



Comisiynydd y  
Gymraeg  
Welsh Language  
Commissioner

# Website monitoring surveys: Justice Bodies and Fire and Rescue Services – The Welsh Language Standards (No. 5) Regulations (2016)



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# 1 Introduction

- 1.1 This year, we have reviewed our arrangements for monitoring and regulating the compliance of public organisations with their language duties, to ensure alignment with the aims of the Strategic Plan and Regulatory Outcomes published in 2024-2025.
- 1.2 We were keen to develop monitoring and promotion methods which would provide us with greater assurance regarding the compliance of organisations. A decision was made to plan quarterly monitoring surveys, with results being reported to individual organisations within the same quarter.
- 1.3 One of the key benefits of this monitoring approach is that organisations are informed of any compliance issues in a timely manner throughout the year, allowing them to put appropriate solutions in place promptly.
- 1.4 Organisation websites are a principal method of communication and a core element of users' experiences when engaging with public organisations. Given the continued increase in the use of the web and mobile devices to access information, it is essential that online provision is accessible, consistent and available fully in Welsh, in line with the requirements of the Welsh Language Standards. Although previous surveys have demonstrated an improvement in provision, we must continue to strengthen compliance, particularly in terms of updating content and ensuring that links are correct and functional, to maintain public trust and the accuracy of the services provided.
- 1.5 Over the last four years, website monitoring surveys of bodies subject to the No. 5 Regulations have shown a general trend of improved compliance with the standards. However, previous surveys have highlighted several areas that remain challenging, including the accuracy and functionality of links to Welsh language content, as well as consistency of information between Welsh and English pages. In this context, this work provides an opportunity to monitor and assess achievement and identify any weaknesses or further action needed to ensure full compliance with the requirements.
- 1.6 This report provides an overview of the findings of the monitoring surveys undertaken with organisations subject to the Welsh Language Standards (No. 5) Regulations and sets out recommendations for consideration to support and strengthen compliance within your organisation.
- 1.7 Alongside this report, individual survey findings will be discussed with each organisation involved in the work, to provide tailored feedback and support specific improvement action.
- 1.8 Although the survey was undertaken with a sample of organisations only, the findings of this report, as well as the recommendations made, apply to all organisations subject to the Welsh Language Standards (No. 5) Regulations.
- 1.9 Following the publication of the report and sharing the findings with the individual organisations, all organisations are expected to report to the Commissioner, within three months, on the action taken to respond to these recommendations.

## 2 Methodology

- 2.1 The Welsh Language Standards (No. 5) Regulations 2016 include standards relating to organisations' use of their websites, as well as promotional materials and elements of corporate identity.
- 2.2 These surveys focussed on compliance with standards specifically applicable to websites, namely standards 49, 50, 52 and 53. In addition, Standard 35 (publicity and advertising) and Standard 80 (corporate identity) were considered as part of the work.
- 2.3 Standards 49 and 50 refer specifically to organisations' use of their websites:

*“Standard 49 - You must ensure that—*

- (a) the text of each page of your website is available in Welsh,*
- (b) every Welsh language page on your website is fully functional, and*
- (c) the Welsh language is not treated less favourably than the English language on your website.*

*“Standard 50 - You must ensure that—*

- (a) the text of the homepage of your website is available in Welsh,*
- (b) any Welsh language text on your homepage (or, where relevant, your Welsh language homepage) is fully functional, and*
- (c) the Welsh language is treated no less favourably than the English language in relation to the homepage of your website.*

- 2.4 Standard 52 also states:

*“If you have a Welsh language web page that corresponds to an English language web page, you must state clearly on the English language web page that the page is also available in Welsh, and you must provide a direct link to the Welsh page on the corresponding English page.”*

- 2.5 Standard 56 states ‘*You must provide the interface and menus on every page of your website in Welsh*’.
- 2.6 Although there is no specific Code of Practice in relation to the No. 5 Regulations, the advice and clarification for the standards as set out in the Code of Practice for the No. 1 Regulations are used as an appropriate basis to interpret and identify the requirements of the relevant standards.
- 2.7 Under the Code of Practice, it is noted that an organisation does not have to repeat a statement on all English language pages that content is available in Welsh. However, the approach used must be clear and effective, such as including a “Cymraeg” button in a prominent position which navigates the user directly to the corresponding page in Welsh. Simply displaying symbols or flags does not meet this requirement.

2.8 These requirements are expected to be met on every relevant page of the organisation's website, including the homepage, new pages, and revised pages.

2.9 Standard 80 states:

*When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.*

2.10 Standard 80 requires a body to ensure that the Welsh language is not treated less favourably than the English language when forming, revising or presenting its corporate identity, including names, logos, branding, slogans and visual elements on materials such as documents, signs, vehicles and social media accounts. The Welsh language should be the same as the English language in terms of standard, quality, prominence, size, visual presentation and timescale. The standard does not apply where an enactment requires the use of a specific legal name that cannot be translated.

2.11 A body may use bilingual material or separate versions, but in the case of separate versions, the corporate identity in Welsh must appear in the English language version as well as the Welsh language version to ensure that the Welsh language is treated no less favourably than the English language.

2.12 During October and November 2025, the websites of nine organisations subject to the Welsh Language Standards (No. 5) Regulations were surveyed.

2.13 Ten pages on the website of each organisation were reviewed, including the homepage, assessing:

- to what extent the homepage and relevant pages were available in Welsh
- to what extent those pages complied with the relevant standards for websites
- to what extent the Welsh language was treated less favourably than the English language.

## 3 Findings

### The results of the survey of website compliance

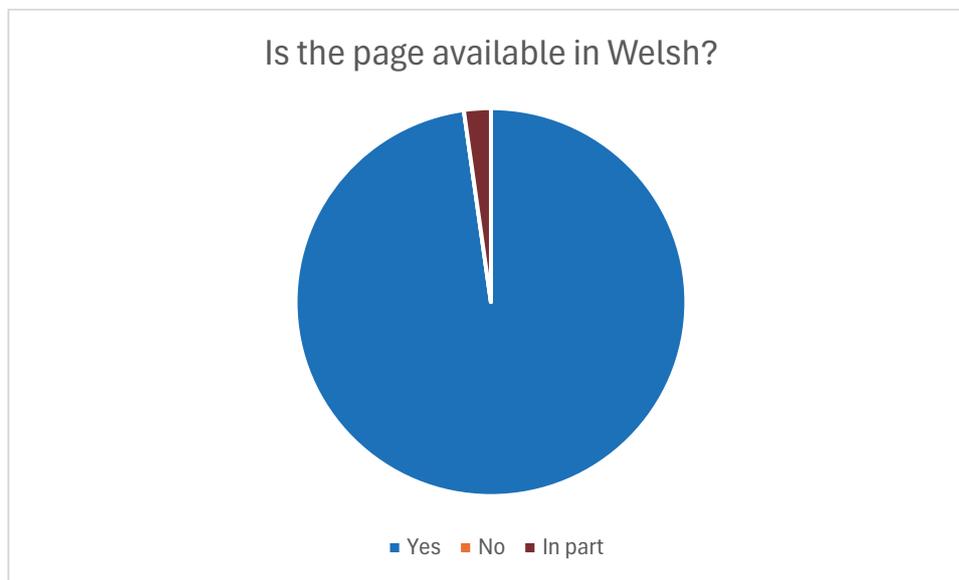
3.1 Here is a summary of the results:

- Percentage of pages available in Welsh: 98%
- Percentage of pages complying with Standard 49: 92%
- Percentage of pages treating the Welsh language less favourably than the English language: 9%
- Compliance with Standard 52: 100%

- Compliance with Standard 53: 95% - It was noted that English only buttons appeared on the Welsh language pages of one organisation.

## Analysis of Findings

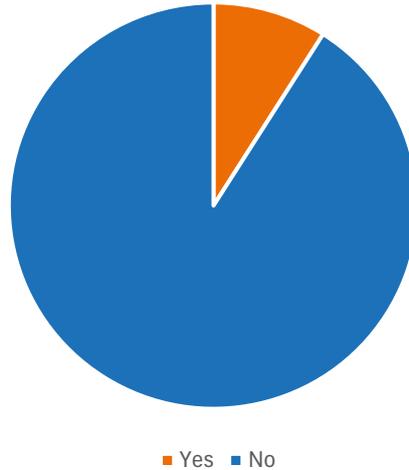
3.2 The results of the survey show that 98% of pages were available in Welsh, with 2% of pages not available in Welsh.



3.3 Of those pages reviewed as part of the survey, it was found that 9% treated the Welsh language less favourably than the English language. Examples such as the following were identified:

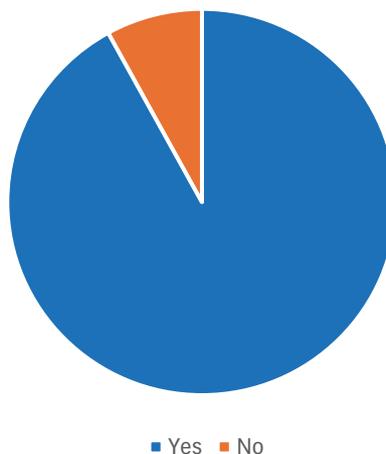
- Links on Welsh language pages to English language pages.
- Titles or text appearing in English on Welsh language pages instead of Welsh language content.

Was the Welsh language treated less favourably than the English language?

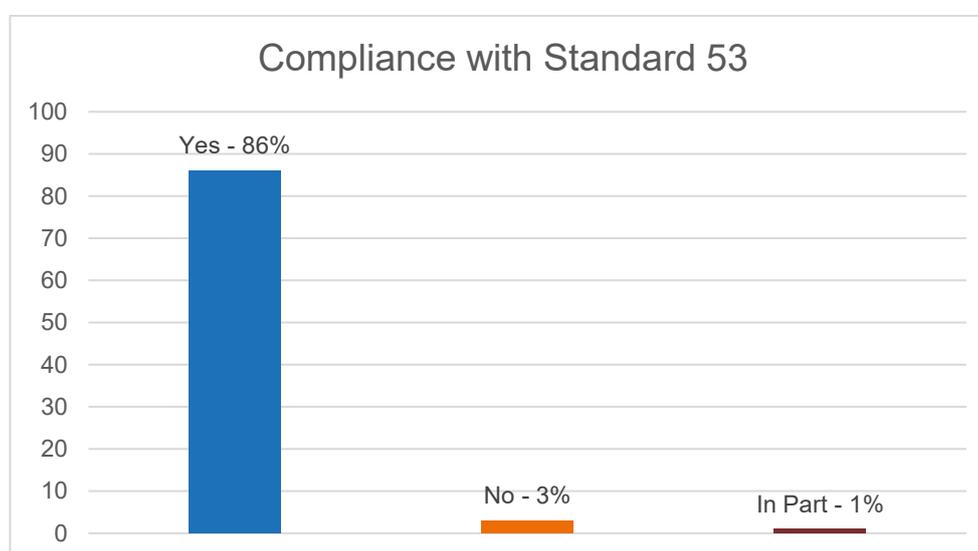


- 3.4 Examples were also seen of buttons to download specific documents on the Welsh language website which included text in English only. Additionally, on the pages of one organisation, it was noted that English only menus appeared on Welsh language pages, contrary to the specific requirements of the standards.
- 3.5 It was seen that 92% of the pages reviewed complied fully with the requirements of Standard 49. Text in English appeared on Welsh language pages on 7 (or 8%) of the pages reviewed, including links and buttons in English only which linked to information in Welsh.

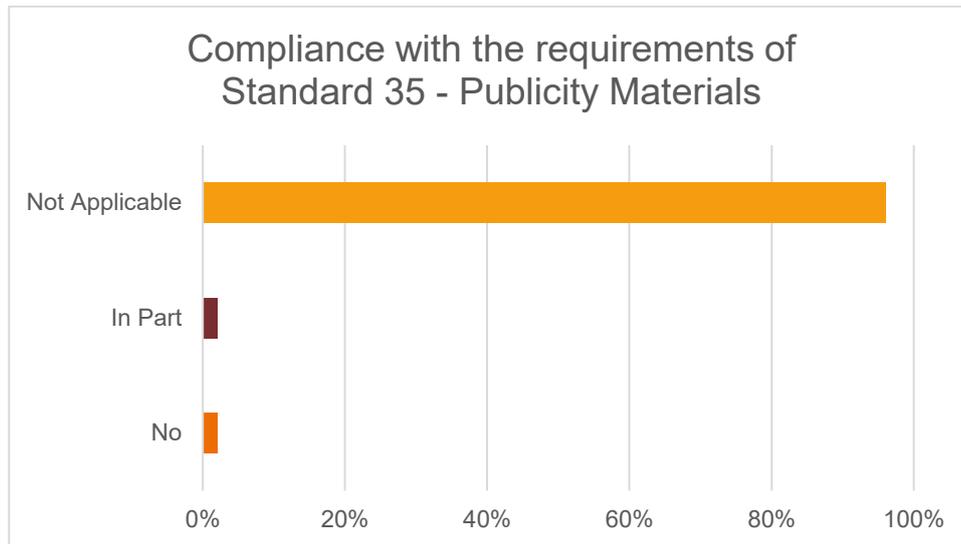
Compliance with the requirements of Standard 49  
- Text on websites



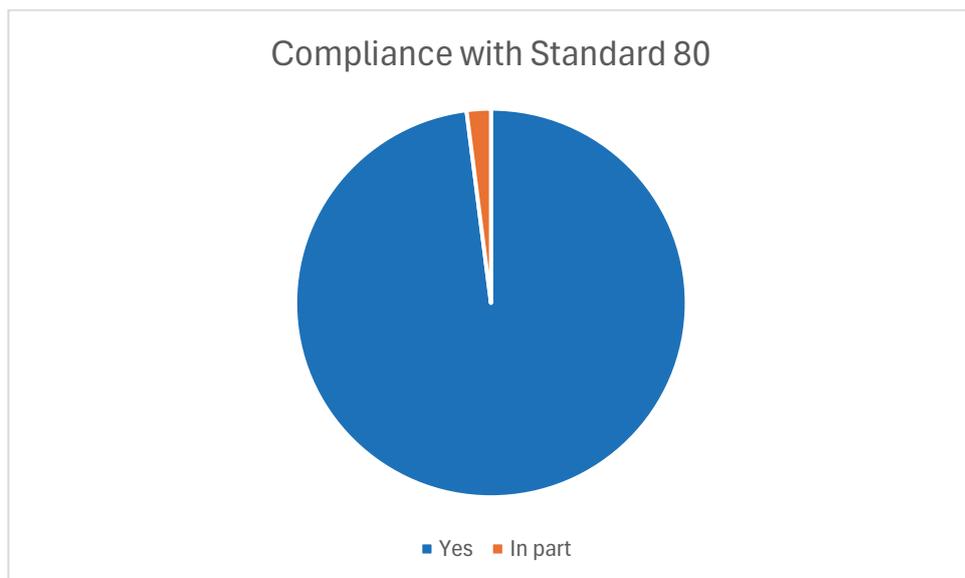
- 3.6 It was noted that 100% of the pages reviewed included a link or language choice button and, therefore, complied with the requirements of Standard 52.
- 3.7 All the 90 pages reviewed complied fully with the requirements of Standard 52, as the English language page included a link leading directly to the organisation's corresponding page in Welsh.
- 3.8 It was noted that 95% of the pages reviewed complied with the requirements of Standard 53. Four per cent of the pages failed to comply and 1% were partly compliant. All the failures to comply or cases of partial compliance were found on the website of one organisation.
- 3.9 This was due to English only buttons appearing on Welsh language pages. Although these buttons led to pages and information in Welsh, the fact that the text of the button itself was in English undermined the user experience and contravened the specific requirements of Standard 53. Consequently, organisations should check regularly to ensure that any menus and buttons on their Welsh language pages comply with Standard 53, in order to ensure a full and consistent user experience in Welsh.



- 3.10 In terms of Standard 35 relating to publicity material, only four pages were found to include such content and were, therefore, applicable to the standard. Of those four pages, two were partly compliant while the other two failed to comply. As a result, there were no examples of publicity material that complied fully with the requirements.



3.10 Regarding the requirements of Standard 80, relating to corporate identity, 98% of relevant pages were compliant. However, two pages (2%) did not comply fully. In these cases, examples were seen of names and logos in English only, or logos where the English appeared above the Welsh, as well as instances where the font of the English logo was more prominent than the Welsh version.



## 4 Trends

### Availability of Welsh

4.1 The fact that 98% of the pages reviewed were available in Welsh is encouraging and shows the organisations' firm commitment to provide Welsh language content on their websites. However, when assessing compliance with Standard 49, the percentage fell to 92%, as the Welsh language was treated less favourably than the English language on 8% of the pages reviewed. This failure was due to a range of factors, including:

- Buttons in English only on Welsh language pages, particularly for downloading documents.
- Filters or menus on some pages available in English only, creating an inconsistent experience for Welsh language users.

These examples suggest a lack of consideration of the experience of Welsh language users when planning, undermining the principles of Standards 49 and 53.

- 4.2 Although the results this year demonstrate general progress, the findings demonstrate that there is more to do to ensure full compliance with the standards, particularly in ensuring that the Welsh language is not treated less favourably than the English language.
- 4.3 One example was seen of a body using an English only name and logo on its website, contrary to the requirements of Standard 80. Although the relevant pages were available in Welsh and links led to information in Welsh, the corporate identity elements, including the logo and associated material, did not comply fully with the requirements of the standard. As a result, the Welsh language was treated less favourably than the English language in this context.
- 4.4 The Welsh language pages corresponded with the English language pages in terms of the information provided, demonstrating that a clear effort has been made since the previous website surveys to improve the presentation of information in Welsh. During the 2024-25 surveys, weaknesses were identified amongst a few organisations regarding the way in which users accessed further information, including supplementary documents and content, on the Welsh language pages.
- 4.5 In the current survey, it was noted that a significant improvement had been made to provide links to Welsh language documents and pages. This was a weakness highlighted previously and it is encouraging to see that most organisations have responded to the feedback given by ensuring that appropriate links to Welsh language content are now in place.
- 4.6 The organisations reviewed provided Welsh language pages that corresponded with the English versions and did so contemporaneously. It therefore appears that a number of organisations now have an arrangement in place to ensure compliance with linguistic requirements when creating and/or updating information on their website.

### **Organisations' Compliance with Specific Standards**

- 4.7 **Standard 35:** Failures by some organisations in presenting publicity material on their websites were identified. These included English only advertisements and pop-ups appearing on Welsh language pages.
- 4.7 **Standard 52:** All (100%) of the pages reviewed included a language choice link, which is encouraging and demonstrates that organisations are ensuring that the Welsh language is available on their websites.
- 4.8 **Standard 53:** Examples were seen of English only menus, buttons and filters on Welsh language pages. Although these elements led to pages, documents and information in

Welsh, the use of English only buttons on Welsh language pages impairs the user experience and contravenes the specific requirements of Standard 53. Organisations should ensure that the language of menus, buttons and other navigation tools is consistent with the language of the page, as an integral part of their website review and maintenance processes.

## Corporate Identity

- 4.9 It was seen that 98% of the pages reviewed complied with the requirements of **Standard 80**. Generally, logos and the presentation of the corporate identity of the organisations involved were consistent and accurate in both languages.
- 4.10 However, in one case, there was inconsistency between both languages when presenting corporate identity. Although the Welsh language was prominent on the Welsh website, the logo on the English language page was in English only.
- 4.11 All organisations need to review the presentation of their corporate identity across their websites as a result of the findings of this survey.

## Technical Matters

- 4.12 The problems identified, including the use of English only buttons and filters or English only menus on Welsh language pages, highlight the need to pay greater attention to the interactive elements of websites. These elements are essential to the user experience, and a lack of bilingualism in these elements creates practical barriers for Welsh language users.

# 5 Conclusion and Recommendations

- 5.1 The general level of compliance is encouraging. However, survey findings demonstrate that further improvement is needed, especially in relation to the visual elements and interface of websites. Following these reviews, it was noted that specific weaknesses remain that may lead to inconsistency in user experiences and to treating the Welsh language less favourably than the English language in some contexts.
- 5.3 The data demonstrates that most organisations comply with the core standards. However, consistent weaknesses remain in terms of organisations' identity and information accessibility. Although some organisations demonstrate good practice, such as providing clear links between Welsh and English language pages, and using videos or graphics in Welsh, there is room for improvement.
- 5.4 To address the weaknesses identified during the survey, the following actions are recommended:

### Recommendation 1:

Organisations must complete a comprehensive review of their websites, reviewing all interactive elements (including buttons, filters and menus) to ensure that they are available in Welsh, and that links from Welsh language pages lead consistently to pages and information in Welsh.

**Recommendation 2:**

Organisations must ensure that every page provides the same level of information in both languages, including content in links, documents, filters and supplementary material.

**Recommendation 3:**

Organisations must review their arrangements for publishing publicity material on websites, to ensure that every item is published in Welsh at the same time as English language material, and that the Welsh language is not treated less favourably than the English language, in accordance with the requirements of Standard 35.

**Recommendation 4:**

Organisations should review and strengthen their arrangements for overseeing and maintaining the content of websites, to satisfy themselves that those arrangements are sufficiently robust to ensure continued compliance with the relevant standards. They should ensure that clear mechanisms are in place to identify any errors or weaknesses, and that effective arrangements are in place to correct them promptly when identified.

# Appendices

## Survey data

	Organisation Pages Regulations No. 5
Number of pages reviewed	90
Number and % of pages available in Welsh	88 (98%)
Number and % of pages available partly in Welsh	2 (2%)
Number and % of pages that treated the Welsh language less favourably than the English language	8 (9%)
Number and % of relevant pages that complied with Standard 35	
Number and % of relevant pages that complied with Standard 49	83 (92%)
Number and % of relevant pages that complied with Standard 52	90 (100%)
Number and % of relevant pages that complied with Standard 53	86 (95%)
Number and % of relevant pages that complied with Standard 80	88 (98%)

## List of organisations that took part in the survey

The websites of the following organisations were reviewed:

- Independent Office for Police Conduct.
- British Transport Police.
- South Wales Police and Crime Commissioner.

- Dyfed-Powys Police and Crime Commissioner.
- North Wales Police and Crime Commissioner.
- Gwent Police and Crime Commissioner.
- Mid and West Wales Fire and Rescue Service.
- South Wales Fire and Rescue Service; and
- North Wales Fire and Rescue Service.