

Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Social Media Monitoring Surveys: Welsh Ministers, Local Authorities and National Parks (Welsh Language Standards Regulations No. 1)



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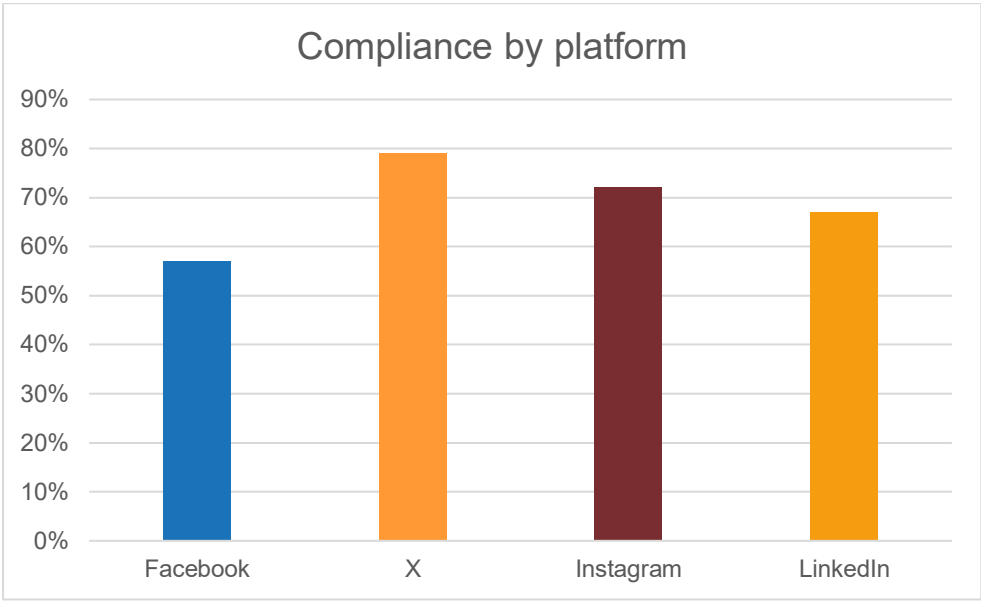
1 Introduction

- 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 because 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.1 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.
- 1.8 Although the survey was carried out with a sample of organisations only, the findings of this report, together with the recommendations, are relevant to all organisations subject to the Welsh Language Standards Regulations No. 1.

2 Methodology

- 2.1 A total of 13 organisations subject to the Welsh Language Standards Regulations No. 1 were surveyed, including 12 local authorities and one national park.
- 2.2 The organisations were surveyed during July and August 2025.
- 2.3 Regulations No. 1, namely the Welsh Language Standards Regulations relevant to this sector, include two standards—Standard 58 and Standard 59—which relate to organisations’ use of social media.
- 2.4 Standard 58 states ‘When you use social media you must not treat the Welsh language less favourably than the English language.’
- 2.5 Standard 59 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 58.
- 2.7 The platforms Facebook and X (formerly Twitter) were checked, with a focus on sub-accounts rather than the organisations’ main accounts. This was because we have checked the main Facebook and X accounts annually since 2018, and because we are receiving an increasing number of enquiries and complaints relating to sub-accounts on these platforms. For local authorities, sub-accounts for libraries and leisure services were checked (where such accounts exist). All 13 organisations included in the survey had sub-accounts on Facebook. Only eight organisations had sub-accounts on X, although there were some examples of old accounts still present on the platform but not used in recent years. For those organisations with sub-accounts, five posts from the library service account and five from the leisure service account were checked. Where there were not separate accounts for both services, ten posts from the same account were checked.
- 2.8 Accounts on Instagram and LinkedIn were also checked for all 13 organisations. The Commissioner has not previously surveyed these platforms. Every organisation used these platforms. Ten recent posts were checked on each organisation’s main account for both platforms.
- 2.9 A total of 470 posts were checked across all platforms, assessing:
 - Whether the message was available in Welsh
 - Whether the message complied with the standards relating to social media
 - Whether Welsh was treated less favourably than English
- 2.10 In addition, compliance with Standard 83, which relates to corporate identity, was also checked. Standard 83 states - ‘When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.’

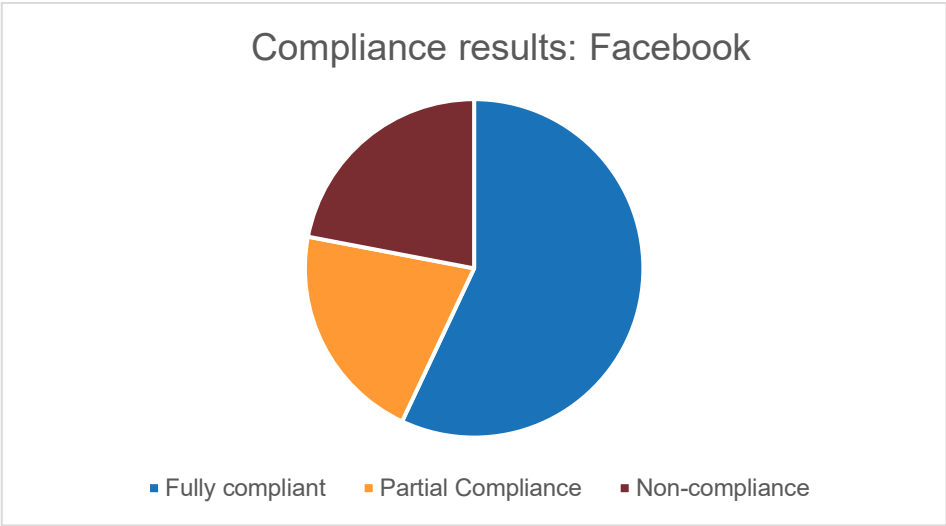
3 Findings



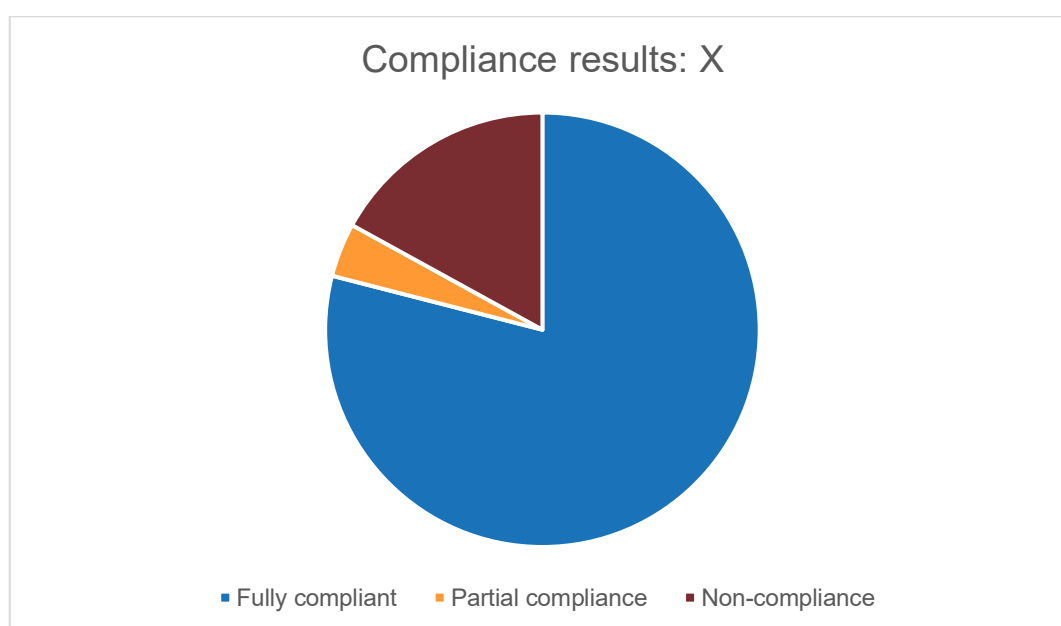
- 3.1 The surveys found that organisations achieved higher compliance when publishing messages on the X platform (79%). The platform with the lowest level of compliance was Facebook (57%). 72% of the messages checked on Instagram were fully compliant with Standard 58, while 67% of the messages on LinkedIn were compliant.

Facebook and X sub-accounts

- 3.2 This year's survey results showed that 76% of the posts checked on Facebook and X sub-accounts were fully available in Welsh. 15% of the posts checked on these sub-accounts were English only.
- 3.3 65% of the posts checked on Facebook and X sub-accounts were fully compliant with the requirements of Standard 58.
- 3.4 On Facebook, four organisations in this year's sample were fully compliant in all ten posts checked, while one organisation failed to comply with Standard 58 in all ten posts checked.

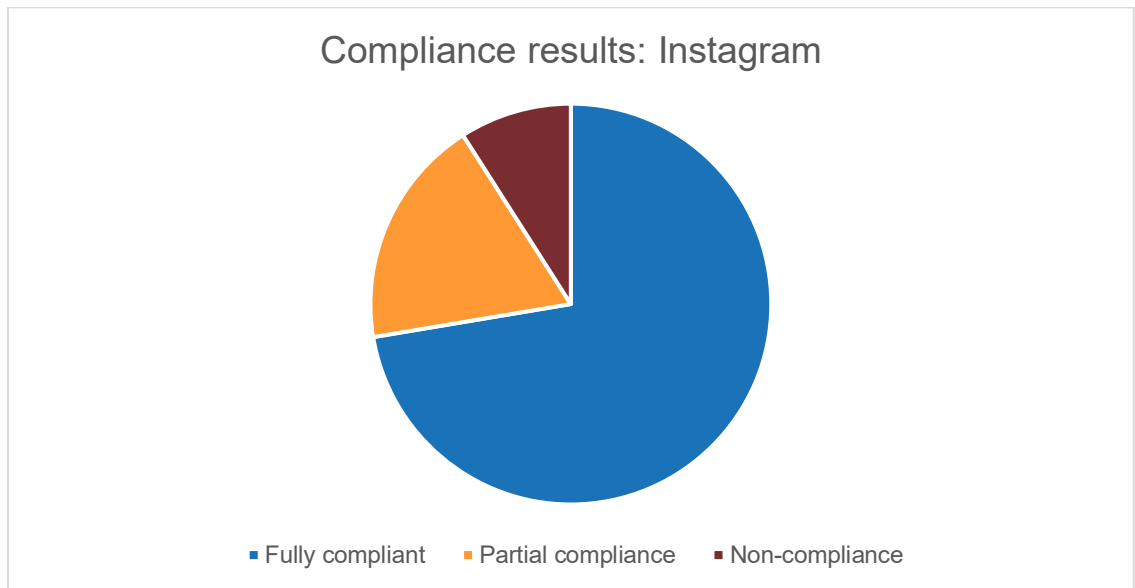


- 3.5 Only one organisation succeeded in ensuring that Welsh was not treated less favourably than English in all ten posts checked.
- 3.6 Of the 25 Facebook sub-accounts checked, four were English-only. Both sub-accounts checked for one organisation were English-only.
- 3.7 On X, two organisations were fully compliant in all ten posts checked. One organisation failed to comply with Standard 58 in all ten posts checked. Two organisations succeeded in ensuring that Welsh was not treated less favourably than English in all ten posts checked on their X sub-accounts.



- 3.8 Of the 14 accounts checked on X, one was an English-only account.
- 3.9 Overall, organisations performed better on the X platform, with 79% of posts being fully compliant, compared to only 57% of posts on Facebook. It was also noted that 34% of posts on X and 57% on Facebook treated Welsh less favourably than English.
- 3.10 Last year's (2024–2025) survey findings showed that the level of compliance with Standard 58 was high among organisations subject to the Welsh Language Standards Regulations No. 1, with 93% of posts checked being fully compliant. While compliance with the requirements was high for the main Facebook and X accounts last year, the results of the surveys on sub-accounts show a different picture and highlight the need for organisations to take deliberate steps to ensure compliance across all accounts.
- 3.11 It was noted that some of the services in question are provided by third parties on behalf of the organisation. In such cases, the level of compliance tended to be lower. This highlights the need for organisations to ensure that their third-party providers are fully aware of and familiar with the requirements of the standards in relation to social media, and that robust arrangements are in place to monitor and ensure compliance as part of the agreement with the provider.

Instagram



3.12 On Instagram, 72% of the posts checked were fully compliant with the requirements of Standard 58, and 89% of the posts were available in Welsh.

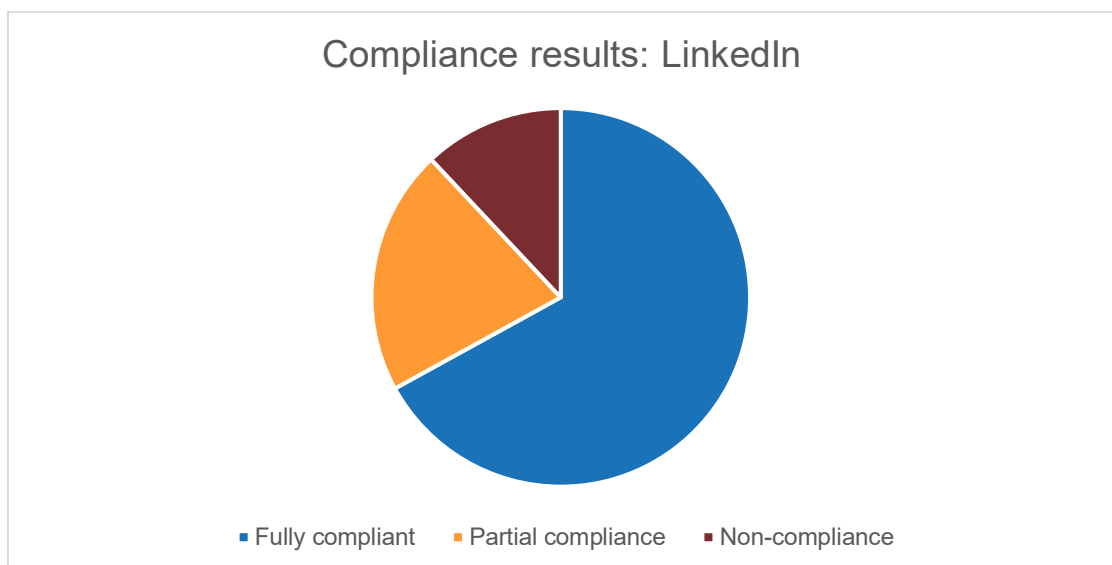
3.13 Two organisations were fully compliant in all ten posts checked.

3.14 However, it was found that Welsh was treated less favourably than English in 47% of the posts checked.

3.15 Two organisations succeeded in ensuring that Welsh was not treated less favourably than English in all ten posts checked on their accounts.

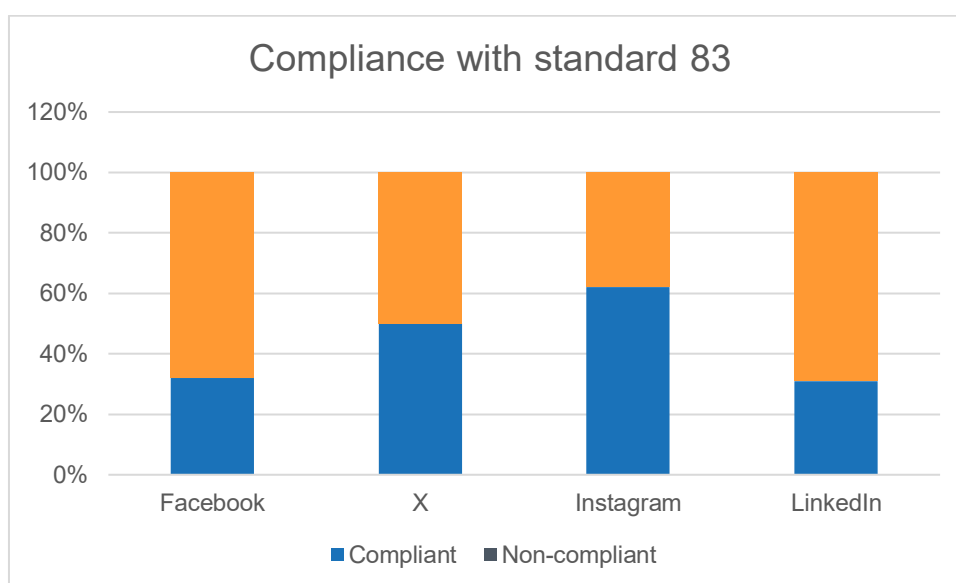
3.16 Of the 13 accounts checked on Instagram, all were available in Welsh.

LinkedIn



- 3.17 67% of the posts checked on the LinkedIn platform were fully compliant with the requirements of Standard 58, with 78.5% of the posts available in Welsh.
- 3.18 Two organisations were fully compliant in all ten posts checked. In contrast, one organisation failed to comply with Standard 58 in all ten posts checked.
- 3.19 43% of the posts checked treated Welsh less favourably than English, with only one organisation succeeding in ensuring that Welsh was not treated less favourably than English in all ten posts checked.
- 3.20 Of the 13 accounts checked, one organisation operated an English-only account, while the other 12 accounts were available in Welsh, either through a dedicated Welsh account or bilingual accounts.

Corporate identity (standard 83)



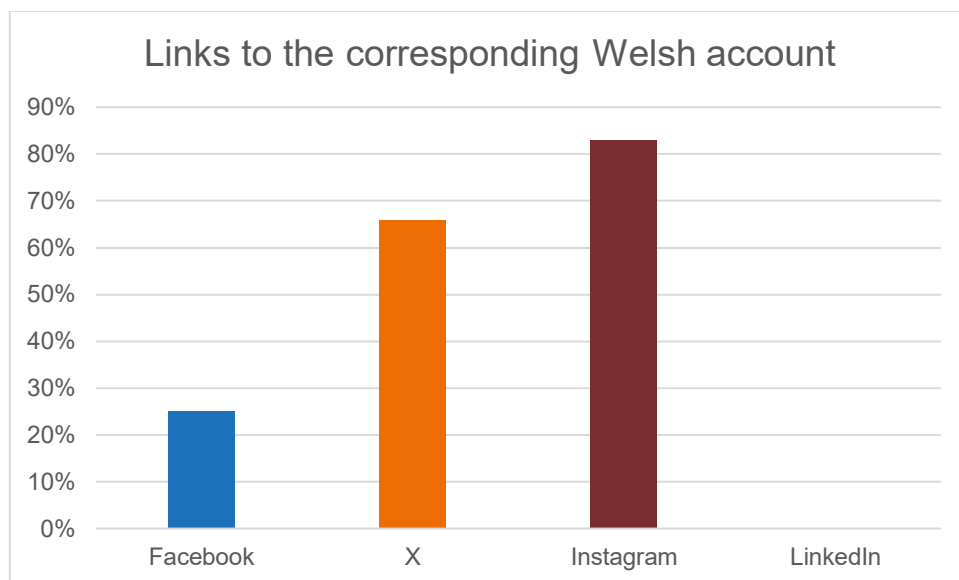
- 3.21 In terms of the requirements of Standard 83 and the duty not to treat Welsh less favourably than English when presenting corporate identity, it was found that 68% of the accounts checked on Facebook failed to comply, while 50% of the accounts on X also treated Welsh less favourably than English.
- 3.22 Welsh was treated less favourably than English when presenting corporate identity in 38% of the accounts checked on Instagram.
- 3.23 In the case of accounts on the LinkedIn platform, it was found that 69% of them treated Welsh less favourably than English when presenting their corporate identity.
- 3.24 The main reason for this was that organisations tended to use an English-only names, even though the messages published on those accounts were frequently bilingual. There were also examples where the general information within the profile was English-only, or where there was less information on the corresponding Welsh profile where organisations operated separate accounts. In the case of LinkedIn and Instagram, it was also found that the corporate profile was often English-only on bilingual accounts, or that there was less information on the Welsh account profile compared to the corresponding English account.

Raising awareness of Welsh-language accounts

3.25 The Code of Practice for the Welsh Language Standards Regulations No. 1 states –

‘If a body decides to operate separate Welsh and English accounts, it must raise awareness of the Welsh language account on its corresponding English language account in accordance with standards 81 and 82. This may include a body providing a direct link to the Welsh language account from its corresponding English language account.’

3.26 Of the 65 accounts checked as part of the survey, 16 were dedicated Welsh-language accounts (with a corresponding separate English account). Of those 16 accounts, only eight of the English accounts included a link referring to the Welsh account.



3.27 Of the 25 accounts checked on Facebook, four were dedicated Welsh-language accounts. Of these four accounts, only one included a link from the corresponding English account referring to the Welsh account.

3.28 Of the 14 accounts checked on X, three were dedicated Welsh-language accounts. Of these three accounts, two included a link from the corresponding English account referring to the Welsh account.

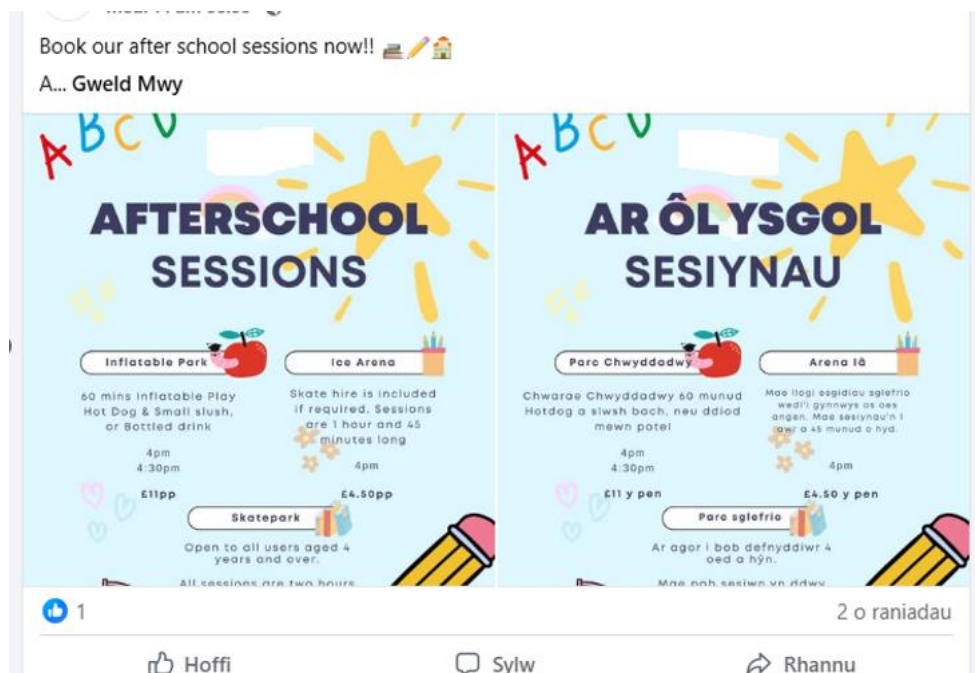
3.29 Of the 13 accounts checked on Instagram, six were dedicated Welsh-language accounts. Of these six accounts, five included a link from the corresponding English account referring to the Welsh account.

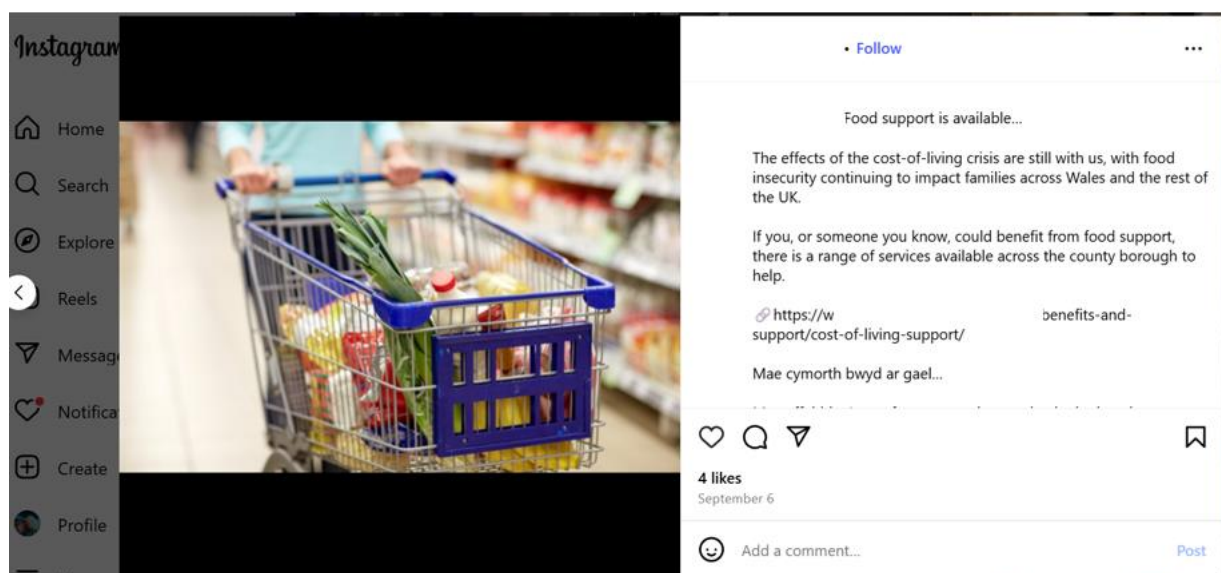
3.30 Three organisations operated separate Welsh and English accounts on LinkedIn. None of the corresponding English accounts included a reference to the Welsh account on their profile page.

4 Trends

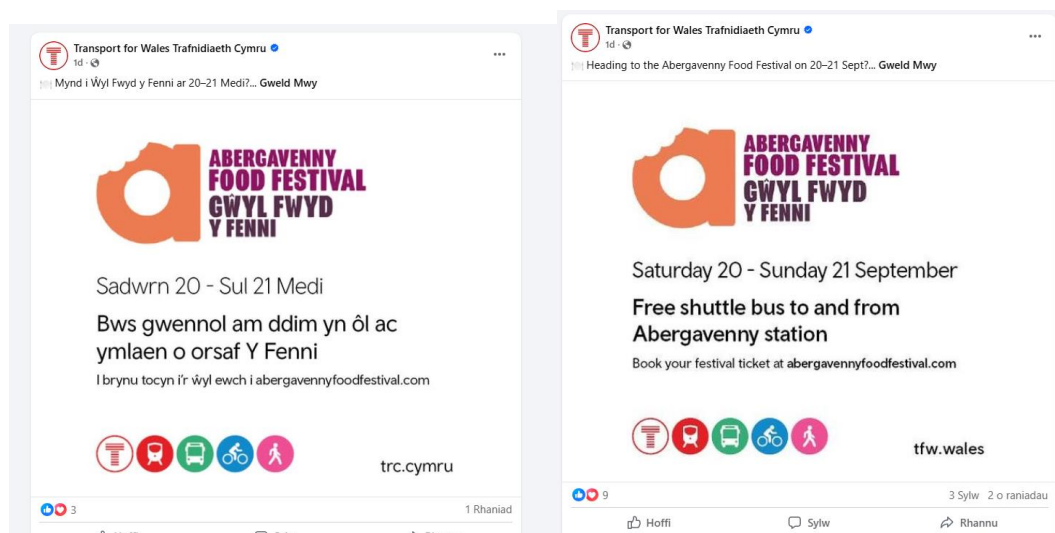
Not treating the Welsh language less favourably than English language

- 4.1 The survey shows that 17% of the posts partially complied with the standard, while 32% failed to comply. This failure was the result of a variety of different factors, but the most obvious reason was the fact that Welsh language was treated less favourably than English language.
- 4.2 A number of organisations used hashtags as part of their posts. Some examples were seen where hashtags were not part of the Welsh text and were in English only. Additionally, there were instances where links to external accounts or websites were included in English messages but not in the corresponding Welsh message. When including external links, it must be ensured that the links lead to Welsh-language content, where available.
- 4.3 It was also noted that the Welsh language content was not equally accessible or visible as the English content in a number of bilingual posts. Examples were seen where the Welsh text was placed beneath the English text. On several of these platforms, this meant that the Welsh text was not immediately visible, as users had to scroll or click a button to view the text in full, as shown in the examples below:





- 4.4 Where organisations have separate Welsh and English accounts, several examples were seen where the Welsh account did not contain the same content as the English one, with significantly more posts and content posted on the English accounts compared to the Welsh ones. As a result, those who choose to follow the Welsh account see fewer posts and notifications than followers of the English account.
- 4.5 On a positive note, examples were also seen where organisations had successfully ensured that Welsh and English messages were treated equally by posting separate messages on a single bilingual account. One such organisation was Transport for Wales (which is subject to standards imposed on Welsh Ministers). In the example below, Transport for Wales creates equivalent texts in separate messages and publishes them at the same time:



Corporate identity

- 4.6 When presenting their corporate identity, it was found that 58% of the accounts reviewed treated the Welsh language less favourably than the English language. Examples were seen where the logo, name or account handle were English-only,

and where the profile information was either entirely in English or contained less information in Welsh compared to the equivalent English text.

- 4.7 We acknowledge that there are limitations to the amount of text that can be included in the profile section of these accounts. This highlights the need to consider the need to include Welsh text when creating accounts and drafting profile text to ensure all relevant information can be included in Welsh. Examples were seen where organisations had successfully achieved this effectively:



Videos and sound clips

- 4.8 Standard 37 states –

“Any publicity or advertising material that you produce must be produced in Welsh, and if you produce the advertising material in Welsh and in English, you must not treat the Welsh language version less favourably than you treat the English language version.”

- 4.9 78 of the posts reviewed across the four platforms included videos or audio clips as part of the post.
- 4.10 57 of the videos and audio clips reviewed were available in Welsh, which is equivalent to 73%.
- 4.11 Of the 57 posts available in Welsh, 25 (44%) presented the Welsh language through subtitles or voiceover.
- 4.12 The Code of Practice for the Welsh Language Standards Regulations No. 1 states that the use of subtitles and voiceovers over English clips can result in the Welsh language being treated less favourably than English.
- 4.13 We acknowledge that ensuring Welsh speakers are available on every occasion can be challenging, and in some circumstances, it may not be reasonable or practical – for example, where a specific person is needed to convey a message directly and they do not speak Welsh. Nevertheless, organisations are expected to make

reasonable efforts to use Welsh speakers where possible, and to publish videos in Welsh when feasible.

- 4.14 Although the nature of some videos is very specific and specialised in content, a few examples were seen where organisations had successfully published a video in Welsh, including a [video](#) by the Trading Standards Department of Rhondda Cynon Taf County Borough Council warning about the dangers of counterfeit toys.
- 4.15 Examples were also seen of organisations publishing videos without dialogue, with Welsh (or bilingual) text included as part of the video. This is considered a practical and effective way of ensuring that Welsh is visible and accessible, especially in cases where using Welsh speakers may be difficult.

5 Conclusions and recommendations

- 5.1 68% of the posts reviewed as part of the survey fully complied with the requirements of Standard 58. This represents a 25% decrease compared to the findings of the 2024–2025 survey, when only main accounts were reviewed. These results suggest that the arrangements currently in place to ensure compliance of sub-accounts are insufficient. In conclusion, organisations need to review their self-regulation processes to ensure that any monitoring and checking arrangements apply the same level of scrutiny to sub-accounts as the main account.
- 5.2 The Welsh language continues to be treated less favourably than English, with 46% of the posts failing to fully comply with this duty. Using a dedicated Welsh account, or publishing a post in Welsh only, does not guarantee compliance. Consideration must be given to a wider range of factors, including the language of any videos or audio clips, the use of hashtags, visibility and accessibility, as well as ensuring that the Welsh content is of the same quality and detail as the corresponding English material. In connection with this, organisations should check the requirements of the standards relating to publicity materials when publishing content on social media accounts, in addition to the requirements of Standard 58.
- 5.3 When creating and maintaining social media accounts, organisations must consider the requirements of Standard 83 relating to corporate identity, as well as the standards relating to social media accounts. Organisations must ensure that logos, names, handles, and profile information do not treat the Welsh language less favourably than English.
- 5.4 Organisations need to take steps to ensure that any Welsh-language content or accounts are promoted in accordance with the requirements of Standards 81 and 82. Organisations should include links to the Welsh account from their website and from the corresponding English account. Welsh accounts can also be promoted through targeted campaigns, directing followers of the English accounts to the Welsh ones.
- 5.5 Based on the findings of the survey, we present the following recommendations to organisations subject to the Welsh Language Standards Regulations No. 1:

Recommendation 1: Monitoring arrangements

Organisations should review their self-regulation processes to ensure that all social media accounts across all platforms comply with the requirements of all relevant standards. It should be ensured that every member of staff who posts on social media and is responsible for the accounts used is fully aware of the standards' requirements, through the provision of guidance and instructions on using Welsh on social media.

Recommendation 2: Corporate identity

Organisations should carry out a full audit of all social media accounts they are responsible for, to ensure that the Welsh language is not treated less favourably than English when presenting the organisation's corporate identity. This includes checking logos, names, handles, and profile information.

Recommendation 3: Consistency when posting on social media

Organisations should ensure that, when publishing posts on social media, the whole content is available in Welsh—including the text, images, videos, and audio clips. It should also be ensured that the Welsh content is equally accessible and visible as the English content.

Recommendation 4: Promoting Welsh language accounts

Organisations should take steps to promote their Welsh-language accounts by including clear links from the corresponding English accounts to the Welsh accounts.

Recommendation 5: Videos

Organisations should explore alternative methods of publishing videos in Welsh, ensuring that the Welsh language is not treated less favourably than English within video content, where practically possible.

Appendices

Appendix 1: Survey data

| | Facebook: sub-account | X: sub- account | Instagram: corporate account | LinkedIn: corporate account | Totals and percentages |
|---|--------------------------|--------------------|------------------------------------|-----------------------------------|---------------------------|
| Number of organisations using the platform | 13 | 8 | 13 | 13 | |
| Number of accounts verified | 25 | 14 | 13 | 13 | 65 |
| Number and % of organisations with a separate Welsh account | 4 (16%) | 3 (21%) | 6 (46%) | 3 (23%) | 16 (25%) |
| Number and % of organisations with a bilingual account | 17 (68%) | 10 (71%) | 7 (54%) | 9 (69%) | 43 (66%) |
| Number and % of organisations with an English only account | 4 (16%) | 1 (7%) | 0 | 1 (8%) | 6 (9%) |
| Number and % of organisations complying with corporate identity requirements | 8 (32%) | 7 (50%) | 8 (62%) | 4 (31%) | 27 (42%) |
| Number of posts checked | 130 | 80 | 130 | 130 | 470 |
| Number and % of posts that were available entirely in Welsh | 95 (73%) | 64 (80%) | 116 (89%) | 102 (78.5%) | 377 (80%) |

| | | | | | |
|--|-------------|-------------|---------------|-------------|--------------|
| Number and % of fully compliant posts | 74 (57%) | 63 (79%) | 94 (72%) | 87 (67%) | 318 (68%) |
| Number and % of partially compliant posts | 27 (21%) | 3 (4%) | 24 (18.5%) | 27 (21%) | 81 (17%) |
| The number of posts treating Welsh less favourably than English <i>(including in full or in part)</i> | 70 (54%) | 27 (34%) | 61 (47%) | 56 (43%) | 214 (46%) |

Appendix 2 Videos (guidance)

Is a video clip that contains Welsh subtitles or a voice over treating the Welsh language less favourably than the English language?

This depends on the nature and content of the clip in question. Two possible examples have been noted below.

Video clips which contains a voice over, where words are narrated over pictures.

In such a clip, the words are spoken by a person whilst pictures of something else can be seen (i.e. the person cannot be seen).

If the clip on the Welsh side of the website is:

- using Welsh subtitles when another person could make an equivalent contribution in Welsh
- using Welsh subtitles where it would be possible to include a Welsh voiceover
- using Welsh subtitles on an English contribution on the clip—if there is no Welsh contribution on the equivalent English clip subtitled,

it may be treating the Welsh language less favourably than the English language.

Video clips which show a person who can be seen speaking

In such a clip, a person can be seen speaking and expressing their thoughts/opinion on their personal experiences.

If the clip on the Welsh side of the website: o uses Welsh subtitles rather than a Welsh voice over o uses an English voiceover rather than a Welsh voice over, it may be treating the Welsh language less favourably than the English language.

Appendix 3 List of organisations included in the survey:

- Vale of Glamorgan County Borough Council
- Caerphilly County Borough Council
- Merthyr Tydfil County Borough Council
- Bridgend County Borough Council
- City and County of Swansea Council
- Welsh Ministers
- Bannau Brycheiniog National Park
- Blaenau Gwent County Borough Council
- Rhondda Cynon Taf County Borough Council
- Torfaen County Borough Council
- Wrexham County Borough Council
- Powys County Council