National policy on Welsh linguistic infrastructure

Consultation response form

Your name: Welsh Language Commissioner

Organisation (if applicable):

e-mail/telephone number: post@cyg-wlc.wales

Your address: Market Chambers, 5–7 St Mary St, Cardiff, CF10 1AT

Responses should be returned by **6 July** to

Welsh Language Division
Education and Public Services
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: UnedIaithGymraegWelshLanguageUnit@gov.wales

Question 1 – Do you agree with the proposed approach of developing a policy to better coordinate Welsh linguistic infrastructure?

Agree	✓	Disagree	☐	Neither agree nor disagree	☐

Question 2 - What **dictionaries or tools** do you use to search for Welsh words? (Tick each one that's relevant.)

✓ Geiriadur Prifysgol Cymru (the standard historical Welsh dictionary) online

✓ Geiriadur Prifysgol Cymru App

✓ Geiriadur Prifysgol Cymru – print version

✓ The Welsh Academy English-Welsh Dictionary online

✓ The Welsh Academy English-Welsh Dictionary – print version

✓ University of Wales Trinity Saint David online dictionary

✓ Bangor Welsh-English Dictionary online

✓ Ap Geiriaduron

✓ Cysgeir

✓ Y Gweiadur online

✓ Y Geiriadur Mawr (print version)

✓ Geiriadur Cymraeg Gomer (print version)

✓ Bing Translator

✓ Microsoft Translator

✓ Google Translate

✓ Other (please give further details)

Supporting comments

As an organisation whose principal statutory aim is to promote and facilitate the use of the Welsh language and one which works mainly through the medium of Welsh, it is natural that our officers consult with a number of the resources listed above regularly in their day-to-day work. We have invested in print copies of these resources for our offices, but our officers have increasingly taken advantage of the electronic provision in recent years and this has been more important than ever in the context of home working. The provision of free standardised electronic resources is essential to support flexible working patterns in future.

Due to the manifold and fragmented nature of the current provision officers are required to cross-reference a number of the above sources to find the required words or combination of words. They also have to cross-reference the resources listed in section 3 below. This

calls for a developed linguistic ability and understanding of quite complex factors such as the status, purpose and, at times, age of the publication in question. It is not reasonable to expect that every officer who wishes to use Welsh in their work has the time, the background knowledge, or the necessary skills to undertake such research every time they need to choose a word – this is equally true of members of the public, of course.

We provide training for officers on the nature, purpose and reliability of the above resources as part of a programme of induction sessions. It can be striking how little prior awareness staff have regarding these resources – which again highlights the need for the provision to be better coordinated and promoted.

The Commissioner has a licence to publish *The Welsh Academy English-Welsh Dictionary* online until 2027. It is an extremely popular resource and 2,459,536 searches were made within it during the 2019–20 financial year, for example. The fact that there has been insufficient funding available to continue the work of developing the online dictionary is a genuine source of concern for us as an organisation, as you will be aware. Beyond the fact that it has not been updated or revised for many years, as you note in the consultation document, the initial work of digitalising the print version has not been completed satisfactorily either. A number of the longest and most complex entries – often indicating their importance – remain in pink as they have not been fully digitalised and proofread. As a result, it is sometimes necessary to use the print version alongside the online version in order to check the accuracy of entries. This situation is not acceptable and we urge the Government to ensure more suitable arrangements for this important dictionary as a matter of urgency in order to maintain, and indeed increase, its value to future users.

In addition to the key resources listed above, we also use specialist dictionaries to support us in our duties, such as *The New Legal Dictionary* (ed. Robyn Léwis). It is essential that standard and specialist vocabulary is developed and standardised to enable people to work in Welsh in all areas. This need is partly met by specialist terminology projects, but it must be ensured that adequate arrangements are put in place to tackle those items that do not fit neatly into the definition of technical terminology but which constitute vocabulary spanning a number of subject areas, such as public administration terminology.

Question 3 – What **terminology resources** do you use to search for Welsh terms? (Tick each one that's relevant.)

- ✓ BydTermCymru
- ✓ Welsh National Terminology Portal
- ✓ Ap Geiriaduron
- ✓ Cysgeir
- ✓ The Coleg Cymraeg Cenedlaethol's Terms for Higher Education
- ✓ Y Termiadur Addysg
- ✓ Other (please give further details)

Supporting comments

All these resources are used by the Commissioner's officers. As suggested in the response to question 2 above, as well as comparing the answers in these terminology sources, the user must often cross-reference against the dictionary resources also listed in order to find a definition or authoritative answer on orthography or a part of speech, for example. Despite the technical and recognised differences between the disciplines of terminology standardisation and lexicography, the lay user is not always aware of these distinctions and some of the resources listed under 2 and 3 above blur the lines between these disciplines.

Question 4a – If we were to develop a website to provide various linguistic resources in one place, apart from what we've noted in area 5 in the consultation document what else would you like to see the website doing?

Supporting comments

There is no doubt that the creation of a single website to pull together Welsh linguistic resources would be of great benefit to the user. Creating such a shop window would ensure that everyone who wishes to use Welsh has an overview of the resources available to them. It would resolve part of the current problem of resources dispersed over the internet and users not necessarily being aware of all of them.

However, it must be emphasised that this would only be the first step. It would be a significant improvement on the present situation and would raise awareness of the current provision, but it would not be sufficient to resolve the second problem outlined in the consultation document that 'the everyday user can't be expected to know what status these resources have, nor which is most likely to suggest an answer appropriate to their needs.' (p. 22). Indeed, by drawing these resources together in a single search portal the problem might become even *more apparent* to the user in the short term and underline the inconsistency that exists between the resources.

We therefore welcome the suggestion in the consultation paper that there will need to be some initial preparatory and standardising work to ensure the success of this website, such as the standardisation of spellings. This work is essential but may take considerable time to complete. The proposed new unit will have to draw up an appropriate procedure for identifying and prioritising entries to be amended and there will also have to be sufficient funding to support this work. The suggestion that the website may be utilised as a tool to identify user search patterns and priorities is also to be welcomed. It is essential that innovative technological solutions are planned in order to automate some of this identification work and speed up the work of improving the provision.

The consultation document recognises that this website may be used by a range of diverse users, of all ages and linguistic abilities. It is therefore essential that the interface is not only designed to ensure a good experience for these users, but that the provision itself is sufficiently encompassing to respond to all their requirements. There must be dictionaries to appeal to children of all ages (including pictorial dictionaries) as well as dictionaries to meet the specific needs of learners, for example. The electronic medium means that the restrictions of the printed page need not be a consideration and therefore additional information such as inflexions, mutations, preposition etc. might be included.

To improve people's confidence to write well in Welsh it would be helpful to include accessible, searchable advice on grammar as well as guidance on writing and practical advice similar to that found in *Y Golygiadur* (*Cymdeithas Lyfrau Ceredigion Gyf*., 2006) and the Welsh Government Translation Service's *Arddulliadur*. A resource providing

guidance on Welsh idioms and expressions would also be particularly helpful to new speakers.

The consultation document makes no mention of the inclusion of any spell checker as part of the website content. The offer of a free comprehensive spelling and grammar checker which is updated regularly on the basis of the proposed coordination work would be a boon to users as it would complete the basic work of checking spellings for them.

On page 20 of the consultation document the Commissioner's work on standardising the place-names of Welsh settlements is recognised and it is suggested that it would be appropriate for the proposed unit to contribute to raising awareness of this work. One means of achieving this would be to ensure that the Commissioner's List of Standardised Welsh Place-names is given due prominence on the proposed interface. It should be emphasised, however, that there are other names that provide a regular hindrance to translators and other users, such as street names and topographical names. The Commissioner will shortly be commencing a pilot project to consider some of the topographical names within the Snowdonia National Park. This pilot will test the methodology and feasibility of the work but it will be necessary to ensure sufficient funding before this service is offered more widely.

In addition to the above, and in view of the emphasis on international languages in the Languages, Literacy and Communication Area of Learning and Experience of the new curriculum, access to dictionaries from Welsh to other European languages such as German, French and Spanish should also be included.

Therefore, in summary, the Commissioner welcomes the practical proposal to create a single interface to facilitate users' search experience. However, it is essential that this resource realises the ambition of the consultation document to be 'more than a search engine' and that it is used as a tool to map the next steps in the development of Welsh language infrastructure for the benefit of users.

Question 4b – If we were to develop a website to provide various linguistic resources in one place, under what circumstances would you use the website?

Supporting comments

The Commissioner's officers would use such a resource in their day-to-day work. As remote working arrangements introduced in response to the COVID-19 pandemic are likely to influence future working arrangements, it is crucial that workers have easy access to online resources. The consultation document recognises the importance of ensuring that people can search the website via a variety of technical devices – from laptops to mobile phones. This need was highlighted during the recent lockdown when people were required to work and study from home – not all households have access to a laptop therefore it is essential to ensure easy access on a mobile phone. It is suggested on page 22 of the consultation document that there would also be a commitment 'with time' to providing resources through apps to be used on mobile phones or tablets. In view of the popularity of apps – especially among the younger generation – it would be helpful if this provision could be offered as soon as possible.

Question 5a – This draft policy sets out our proposals to better coordinate all elements of Welsh linguistic infrastructure. Will what we propose enable us to do this?

Supporting comments

The Ministerial Foreword provides a useful summary of the main issue the current draft policy is attempting to address:

> 'The main issue that needs attention has remained pretty consistent: confusion for the user as a result of a number of different sources for words and terms (a number of you have said that you don't always know which one to use; others aren't aware that some of them exist at all), and that those sources can offer suggestions that contradict each other. We want to help to change that.'

The Commissioner believes the draft policy represents an important step forward towards a better coordination of all elements involved in the Welsh linguistic infrastructure. It will be sufficient to answer the difficulty identified by the Minister, namely *where* should someone turn if they want to know the meaning of a word or how to translate it. However, it is less clear whether the draft policy in its current form will allow government to address the second difficulty of existing sources often offering contradictory recommendations. The Minister herself asks the key question in the Introduction, 'what happens if an answer in one place is different from one elsewhere?'. As far as we can see, there is no comprehensive answer to that question in the draft policy nor clear plans to resolve this underlying problem.

The draft policy talks of the 'coordination' of resources, but the meaning of the word 'coordination' is rather vague – does it ultimately mean little more than providing easy access to them via a central website? Although the introduction sets out an ambition to 'help the different elements work together better' and avoid the duplication of resources and inconsistencies, there is insufficient detail in the policy with regard to how this could be achieved in practice. It must be recognised, however, that there is potential for a number of the schemes put forward to improve significantly the provision and correct inconsistencies over time as well as ensuring greater consistency and more comprehensive provision in commissioning work in future.

Below, we offer comments and suggestions on all the required areas of development outlined in the draft policy in the hope they will be of practical assistance in planning the next steps:

Area of development 1: Dictionaries
The Commissioner very much agrees with the suggestion that the main Welsh dictionaries should be brought together under the auspices of a single organisation to ensure they receive the consistent editorial care they require. This would provide a means of resolving the current unsatisfactory situation described in the context of *The Welsh Academy English-Welsh Dictionary* where the published version has not received the appropriate editorial attention for almost twenty years. This could also lead to financial savings if all these dictionaries were maintained on the same systems and servers in due course.

The provision of a standardised online Welsh-English dictionary would be most helpful to users and, by drawing all the existing resources together, there is the potential to achieve that. It must be recognised, however, that there are copyright issues the Welsh Government will need to address in planning this work and that it will need to give detailed attention to how to include the valuable output produced by individuals as part of this

picture. It must be emphasised, for example, that the content of the *Gweiadur* would address a number of the gaps identified by us in the response to question 4a above.

Ensuring greater consistency in respect of the orthography of Welsh dictionaries would also lead naturally to greater consistency in due course in the field of term standardisation as terminologists would out of necessity turn to dictionaries as the bricks and mortar of their discipline.

The consultation document suggests there is a need to improve the training available for those who wish to be lexicographers, in order to increase the number of people able to do the work. Alongside establishing suitable paths of learning, it will also be necessary to provide sufficient funding streams to recruit lexicographers to undertake the proposed new work and create attractive careers to allow people to develop in their roles.

Area of development 2: Terminology
The Commissioner agrees that a new unit needs to be set up to enable the better coordination of existing terminology standardisation efforts and the provision of stable sources of funding for the work. It is easy to see how the planning work of this unit will ensure less duplication of effort in future, but it is not obvious in the short term where the investment will come from nor what the plan is in terms of reviewing and ensuring the consistency of the substantial work achieved in these areas to date. It is essential that the Welsh Government provides sufficient funds to tackle this work to ensure that it is possible to build on the efforts and foundations of the past in a meaningful way.

We also agree that the setting up of a service to deal with queries relating to urgent terminology would be of assistance to organisation and users in Wales. It would not be necessary for officers in the new unit to provide this service directly – consideration could be given to the commissioning of an external contractor to provide the service in order to take advantage of the terminology standardisation infrastructure of the contractor. The unit should however play a central role in the marketing and disseminating of information relating to these new terms, in order to underline their status.

The horizon-scanning responsibilities suggested for this unit are crucial. The consultation document suggests that the unit would be responsible for investigating the best means of standardising terminology packages. The Commissioner wishes to place on record that he is pleased one of his officers was recently invited to be a member of the Welsh terminology standardisation Task and Finish Group in the equality area of Race and Ethnicity. The arrangements for that group have worked very effectively to date and it possibly provides a model that may be replicated. There will need to sufficient funding to commission research work by terminologists to support the efforts of similar groups in future and enable them to tackle a meaningful number of terms.

Area of development 3: Corpora
The Commissioner acknowledges the importance of this area of development in maintaining and driving developments in the field of language technology, as well as creating evidence-based linguistic resources. The Commissioner welcomes the emphasis in this section on ensuring that corpora resources are available under an open licence and the proposal that the principle of providing resources under an open licence is applied to as many as possible of the resources referred to in the draft policy. We therefore urge the Welsh Government to explore ways of overcoming intellectual rights restrictions which might prove a barrier to achieving this ambition.

Area of development 4: Standardisation
The Commissioner welcomes the recent actions taken by the Welsh Government to convene a Welsh Language Standardisation Panel in accordance with the

recommendation of the Panel for the Coordination of Terminology Standardisation and Lexicography convened by the Commissioner and the further planning by the Commissioner on behalf of Coleg Cymraeg Cenedlaethol. An officer from the Commissioner's office sits on the Panel and attests to how fruitful and constructive the discussions have been to date with a clear focus on finding practical solutions that will be easy to explain to all Welsh speakers. It is clear that the Panel has great potential to provide a quick solution to a number of minor orthographical inconsistencies found between sources at present. It is early days for this Panel, however, and sufficient resources must be earmarked to facilitate its discussions and raise awareness of its status. It will be necessary to ensure that appropriate administrative, research and corpora services are available to the Panel for the work to evolve to tackle the provision of guidance on grammar, for example.

We welcome the attention given in the document to the specific responsibility of the Commissioner to standardise Welsh place-names and the acknowledgement that this standardisation work stands apart from general standardisation efforts for the language. The Commissioner welcomes the aim of the Welsh Government to raise the status of the different types of standardisation work taking place in Wales and is keen to explore further how the authority and influence of the Commissioner may be extended in this area. This is essential as not all public bodies in Wales routinely follow the recommendations of the Commissioner's Place-names Standardisation Panel. Some may commit to following the Commissioner's recommendations regarding the form for use in Welsh language texts, but continue to follow the opinions or decisions of officers with regards to the forms used in English. A notable example was seen recently when Rebecca Evans MS published her decisions regarding ward names in Rhondda Cynon Taf where she chose forms which were contrary to the Commissioner's and the Boundary Commission's advice. ([Written Statement: Local Authority Electoral Boundary Review – Update (24 June 2021) | GOV.WALES](#)) The Government have chosen to use Llwynypia in Welsh, but Llwyn-y-pia in English, Ynys-y-bwl in Welsh, but Ynysybwl in English, Pont-y-clun in Welsh and Pontyclun in English etc. This is clearly contrary to the standardisation guidelines and the basic principle advocated by the Commissioner that the use of a single form should be aimed for when there is only a letter or two's difference between the Welsh and the 'English' forms.

Area of development 5: Creating one interface to make it easier to search through all resources
The Commissioner agrees with the underlying vision to create a single interface to ensure easy access for users to the infrastructure resources. However, it is essential that this investment leads to the creation of a resource that is more than merely a search website and that technology facilitates the planning and commissioning work of the proposed unit. The Commissioner recognises there may be considerable work involved in tagging and structuring the databases of different projects in a way that allows people to search them on a central interface. It will be essential to scope and plan this work thoroughly before commencement in order to consider whether it is possible to achieve other things as part of the same task – identifying inconsistencies or gaps, for example. It would also be possible to consider whether there is potential to complete the initial work of proofreading *The Welsh Academy English-Welsh Dictionary* as part of the process.

The Commissioner notes the intention for all dictionaries and terminology databases to remain independent projects with their own websites. This situation will need to be reviewed over time and it will be necessary to consider the feasibility of commissioning and procuring infrastructure and websites jointly in order to ensure the best use of public money and that all projects are in a position to take advantage of innovative, state-of-the-art technology.

Area of development 6: Setting up a new unit to coordinate Welsh linguistic infrastructure

The Commissioner believes it is crucial that a body be set up with a specific responsibility for coordinating the linguistic infrastructure for the Welsh language and ensuring that Welsh speakers have the necessary linguistic resources for use in all aspects of life. This is a common practice in countries with languages in a similar position to Welsh, as outlined in the consultation document. It must also be emphasised that these organisations provide stable funding over an extended period to agencies providing services on their behalf. This is essential to ensure the continuity of projects and nurture expertise.

The Commissioner agrees that this unit will need to be properly staffed in order to be best placed to undertake planning in this area as well as responding to language queries. This section of the consultation document refers to the appointment of a head and senior official to begin the work but it is noted in area of development 5 that language technicians will need to be appointed to be responsible for the creation of the website and its day-to-day management. The Commissioner is of the opinion that all these officers will be needed as a minimum, in order to start the work of coordinating a field which has been neglected for many years.

The proposed role of the unit in 'horizon scanning' and actively identifying areas where work needs to be commissioned is essential. This will certainly lead to a situation whereby resources commissioned in future will be better coordinated and support the same recognised standards. For this unit to be truly effective it will also need to keep an eye on the work achieved in the past and ensure that those efforts are revised and developed as required.

The specific responsibility for the unit to market its work and provision is essential but it is unclear from the draft policy what marketing resources will be available to it. It is suggested that locating the unit within the Welsh Government would save on overheads from the point of view of administrative structures, such as human resource services, but will the unit have access to the marketing resource of Project 2050, for example?

Question 5b – This draft policy sets out our proposals to better coordinate all elements of Welsh linguistic infrastructure. Is anything missing from the draft policy?

Supporting comments

The draft policy outlines clearly how it will organise the shop window of Welsh language infrastructure, by ensuring easy access to the main resources via one search portal. However, there are no details regarding how it will go about organising the resources intended to be searchable through this shop window and there is insufficient emphasis on the need to standardise and revise past efforts and ensure their consistency. Although the work of the Standardisation Panel will make a valuable contribution to resolving minor orthographical inconsistencies, it will not be able to tackle situations where several terms

currently exist to describe the same concept. To a degree, it is accepted that addressing such detail would be part of the respective work of the new unit. Therefore, it must be ensured that any attempt to coordinate the current provision is not merely superficial and that the unit has the necessary authority and resources to resolve these issues.

The draft policy does not outline how it will be possible to include the valuable work of individuals and publishers who are not named in the document and are not funded by Welsh Government.

The draft policy deals with the processes for dealing with Welsh language words but it may also be suggested that better procedures need to be put in place for standardising English words. This need was highlighted anew in the discussions of the Task and Finish Group convened to discuss Welsh terminology relating to Race and Ethnicity where it was sometimes found that the English terminology used was unsatisfactory or unsuitable. There would be potential for this Unit within Government to undertake the pioneering and necessary work of standardising terminology for *Wales*, and offering expert advice on the best and most conceptually accurate terminology to be adopted in both Welsh and English.

Question 5c – This draft policy sets out our proposals to better coordinate all elements of Welsh linguistic infrastructure. Should we follow a different path in relation to some of these areas?

Supporting comments

The Commissioner believes the general direction of the policy is correct. It is to be welcomed that the Welsh Government is prepared to take direct responsibility for coordinating this area and planning strategically for the future on the basis of need. This accords with the Commissioner's view that only government has the necessary authority and funding streams to coordinate this area successfully. It is also sensible as the Welsh Government already funds a number of the projects in question. It makes sense for the proposed department to be located within the Welsh Government in the short term for strategic and practical reasons, as outlined in the consultation document. It would also be a practical way of enhancing the status of work in the field of Welsh language infrastructure. Consideration must be given in the medium term, however, to whether this is the best arrangement for a unit of this nature or would other governing structures be more suitable. There should be no further delay in taking decisive action to create these new structures which have the potential to ensure the better coordination of activities in this area over time, as well as identifying and planning specifically for future needs. It is crucial that a clear timetable for this work is published as soon as possible to give stakeholders confidence that the Welsh Government is serious in its commitment to take responsibility for the future of Welsh language infrastructure and its viability.

However, it must be recognised at the same time that the policy document in question sets out the correct direction to *start* the process. The last of the areas of development, to create a new unit to coordinate Welsh linguistic infrastructure, is essential to ensure that efforts in terms of infrastructure are coordinated strategically. It must therefore be arranged for the proposed unit to have appropriate resources to undertake its work and commission others to complete work on its behalf. Page 26 of the consultation document states clearly that the Welsh Government does not intend to *reduce* the funding currently distributed to various linguistic infrastructure projects. This assurance is to be welcomed but it must also be ensured that the unit has sufficient authority to make strategic and

comprehensive financial arrangements to ensure value for money as well as sufficient, stable and long-term investment in the area.

It must also be recognised that an initial substantial investment will be needed in some cases as some of these resources have not been updated or revised since publication. This investment is essential to ensure that past efforts remain current and useful and that the significant public money invested in them in the past is not wasted.

Question 6 – We would like to know your views on the effects that the proposals in this draft policy on Welsh linguistic infrastructure would have on the Welsh language, specifically on:

i)   opportunities for people to use Welsh
ii)   treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

The proposals in this policy would have a positive impact on the opportunities for people to use Welsh by the provision of a central website which will facilitate access for Welsh learners and people who do not yet speak Welsh to essential linguistic resources. The enquiry service for new terms will also be helpful in ensuring that the Welsh language has appropriate provision to prevent people from turning to use new terms which gain currency effortlessly in English. These services will be particularly valuable to parents or guardians who have chosen Welsh-medium education for their children. They also have the potential to *enrich* people's experiences of using Welsh by equipping them with the necessary linguistic infrastructure to use Welsh with confidence in all aspects of their lives.

Question 7 – Please also explain how you believe the proposed policy could be formulated or changed so as to have:

i)   positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
ii)   no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

As suggested throughout this response, we consider that this draft policy sets out positive and pragmatic first steps. It will be necessary to ensure that the proposed new unit has the required expertise, resources and authority to plan the next steps and coordinate the infrastructure appropriately to ensure further positive impacts on people's opportunities, ability and confidence to use Welsh.

Question 8 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

The Ministerial Foreword acknowledges that the content of the consultation document builds on previous work by the Welsh Language Board and the Welsh Language Commissioner. The Commissioner was also pleased to receive an invitation to be a member of the group of experts advising the Welsh Government as it drew up this draft policy.

In *A living language: a language for living*, the Commissioner was invited to 'coordinate' developments in the field of Welsh language terminology standardisation in Wales. To undertake this task, the Commissioner convened a panel of strategic funders and key stakeholders. The aim of the panel was to consider possible joint working to ensure the best possible provision for Welsh language users. The panel members represented the main policy makers and funders in the field in Wales together with other associate members. Relevant Welsh Government officials were also invited to provide information on relevant Welsh Government projects and give evidence regarding the Welsh Government Translation Service's terminology provisions and requirements.

The panel met four times during 2013–14 to discuss research papers and share their experience of commissioning and funding work in these areas over the years. Furthermore, a delegation from the panel held an evidence gathering meeting with the main practitioners in the field.

The panel came to a number of key conclusions regarding activity in this area. The Commissioner submitted these conclusions to the First Minister, who had responsibility for the Welsh language at the time, and has continued to bring them to the attention of successive Ministers with responsibility for the Welsh language. It is worth repeating them here as they are as relevant as ever and support the key message in the consultation document in question, that the needs of the Welsh language and Welsh speakers are not being met under the present arrangements.

1.   The work already carried out, and the work in progress in this field and in related fields is substantial.
2.   However, the funding arrangements for the field are often disjointed and short-lived and the lack of financial stability has implications for the quality of work produced, continuity of terminological work, fostering language skills etc.
3.   There has been insufficient strategic planning and coordination of efforts in the field to date and consequently there has been significant duplication of effort and expenditure.
4.   There are multiple sources of terminology and vocabulary at present. This is confusing to the user, especially since those sources often provide conflicting recommendations.
5.   The relationship between these sources is also unclear and this can be confusing for users looking for authoritative answers.
6.   This field is one that is constantly evolving and one that requires constant and strategic investment to meet the demand.
7.   There is a need to establish a procedure for the future that will take full advantage of the work already carried out in the field and bring the strengths and expertise of current practitioners together.
8.   The panel also wished to stress that it is essential that terminology and lexicography work is not seen as a discipline on the fringes of the language planning agenda. There is a direct relationship between efforts in this field and the health and viability of the language.

There is no reason to believe the Welsh Government sees the linguistic infrastructure as a discipline on the fringes of the language planning agenda. On the contrary, its central place in the *Cymraeg 2050: A million Welsh Speakers* strategy and the Welsh Government's *Welsh language technology action plan* is to be welcomed. We also welcome the fact that the current consultation document echoes the findings of the Panel in this area. The proposals in the draft policy represent a pragmatic first step towards dealing with a number of these findings and facilitating people's access to linguistic resources.

However, as the consultation document itself emphasises, developments in this area have been exceedingly slow, due to its complexity, and there should be no further delay in initiating processes that have the potential to ensure the better coordination of provision in future. It must be ensured that the current government has a clear and ambitious timetable to realise the ambition of the draft policy and that this consultation exercise is not added to the list of discussions in this area that have yet to come to fruition. However, beyond ensuring easy access to the resources already made available by various providers, the current policy does not address how to set up a procedure for the future to draw together strategically the specialisms and strengths of practitioners. It is a policy that addresses the shop window and providing for future terminology needs without tackling the complex matters regarding the structures, or infrastructures, which maintain the current resources. The Commissioner recognises that this is a complicated matter and that it inevitably needs to be tackled one step at a time. However, at the same time, it must be ensured that there is a clear vision from the outset in respect of the ideal final outcome and that services and budgets are planned accordingly.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: ☐