforce Council
- Residential Property Tribunal Wales
- Social Care Wales.

Regulations No. 5

- Gwent Police and Crime Commissioner
- Independent Office for Police Conduct
- Powys Police and Crime Commissioner
- South Wales Fire and Rescue Authority
- The Chief Constable of Gwent Police
- The Chief Constable of North Wales Police
- The Chief Constable of the British Transport Police.

Regulations No. 6

- Bangor University
- Bridgend College
- Cardiff and Vale College
- Coleg y Cymoedd
- Gower College Swansea
- Higher Education Funding Council Wales
- Merthyr Tydfil College
- NPTC Group
- Swansea University
- The Open University
- University of South Wales
- University of Wales Trinity Saint David.

Regulations No. 7

- Aneurin Bevan University Health Board
- Betsi Cadwaladr University Health Board
- Cardiff and Vale University Health Board
- Cwm Taf Morgannwg University Health Board
- Hywel Dda University Health Board
- Powys Teaching Health Board
- Public Health Wales NHS Trust
- Swansea Bay University Health Board
- Velindre NHS Trust
- Welsh Ambulance Services NHS Trust.

Organisations implementing Welsh language schemes

- Companies House

- Department for Work and Pensions

- Driver and Vehicle Licensing Authority

- Driver and Vehicle Standards Agency

- Dŵr Cymru

- Hafren Dyfrdwy

- Health and Safety Executive

- HM Prison and Probation Service

- HM Revenue & Customs

- Meat Promotion Wales

- National Heritage Memorial Fund

- Office of the Public Guardian

- Royal Mail Group

- Rural Payments Agency

- The Financial Conduct Authority.

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Commissioner