



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Leisure and library website monitoring surveys: **Local Authorities (Welsh Language Standards Regulations No.1)**



Contents

1	Intoduction	1
2	Methodology	2
3	Findings	3
4	Trends	10
5	Conclusions and Recommendations	13
6	Appendices	15

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 that they are in line with the aims of the Strategic Plan and the Regulatory Outcomes published in 2024-2025.
- 1.2 We were keen to develop monitoring and promotional methods that would give us more certainty about organisations' compliance. It was decided that monitoring surveys were to be carried out every quarter, with results reported back to the individual organisations within the same quarter.
- 1.3 One of the key benefits of this method of monitoring is that organisations are notified of any compliance issues in a timely manner throughout the year, giving them the opportunity to promptly implement appropriate solutions.
- 1.4 The leisure and library websites of the local authorities have been identified as a priority area this year. Over the last four years, we have focussed our attention on the authorities' corporate websites. An increasing number of organisations now use third party companies to carry out these services on behalf of the local authorities, and the Commissioner has received comments about the use of the Welsh language in general in these areas.
- 1.5 This report provides an overview of the findings of the monitoring surveys which focused specifically on local authority sub-sites for leisure services and libraries. Although the websites of the National Parks, the Welsh Ministers and the Corporate Joint Committees were not checked as part of the survey, the findings of this report, together with the recommendations, are relevant to all organisations subject to the Welsh Language Standards Regulations No. 1, with regards to maintaining sub-sites in accordance with the requirements of the standards.
- 1.6 Following the publication of the report and sharing the findings with the individual organisations, an organisation will be expected to report to us in three months, indicating the steps that have been taken to respond to these recommendations.

2 Methodology

- 2.1 All local authorities (22 organisations) subject to the Welsh Language Standards Regulations No. 1 ("Regulations No. 1") were inspected during October 2025.
- 2.2 Regulations No. 1, which apply to local authorities, consist of five standards (52, 53, 54, 55 and 56) that set requirements for providing a Welsh website.
- 2.3 Standards 52, 55 and 56 are imposed on all local authorities and are therefore part of the surveys.
- 2.4 Standard 52 states:
- 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.*
- 2.5 Standard 55 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.*
- 2.6 Standard 56 states:
- You must provide the interface and menus on every page of your website in Welsh.*
- 2.7 In addition to the above standards, two related standards were inspected, namely standard 37 (publicity and advertising) and standard 83 (corporate identity).
- 2.8 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.*
- 2.9 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.*
- 2.10 Ten pages relating to leisure services, and ten pages relating to library services were checked on each organisation's website.

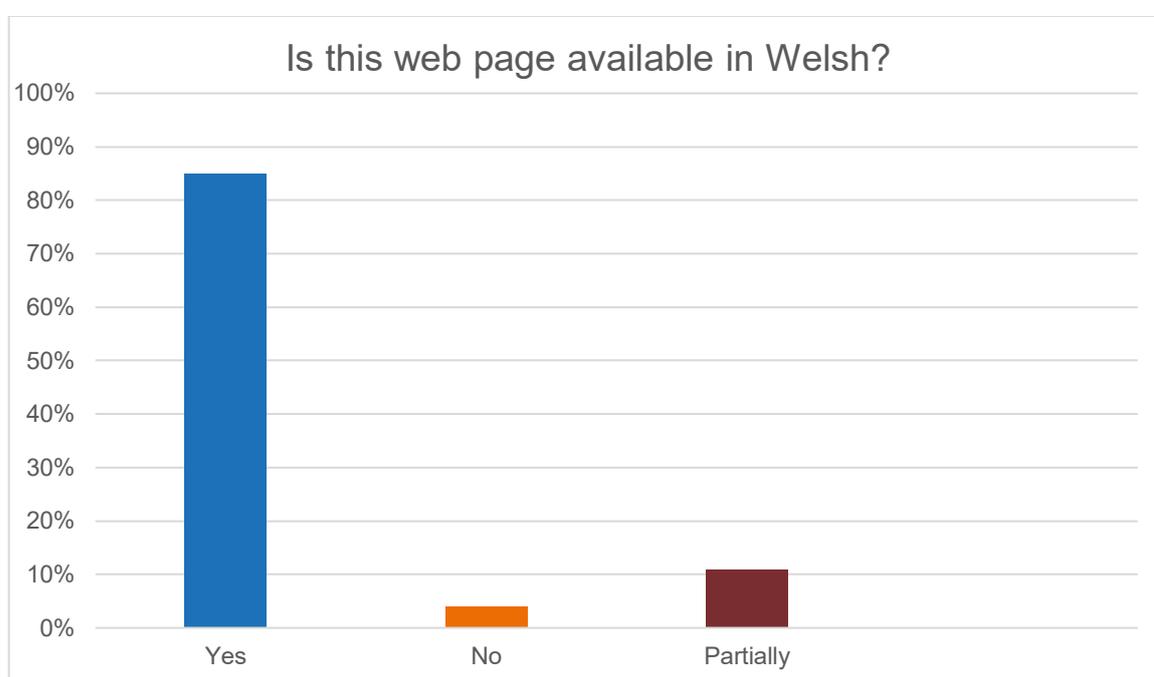
2.11 One organisation didn't have ten pages to check on the leisure website or on the library website.

2.12 In total, 215 leisure pages and 214 library pages were checked.

3 Findings

3.1 An overview of the findings of our survey work in relation to the leisure and library web pages of the local authorities is provided below.

Leisure Services



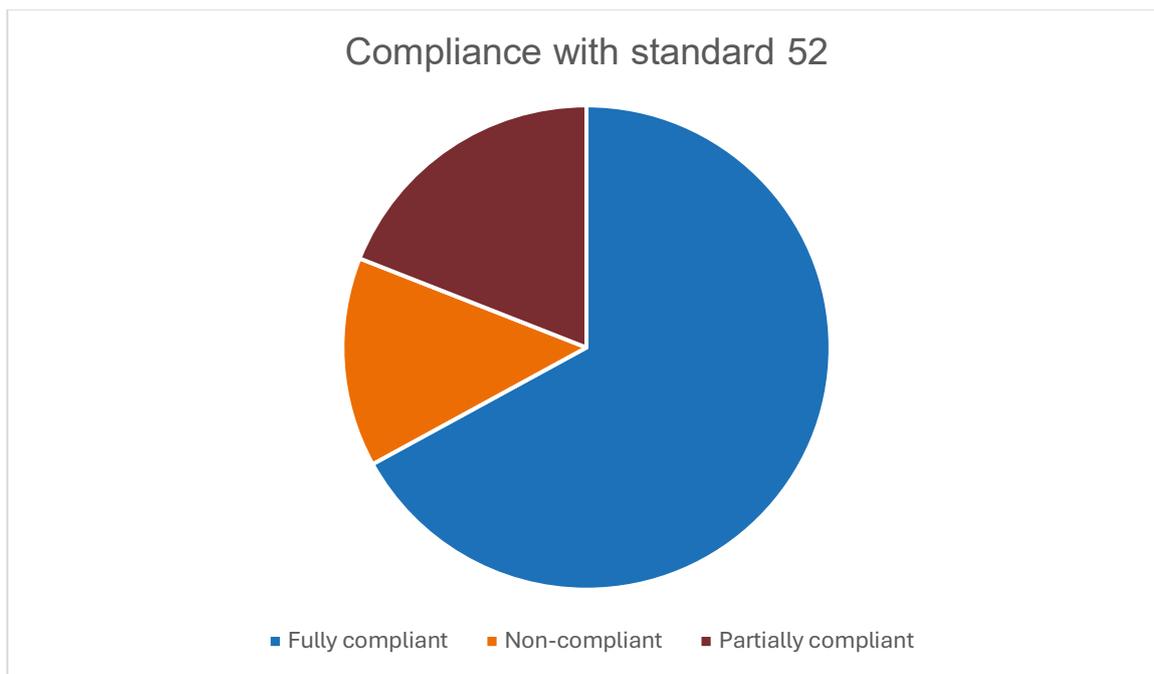
3.2 The results of the inspections showed that 85% (183) of the pages were available in Welsh, 4% of the pages were not available at all in Welsh, and 11% were only partially available in Welsh.

3.3 41% (88) of the pages treated the Welsh language less favourably than the English language. Among the examples of less favourable treatment were links referring to English pages, and English titles or text appearing on Welsh pages where there should be Welsh titles and text.

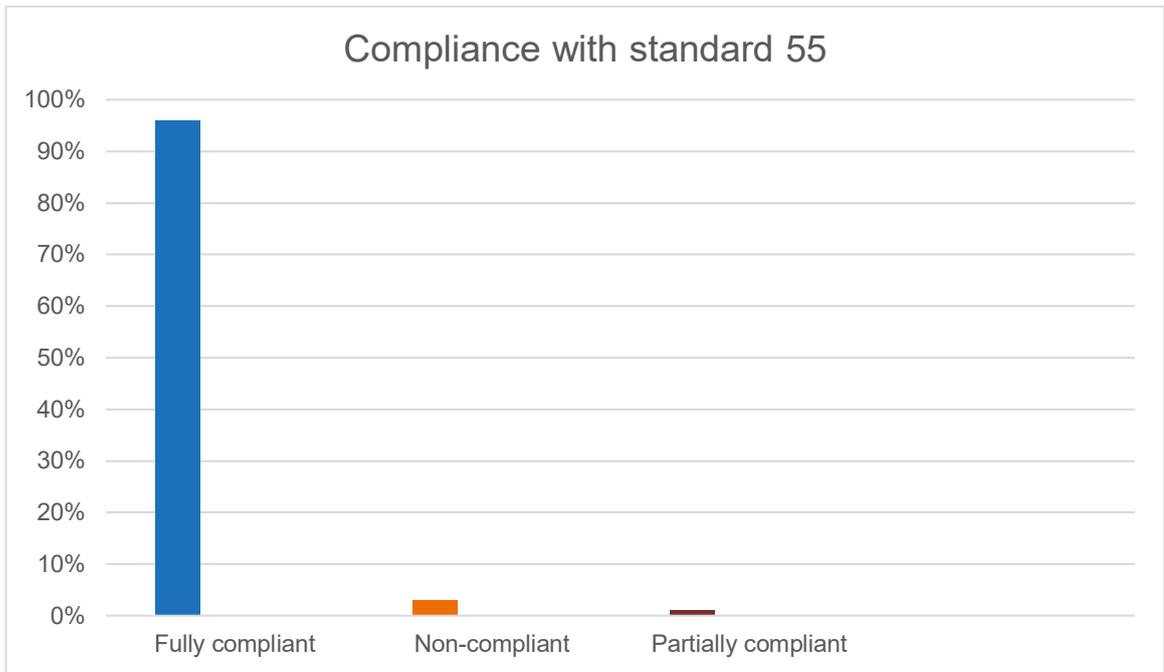
3.4 Conwy County Borough Council was the only local authority that managed to ensure that the Welsh language was not treated less favourably than the English language on all of the pages checked.

3.5 Examples of poor translation were seen on some pages. For example, when booking an activity on a leisure service website, where the English stated 'Book activity', the Welsh version noted 'book' as the noun ('Gweithgaredd Llyfr'), i.e. something we read (rather than the verb, i.e. 'ordering an activity'). Another example was 'Day Passes', where the Welsh version noted the passing of time of a whole day ('Diwrnod yn mynd heibio'), as opposed to a pass for leisure centres. This website included a note explaining that they use Artificial Intelligence (AI) to translate content into Welsh, and therefore the website could contain errors. See the Commissioner's stance on machine translation in section 5 below.

3.6 67% of the pages checked were seen to fully comply with standard 52.

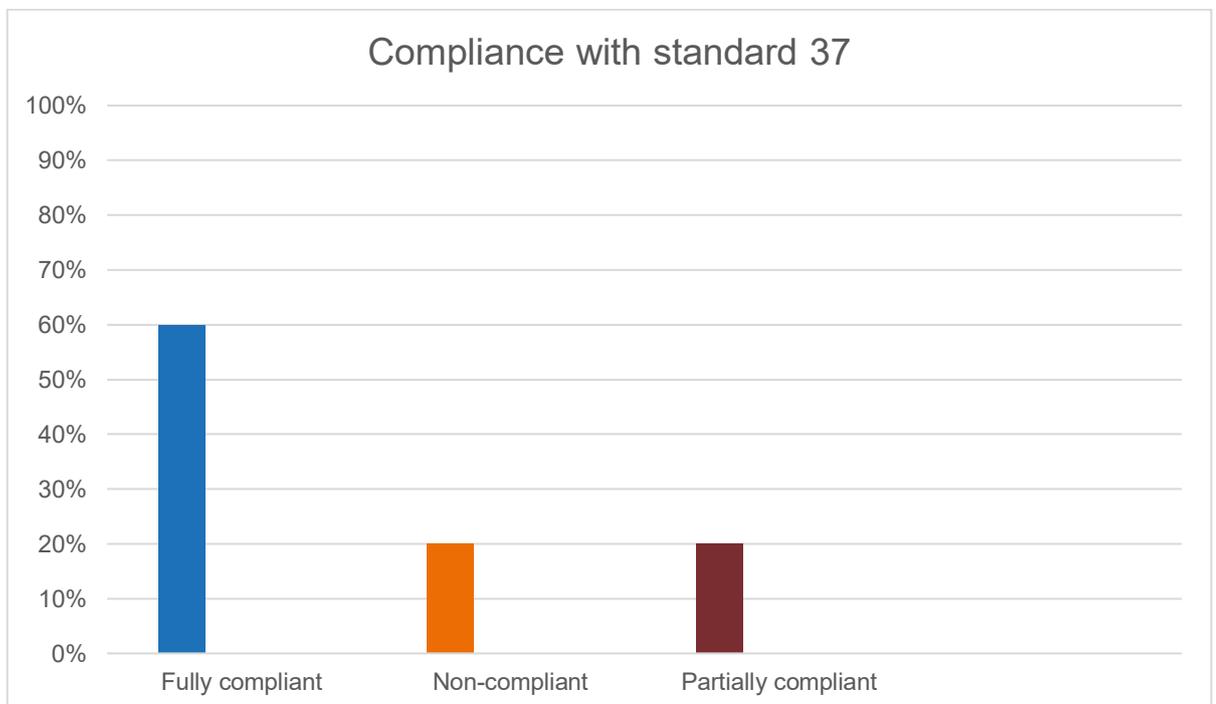


3.7 It was noted that 96% of the pages complied with standard 55. Seven pages were non-compliant as there was no corresponding page available in Welsh.



3.8 85% of the pages complied with standard 56. Among the rest that were non-compliant or only partially compliant, examples were seen of menus in English, menu titles in English, and a lack of Welsh pages.

3.9 With regard to standard 37 (publicity material), only 30 pages contained publicity material and were therefore relevant to the standard. Of those pages, 60% were compliant, 20% non-compliant, and 20% only partially compliant.



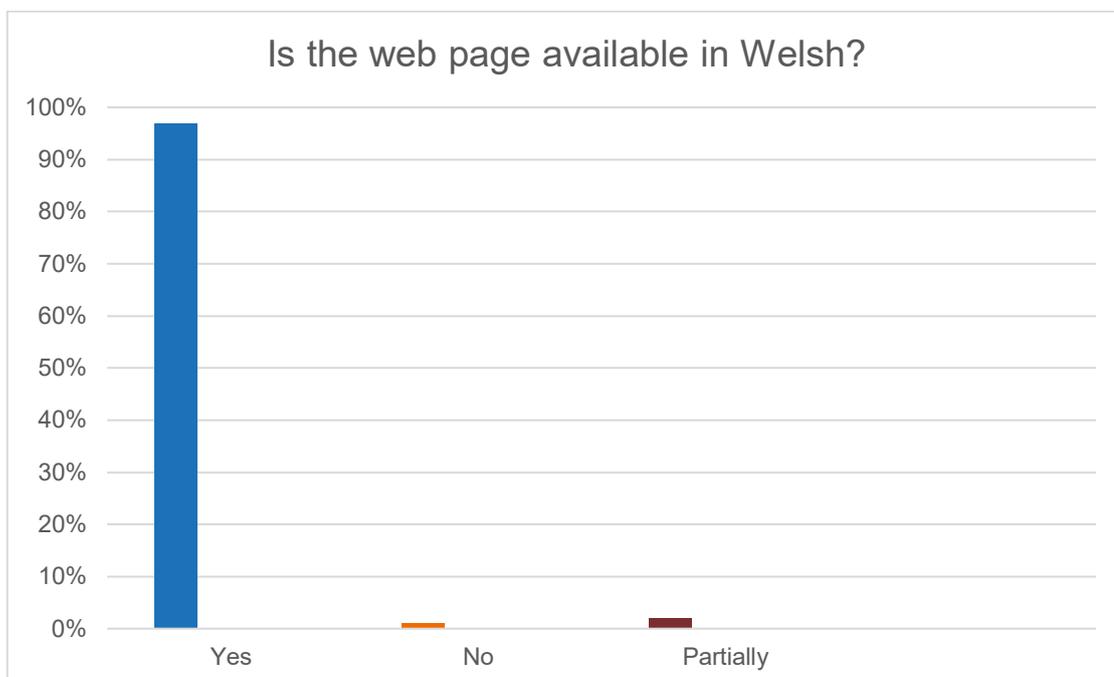
3.10 Examples of non-compliance included English-only titles on videos without voices, and English-only publicity banners.

3.11 Compliance with the standard relating to corporate identity (standard 83) was relatively better, with 88% of the relevant pages compliant. 12 pages (6%) were noted to be non-compliant, due to examples of English-only names or logos, or logos where the English language was above the Welsh language. A further 6% were noted as partially compliant.



Libraries

3.12 The results of the surveys showed that 97% (209) of the pages were available in Welsh, 1% of the pages were not available at all in Welsh, and 2% were only partially available.



3.13 33% (70) of the pages treated the Welsh language less favourably than the English language. Among the examples were English titles and text appearing on Welsh pages where there should be Welsh titles and text, the months of the year being in English even though the days were in Welsh, and links leading to English versions even though Welsh versions were available.

3.14 Swansea City Council, Cardiff Council and Monmouthshire County Council were the only local authorities that managed to ensure that the Welsh language was not treated less favourably than the English language on all of the pages checked.

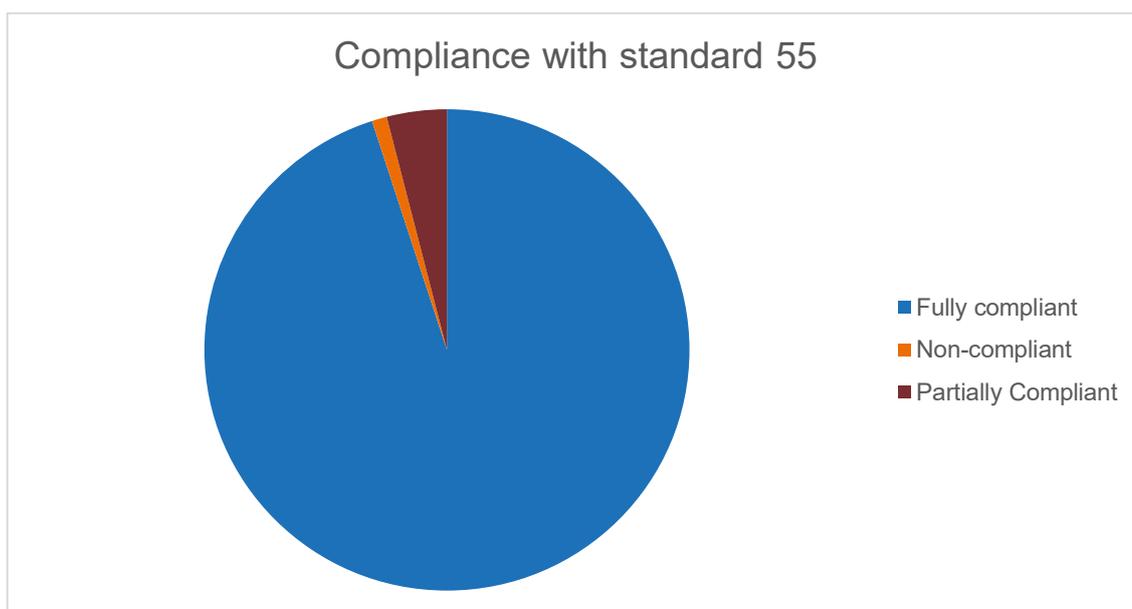
3.15 Examples of poor translation were also seen. One example was on the Borrowbox website – a digital service that offers e-books and audiobooks to download and read or listen to on a computer or mobile device. The service is available free of charge to members of public libraries in Wales (and the UK), and is used by a large proportion of local authorities in Wales. This means that the errors affect all authorities that use it. Examples included:

“Unlimited copies - everyone can borrow today”, where the Welsh translation would read “Unlimited copies - everyone can” (“Copïau diderfyn - gall pawb”).

3.16 85% of the pages checked were seen to be fully compliant with standard 52.

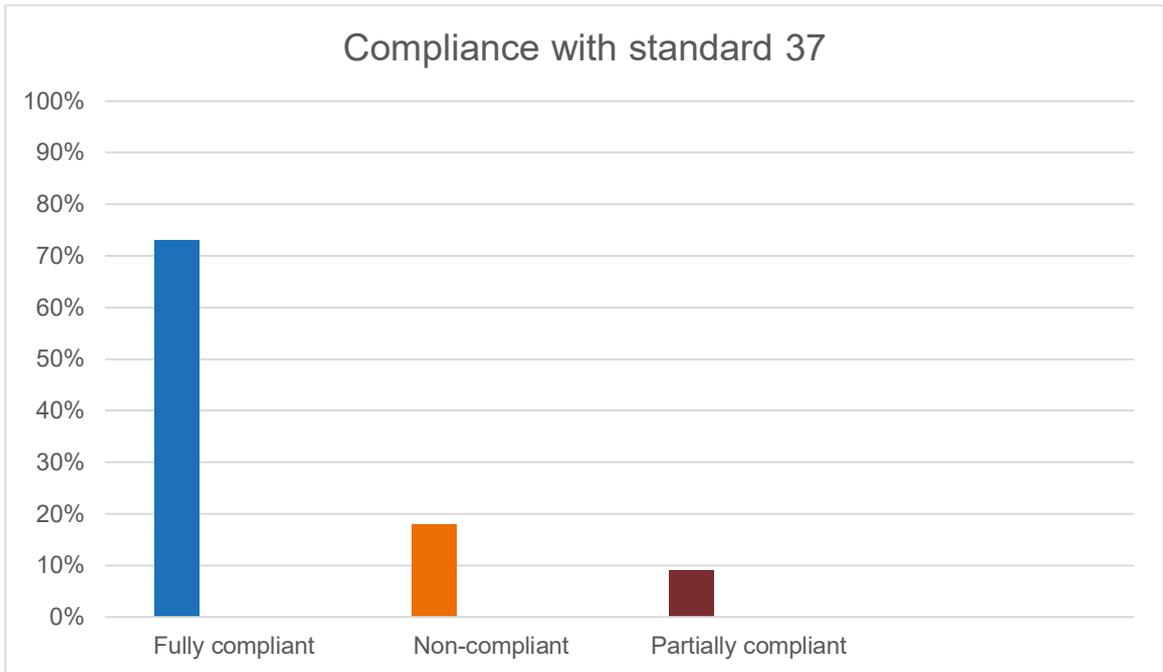


3.17 It was noted that 95% of the pages complied with standard 55. The only non-compliant page was one where no corresponding page was available in Welsh.



3.18 98% of the pages complied with standard 56. Among the rest that were non-compliant or only partially compliant, examples of menus and menu titles were seen in English.

3.19 With regard to standard 37 (publicity material), only 11 pages contained publicity material and were therefore relevant to the standard. Of those pages, 73% were compliant, 18% non-compliant and 2% only partially compliant. Examples of non-compliance included English-only infographics on videos.



3.20 The organisations' compliance with the standard relating to corporate identity (standard 83) is better, with 97% of the relevant pages being compliant. Four pages (2%) did not comply. This was due to examples of English-only names and logos, or logos with the English language above the Welsh language. 1% of pages were noted as only partially compliant.



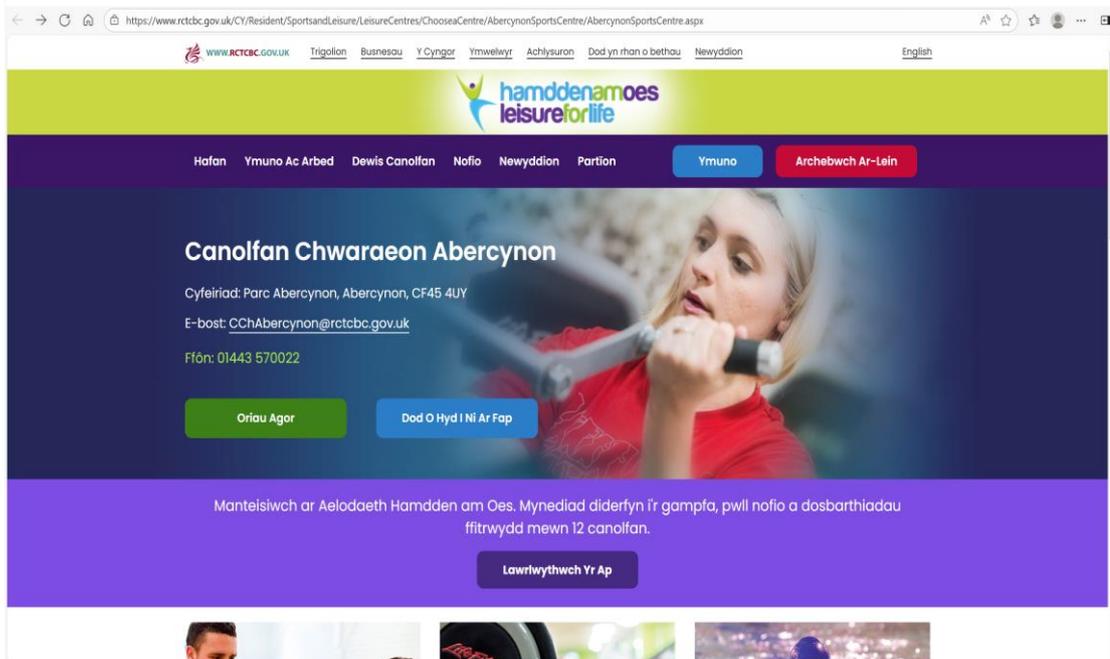
4 Trends

Treating the Welsh language no less favourably than the English language

- 4.1 The inspections show that 91% of the pages checked in the leisure and library departments were available in Welsh. These results are encouraging, but there is further work to be done to ensure full compliance.
- 4.2 However, 37% of those pages treated the Welsh language less favourably than the English language.
- 4.3 Examples included language selection buttons that did not work, or were found in places that were not obvious to the user.
- 4.4 Examples of English-only names and logos, or the English language appearing above the Welsh language, were also noted. Ensuring that Welsh language services are easily identifiable is essential for their use; therefore, making the Welsh language as prominent as the English language would be a crucial step.
- 4.5 A number of cases were seen where English appeared on Welsh pages, such as dates, titles, menus, timetables and calendars with the months of the year in English only, despite the days being in Welsh.
- 4.6 It was also noted that links on Welsh pages led to English pages even though Welsh versions were available, and that there were links on English pages that did not appear on the Welsh version.
- 4.7 When using addresses on websites, e.g. the address of a library or a leisure centre, only English addresses were used. There were also several examples where the English page had been updated, but the Welsh page had not been updated for some time.

Corporate identity

- 4.8 When presenting a corporate identity, 7% of the pages checked were seen to treat the Welsh language less favourably than the English language. The following reasons were common across the non-compliant organisations: an English-only name and logo on the service in question was the main reason, while other cases included the English language appearing above the Welsh language or being highlighted more clearly.
- 4.9 A positive example was seen from Flintshire County Council, where the organisation had succeeded in using a Welsh name alongside the English.



Videos and audio clips

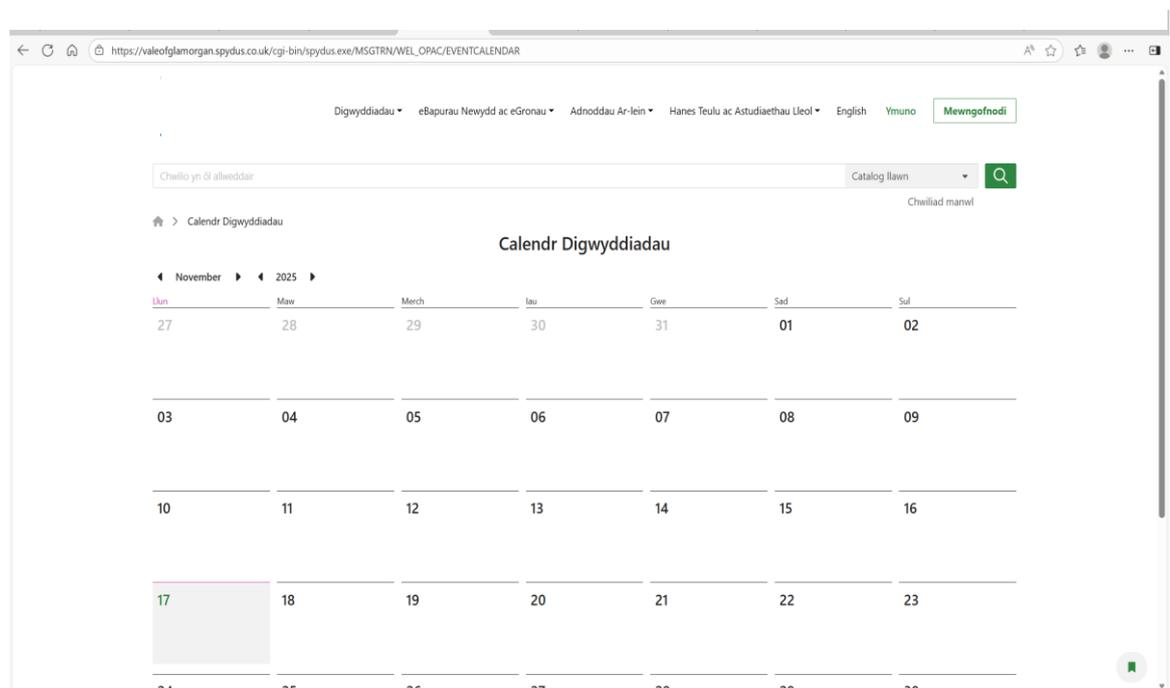
4.10 Standard 37 states:

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

- 4.11 Nine videos were viewed on the pages checked. Among these, one video was in English only, one video contained an English voice and Welsh subtitles, and two videos contained only English text. The rest were videos without dialogue, with only background music.
- 4.12 Our Code of Practice for Welsh Language Standards Regulations No. 1 states that using Welsh subtitles or voiceover in English clips can lead to the Welsh language being treated less favourably than the English language.
- 4.13 One example was seen of an English-only video featuring a schoolchild speaking, with no corresponding Welsh video available. We recognise that securing Welsh speakers on all occasions can be challenging, and that this may not be reasonable or practical in some circumstances – for example, where a specific person who does not speak Welsh is needed in order to convey a specific message. Nevertheless, organisations are expected to make reasonable efforts to use Welsh speakers where possible, and to publish videos in Welsh when possible. In this case, we believe that it would not be unreasonable to expect the authority in question to make a corresponding video with a child in a Welsh-medium school in order to ensure that the Welsh language is not treated less favourably.

Library Services Digital Platforms

- 4.16 The majority of organisations use Borrowbox and Spydus to run their library services. Although these pages are available in Welsh, they contain the same errors across all organisations. One example of this is the Events Calendar on Spydus, which shows the days of the week in Welsh, but keeps the names of the months in English only:



5 Conclusions and Recommendations

- 5.1 60% of the messages checked as part of the survey fully complied with the requirements of standard 52. This is a 19% reduction in comparison to the findings of the survey in 2024-2025, when only corporate website pages were checked. These results suggest that the current arrangements for ensuring compliance of sub-sites are not sufficient. As a result, organisations should review their self-regulatory processes, ensuring that monitoring and checking arrangements give the same level of scrutiny to the sub-sites as to the main website.
- 5.2 The Welsh language continues to be treated less favourably than the English language, with 37% of the pages having failed to ensure full compliance with this duty. Publishing a website page in Welsh does not guarantee compliance. A wider range of factors need to be considered, including links to other pages or websites, banners at the top or bottom of pages, section titles, the language of any videos or audio clips, the visibility and accessibility of the Welsh content, as well as ensuring that the Welsh content is up to date and of the same quality as the English material. Related to this, the requirements of standards relating to publicity materials should be checked when publishing website pages, as well as standard 52 requirements.
- 5.3 When publishing and maintaining website pages, the requirements of standard 83 relating to corporate identity must be considered, as well as the standards that apply to website pages. It should be ensured that neither the logo nor the name of the organisation treats the Welsh language less favourably than the English language.
- 5.4 As stated in 3.4 above, examples were seen of poor translation and the use of Artificial Intelligence (AI) to maintain Welsh pages. Using AI models to translate documents, websites or communications without robust arrangements to check accuracy can lead to linguistic errors or mistakes that undermine the standards of the Welsh language and diminish trust in the services. It is essential that organisations ensure they have robust arrangements for any machine translations to be monitored, checked and reviewed by a competent official before they are published.
- 5.5 The Welsh Language Commissioner has announced a new [regulatory policy statement](#) which outlines clear expectations on organisations that use Artificial Intelligence (AI) when providing services to the public. The statement emphasises that new technologies must support and promote the Welsh language, and that their use is not an excuse for failing to comply with Welsh language duties.
- 5.6 Based on the findings of the survey, the following recommendations are presented to the organisations subject to the Welsh Language Standards Regulations No. 1:

Recommendation 1: Supervision arrangements

Organisations should review their self-regulatory processes to ensure that sub-sites comply with all relevant standards. Practical guidance and guidelines should be provided to all members of staff, including third parties responsible for websites or department pages, to ensure that they are fully aware of the requirements and how to meet them.

Recommendation 2: Corporate identity

Organisations should carry out a full audit of all the websites they are responsible for, to ensure that the Welsh language is not treated less favourably than the English language when presenting corporate identity, including checking logos and names.

Recommendation 3: Consistency when publishing or revising pages

Organisations should ensure that Welsh pages are as up to date as the English ones. It should be ensured that robust procedures are in place to prevent the publication or amendment of an English page without having taken the same steps for the corresponding Welsh page.

Recommendation 4: Translation

Organisations should ensure that robust processes are in place to check the quality and accuracy of translations. Where machine translation or AI is used, the content must be checked by a competent official before publication.

Recommendation 5: Videos

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

Recommendation 6: Collaboration

Organisations using the Borrowbox and Spydus platforms should work with these companies to put steps in place to ensure full compliance with the standards.

6 Appendices

Appendix 1: Survey data

	Leisure Pages	Library Pages
Number of pages checked	215	214
Number and percentage of pages available in Welsh	183 (85%)	209 (97%)
Number and percentage of pages that were partially available in Welsh	23 (11%)	3 (2%)
Number and percentage of pages that treated Welsh language less favourably than the English language	88 (41%)	70 (33%)
Number and percentage of relevant pages that complied with standard 37	18 (60%)	8 (73%)
Number and percentage of relevant pages that complied with standard 52	144 (67%)	181 (85%)
Number and percentage of relevant pages that complied with standard 55	207 (97%)	204 (95%)
Number and percentage of relevant pages that complied with standard 56	183 (85%)	211 (98%)
Number and percentage of relevant pages that complied with standard 83	167 (88%)	197 (97%)

Appendix 2: List of survey institutions

- Blaenau Gwent County Borough Council
- Bridgend County Borough Council
- Caerphilly County Borough Council
- Cardiff Council
- Carmarthenshire County Council
- Ceredigion County Council
- Conwy County Borough Council
- Cyngor Gwynedd
- Denbighshire County Council
- Flintshire County Council
- Isle of Anglesey County Council
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- Neath Port Talbot Council
- Newport City Council
- Pembrokeshire County Council
- Powys County Council
- Rhondda Cynon Taf County Borough Council
- Swansea Council
- Torfaen County Borough Council
- Vale of Glamorgan Council
- Wrexham County Borough Council