



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Social media monitoring surveys: Health Sector Organisations (Welsh Language Standards Regulations No. 7)



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1 Introduction

- 1.1 This year, we have reviewed our arrangements for monitoring and regulating public bodies' compliance with their language duties, to ensure they align with the aims of the Strategic Plan and the Regulatory Outcomes published in 2024-2025.
- 1.2 As part of this review, we considered what changes and alternative approaches were needed to make the best use of our resources, and to promote compliance in a more proactive way.
- 1.3 We were keen to develop monitoring and promotional methods that would provide us with greater assurance regarding organisations' compliance. It was decided to plan quarterly monitoring surveys, with results reported back to individual organisations within the same quarter.
- 1.4 One of the key advantages of this monitoring approach is that organisations are informed of any compliance issues in a timely manner throughout the year, giving them the opportunity to implement appropriate solutions promptly.
- 1.5 Social media has been identified as a priority area for all organisations this year. This is due to the fact that organisational practices in this area have evolved significantly over the past four years, with increasing use of a variety of platforms.
- 1.6 This report provides an overview of the findings from the monitoring surveys conducted with organisations subject to the Welsh Language Standards Regulations No.7 and presents recommendations for you to consider to ensure better compliance within your organisation.
- 1.7 In addition to this report, individual findings will be discussed with each organisation to offer tailored feedback and support specific improvement actions.

2 Methodology

- 2.1 A total of 10 organisations subject to the Welsh Language Standards Regulations No. 7 were inspected.
- 2.2 The organisations were inspected during July 2025.
- 2.3 Regulations No. 7, the Welsh Language Standards Regulations that apply to this sector, include two standards, standard 45 and standard 46 which refer to organisations' use of social media.
- 2.4 Standard 45 states '*When you use social media you must not treat the Welsh language less favourably than the English Language*'.
- 2.5 Standard 46 refers to responding to people on social media - '*If a person contacts you by social media in Welsh, you must reply in Welsh (if an answer is required)*'.
- 2.6 These surveys focused on compliance with standard 45.
- 2.7 Each organisation has an exception under standard 45 which states the following:
When you use social media you must not treat the Welsh language less favourably than the English language.
You must comply with standard 45 in the following circumstances:
 - *when using social media on your corporate and departmental accounts.*
- The main corporate accounts of all the organisations were checked on Instagram and LinkedIn as the Commissioner has not previously monitored these platforms. In addition, one departmental sub-account was checked on Facebook and X, as the main corporate accounts on those platforms had already been checked in previous surveys. The aim of the process was to examine new accounts and collect different data. Not all organizations had relevant sub-accounts on Facebook and X, either because they did not exist, or because they were not prominent enough to be discovered and therefore not promoted.
- 2.8 We checked 10 posts for each account on each platforms where a relevant account existed. All 10 organisations had corporate accounts on Instagram and LinkedIn. A departmental sub-account was found for 7 organizations on Facebook, and for 8 organizations on X.
- 2.9 A total of 350 messages were checked assessing:
 - Whether the message was available in Welsh
 - Whether the message complied with standards requirements relating to social media
 - Whether Welsh was treated less favourably than English
- 2.10 In addition, compliance with standard 62 relating to corporate identity was also checked. Standard 62 states '*When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.*'

3 Findings

Corporate Instagram accounts

- 3.1 Every organisation had a corporate account on Instagram. Half of them operated separate Welsh and English accounts, while the other half used one bilingual account
- 3.2 We checked 100 posts on Instagram, 10 for each organisation.
- 3.3 80% of the organisations complied with the corporate identity requirements when using Instagram, specifically in terms of including a description or profile picture for the account. A few examples were seen where the account name was only in English, although the rest of the content complied.
- 3.4 Compliance was very high overall, with 82% of posts available in Welsh and corresponding to the English version, across the whole sector. Only 3% of posts were in English only.
- 3.5 One obvious pattern was the lack of Welsh speakers or contributors in videos. Although the captions and text of the video were in Welsh, and Welsh subtitles were included more often than not, including more Welsh contributors would be a further step towards ensuring that the Welsh language is not treated less favourably than English.
- 3.6 We recognise that securing Welsh speakers on all occasions can be challenging, and in some circumstances, it may be necessary to convey a message directly from a person who does not know Welsh, e.g. an expert or Chief Executive. However, there were no instances where the messages checked required this type of provision, such as messages of an urgent nature or messages where the speaker is essential to the message. This underlines the importance of including Welsh speakers where possible, in order to ensure equal treatment for the Welsh language
- 3.7 For those who had separate Welsh and English accounts, 80% of the English accounts included a link to the Welsh account.

Corporate LinkedIn accounts

- 3.8 Every organisation had a corporate account on LinkedIn.
- 3.9 Seven organisations had a bilingual account, one organisation had separate English and Welsh accounts, and one organisation had an English-only account.
- 3.10 We checked 100 posts on LinkedIn, 10 for each organization.
- 3.11 The main challenge in using LinkedIn was to comply with the corporate identity requirements. Only two organisations fully complied with these requirements. Bilingual accounts often used a monolingual English name and profile page, even though the messages themselves were bilingual and therefore compliant.
- 3.12 76% of the posts were available in Welsh in full and corresponding to the English version. 16% of the messages were available in English only.

Facebook departmental sub-accounts

- 3.13 A departmental Facebook sub-account was found for 7 organisations. Although more sub-accounts may exist for the other organisations, they were not easily found. It would be necessary to check directly with those organizations to confirm. The nature of the accounts varied, but a number of maternity services accounts were checked, suggesting that the majority of Health Boards have such departmental accounts.
- 3.14 A total of 70 messages were checked on Facebook, 10 for each relevant organization.
- 3.15 There was considerable variation in compliance across the sector. Three of the accounts were in English only and therefore fail to comply with the requirements of the social media standards. Three were bilingual accounts, and one was a separate Welsh account.
- 3.16 Only the separate Welsh account fully complied with the requirements. The majority of the bilingual accounts used a monolingual English name or description, although the content and messages were bilingual.
- 3.17 55.7% of the posts were available entirely in Welsh, and 32.8% were not available in Welsh at all – which reflects the fact that some of the accounts were English only. 32.9% of the posts treated Welsh less favourably than English, mainly because the post was in English only, or the caption was bilingual but the picture/graphic attached was in English only.
- 3.18 One of the challenges in checking departmental sub-accounts on Facebook was determining whether the account came under the direct control of the relevant organisation or was run by a third-party. This highlights the need for organisations to ensure that their third-party providers are fully aware of the requirements of the standards, and act in accordance with them. Robust arrangements should be in place to monitor and ensure compliance as part of any agreement with external providers

X departmental sub-accounts

- 3.19 A departmental sub-account was found on X for 8 organisations. Although more sub-accounts may exist for the other organisations, they were not easily found. It would be necessary to check directly with those organisations to confirm. The nature of the accounts varied – including recruitment accounts, opinion seeking, and research departments.
- 3.20 A total of 80 X posts were checked, 10 for each relevant organisation.
- 3.21 There was some variation in compliance across the sector. Five of the accounts were bilingual, one was a separate Welsh account, and 2 were English only accounts.
- 3.22 Three of the accounts fully complied with the corporate identity requirements. The rest did not comply, mainly because the name and description on the account were in English only.
- 3.23 62.5% of the messages were available fully in Welsh, while 32.5% were not available in Welsh at all. 38.8% of the messages treated Welsh less favourably than English, mainly because they were in English only, or because the attached graphic or picture only contained English text.

4 Trends

Corporate identity

- 4.1 In general, the sector complied very well on Instagram and LinkedIn, with the majority of posts on corporate accounts available in Welsh and corresponding to the English version. The main challenges on these platforms were compliance with corporate identity requirements – especially on LinkedIn, where most of the accounts used an English only name and profile page – and a lack of Welsh contributors in videos. Overall, captions and pictures were the main medium for posts, with a very low number of videos being used.
- 4.2 The results of the monitoring varied among the sub-accounts examined on Facebook and X, reflecting the nature of the accounts rather than the organization responsible for them. General problems were seen in terms of corporate identity, with many accounts using English only names and descriptions, although the content itself was in some cases bilingual.
- 4.3 When presenting corporate identity, it was found that 60% of the accounts checked treated Welsh less favourably than English. Examples were seen where the logo, name and/or "handle" of the account was in English only, and the information in the profile was in English only or contained less information in Welsh than in the English version. Although there are restrictions on the length of text in profile sections on some platforms, this underlines the need to consider the Welsh language when creating the accounts and when compiling the profile text, in order to ensure that all relevant information is available in Welsh

Not treating the Welsh language less favourably than English

- 4.4 The survey showed that 80.6% of posts fully or partially comply with the standard, while 19.4% failed to comply. This failure resulted from various factors, but the most obvious reason was a less favourable treatment of the Welsh language - for example, when there was more text on the English version, or when the caption was bilingual, but the attached picture or graphic was in English only.
- 4.5 The Code of Practice for Regulations no. 7 sets out a number of factors that can lead to less favourable treatment, including:
 - the appearance of the material (in relation to colour, size, font and format)
 - Language of Material
 - Language order of the material
 - quality of material
 - location and prominence of the material
 - when and how the material will be published
 - clarity and accuracy of the material
 - content of the material

Videos and audio clips

4.6 There were not a large number of videos across the social media accounts examined. When videos were available, the speakers or contributors often only spoke English, with the video containing Welsh subtitles. Despite this, in the majority of cases, any text in the video itself - such as graphics or labels - was available in Welsh.

4.7 The Code of Practice for Regulations no. 7 states the following:

'A body may be treating the Welsh language less favourably than the English language if the Welsh language version of the video clip is:

- using Welsh language subtitles when another person could have made an equivalent contribution in Welsh*
- using Welsh language subtitles where it would be possible to include a Welsh language voiceover, or*
- using Welsh subtitles on an English contribution on the clip – if there is no Welsh contribution on the equivalent English clip subtitled'.*

5 Conclusion and Recommendations

- 5.1 The social media standard for Regulations no. 7 specifically refers to the requirement not to treat the Welsh language less favourably when using social media. All organisations subject to these regulations have an additional exception that limits the duty to corporate and departmental accounts. In practice, this means that most accounts fall within the scope of the standard and are therefore subject to the requirements.
- 5.2 The sector performs very well in general on their corporate accounts. The Commissioner has monitored the main accounts on Facebook and X in the past, with generally positive results. Looking at new platforms this year - such as Instagram and LinkedIn - this positive pattern continues
- 5.3 However, levels of compliance vary among the departmental sub-accounts. It is assumed that there are various reasons for this, including the fact that specific teams are responsible for these accounts rather than the central communications team, which can make monitoring and ensuring consistency more challenging. One of the main areas of weakness on the sub-accounts is compliance with corporate identity requirements, particularly in terms of account names and descriptions.
- 5.4 As standard 33, which relates to publicity and advertising, also applies to activity on social media, it is important that any videos or posters comply with the requirements - that is, that they are bilingual and do not treat the Welsh language less favourably. Our code of practice offers further advice on how to comply in this area, and we are currently developing additional simpler and more accessible resources to help organizations comply specifically in this area.
- 5.5 Based on the findings of the survey, we present the following recommendations to the organisations subject to the Welsh Language Standards Regulations No. 7:

Recommendation 1: Corporate Identity

Organisations should take steps to promote Welsh identity on their social media accounts. It should be ensured that the same level of information is available in the Welsh versions of the organisation's details - such as name, description, type of organisation, and contact details.

Recommendation 2: Videos

Organisations should consider including more Welsh speakers in videos. Although this is not always possible or appropriate - especially when the content is specialist - more general videos, for example those containing patient experiences or public information, would benefit from Welsh contributors. This would also reduce the need for voiceover or subtitles.

Recommendation 3: Consistency when posting on social media

Organizations should check before publishing messages that the Welsh language appears first, and that the Welsh text is correct in terms of meaning and expression and conveys the same message as the English text.

Recommendation 4: Monitoring arrangements

Organizations should strengthen their self-regulation processes by ensuring that all social media accounts, including any sub-accounts, comply with the relevant standards. This means providing clear guidance to staff who post, regularly monitoring content, and ensuring linguistic consistency and a high standard of translation between Welsh and English.

Appendix

Appendix 1

Survey data

| | Facebook departmental sub-account | Departmental sub-account X | Corporate Instagram | Corporate LinkedIn | Totals and percentages |
|--|---|----------------------------------|------------------------|-----------------------|----------------------------|
| Number of organisations using the platform | 7 | 8 | 10 | 10 | 35 |
| Number and % of organisations with a separate Welsh account | 1/7 (14.3%) | 1/8 (12.5%) | 5/10 (50%) | 2/10 (20%) | 9/35 (25.7%) |
| Number and % of organisations with a bilingual account | 3/7 (42.8%) | 5/8 (62.5%) | 5/10 (50%) | 7/10 (70%) | 25/35 (71.4%) |
| Number and % of organisations with an English only account | 3/7 (42.8%) | 2/8 (25%) | 0/10 (0%) | 1/10 (10%) | 6/35 (17.1%) |
| Number and % of organisations complying with corporate identity requirements | 1/7 (14.3%) | 3/8 (37.5%) | 8/10 (80%) | 2/10 (20%) | 14/35 (40%) |
| Number of posts checked | 70 | 80 | 100 | 100 | 350 |
| Number and % of posts that were available entirely in Welsh | 39/70 (55.7%) | 50/80 (62.5%) | 82/100 (82%) | 76/100 (76%) | 271/350 (77.4%) |
| Number and % of posts that were partially available in Welsh | 8/70 (11.4%) | 4/80 (5%) | 15/100 (15%) | 8/100 (8%) | 35/350 (10%) |

| | | | | | |
|---|------------------|------------------|-----------------|-----------------|---------------------------------|
| Number and % of posts that were not available in Welsh at all | 23/70 (32.8%) | 26/80 (32.5%) | 3/100 (3%) | 16/100 (16%) | 68/350 (19.4%) |
| Number and % of fully compliant posts | 39/70 (55.7%) | 50/80 (62.5%) | 81/100 (81%) | 75/100 (75%) | 245/350 (70%) |
| Number and % of partially compliant posts | 8/70 (11.4%) | 4/80 (5%) | 16/100 (16%) | 9/100 (9%) | 37/350 (10.6%) |
| The number of posts treating Welsh less favourably than English (including in full or in part) | 23/70 (32.9%) | 31/80 (38.8%) | 18/100 (18%) | 26/100 (26%) | 98/350 (28%) |

Appendix 2

Sample institutions

Powys Teaching Health Board

Aneurin Bevan University Health Board

Swansea Bay 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

Public Health Wales NHS Trust

Welsh Ambulance Service NHS University Trust

University of Velindre NHS Trust