



Rt Hon Darren Jones MP  
Chief Secretary to the Prime Minister

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05 May 2025

Dear Chief Secretary

### **Consultation - Making public services work for you with your digital identity**

Thank you for the opportunity to respond to the above consultation on digital identity. Our response will focus on issues relevant to the Welsh language, and to its speakers.

#### **Rights of Welsh speakers**

You will be aware that most public organisations operating in Wales must offer Welsh language services to the public. Some organisations implement Welsh language schemes in accordance with the Welsh Language Act 1993, while other organisations operate in accordance with Welsh language standards formed in accordance with the Welsh Language (Wales) Measure 2011. The Measure also created the post of Welsh Language Commissioner to promote and facilitate the use of the Welsh language and provided me with regulatory powers to oversee the compliance of public organisations with the Welsh language standards and schemes.

Most public organisations operating at a UK-level implement language schemes, including large bodies such as His Majesty's Revenue and Customs (HMRC) and the Department for Work and Pensions (DWP) which provide services to many people in Wales. My office is already working with officials from the Department for Science, Innovation and

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Technology to formulate a language scheme that will set out the organisation's commitments in terms of providing services through the medium of Welsh.

### A bilingual digital identity service

We welcome the fact that you have published this consultation bilingually. We were also pleased when your officials confirmed in correspondence to us that UK Government ministers had publicly stated that the following would be available in Welsh:

- All content of the user-journey in obtaining the National ID certificate, as well as user-facing content in One Login [GOV.UK](#)
- Support for Welsh-speaking users over the telephone, email and webchat with Welsh language service support agents available, as well as users of One Login [GOV.UK](#)
- The design of the final product itself will be developed in accordance with legal requirements, and you will be consulting on this.

We were therefore surprised that there was no reference to the above, or the Welsh language at all, within the consultation document. To ensure that the above is operational when the service goes live, the Welsh language should be a core design requirement for the digital identity service from the outset, and we encourage you to commit to that in any further plans that are developed before constructing the new service. The needs of Welsh speakers and the characteristics of the language need to be considered from the outset to avoid any problems and a lower quality service at a later date.

To ensure an equal service in both languages, both versions must be developed at the same time, user-testing both versions to ensure that the language used is suitable and accessible. The following resources will be of use to you when planning the new service and we ask you to give them due consideration:

- Our [advice document](#) on how to consider the Welsh language in technology, websites and software

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- Our [advice document](#) on bilingual drafting, translating and using the Welsh language face-to-face
- Our [regulatory policy statement](#) on artificial intelligence and the Welsh language (Many of the references in this document relate to Welsh language standards, but are equally relevant to organisations implementing Welsh language schemes)
- A [blog](#) about your colleagues' experiences when planning the new bilingual service for applying for lasting power of attorney.

It is not clear what is meant by 'ensuring that the design of the final product will be developed in accordance with legal requirements'. The Welsh Language (Wales) Measure 2011 states that the Welsh language has official status in Wales, and we are therefore of the view that the final design should be available bilingually to everyone in Wales and beyond.

### Joined-up public services

Part 3 of the consultation mentions the importance of effectively linking the digital identity service with other public services, to facilitate the delivery of joined-up public services. We support this ambition, and we believe that this is very relevant in the provision of services through the medium of Welsh. If an individual's choice to use Welsh is not respected, or if it results in an inferior service, then the individual is less likely to choose to use that service in Welsh again in the future.

As mentioned above, many Crown bodies already provide Welsh language services to thousands of people through their language schemes, and this should be a consideration when striving to ensure a seamless connection between those services and the digital identity service. This could mean ensuring that individuals' language choice is maintained between services, as well as thinking about how the new service could facilitate that language choice by default across Government services. As the digital identity service will be used by various users to verify the identity of individuals, the system will need to be able to facilitate the language choice of each of those users along the journey seamlessly.

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The language choice of other individuals within the process should not in any way affect the service that Welsh speakers receive.

We hope that the above comments will be useful to you in your consultation. My officers would be happy to meet with you to discuss things further.

Yours sincerely,

**Efa Gruffudd Jones**

Comisiynydd y Gymraeg

Welsh Language Commissioner

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