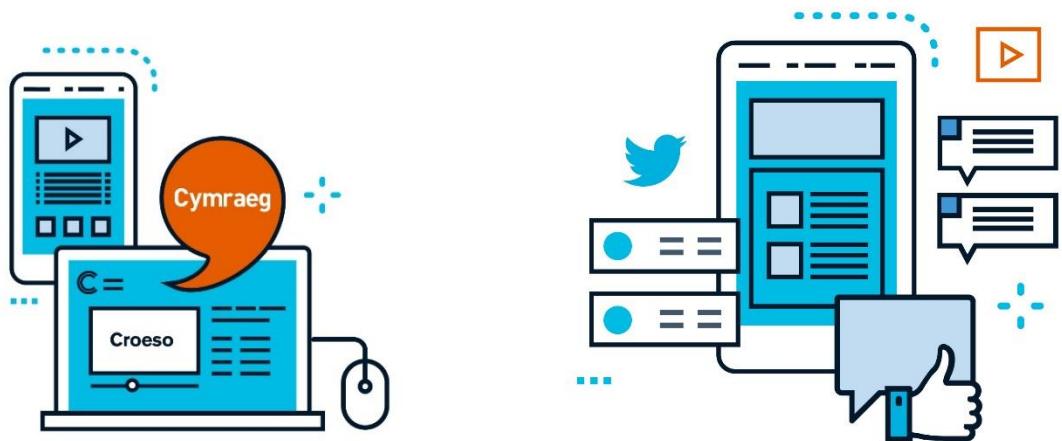


Comisiynydd y  
Gymraeg  
Welsh Language  
Commissioner

# Social Media Monitoring Surveys: Welsh National Bodies (Welsh Language Standards Regulations No.2)



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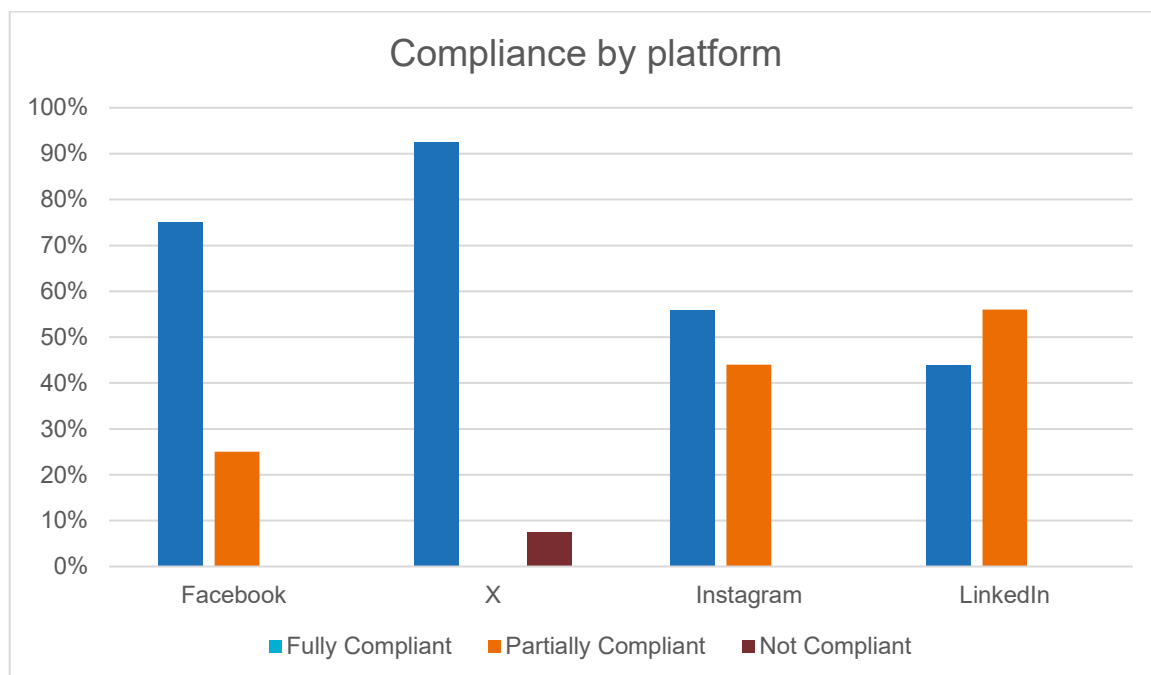
# Introduction

- 1.1 This year, we have reviewed our arrangements for monitoring and regulating public bodies' compliance with their language duties, to ensure they align with the aims of the Strategic Plan and the Regulatory Outcomes published in 2024-2025.
- 1.2 As part of this review, we considered what changes and alternative approaches were needed to make the best use of our resources, and to promote compliance in a more proactive way.
- 1.3 We were keen to develop monitoring and promotional methods that would provide us with greater assurance regarding organisations' compliance. It was decided to plan quarterly monitoring surveys, with results reported back to individual organisations within the same quarter.
- 1.4 One of the key advantages of this monitoring approach is that organisations are informed of any compliance issues in a timely manner throughout the year, giving them the opportunity to implement appropriate solutions promptly.
- 1.5 Social media has been identified as a priority area for all organisations this year. This is due to the fact that organisational practices in this area have evolved significantly over the past four years, with increasing use of a variety of platforms.
- 1.6 This report provides an overview of the findings from the monitoring surveys conducted with organisations subject to the Welsh Language Standards Regulations No.2 and presents recommendations for you to consider in order to ensure better compliance within your organisation.
- 1.7 Although the survey was carried out with a sample of organisations only, the findings of this report, together with the recommendations, are relevant to all organisations subject to the Welsh Language Standards Regulations No. 2.

## 2 Methodology

- 2.1 A total of 7 organisations subject to the Welsh Language Standards Regulations No. 2 were surveyed.
- 2.2 The organisations were surveyed during July 2025.
- 2.3 Regulations No. 2, namely the Welsh Language Standards Regulations relevant to this sector, include two standards—Standard 54 and Standard 55—which relate to organisations’ use of social media.
- 2.4 Standard 54 states ‘*When you use social media you must not treat the Welsh language less favourably than the English language.*’
- 2.5 Standard 55 refers to responding to people on social media – ‘*If a person contacts you by social media in Welsh, you must reply in Welsh (if an answer is required).*’
- 2.6 These surveys focused on compliance with Standard 54.
- 2.7 The Facebook and X (formerly Twitter) platforms were checked, focusing on the main accounts of the organisations. Accounts on Instagram and LinkedIn were also reviewed for the seven organisations. The Commissioner has not previously monitored these platforms. Not all organisations used these platforms. Ten recent posts from each organisation’s main accounts on both platforms were reviewed.
- 2.8 A total of 193 posts were checked across all platforms, assessing:
  - Whether the message was available in Welsh
  - Whether the message complied with the standards relating to social media
  - Whether Welsh was treated less favourably than English
- 2.9 In addition, compliance with Standard 79, which relates to corporate identity, was also checked. Standard 79 states ‘*When you form, revise or present your corporate identity, you must not treat the Welsh language less favourably than the English language.*’

## 3 Findings



- 3.1 This year's inspections found that organisations were more compliant when publishing posts on the X platform (92.5%). The platform with the lowest level of compliance was LinkedIn (44%). Of the posts reviewed on Instagram, 56% were fully compliant, while 72% of the posts on Facebook were fully compliant.

### Facebook and X

- 3.2 This year's inspection results showed that 75% of the posts reviewed on Facebook accounts, and 92% on X accounts, were fully available in Welsh. These figures reflect a high level of compliance across the platforms, with only three posts out of the 193 reviewed lacking a corresponding Welsh version – all of which were on the X platform, from two different organisations.
- 3.3 In the case of the Facebook platform, four organisations were fully compliant in all ten posts reviewed, while one organisation was partially compliant with all of its posts. This suggests a consistent commitment to providing Welsh-language content, although there is room to strengthen provision further.
- 3.4 Of the seven Facebook accounts reviewed, one organisation had a separate Welsh-language account, and one account was English-only. On X, of the six accounts reviewed, four organisations had a separate Welsh-language account. There may be scope here to consider a more consistent approach across organisations.

### Instagram

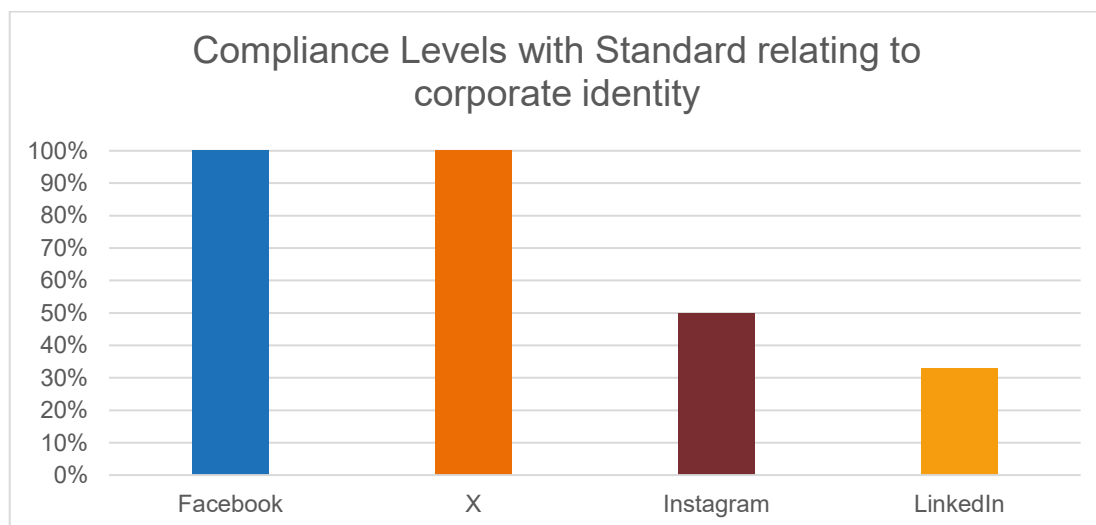
- 3.5 On the Instagram platform, 56% of the posts reviewed were fully compliant with the requirements of Standard 54, with 100% of the posts available in Welsh.
- 3.6 Two organisations were fully compliant in all ten posts reviewed, reflecting good practice in providing Welsh-language content.

- 3.7 However, it was found that Welsh was treated less favourably than English in 44% of the posts reviewed. This suggests that there is room to strengthen understanding of what constitutes ‘less favourable treatment of Welsh’ when presenting Welsh-language content, despite the fact that the content is available.
- 3.8 Of the six Instagram accounts reviewed, four were bilingual. Again, there may be scope to consider a more consistent approach across organisations, along with consideration of whether the language of the account affects levels of compliance—particularly in relation to whether Welsh is treated less favourably than English

## LinkedIn

- 3.9 On the LinkedIn platform, 44% of the posts reviewed were fully compliant with the requirements of Standard 54, with 100% of the posts available in Welsh. One organisation was fully compliant in all ten posts reviewed, while the others varied between partial and full compliance.
- 3.10 Although Welsh was available in every case, it was found to be treated less favourably than English in 56% of the posts. This suggests that there is room to improve how Welsh is presented on the platform.

## Corporate Identity



- 3.11 In relation to the requirements of Standard 79, which concerns the duty not to treat Welsh less favourably than English when presenting corporate identity, full compliance was observed in all accounts reviewed on the Facebook and X platforms.
- 3.12 On Instagram and LinkedIn, however, Welsh was found to be treated less favourably than English in 50% and 66% of the accounts respectively. This suggests that specific challenges remain on these platforms in ensuring equal status for Welsh when presenting corporate information
- 3.13 The main reasons for non-compliance were the use of English-only links to organisational pages, and presenting information about the organisation at the top of the page in English only. These are areas where relatively simple improvements could be considered to strengthen compliance.

## 4 Trends

### Not treating Welsh less favourably than English

- 4.1 Several organisations placed the Welsh text below the English within the body of the post. This not only suggests less favourable treatment of Welsh in terms of language order, but can also affect the accessibility of the Welsh text—particularly on platforms such as Facebook, where longer sections of text are hidden behind a “read more” button.
- 4.2 There were also examples where organisations alternated between English and Welsh paragraphs, with Welsh always following English. Although the content was available in both languages, this approach can be difficult to follow and still suggests less favourable treatment of Welsh.
- 4.3 In several cases, less information was available in the Welsh post compared to the corresponding English version, and there were examples where no Welsh equivalent post was published at all.
- 4.4 In terms of video content, there were instances where the voiceover switched between the two languages—with different sentences presented in Welsh and English, and bilingual subtitles throughout. Clarity and consistency are needed when presenting Welsh in video format.

### Corporate Identity

- 4.5 A number of cases were observed where Welsh was treated less favourably than English in the presentation of corporate identity on social media accounts. Some organisations used English-only links on their pages, including links at the top of Welsh or bilingual account pages that led to English-only websites. In addition, the descriptive text on the main pages of some bilingual accounts was English-only.
- 4.6 Examples were also seen where English was placed above Welsh in logos, page headers, and the order of text. In some cases, even the contact email addresses provided were English-only (e.g. information@test.com). These patterns suggest that there is scope to strengthen the bilingual presentation of corporate identity to ensure that Welsh is treated equally.

### Accessibility Issues

- 4.7 When Welsh text is placed below English in long posts, users are often required to click or scroll to view the Welsh content. This can affect the accessibility of Welsh, especially on platforms where text is partially hidden by default. The order of the text is therefore important not only in terms of language status, but also in relation to user experience.

## Videos / Use of Subtitles and Voiceover

- 4.8 An example was observed of a video where the voiceover switched between Welsh and English—presenting different sentences in each language, without fully voicing the content in either language. This made the video difficult to follow and reduced the clarity of the message.
- 4.9 In another case, Welsh subtitles were used for a contributor who spoke English, but who was not a subject expert. It could be argued that, in the case of a Welsh-language video, it would be preferable to use a contributor who can speak Welsh or present bilingually, in order to ensure the message is clear and accessible to a Welsh-speaking audience.



## 5 Conclusions and Recommendations

- 5.1 Overall, the level of compliance with the standards relating to social media is high among the organisations, particularly those subject to Welsh Language Standards Regulations No. 2. This reflects a strong commitment to ensuring that Welsh is used effectively on these platforms.
- 5.2 However, Welsh continues to be treated less favourably than English in a significant number of cases—with up to half of the posts reviewed on Instagram and LinkedIn showing this type of treatment. This demonstrates that simply establishing a Welsh-language account, or publishing a post in Welsh, is not sufficient to ensure full compliance. Consideration must be given to factors such as text placement, language used in videos or audio clips, use of hashtags, visibility and accessibility, as well as ensuring that Welsh-language content is of the same quality as the English material.
- 5.3 When establishing and maintaining social media accounts, organisations must consider requirements relating to corporate identity as well as the specific standards for content. Elements such as logos, organisation names, links and profile information should not treat Welsh less favourably than English.
- 5.4 Based on the findings of the inspection, we present the following recommendations to the organisations subject to Welsh Language Standards Regulations No. 2:

### **Recommendation 1: Supervisory arrangements**

Organisations should review their self-regulation processes to ensure that all social media accounts on all platforms comply with the relevant standards. Clear guidance should be provided to all staff responsible for posting on social media, to ensure they are fully aware of the standards' requirements and confident in using Welsh.

### **Recommendation 2: Corporate identity**

Organisations should conduct a full audit of all their social media accounts to ensure that Welsh is not treated less favourably than English in the presentation of corporate identity. The audit should include elements such as logos, names, handles and profile information.

### **Recommendation 3: Consistency when publishing posts**

When publishing posts on social media, organisations should ensure that Welsh-language content is complete—including text, images, videos and audio clips. Welsh should also be equally accessible and visible as English.

### **Recommendation 4: Videos**

Organisations should explore alternative methods of publishing videos in Welsh, ensuring that Welsh is not treated less favourably than English within those videos—in terms of voiceover, subtitles, and presentation style.

# Appendices

## Appendix 1: Survey Data

	Facebook Corporate	X Corporate	Instagram Corporate	LinkedIn corporate	Total and percentage
Number of organisations using the platform	7/7	6/7	6/7	6/7	<b>25/28</b>
Number of Organisations with a dedicated Welsh account	1/7 (14.3%)	4/6 (66.7%)	1/6 (16.7%)	0/6 (0%)	<b>6/25 (24%)</b>
Number of organisations with bilingual accounts	5/7 (71.4%)	2/6 (33.3%)	4/6 (66.7%)	6/6 (100%)	<b>17/25 (68%)</b>
Number of organisations with English-only accounts	1/7 (14.3%)	0/6 (0%)	1/6 (16.7%)	0/6 (0%)	<b>2/25 (8%)</b>
% compliant with the Corporate identity requirements	7/7 (100%)	6/6 (100%)	3/6 (50%)	2/6 (33.3%)	<b>19/28 (67.9%)</b>
Number of posts checked	40	40	50	43	<b>173</b>
Number and % of posts available in Welsh	40/40 100%	38/40 95%	50/50 100%	43/43 100%	<b>171/173 (98.8%)</b>
Number and % of posts that were fully compliant	30/40 75%	37/40 92.5%	28/50 56%	19/43 44%	<b>114/173 (65.9%)</b>
Number and % of posts that were partially compliant	10/40 25%	3/40 7.5%	22/50 44%	24/43 56%	<b>59/173 (34.1%)</b>
Number of posts treating the Welsh Language less favourably than English (including fully or partially)	10/40 25%	3/40 7.5%	22/50 44%	24/43 56%	<b>59/173 (34.1%)</b>

### Code of Practice Regulations No. 1 – sections relevant to the findings and recommendations in the body of this report.

#### What is meant by the term ‘treating the Welsh language no less favourably than the English language’?

4.11.8. Schedule 1, Part 3, Paragraph 36 of the regulations states:

“For the purpose of standards 52 to 57 (websites and apps) and standards 58 and 59 (social media), references to treating the Welsh language no less favourably than the English language include, amongst other matters (and in addition to specific matters referred to in any individual standard), treating the Welsh language no less favourably as regards— (a) the visual presentation of the material (for example in relation to the colour, size, font and format of any text), or (b) when material is published on the website, app or social media but it does not mean that Welsh language material must appear on the same page as English language material, or on a page that a person is likely to find before the English language page when searching.”

4.11.9. Other matters' may include treating the Welsh language no less favourably as regards:

- the language of material
- the material's language order
- the standard and quality of the material
- the position and prominence of the material
- when and how the material is published
- the publication format of the material
- the clarity and accuracy of the material (for example in terms of the meaning and expression of any text), and
- the content of the material (for example in terms of the detail or quality of the information it contains).

#### The Welsh language part of bilingual messages can sometimes be hidden. How can it be ensured that this does not mean that the body treats the Welsh language less favourably than the English language?

4.11.21. In some cases, text within posts on social media platforms appears in windows which are restricted in size. This may mean that it is not possible for a person to see the last part of the post until they have clicked on an additional link.

4.11.22. A body may ensure that it treats the Welsh language no less favourably than the English language by ensuring that it is no more difficult to see a Welsh language version of a post compared with an English version of that same post. For example, a body may ensure that a reader is not required to take any additional steps, such as scrolling down for longer, or clicking on an additional link, in order to find the Welsh language text. A body may choose to place Welsh language posts above or to the left of English language posts to avoid this.

## Do these standards apply to 'tags' and 'hashtags'?

4.11.23. Yes, they can be a consideration to ensure that a body does not treat the Welsh language less favourably than the English language when using social media

4.11.24. If a body tags or mentions another person in a message, it may ensure that the Welsh language is treated no less favourably than the English language by ensuring that the Welsh language version of that message tags or mentions that person's Welsh language account (if there is one). For example, if the body posts a message on Twitter in Welsh mentioning that person by tagging the username of the person within the message, it can ensure that it tags that person's Welsh language account rather than their corresponding English Language.

4.11.25. . If a body creates hashtags for a post, it may ensure that the Welsh language is treated no less favourably than the English language by using Welsh language or bilingual hashtags for Welsh language posts.

4.11.26. If a body uses hashtags created by other persons in a post, it may ensure that the Welsh language is treated no less favourably than the English language by using Welsh language or bilingual versions of those hashtags (if they exist) for Welsh language posts.

## Does a body have to ensure that the user names and its account names are in Welsh?

4.11.29. A body may ensure that it does not treat the Welsh language less favourably than the English language when using social media by ensuring that its user names ('handle') and its account names ('display name') are available in Welsh.

4.11.30. This may be done by using one of the following:

- a Welsh only user name and account name on a bilingual account
- a bilingual user name and account name on a bilingual account; or by
- operating separate Welsh language and English language accounts as noted in paragraph 4.11.7 with a Welsh only or bilingual user name and account name.