



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Forms verification surveys: Higher Education Sector (Welsh Language Standards No. 6 Regulations)



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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 that they are in line with the aims of the Strategic Plan and Regulatory Outcomes published in 2024-2025.
- 1.2 We were keen to develop monitoring and promotion approaches that would give us greater assurance regarding the compliance of organisations. We decided to plan quarterly verification surveys, with results being 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 implement prompt and appropriate solutions.
- 1.4 Forms were identified as a priority area for the education sector this year. This is due to the fact that organisations' practices in this area have been identified as needing significant improvement, as identified in our [latest performance report \(2024-2025\)](#).
- 1.5 This report provides an overview of the findings of the verification surveys carried out with organisations within the Higher Education sector subject to the Welsh Language Standards (No.6) Regulations 2017, setting out recommendations for consideration in order to ensure better compliance within the organisations.
- 1.6 Following the publication of the report and sharing the findings with the individual organisations, each organisation will be expected to report back to us **within three months**, setting out the steps taken to respond to these recommendations.

2 Methodology

- 2.1 All Higher Education (HE) bodies were surveyed, consisting of 10 organisations subject to the Welsh Language Standards No. 6 Regulations ("No. 6 Regulations"). The surveys were conducted during the months of October and November 2025.
- 2.2 No. 6 Regulations, which apply to HE organisations contain four standards (53, 53A, 53B and 54) which set out requirements for the provision of forms.
- 2.3 Standard 53 states that any form that the organisation makes available to the public or to students must be produced in Welsh.
- 2.4 In line with Standard 53A, when an organisation produces a Welsh language version and a separate English language version of a form, it must ensure that the English language version clearly states that the form is also available in Welsh.
- 2.5 Standard 53B refers to a situation where an organisation produces a form in English and Welsh (whether separate versions or not) and requires that the Welsh version is treated no less favourably than the English version. The standard specifically states that no differentiation should be made between them in relation to any requirements that are relevant to the form, including, for example, any deadline for submission or the time allowed for responding to its contents.
- 2.6 Standard 54 relates to situations where information is pre-entered on a Welsh version of the form (for example, before it is sent to a member of the public to check the content in order to fill in the remainder of the form). This standard states that organisations need to ensure that all the information pre-entered is in Welsh.
- 2.7 The forms surveys focused on assessing organisations' compliance with the above four standards.
- 2.8 In addition to these standards, standard 92 was also verified as part of the surveys in relation to Form 1 (Application for accommodation). Standard 92 states that 'when students or prospective students apply to you for residential accommodation you must allow those students to express a preference for accommodation (or part of an accommodation) that will be reserved for Welsh speakers'.
- 2.9 This survey focused on the two following groups:

Group A - Various forms available on the organisations' websites. Two examples were reviewed for each organisation where relevant to the standards in question.

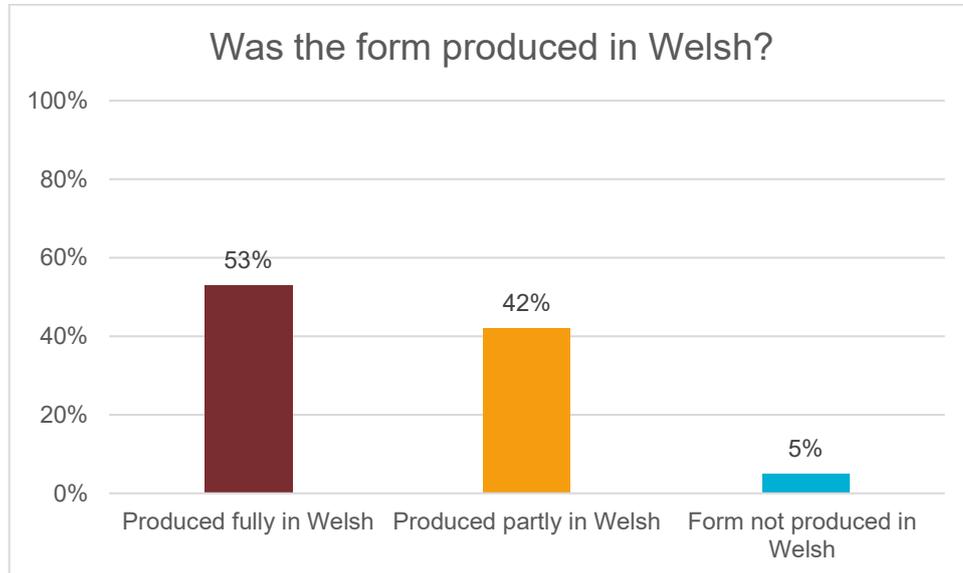
Group B - The second part of the survey included a review of the following forms from each of the 10 organisations:

- Form 1 – Accommodation application form
- Form 2 – Application form to the Ethics committee
- Form 3 – Registration form for an academic course
- Form 4 – Registration form for modules (where this process is separate from Form 3)

- 2.10 These specific forms were selected as part of Group B as they are likely to be used by all organisations. They also offer an opportunity to review patterns of practice in relation to the Welsh language across the HE sector.
- 2.11 Not all organisations were able to provide full information on their Group B forms in line with the request. Some organisations indicated that the registration forms could not be accessed at the time of the survey, as the registration period had ended. Another organisation stated that a copy of the accommodation application form could not be provided as the accommodation period had expired.
- 2.12 This means that it was not possible to carry out an assessment of each of the above forms across all organisations.
- 2.13 The table in appendix 2 shows the number of individual forms and information provided by organisations, which enabled us to include them as part of the Group B sample.
- 2.14 The main aim of the survey was to assess the extent to which the forms comply with the requirements of the relevant standards. In particular, we considered the following:
- Was the specific form available in Welsh?
 - Was the Welsh version of the form treated less favourably than the English version?
 - Were the Welsh and English versions equally available?
 - Did the English version of the form clearly state that it was available in Welsh, and therefore promote the Welsh language?
 - Was all the information pre-entered on the form included in Welsh on a Welsh version?
 - Were the infrastructure and other fields that are part of the forms fully available in Welsh on the Welsh version?
 - Were there any parts of the form where the Welsh language was not visible?
 - To what extent was the form just as user-friendly to use in Welsh as in English from the user's point of view.

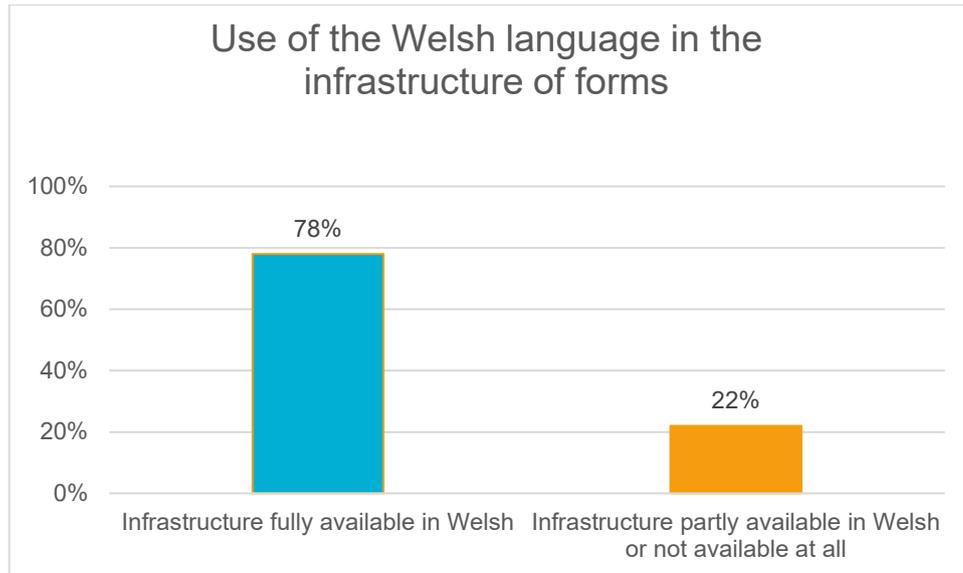
3 Findings

Group A forms



- 3.1 The results of the surveys show that 53% (10 out of 19) of the forms in this group are fully available in Welsh. 5% (1 out of 19) of the forms were not available in Welsh, while 42% (8 out of 19) were only partly in Welsh.
- 3.2 Those forms in the category that were partly in Welsh contained examples where not all pieces of information were available in Welsh for use on the form. This could mean, for example, that some details on the form were only available in English, or that not all questions and options were provided in Welsh.
- 3.3 The situation seems to have improved since the last surveys in terms of the number of forms that were not produced in Welsh at all. In particular, more forms now - although not fully compliant - contain more Welsh language content and therefore fall into the category of being partly available in Welsh. This suggests gradual progress but also highlights the need for further improvements to ensure full compliance.

Infrastructure of forms, pre-entering information and treating the Welsh language less favourably



- 3.4 In reviewing the forms, we assessed to what extent users were able to fully access them in Welsh through the infrastructure. This included, among other things, the ability to:
- access instructions on the form in Welsh
 - receive alerts in Welsh when mandatory parts were not filled in
 - ensure that navigation buttons on Welsh forms are fully available in Welsh.
- 3.5 It was positive to see that a total of 78% (14 out of 18) of the forms provided a complete infrastructure in Welsh on their Welsh-medium forms. This shows a marked improvement in the infrastructure of forms since previous verification surveys by the Commissioner, when it was found that a number of organisations relied on an English-only infrastructure. There is, therefore, evidence that more organisations are now ensuring that a Welsh language infrastructure is an integral part of the framework of their forms.
- 3.6 When considering information pre-entered on forms relevant to the requirements of standard 54, we found that 74% (8 out of 11) of the relevant forms had pre-entered information in Welsh.
- 3.7 The Commissioner's Code of Practice (No. 1) states :
- 'The type of information being pre-entered by a body on a form may include personal details such as name, address, title, marital status, job title etc.*
- o
- On an electronic form, that may include the information which is being pre-entered automatically on a form after a person has completed another part of the form. For example, that may include a Welsh language version of a postal address being pre-entered after a person has pre-entered their postcode on the Welsh language version of the form. It may also include ensuring that any drop-down options are available in Welsh.'*

3.8 Although the above figures show some positive aspects, it was found that 68% (13 out of 19) of the forms assessed treated the Welsh language less favourably than the English. This less favourable treatment has been found to be mainly related to the following factors:

- Some forms were not available at all in Welsh, or only certain parts of them were available in Welsh
- The infrastructure of some Welsh language forms remains available in English only
- Information pre-entered on Welsh language forms is in English only
- Some Welsh language forms are less clear or are more difficult to follow than the English versions, in terms of the language used
- Some links on Welsh language forms lead to information in English, forcing the user to take extra steps to view the Welsh information.

Group B Forms

3.9 As not all organisations were able to provide sufficient information on their Group B forms, it was not possible to draw a firm conclusion about organisations' compliance across the sector. However, the surveys enabled us to draw conclusions about the compliance of some individual organisations, where sufficient evidence had been provided.

3.10 The table below sets out the number of Welsh forms available, based on the evidence provided.

	Accommodation	Ethics	Registration	Modules
Available in Welsh – in part or in full	5/9	8/10	6/10	1/4
Not available in Welsh at all	1/9	0/10	2/10	2/4
Different Welsh and English versions	0	1/10	0	1/4
From information provided, evidence that the form treated the Welsh language	6/6	4/9	5/8	4/4

less favourably				
Forms that we failed to assess due to insufficient information having been submitted	3/9	1/10	2/10	n/a

- 3.11 For the purposes of the analysis, it was not possible to determine with certainty how many forms were fully available in Welsh. As a result, we assessed instead whether the forms were available in Welsh at all - whether in part or in full. This approach was adopted because certain elements, such as the dropdown menus, could not be seen on some forms in the evidence provided by a number of organisations. As a result, it is likely that a higher number of forms are available in full in Welsh than is indicated here.
- 3.12 Based on the forms received, the table above shows our assessment of the number of those forms that treated the Welsh language less favourably than English in our view.
- 3.13 This table also shows that some forms were not available in Welsh at all, which is a cause for concern as they force students to use the English-only forms. This trend was most often seen when a separate system or portal was used for the purpose of gathering information.
- 3.14 Some organisations have indicated that they recognise that these systems are not currently available in Welsh, but that they intend to put arrangements in place to enable this.

Allowing students or prospective students to express their preference for accommodation reserved for Welsh speakers when applying for accommodation (standard 92)

- 3.15 In relation to the requirements of Standard 92, which relates to the duty to allow students and prospective students to express a preference for accommodation (or part of an accommodation) reserved for Welsh speakers, it was noted from the sample that some organisations offer this, although it is relatively limited.
- 3.16 As only 6 out of 9 establishments (66%) were able to provide evidence of their accommodation application form, it was not possible to reach a firm conclusion as to whether a larger number of organisations include this option on their application forms.
- 3.17 However, of the 6 organisations that provided a copy of the accommodation application form, we saw that 4 organisation included a specific question asking students or prospective students to express their preference in this regard, through a specific section on the accommodation application form.

Raising awareness of Welsh language forms

- 3.18 We found that a number of Group A forms were available as separate Welsh and English forms, with a language toggle button enabling the user to move between the two languages. This method is also considered to be an effective way of indicating on the English form that the form is available in Welsh.
- 3.19 As a result, 94% of Group A forms were found to comply with the requirements of standard 53A.
- 3.20 In relation to the Group B forms, and due to a lack of sufficient evidence, it was not possible to reach a reasonable conclusion as to compliance with standard 53A. However, there was evidence that some of the organisations that had separate Welsh and English forms offered a language toggle button on some systems or portals used to complete the forms.
- 3.21 In other cases, however, evidence was not provided to show how organisations were promoting and facilitating the use of the Welsh forms, or informing students that the Welsh option was available by clearly identifying it on the English form.

Other information provided on forms

- 3.22 There were several examples where organisations used links on forms in order to direct the user to relevant information.
- 3.23 In some of these cases, the use of Welsh was inconsistent. While some good practice was seen, the overall picture suggests that Welsh continues to be treated less favourably than English, and less accessible than the English information or material provided through forms.
- 3.24 There were also a few examples, particularly among Group B forms, where links to the organisation's accessibility or privacy policies did not lead to Welsh language pages on the website. As a result, the user was required to take an additional step to change languages in order to view the Welsh content.

4 Trends

The Welsh language was not available through every source

- 4.1 In terms of Group A forms, it was positive to note that the Welsh and English forms are equally available, ensuring a consistent user experience in all languages.
- 4.2 It was found that there is a tendency among the HE sector to offer forms through a number of different sources. In particular, the following methods were used to provide forms:
 - in the form of a link on the organisation's website – e.g. a Word or PDF document
 - by including the form directly on the organisation's website page
 - through forms on the Moodle platform for students
 - through the organisation's internal systems or portals – often requiring students to log in with their personal details before accessing the form itself.
- 4.3 In presenting evidence for Group B forms, we noted comments which highlighted that not all of those forms were available in Welsh, or that not all forms were available in Welsh and English equally.
- 4.4 One organisation reported that their module selection form was not available in Welsh, as limited use was made of it. As a result, a form on Moodle was used to select options, which is currently only available in English.
- 4.5 Another organisation noted that it has a number of different methods for students to register for courses, explaining that there are four methods in place. All methods, except one - self-service registration - were available in both Welsh and English.
- 4.6 There was also a tendency by some organisations to use different systems and arrangements for each academic school, including different forms for each academic school. An example was given of a department providing an English-only form for the provision where the course was only available in English. It was noted, however, that students on the Welsh pathway are enrolled on Welsh language modules by default.
- 4.7 We noted a further example of the practice of not providing a Welsh language registration form through the same system used for the English version. Instead, users were required to complete a manual form for the Welsh version. It was noted, however, that plans are underway to change this, but without a specific target date to implement the changes.
- 4.8 Another organisation noted that a form for Ethics committee approval is only available in English through a third-party provider system. However, the Welsh and English forms were available on the organisation's website pages.
- 4.9 Operating in line with the above examples, by offering Welsh forms in certain circumstances or only through limited channels, would be in breach of the requirements of the Welsh Language Standards.
- 4.10 The survey also shows that some organisations tend to deviate from the requirements of the standards due to issues such as user numbers, or other

academic school arrangements. This risks providing a poor experience for Welsh speakers, as well as breaching the requirements of the standards.

- 4.11 It must be emphasised that the requirements of Welsh language standards in relation to forms are not just limited to subjects provided in Welsh. The forms are required to be available in Welsh unconditionally, where that applies to Wales, regardless of the language of the course or who the audience is — whether they are students or members of the public.
- 4.12 Similarly, the requirements of the Welsh Language Standards do not depend on the numbers likely to use the form. When a form is produced and made available to the public or students, it must comply with the standards.
- 4.13 As not all organisations were able to provide copies of each of the Group B forms, there is a risk that the number of forms not available in Welsh — or where Welsh is presented in a different way to English — may be higher than that what is indicated here. As a result, there is some uncertainty about the full level of Welsh language provision among these organisations.

Mixed use of Welsh on forms

- 4.14 There was a lack of consistency in the use of Welsh across some of the forms assessed. In particular, examples were found where certain parts of the form were only available in English, resulting in situations where individual elements or supporting information were not provided in Welsh.
- 4.15 Specific examples of this type of practice was seen in the context of Group B forms (Welsh versions), including:
- the text "click and type here" marked on fields for completion
 - form titles available in English only
 - specific sections of English-only text, such as "please answer only if you have a disability otherwise leave blank"
 - specific questions, for example about neurodiversity, only available in English
 - room names, block numbers, flat numbers and floor descriptions available in English only
 - the text "applications for the 2025–26 academic year are now open" displayed in English only before logging into the form
 - some navigation buttons display "Next" in English only when guiding the user through the form, although other elements of the infrastructure use the Welsh term "Nesaf".
- 4.16 Providing additional information or instructions in English only, as in the examples above, puts the Welsh speaking user at a disadvantage. In these cases, it is not possible to use the form in full in Welsh, and more information is available in English only.
- 4.17 Organisations need to ensure that all parts of the form are available in Welsh. To ensure the effective use of Welsh language forms and a consistent user experience, organisations need to ensure that all elements of the form — including supporting texts, navigation buttons and dynamic fields — are fully available in Welsh.

Treating the Welsh language less favourably

- 4.18 There were a number of examples where the Welsh language was treated less favourably on organisations' forms.
- 4.19 In one case, although options for completing the form in Welsh were available, we considered that the form treated the Welsh language less favourably as it did not operate in the same way in both languages.
- 4.20 In this case, a form for booking a place at an open event required the user to select subject areas of interest. Based on these choices, the system prepared a list of academic courses. On the English version, a number of course options (e.g. design) appeared; however, on the Welsh version no course options appeared – only the location of the course. As a result, the user was not able to access the same information through the Welsh form.
- 4.21 This example highlights the need for organisations to test their systems in both languages, to ensure that they operate in the same way, and that information is not lost when using the Welsh option.
- 4.22 There were other examples where organisations had included links to their privacy and accessibility policies on Welsh and English forms, stating that the user needed to read the policy, and confirm that they had done so. However, by clicking on the links to these documents, they led the user to the English version – requiring the language to be changed to view the Welsh version.
- 4.23 Organisations should, therefore, check and ensure that links to relevant information are available by default to the user in Welsh, without the user having to take additional action.
- 4.24 A further example of the Welsh language being treated less favourably was seen when the Welsh version of a form was not as clear as the English version. For example, one form identified communication options to choose from that were vague and less clear than the corresponding English text.
- 4.25 This underlines the need for organisations to ensure that translations on Welsh forms are accurate, clear and of an appropriate standard. Although it is possible that machine translation is used in the creation of some Welsh versions of forms, this does not always ensure an accurate or intelligible translation, as the examples above show.

Information pre-entered on forms

- 4.26 It was positive to see that a relatively high percentage of organisations ensure that all information pre-entered on Group A forms is available in Welsh. 73% (8 out of 11) of organisations had been successful in doing this for Group A forms.
- 4.27 Nevertheless, the survey shows that some organisations continue to use English-only lists on their forms. It was found that 3 out of the 11 forms in the Group A sample continued to do so. In addition, there were examples of Group A and Group B forms where visibility options were only available in English on Welsh versions, or where certain fields, such as nationality, were only available in English.

4.28 There was also the practice of providing the names of academic subjects in English only on some forms. However, some organisations followed good practice by noting the names of subjects in Welsh and arranging their lists on Welsh forms in alphabetical order, rather than translating the names of subjects directly as they appear on the English forms.

Enabling a multilingual option on forms

- 4.29 We saw examples of some organisations using 'Forms' or similar systems. Unfortunately, in some cases, although Welsh was available as a language option, the options on the form continued to appear in English only.
- 4.30 I would therefore encourage organisations to ensure that the multilingual option is fully enabled on digital forms, such as Microsoft Forms, to ensure that all options and associated infrastructure appear fully in Welsh.
- 4.31 It was positive to see that a significant proportion of organisations using Forms have already enabled the multilingual option, ensuring that all information and operational elements are fully available in Welsh on the Welsh version of the form.

5 Conclusions and Recommendations

- 5.1 As noted above, the levels of compliance of organisations with respect to Group A and Group B Forms was varied.
- 5.2 Overall, the user experience when using Welsh language forms from HE organisations is mixed. While there is evidence of improvement from some organisations, particularly in relation to Group A forms, clear gaps remain.
- 5.3 It was not possible to come to a full conclusion on the compliance of Group B forms, mainly due to a lack of evidence from some organisations, as well as a lack of information on some forms at the time of the survey.
- 5.4 The findings show that further work is needed to ensure consistency in Welsh language provision, in order to improve the user experience. In particular, it should be ensured that all information on forms is available in full in Welsh on the Welsh versions, and that those forms are promoted appropriately.
- 5.5 The survey underlines the need for organisations to carefully consider the user journey when designing forms. It seems that the experience of using some Welsh forms is not as user-friendly as it could be, and there is clear evidence that not all elements of the forms are provided in Welsh.
- 5.6 Examples were found where not all parts of the form were in Welsh, or where additional information was provided in English only. It is positive that some organisations have acknowledged these issues when submitting evidence regarding their forms, and have noted that arrangements are in place to rectify them. However, there are currently no clear commitments as to when these amendments will be implemented.
- 5.7 We also saw examples where the Welsh language had not been adequately considered in the design of forms. The Welsh language should be a central consideration in the formulation of choice options such as drop-down menus, in order to ensure an equal experience for Welsh users.
- 5.8 Based on the findings of the survey, we present the following recommendations to the HE organisations subject to the Welsh Language No. 6 Standards Regulations:

Recommendation 1: Consistency in the production of forms in terms of Welsh language content and infrastructure

Organisations should ensure that robust processes are in place to check that all their forms are fully operational through the medium of Welsh. It should be ensured that all content is available in Welsh, and that the user can complete the form fully in Welsh. This should include, but is not limited to, the following areas:

- Form titles
- any instructions or messages for completing mandatory fields
- any error messages that appear when filling in or submitting the form
- any buttons or navigational elements, such as those used to move on to the next question or back to a previous part of the form.

Recommendation 2: Verifying forms before they are published

Organisations should conduct checks on forms before they are published to ensure that the Welsh language is fully functioning, and that the Welsh language is not treated less favourably than English. Situations where options or information are missing from the Welsh version should be avoided.

Welsh forms should be just as accessible as English ones. It is also recommended that organisations take steps to ensure that any links on Welsh language forms lead to the Welsh language pages of the website, where that information is available in Welsh.

Recommendation 3: Consistent methods in the provision of Welsh and English forms

Organisations should ensure that Welsh and English forms are produced and provided in the same way.

In particular, situations should be avoided where a Welsh form is provided in one format (for example, on paper), while the English form is provided through an electronic system or other digital portal. This will ensure that Welsh forms are not treated less favourably, and that users of Welsh forms are not put at a disadvantage.

Recommendation 4: Information pre-entered on forms

Organisations should ensure that all information entered on forms – including drop-downs and any options to be selected or checked by students or members of the public – is available in Welsh.

The accessibility and usability of lists on forms should also be considered. For ease of use, particularly where a list of options on the English form is arranged in alphabetical order, it should be ensured that Welsh lists also follow the order of the Welsh alphabet.

Recommendation 5 Including a question about Welsh-medium accommodation

Organisations should ensure that a question that enables students or prospective students to express a preference for Welsh-medium accommodation, or part of an accommodation, in the medium of Welsh is included on application forms for English and Welsh accommodation, if this is not already the case.

Recommendation 6: Promoting Welsh language forms

Organisations should take proactive steps to promote their Welsh forms. Where there is no language toggle button to access the Welsh form from the English version, it should be clearly stated on the English version that the form is also available in Welsh.

6. Urgent further action on Group B forms

- 6.1 The survey's findings show that some organisations continue to provide forms or relevant information through some systems in English only. In addition, not all organisations have been able to provide appropriate evidence to confirm their ability to provide Welsh forms in relation to Group B forms.
- 6.2 As a result, in cases where Group B forms do not comply with the statutory requirements that apply to the organisations, urgent action is required.
- 6.3 Organisations are therefore expected to either:
- provide clear evidence confirming that they comply with the requirements applicable to their Group B forms; or
 - they provide a clear action plan to introduce improvements and ensure compliance.
- 6.4 These expectations reiterate the requirement set out in paragraph 1.6, namely that all organisations will be expected to report back to the Commissioner within three months of the publication of the report, setting out the steps taken in response to these recommendations.

Appendices

Appendix 1: Survey data

	Group A
Number of forms included in the sample	19
Total and % of forms produced in Welsh in full	10/19 (53%)
Total and % produced in Welsh in part	8/19 (42%)
Total and % where the form was not available in Welsh	1/19 (5%)
Total Welsh forms available	18
Total and % of Welsh forms where the infrastructure was available in Welsh in full on the forms	14/18 (78%)
Total and % of returns where the infrastructure was not fully / not available at all in Welsh on the forms	4/18 (22%)
Total and % of forms where the Welsh and English versions were provided equally	17/18 (94%)
Total of all forms where the Welsh language has been treated less favourably	13/19 (68%)

Number and % of forms that were fully compliant with standard 53	10/19 (53%)
Number and % of forms that were fully compliant with standard 53B	13/18 (72%)
Total Welsh and English forms available separately	17
Number and % of forms that were fully compliant with standard 53A	16/17 (94%)
Number of forms on which information was pre-entered	11
Number and % of forms that fully complied with standard 54	8/11 (73%)

Appendix 2: Survey data and sample numbers for individual Group B forms

	Form 1	Form 2	Form 3	Form 4	TOTAL Forms Received
	Application for accommodation	Application to the Ethics Committee	Registration for an academic course	Registration for modules (if done separately from Form 3)	
Number in the sample that was available and the information shared with the Commissioner to carry out an assessment of compliance with the Welsh language standards.	6/9	9/10	8/10	4 organisations	27

Appendix 3: List of organisations surveyed

- Aberystwyth University
- Bangor University
- Cardiff Metropolitan University
- Cardiff University
- Swansea University
- The Open University
- The Royal Welsh College of Music and Drama
- University of South Wales
- University of Wales Trinity Saint David
- Wrexham University