



Professor Sir Ian Diamond
National Statistician
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Dear Sir Ian Diamond,

Consultation on the Future of Population and Migration Statistics (2023)

Thank you for the opportunity to respond to this consultation. The comments presented below are an attempt to answer the first two questions of your questionnaire by explaining the essential and statutory use the Welsh Language Commissioner currently makes of census statistics, and to outline how your proposal will affect our information needs. The main points we wish to emphasize are:

- How vital the census data is to the Commissioner's work, to the extent that the Welsh Language (Wales) Measure 2011 creates a statutory requirement for the Commissioner to report on and interpret the position of the Welsh language on their basis.
- Census data is the main foundation of language planning efforts in Wales – at a national level and at a very local level.
- The census gives us a once in a decade opportunity to combine data about different characteristics in order to better understand the life circumstances of Welsh speakers.
- The census in its current form does not meet our core need for data about language use. Nor does it meet the demand in Wales for more frequent data about the Welsh language.
- We must therefore evolve and innovate, but until the Office for National Statistics (ONS) is confident that it can overcome the challenges and risks outlined below,

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and that statistics about the Welsh language can meet all of the quality measures it sets for itself, it seems premature to decide not to hold a census in 2031.

We are also keen to emphasize once again the need to increase the statistical resources published bilingually by the ONS. The current shortcoming has hampered the ability of public bodies in Wales to promote and get the most benefit from the flexible and innovative resources of the 2021 Census. It is essential that the Welsh language is considered from the outset when designing digital resources and related interfaces. More practical guidance on how to do this has been published on the Welsh Government website [Welsh Technology | Hello Blod \(gov.cymru\)](#) and I know that my officers will be more than happy to support you as you plan how to mainstream the Welsh language in order to realize the commitments of your language plan.

1. Specific requirements of the Welsh Language (Wales) Measure 2011

The [Welsh Language \(Wales\) Measure 2011](#) declares that the Welsh language has official status in Wales and creates a number of important provisions, including the creation of the position of Welsh Language Commissioner whose main statutory aim is to promote and facilitate the use of the Welsh language. It is impossible to overemphasize, therefore, how essential up-to-date, reliable and detailed data about the Welsh language and its speakers is for the Commissioner to achieve this statutory aim. Indeed, we have already conveniently summarized on our website the way in which Census 2021 data will support and inform our work: [The impact of the 2021 Census results on the work of the Welsh Language Commissioner](#).

As the summary on our website emphasizes, [Part 2, 5](#) of the Measure also creates a specific requirement for the Commissioner to produce a report every five years on the position of the Welsh language. This requirement is also very specific in relation to the census: every report that is produced after a census must report on the results of the census in relation to the Welsh language and offer an assessment of the implications of the results for the position of the language. Any change to the current system would mean



that this legislation would have to be reviewed. Here is a link to the report which covered the results of the 2011 Census for information: [5-year report 2012-15](#).

Promoting and facilitating the use of the Welsh language is a duty shared with a number of key bodies in Wales and the Welsh Language Measure creates specific linguistic duties for local authorities in the form of the promotion standards. The [promotion standards](#) create a requirement for these organizations to produce a 5-year strategy for promoting and facilitating the use of the Welsh language and the strategy must include a percentage target for increasing or maintaining the number of Welsh speakers in their areas by the end of the period. The census is the only source of data which enables organizations to measure progress at the necessary geographical levels and which provides detailed information about who speaks Welsh in those areas in order to plan strategic interventions.

2. National progress measurement requirements

Achieving the targets of the 5-year strategies of the local authorities and the national parks should contribute to the realization of the Welsh Ministers' national strategy for the Welsh language: [Cymraeg 2050: A million Welsh speakers \(gov.cymru\)](#). This long-term strategy includes two concrete and measurable targets in order to transform the position of the language:

- The number of Welsh speakers to reach 1 million by 2050.
- The percentage of the population that speak Welsh daily, and can speak more than just a few words of Welsh, to increase from 10 per cent (in 2013–15) to 20 per cent by 2050.

The census figures are at the heart of this first target which has secured cross-party support. It includes (p. 22) a projection of the number of Welsh speakers based on the results of the 2011 Census and demographic trends. This projection is contrasted with a possible alternative route – [the trajectory to 1 million](#) – which is based on the necessary policy changes to realize the quantitative vision of the strategy. This trajectory will now be



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updated following the results of the 2021 Census and will be an opportunity for the Welsh Government to reflect on what more needs to be done in order to reach one million speakers: <https://www.gov.wales/written-statement-response-census-2021-results-welsh-language>.

One of the cornerstones of the *Cymraeg 2050: A million Welsh speakers* strategy is the education sector. The trajectory to 1 million is mainly based on increasing the numbers who attend Welsh-medium education, as well as increasing the numbers who leave English-medium schools as confident Welsh speakers. An important part of the strategy for achieving this is the statutory requirement for local authorities to publish Welsh in Education Strategic Plans. These plans require local authorities to commit to a 10-year target regarding the numbers who will attend Welsh-medium education and include the local authorities' plans in order to achieve these targets. Although the targets themselves are based on data derived from the Pupil Level Annual School Census (PLASC), the targets are also intertwined with the milestones of the trajectory to 1 million, which in turn are based on census data. The 10-year targets that have been set in the local authorities' Welsh in Education Strategic Plans therefore correspond to the growth in Welsh-medium education that will have to be secured in order to achieve the 2031 milestone of the trajectory to 1 million. Therefore, the statutory system of Welsh in Education Strategic Plans is based on interweaving school administrative data and census data to realize the Welsh language and education strategies of the Welsh Government.

The Well-being of Future Generations (Wales) Act 2015 establishes seven well-being goals to ensure that everyone endeavours to reach the same goal. One of the well-being goals that public bodies are required to work towards achieving is 'A Wales of vibrant culture and thriving Welsh language'. To measure progress towards this goal the Welsh Ministers are expected to publish national indicators. These are the national indicators relating to the Welsh language:



36. The percentage of people who speak Welsh daily and can speak more than just a few words of Welsh

37. Percentage of people who can speak Welsh.

Census data is the basis for measuring long-term progress against these indicators together with survey data: [Well-being Wales: national wellbeing indicators | GOV.CYMRU](#).

A question about the Welsh language has been included in the census since 1891 and the long-term and constant nature of the census is key to its value in the field of language planning. When trying to understand the linguistic patterns of communities in Wales, it is necessary to understand the nature of linguistic change over a period of time. Data from previous censuses is used to provide context to the change in linguistic patterns, and to show a decrease or increase over a period of time. This longitudinal data is essential evidence for policy makers and service planners. It also allows statisticians to produce projections of what could happen in the future to the Welsh language and the communities where it is spoken.

It is also interesting to note the psychological and practical effects of publishing census results every decade. They are eagerly awaited every ten years and are often a significant trigger for revising language policies in Wales. This is the yardstick for measuring the effectiveness of the interventions of the past decade, and for setting priorities and the direction of future efforts. For example, the worrying trends in the 2011 Census were a trigger for a national discussion about the position of the Welsh language as the Ministers acknowledged in the foreword of *Cymraeg 2050: A million Welsh speakers*:

The 2011 Census results presented us with an opportunity to have frank conversations and re-evaluate the future that we want to see for the language. Things need to change. We need to renew our energy, be systematic in our approach to planning, and improve collaboration in order to secure the legacy our language deserves.

The 2011 results were also a trigger for several local authorities to tackle the decline strategically before the introduction of the promotion standards. Carmarthenshire Council



announced comprehensive [statistical research](#) on the position of the Welsh language in the county in 2014, for example, which led to [detailed strategic planning](#) for the language. However, that does not detract from the need for more regular data than every ten years about the Welsh language to get a vivid picture of the position of the Welsh language locally and in the community. See our comments below in this regard.

3. The need for more than measuring the number and percentage of speakers

Although numbers and percentages grab the headlines, a central part of the value of the census is the detailed data it gives us about the characteristics of these speakers. The census gives us the once in a decade opportunity to get a complete picture of who exactly speaks Welsh. It enables us to combine data about different characteristics together in order to better understand the life circumstances of Welsh speakers. The level of detail possible is highlighted by the fantastic data set creation resource that the ONS has released which allows us to ask questions as specific as how many Welsh speakers aged 35–49 live in Cardiff, who are in work, who travels to their workplace by bicycle.

The consultation document recognizes that this local and specific data can only be produced once every decade at the level of small geographies. Between censuses the ONS collects data about some of these characteristics and through surveys which are sufficient to produce estimates at a regional level. But you recognize that this 'limited detail' affects your ability to provide 'strong evidence' to decision makers in the years between censuses (p. 26). In many cases at present, surveys do not allow the ONS to go further than the regional level. The consultation document explores how the use of administrative data alongside surveys has the potential to fill some of this gap for a number of characteristics at local authority level, and possibly lower. However, it is not clear how this could be done for the Welsh language – an area where data is needed at the level of the smallest geographical areas.

This ability to scrutinize data at the level of small areas is one of the main qualities of census data. This is particularly true in the context of the Welsh Government's decision to



establish a Commission for Welsh-speaking Communities in August 2022. The Commission was established with the aim of making recommendations in order to strengthen Welsh communities, and prevent the decline that can be seen in the position of the Welsh language in its strongholds. The census data gives us amplification on these areas. One of the [Commission's initial recommendations](#) is that areas of linguistic significance (higher density) should be designated. Designating such areas would allow policy diversity and policy emphasis in favour of Welsh as a community language. The Commission emphasizes the importance of statistical evidence (and census data in particular) as a basis for defining such areas, and also as a way of measuring the impact of different interventions and policies in the future. The type of detailed data available in the census is an essential basis for the Commission's work, especially as the focus of the Commission's policy recommendations will be the relationship between the Welsh language and other areas such as education, housing, the economy, work, and migration and emigration trends. It should also be emphasized that having more frequent and detailed data about the position of the Welsh language would be a huge advantage from the point of view of the Commission's work. It is likely that many of the policy interventions that will result from the commission's work will be experimental in nature, and therefore being able to measure impact more quickly and more consistently will be advantageous.

The census data is also a vital source for us regarding the transmission of language between the generations as this publication testifies: [Welsh language composition of households in Wales \(Census 2021\) | GOV.WALES](#). The importance of language transmission in the home to language viability is acknowledged and the Welsh Government has a [National policy on Welsh language transmission and use in families](#). The census data about language transmission in families will have important implications for the trajectory to 1 million speakers.

The other big need we have in Wales is data about language use. Unlike the census in Ireland, for example, the census data does not currently meet this need or provide a means of measuring the second target of the Government's strategy, namely:



The percentage of the population that speak Welsh daily, and can speak more than just a few words of Welsh, to increase from 10 per cent (in 2013–15) to 20 per cent by 2050.

In the absence of census data, the [Welsh Language Use Survey](#) is the starting point for the Welsh Government to measure progress against this target. The last full survey was carried out between 2013–15 and was jointly commissioned by the Welsh Government and the Welsh Language Commissioner. A subsequent Language Use Survey was started in July 2019 funded by the Welsh Government, but the survey had to be brought to an end early in March 2020 owing to the pandemic. This means that there are obvious limitations to the value of the survey, including the fact that the sample is not sufficient to include estimates at local authority level. This, together with the fact that there is no regular timetable for carrying out this all important survey, is an issue that would be beneficial for the ONS to work with the Welsh Government to resolve as part of the current discussions.

4. Welcoming more frequent data about the Welsh language

However, there are disadvantages linked to the fact that these detailed data about Welsh speakers are only published once every decade. We accept that keeping the current model for producing population statistics and social statistics would mean that the next comparative data would be available in 2033. The Commissioner welcomes the fundamental objective of the ONS to provide statistics at local authority level each year. We recognize the need for more frequent data in order to respond quickly to changes and trends, but the Commissioner would not support doing so at the expense of the wealth of existing data.

In this context we welcome further discussion regarding the possibilities that exist in terms of developing data about the Welsh language in the future. As you know, there is already a range of detailed data about the Welsh language in the area of education, especially for the statutory education period. It is fair to argue that this data gives us a more detailed, authentic and reliable picture of the situation of the Welsh language in relation to children and young people than is found through surveys. That is to say, data about numbers attending Welsh-medium or bilingual schools, or data about the language medium of



qualifications that pupils study, provide a detailed and consistent picture of the situation of the Welsh language at national and local levels. Despite this, this detailed data is limited to the education sector in particular, and therefore gives an insight into the position of the Welsh language only among children and young people.

It is interesting to note that the Welsh Government recently published a white paper on their proposals on a Welsh Language Education Bill. One of the white paper's proposals is to establish a lifelong Welsh language continuum that would emulate the Common European Framework of Reference (CEFR) of language levels. The Government notes there that it considers the continuum 'as a single line of linguistic skills, and it will be possible to map all learners and speakers (regardless of age and proficiency) onto that line'. The intention behind establishing the continuum is that this would not only be a common framework for defining, describing and assessing the Welsh skills of individuals, but that it would also be a mechanism for linguistic planning. The white paper proposes to make the target of one million Welsh speakers by 2050 a statutory target, and link it directly to the education system in Wales. The proposal is that the Bill will set an expectation that the education system enables all learners to leave school as confident Welsh speakers. In order to achieve this, the intention is to set a linguistic outcome (which is equivalent to level B2 on the CEFR) as an objective and goal for all schools in Wales in the future.

It is very important to consider the significance of these proposals in the context of the future of statistics about the Welsh language. The Bill proposes to develop a statutory framework that will enable the linguistic skills of individuals to be described in a much more detailed and specific way than is currently possible. There is also an intention to define the meaning of a Welsh speaker in relation to the continuum, that is a speaker who reaches a proficient level equivalent to B2 on the framework. It is also intended that this would be a lifelong continuum, and there is therefore a possibility that the framework will be used in further education colleges, universities, lifelong learning, and within workplaces. Obviously, there are exciting possibilities of moving in this direction, but you also have to be wary of any unintended consequences. For example, the scope of the vision that exists for the Welsh language is not a million B2 speakers, it is much more than this. When considering



the future of Welsh language statistics, we must ask fundamental questions about the purpose of collecting this data in the first place: what exactly do we wish to measure, and how can this be done in a way that facilitates the basic purpose?

Page 35 of the consultation document gives some general attention to population statistics in other countries. I wonder to what extent you have studied how other countries collect data about languages and their speakers? We are aware of several alternative models that collect more frequent data about speakers. For example, the [Sociolinguistic Survey](#) which is held in the Basque Country every five years and which addresses attitudes, ability, use and linguistic transmission.

5. Change is premature

We welcome the fact that the ONS recognizes in the consultation document the importance of statistics about the Welsh language for users of statistics in Wales and its commitment to collaborate with the Welsh Government to identify appropriate sources to produce these statistics in the future.

Currently, the ONS places the Welsh language firmly in the category of subjects where further research is needed. The table on page 26 places the Welsh language in the category of subjects where 'exploratory' research has taken place to date and a perception that 'partial' evidence from administrative data sources is available. It does not detail the nature of that evidence, but it should be emphasized that the Commissioner does not consider the data obtained from school censuses as sufficient since it only focuses on one age group. Until this research has been carried out and satisfactory solutions have been found it is premature for us to offer a response or draw final conclusions.

It should also be emphasized that we do not consider data about the Welsh language in a vacuum. As emphasized in point 3 above being able to understand these data in the context of other characteristics is crucial. It is a matter of real concern to us, therefore, that so many other characteristics which help us to understand who speaks Welsh are placed



in the 'restricted' category in the table on page 26, including key areas such as national identity, occupation and religion.

This gives us further concern since being able to identify Welsh speakers who also have protected characteristics is a policy priority in Wales. As such the discussion of ethnicity statistics in the consultation document is of particular concern. It identifies differences in the ethnicity statistics based on administrative data, including higher percentages of those in the white ethnic group, and lower percentages of those in the Asian, black and other ethnic groups. This is a real concern for us as we are interested in obtaining information about relatively small groups of Welsh speakers within these ethnic groups in order to realize central policies, such as the [Anti Racist Wales Action Plan](#).

We have been aware for a while of the significant and fundamental difference between the results of surveys about the number of Welsh speakers and the results of the census. The Welsh Government has consistently and emphatically declared that the data from the Annual Population Survey cannot be used to assess progress towards achieving the goal of having one million Welsh speakers, for example: [Chief Statistician's update: a discussion about the Welsh language data from the Annual Population Survey | Digital and Data Blog \(gov.cymru\)](#). The results of the 2021 Census have once again highlighted the differences between this survey data and the census results and we welcome the [work plan](#) you have published together with the Government to improve your understanding of the main sources of administrative data and surveys used to compile statistics on the Welsh language. This work plan is for 2023–24 'and beyond' and will expect the ONS and others to pay due attention to its findings and conclusions before determining the future of collecting statistics on the Welsh language. The current timetable for the National Statistician's recommendation about the future of the Census makes this impossible.

There is also room to question whether we should move from the current model now as the last census was carried out during the unprecedented period of the COVID-19 pandemic. Users were warned of the extraordinary context of the census many times. For example, when presenting the data about [Welsh in Wales](#) the Welsh Government emphasizes that:



The 2021 Census was conducted during the coronavirus (COVID-19) pandemic on 21 March 2021. This followed periods of restrictions on movement, distance learning for many children and many people were working from home. We do not know how the pandemic affected the way people reported their Welsh skills (or their perceptions of other people's Welsh skills).

Therefore, to what extent can Census 2021 be used as a yardstick? It would give users more certainty if a fundamental and significant change to the procedure for collecting data came following a census carried out in an ordinary context.

6. Support in planning for the future

In summary then, we naturally welcome the aim of the ONS to produce 'better statistics', releasing them more quickly than at present. The consultation document outlines the great strides you have taken to provide better population estimates, providing them faster and more frequently. However, it is not yet clear that the proposed changes are going to guarantee 'better statistics' in general, and specifically for the Welsh language. On the contrary, there is a great danger that not carrying out a census would lead to less comprehensive and reliable data about Welsh speakers. Indeed, there is a risk that this change would mean that data about the Welsh language would not meet the quality measures of the ONS itself, specifically in relation to accuracy, geography and detail. We need assurance that these requirements can be fully met, as well as the general demand for better data about the Welsh language and its speakers before moving from the current model.

We recognize, of course, that we should not be satisfied with standing still and that there is a need to continuously explore alternative and innovative methods and routes to data of the same quality – if not better – than what we receive through holding a census every decade. We see exciting potential in being able to access data on a variety of topics that are not currently covered by the census questionnaire, for example income. But the National Statistician's own foreword acknowledges that this field has not fully matured yet



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and that we are waiting to see administrative data 'reach their full potential over the next decade'. This in itself strongly suggests that it would be wiser to wait until after the 2031 Census to make far-reaching decisions about change.

The consultation document also acknowledges the way the census has *evolved* over time. Our view, in view of the points stated above, is that the census should continue to evolve for the time being, taking advantage of the 'significant developments in data science and computing capability' (p. 1) which the consultation document reports on to further support this evolution. We are proud of the constant opportunities to collaborate and engage with you as you plan each census – from being members of a task and finish group that provided expert advice on the wording of the Welsh questionnaires to being active members of the Census Advisory Group in Wales. We trust that it will be possible for this close collaboration to continue as you plan the next steps to meet the statistical needs of Wales.

Yours sincerely

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