



Comisiynydd y  
Gymraeg  
Welsh Language  
Commissioner

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# Welsh Language Commissioner's Standards Report – Section 64 Welsh Language (Wales) Measure 2011

## **Public Bodies: Government**

[Ref: 20150529ASCCLI - 1]

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# 1 Background and context

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011, is to promote and facilitate the use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the Commissioner's work:

- in Wales, the Welsh language should be treated no less favourably than the English language
- persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

On 7 November 2014 the Welsh Government published a document entitled 'Welsh Language Standards Regulations 2015'<sup>1</sup>. These proposed standards were developed to impose duties upon county councils and county borough councils in Wales, national park authorities and Welsh Ministers.

On introducing the document, the following was noted by the Welsh Government:

The standards have been drafted so as to build on the [language] schemes. Organisations who will be required to comply with standards will now be required to take a more proactive, strategic approach to mainstreaming the Welsh language. We are confident that this will provide a solid foundation, enabling the Commissioner to improve services for Welsh-speakers.<sup>2</sup>

The Welsh Language Commissioner's standards investigations and the Welsh Government's evidence gathering exercise for composing their regulatory impact assessment are based upon the draft regulations, published on 7 November 2014.

The Welsh Language Standards (No. 1) Regulations 2015<sup>3</sup> came into force on 31 March 2015, following a debate and vote at a Plenary Meeting of the National Assembly for Wales.

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<sup>1</sup> <http://gov.wales/docs/dcells/consultation/141106-regulations-welsh-language-standards-en.pdf>

<sup>2</sup> <http://gov.wales/docs/dcells/consultation/141106-consultation-welsh-language-standards-en.pdf>

<sup>3</sup> <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

## 2 Standards investigation in relation to Public Bodies: Government

In accordance with section 62 of the Welsh Language (Wales) Measure 2011, an exploration notice was presented on 31 October 2014 for the attention of persons whom appear to the Commissioner to be members of the following groups of persons:

- Persons exercising, on behalf of the Crown, functions conferred by or under an Act or Measure.

The relevant persons within the above-mentioned group in this standards report are:

- Her Majesty's Chief Inspector of Education and Training in Wales

An exploration notice was issued for the attention of the relevant persons on 31 October 2014. An exploration notice is a notice in writing stating the Welsh Language Commissioner's intention to carry out a standards investigation, and which specifies the subject matter of the standards investigation. The Commissioner may not carry out a standards investigation unless she has given an exploration notice to each relevant person (organization), at least 14 days before beginning the investigation.

The subject matter of this standards investigation was to determine which standards (if any) should be specifically applicable to each relevant person within the groups of persons (whether or not the standards are already specified by the Welsh Ministers under section 26(1)). The period of this standards investigation began on 17 November 2014. It ended on 6 February 2015.

As part of this standards investigation, information was collected from each relevant person identified in this section. This was by means of a completed questionnaire. Alongside the process of collecting evidence from all relevant persons, evidence was collected from the Advisory Panel and the public.

A public questionnaire was placed on the Welsh Language Commissioner's website. The purpose of this questionnaire was to give members of the public an opportunity to identify what they felt was reasonable for the relevant persons to undertake and provide in Welsh, in considering the requirements related to the standards published on 7 November 2014. Advertisements were placed in the national press during the period of the standards investigation in order to make the public aware of this questionnaire. Furthermore, a video was posted on the Commissioner's website in order to provide an introduction to the process, and to provide guidance to the public on how to respond to the standards investigation.

### 3 Reasonableness and proportionality

In accordance with section 63 (1), Welsh Language (Wales) Measure 2011, the Commissioner must have regard to the need to secure that requirements for persons to comply with standards by virtue of section 25(1) are not unreasonable or disproportionate.

In carrying out a standards investigation, the Commissioner must consider the following:

- (a) whether, in respect of each of the activities specified in Schedule 9 which a person carries out, it is reasonable and proportionate for service delivery standards to be specifically applicable to a person, and
- (b) as respects each such activity, if it is reasonable and proportionate for service delivery standards to be specifically applicable to a person, conclude that service delivery standards should be specifically applicable to a person in relation to that activity.

In considering the question of reasonableness and proportionality, it should be noted that the Measure places a duty upon Welsh Ministers to secure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to a person if, and to the extent that, the person carries out those activities.

But Welsh Ministers need not secure that regulations provide for service delivery standards to be specifically applicable to a person in relation to an activity specified in Schedule 9 if, or to the extent that:

- (a) a standards report under section 64 indicates that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity, or
- (b) Welsh Ministers think it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity.

This does not prevent regulations from providing for other service delivery standards to be specifically applicable to a person.

By making regulations under this Measure exercisable by statutory instrument, the Commissioner is authorised to give a compliance notice to a person.

A compliance notice is a notice given to a person by the Commissioner, which:

- (a) sets out, or refers to, one or more standards specified by the Welsh Ministers under section 26 (1), and
- (b) requires a person to comply with the standard or standards set out or referred to.

The Welsh Language Commissioner will consider the evidence provided in reaching a decision on the content of a compliance notice given to a person.

The fact that a standard is made specifically applicable to a person does not mean that there is a duty to comply with that standard. A duty to comply with a standard will only be in force if the Commissioner gives a compliance notice to the person, and that notice makes it a requirement to comply with the standard on an imposition day.

The Welsh Language Commissioner will consult with the person before giving the person a compliance notice. The failure of a person to participate in a consultation will not prevent the Commissioner from giving that person a compliance notice.

After the Welsh Language Commissioner has given a compliance notice to a person, that person may apply to the Commissioner asking her to determine whether or not the requirement to comply with that standard, or to comply with it in that respect, is unreasonable or disproportionate. Should the Commissioner inform the person that the requirement to comply with the standard is not unreasonable or disproportionate, they have the right under the Measure to appeal to the Tribunal for determination.

### **The Welsh Language Commissioner's criteria**

In reaching a conclusion on the subject of this standards investigation, in accordance with the requirements outlined in Part 4, Chapter 8 of the Measure, the following criteria were considered alongside the evidence received as part of the standards investigation. Each criterion need not be considered in each case, and each criterion is of equal importance.

- Is the relevant person liable to be required to comply with standards – does the relevant person come within Schedule 5 and also within Schedule 6, or do they come within Schedule 7 and also within Schedule 8?
- Is the class of standard (service delivery; policy making; operational; record keeping; promotion) potentially applicable to the relevant person?
- Does the relevant person carry out the activity<sup>4</sup> in question?
- Has the relevant person already undertaken to provide the activity or action in question, in part or in full, via their Welsh language scheme?
- Does the relevant person already provide the service in Welsh (whether this corresponds exactly to the requirements included in the standard or not), or carry out the activity in accordance with the standard?
- Do the vast majority of other relevant persons within the same sector provide the service in Welsh, or carry out the activity?
- Are there any other reasons, for or against, making the standard specifically applicable to the relevant person?

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<sup>4</sup> This criterion will be considered in respect of service delivery standards only.

## 4 Evidence received from relevant persons

Evidence was received from Her Majesty's Chief Inspector of Education and Training in Wales. This evidence included responses to 190 questions in a questionnaire, as well as further evidence provided following subsequent enquiries.

Each response was read individually and software was used to record and analyse the text and to identify general themes. Regular meetings were held amongst officers of the Welsh Language Commissioner to analyse the evidence received from relevant persons concerned as part of the standards investigation, along with current Welsh language schemes commitments of the relevant persons concerned.

In this section an average percentage is given of the relevant persons' Welsh language schemes commitments corresponding to the standards, (be that entirely or partly corresponding to the standards' requirements), for each activity.

When analysing current Welsh language schemes commitments against the standards, it should be noted that it was not possible to correspond many of the standards in relation to service delivery activities due to the detailed nature of the regulations published by the Welsh Government. In some circumstances, it is possible that relevant persons are committed to, or comply with the requirement, but that it is not stated explicitly in their Welsh language schemes.

A summary is provided of the evidence received from each relevant person from within the groups of persons noted in section 4 of this report. The evidence submitted included information regarding what activities are carried out by the persons in question, what activities they carry out through the medium of Welsh and to what degree they can comply with the standards.

Where there are any references to standards within this report, these refer to the standards specified in the draft regulations published by Welsh Government on 7 November 2014.

## Persons exercising, on behalf of the Crown, functions conferred by or under an Act or Measure

### Service delivery standards

#### **Activity 1: Correspondence sent by a body**

##### **Standards for correspondence sent by a body [1-7]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that it carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to correspondence sent by a body.<sup>5</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they sent all individual and general correspondence either in the provider's chosen language, or bilingually. This was reinforced by noting that the first contact was made by means of a telephone call, and that the Inspection Co-ordinator would confirm the language choice and make a record of it on the central document used. He went on to note that there was a clear statement welcoming correspondence through the medium of Welsh, and that there would be no delay by corresponding with the organization in Welsh.

Her Majesty's Chief Inspector of Education and Training in Wales was of the opinion that standard 3 in respect of correspondence was not relevant to their functions.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to correspondence specifically applicable to them was reasonable and proportionate

#### **Activity 2: Telephone calls made and received by a body**

##### **Standards for telephone calls made and received by a body [8-22]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 87% of commitments corresponded to the standards in relation to telephone calls to a body and from a body.<sup>6</sup>

Her Majesty's Chief Inspector of Education and Training in Wales was of the opinion that making standards in relation to telephone calls was reasonable and proportionate, generally. However, they expressed concern regarding the ability to comply with standards 10, 11 and 19. It was noted that the organization could not offer a Welsh-medium service across all their areas of service at present. However, it was acknowledged that the standards were not unreasonable in principle, but they would need time to ensure that new staff had the appropriate skills in place, as well as to improve the Welsh language skills of their existing staff via the training scheme.

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<sup>5</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>6</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

**Activity 3: Meetings arranged by a body that are not open to the general public  
Standards for meetings arranged by a body that are not open to the general public [23-29]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to meetings held by a body that are not open to the public.<sup>7</sup>

In respect of standards 23-26B Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they held meetings through the medium of Welsh where all in attendance could speak Welsh. Similarly, it was noted that meetings arranged between external organizations, as well as meeting regarding the interests or well-being of individuals were conducted through the medium of Welsh if that was the organization's chosen language.

However, Her Majesty's Chief Inspector of Education and Training in Wales was not of the opinion that the imposition of standard 27 would be reasonable and proportionate. It was noted that Inspectors held pre-inspection meetings in Welsh or bilingually in schools of that medium. He proceeded to state that it was not the practice for the parents of children attending English-medium schools to express a desire to use the Welsh language. Therefore, Her Majesty's Chief Inspector of Education and Training in Wales was of the opinion that having to organise a translation service for meetings in English-medium schools was unreasonable and disproportionate.

**Activity 4: Meetings arranged by a body that are open to the public  
Standards for meetings arranged by a body that are open to the public [30-34]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they did not carry out the activity in question, nor did they do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to meetings arranged by a body that are open to the public.<sup>8</sup>

No evidence was provided in relation to this activity, due to the fact that Her Majesty's Chief Inspector of Education and Training in Wales was of the opinion that they did not carry out the activity. It should be noted that Her Majesty's Chief Inspector of Education and Training in Wales did note meetings held in relation to parents/guardians. Welsh Ministers should ensure clarity on the above in setting standards, and make them specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales.

**Activity 5: Public events organised or funded entirely by a body  
Standards for public events organised or funded entirely by a body [35-36]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

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<sup>7</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>8</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to public meetings.<sup>9</sup>

It was confirmed that Her Majesty's Chief Inspector of Education and Training in Wales did not hold events that were open to the general public. However, it was confirmed that they did hold conferences for which invitations were sent out to specific providers, together with representatives from specific sectors. This was reinforced by noting that any material produced for those events, including publicity material, was available bilingually, and that the Welsh language was not treated less favourably than English.

**Activity 6: A body's publicity and advertising**  
**Standards for a body's publicity and advertising [37]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments responded to the standards in relation to publicity and advertising.<sup>10</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that all advertisement and publicity material produced by the organization was in Welsh and in English. This was reinforced by noting that no Welsh version was treated less favourably than the English version.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to publicity and advertising specifically applicable to them was reasonable and proportionate.

**Activity 7: Displaying material in public**  
**Standards for displaying material in public [38-39]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to public exhibitions.<sup>11</sup>

Her Majesty's Chief Inspector of Education and Training in Wales noted that any material displayed at conferences and stakeholder meetings were displayed bilingually, and that no Welsh version was treated less favourably than the English version.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to displaying materials in public specifically applicable to them was reasonable and proportionate.

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<sup>9</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>10</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>11</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

**Activity 8: A body producing and publishing documents**  
**Standards for a body producing and publishing documents [40-49]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to publications.<sup>12</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they published all documents and publications of national relevance bilingually.

However, it was noted that inspection reports on schools and other providers were published either bilingually or through the medium of English only, in accordance with the provider's wishes. This meant that approximately 70% of reports were produced in English only, due to the target audience foreseen for them. As a result, Her Majesty's Chief Inspector of Education and Training in Wales considered that making standard 47 specifically applicable to them would be unreasonable and disproportionate, on the grounds of costs and the target audience.

**Activity 9: A body producing and publishing forms**  
**Standards for a body producing and publishing forms [50-51]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to forms.<sup>13</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they undertook consultations with providers and the public on a range of matters. This was reinforced by noting that all forms were available bilingually, and that they declared clearly that they welcomed responses in both languages. Similarly, it was noted that questionnaires distributed among parents or guardians were available bilingually, and that no Welsh version was treated less favourably than the English version. Therefore, Her Majesty's Chief Inspector of Education and Training in Wales did not foresee any problem in complying with the standards in relation to the production and publication of forms.

**Activity 10: A body's websites and on-line services**  
**Standards for a body's websites and on-line services [52-57]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to signs.<sup>14</sup>

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<sup>12</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>13</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>14</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that all aspects of the organization's external website were bilingual. Also, it was noted that they ensured that all entries made through the twitter account were bilingual. Her Majesty's Chief Inspector of Education and Training in Wales had not published any apps on the date the evidence was submitted for this standards investigation.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to websites and on-line services specifically applicable to them was reasonable and proportionate.

**Activity 11: Signs displayed by a body**  
**Standards for signs displayed by a body [58-60]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to signs.<sup>15</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that all signs displayed were bilingual, and that the Welsh was read first in all cases.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to signs displayed specifically applicable to them was reasonable and proportionate.

**Activity 12: A body receiving visitors at its buildings**  
**Standards for a body receiving visitors at its buildings [61-66]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, but did not do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, 86% of commitments corresponded to the standards in relation to receiving visitors to the body's buildings.<sup>16</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that the members of staff with responsibility for receiving visitors could not do so through the medium of Welsh at present. However, it was noted that they had identified other staff within the organization as individuals who could receive visitors through the medium of Welsh, if they had been forewarned. It was noted that there was a form for visitors to note their chosen language in relation to this activity.

It was confirmed that those members of staff with responsibility for receiving visitors undertook a 20 week course in order to ensure that they had the skills to be able to carry out this function through the medium of Welsh. Her Majesty's Chief Inspector of Education and Training in Wales had no sign in the reception area noting that persons were welcome to use Welsh in reception; neither were there any badges for the staff.

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<sup>15</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>16</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to receiving visitors specifically applicable to them was reasonable and proportionate. However, they were of the opinion that it was unlikely they could meet the requirements fully until the staff receiving training were confident and able to do so.

**Activity 13: Official notices made by a body**  
**Standards for official notices made by a body [67-68]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they did not carry out the activity in question, nor did they do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to official notices.<sup>17</sup>

No evidence was provided regarding this activity, due to the fact that Her Majesty's Chief Inspector of Education and Training in Wales was of the opinion that they did not carry out the activity.

**Activity 14: A body awarding grants**  
**Standards for a body awarding grants [69-73]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they did not carry out the activity in question, nor did they do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to awarding grants.<sup>18</sup>

No evidence was provided regarding this activity, due to the fact that Her Majesty's Chief Inspector of Education and Training in Wales was of the opinion that they did not carry out the activity.

**Activity 15: A body awarding tender contracts**  
**Standards for a body awarding tender contracts [74-78]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to awarding tender contracts.<sup>19</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they invited tenders for a range of contracts such as translation, information technology and communication services, and inspection work.

It was noted that they did not comply with the requirements in all cases, with some invitations to tender being published in English only. Similarly, it was noted that they did not state that tenderers were welcome to submit applications in Welsh. However, it was

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<sup>17</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>18</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>19</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

confirmed that they were reviewing the present procedures and were of the view that making standards in relation to this activity would be reasonable and proportionate.

**Activity 16: Raising awareness about Welsh language services provided by a body  
Proposed standards for raising awareness regarding Welsh language services provided by a body [79-80]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 50% of commitments corresponded to the standards in relation to raising awareness of Welsh language services provided by a body.<sup>20</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that their Welsh language services were promoted and advertised on the organization's corporate website, together with any publicity material e.g. e-shot in relation to a specific activity.

It should be noted that section 12(2)(b) Welsh Language Act 1993 notes that Welsh language schemes must specify in what ways organizations will ensure the scheme receives publicity. The Commissioner emphasises that this measure is not an optional element within the legislation.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to raising awareness regarding their Welsh language services specifically applicable to them was reasonable and proportionate.

**Activity 17: A body's corporate identity  
Proposed standards for a body's corporate identity [81]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they carried out the activity in question, and did so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to a body's corporate identity.<sup>21</sup>

In submitting evidence relating to this activity, it was confirmed that the organization's corporate identity treated the Welsh and English languages on the basis of equality. This was reinforced by noting that the corporate identity was promoted via their website, together with promotional material at conferences and in publications.

Her Majesty's Chief Inspector of Education and Training considered that making standards in relation to corporate identity specifically applicable to them was reasonable and proportionate.

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<sup>20</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>21</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

**Activity 18: Courses offered by a body**  
**Standards for courses offered by a body [82-84]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they did not carry out the activity in question, nor did they do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to courses offered by a body.<sup>22</sup>

Although Her Majesty's Chief Inspector of Education and Training in Wales noted that they did not carry out the activity, it was confirmed that courses were regularly arranged in order to train and update inspectors. These courses are not open to the public; rather, they are open to inspectors who are under contract to work on behalf of the organization. This was reinforced by noting that all the training provided was available bilingually, together with the material for the courses.

It was confirmed that Her Majesty's Chief Inspector of Education and Training in Wales contributed to sessions at the invitation of the Welsh Government or the Wales Audit Office. It was noted that all the material for similar sessions was available bilingually.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to courses provided specifically applicable to them was not reasonable and proportionate, on the grounds that they did not provide courses for the public as such.

**Activity 19: Public address systems used by a body**  
**Proposed standards for public address systems used by a body [85]**

Her Majesty's Chief Inspector of Education and Training in Wales noted that they did not carry out the activity in question, nor did they do so through the medium of Welsh.

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to public address systems used by a body.<sup>23</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that announcements were made in the lift servicing all the organizations that were tenants of the building, noting that the messages were bilingual, with the English first. They did not have direct responsibility for those systems.

**Standards dealing with supplementary matters in respect of the service delivery standards [158-163]**

In responding to the standards relating to supplementary matters in respect of the service delivery standards, Her Majesty's Chief Inspector of Education and Training in Wales confirmed that their complaints policy had been published on the organization's website. This was reinforced by stating that the policy included comprehensive information on how they deal with complaints from the public regarding services provided.

Her Majesty's Chief Inspector of Education and Training in Wales did not foresee any difficulty in complying with the requirements of standard 158-163, and they considered that

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<sup>22</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>23</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

making the supplementary standards in question specifically applicable to them was reasonable and proportionate.

### **Policy making standards [86-95]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 90% of commitments corresponded to the policy making standards.<sup>24</sup>

Her Majesty's Chief Inspector of Education and Training in Wales noted that the policy making standards, in principle, were current practice and that they acted in accordance with them, to varying degrees, via their Welsh language scheme. There are commitments in the organization's Welsh language scheme to assess the possible linguistic impact of any new proposals submitted for the organization's approval.

However, it was confirmed that the organization did not have a policy on awarding grants, due to the fact that they did not undertake the activity. Similarly, it was noted that the organization did not undertake research when making policy decisions, beyond the usual consultation process.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to policy making specifically applicable to them would be reasonable and proportionate.

### **Standards dealing with supplementary matters in respect of the policy making standards [164-169]**

In responding to the standards dealing with supplementary matters in respect of the policy making standards, Her Majesty's Chief Inspector of Education and Training in Wales confirmed that their complaints policy had been published on the organization's website. This was reinforced by noting that the policy included comprehensive information on how complaints from the public were dealt with.

Her Majesty's Chief Inspector of Education and Training in Wales did not foresee any difficulty in complying with the requirements of standard 164-169, and they considered that making the supplementary standards in question specifically applicable to them was reasonable and proportionate.

### **Operational standards [96-142]**

#### **Standards for the use of the Welsh language within a body's internal administration [96-109]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to the use of the Welsh language in internal administration.<sup>25</sup>

Considering the requirements of standard 96, Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they currently operated a policy on the use of Welsh internally, and that the policy had been published on the intranet. This was reinforced by

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<sup>24</sup> For each activity the average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>25</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

noting that there were opportunities for staff to be able to use Welsh in relation to performance management, and also employment matters.

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they provided all the documents noted in standards 97-102. However, it was acknowledged that they did not offer all the documents in Welsh officially to employees, but that they responded to the employee's chosen language as a matter of course.

In respect of the requirements attached to standards 103-109, he confirmed that all the policies in question were published bilingually. However, it was noted that there was no policy in operation regarding conduct in the workplace or conditions of work.

### **Standards for complaints made by a member of a body's staff [110-113]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to complaints made by a member of a body's staff.<sup>26</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they allowed all members of staff to submit complaints to the organization, and also to respond to a complaint regarding him/her, in Welsh.

It was noted that it would be possible to hold a meeting regarding a complaint in Welsh if the member of staff with responsibility for investigating the complaint had the necessary Welsh language skills. Where this was not possible, the provision of a simultaneous translation service was offered.

### **Standards for a body disciplining staff [114-117]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards for a body disciplining staff.<sup>27</sup>

In considering the requirements attached to standards 114-117, Her Majesty's Chief Inspector of Education and Training in Wales noted that they allowed members of staff to respond in Welsh to allegations made against them through the internal disciplinary process. It was confirmed that they offered to hold any meeting organised in relation to the allegations through the medium of Welsh, without the assistance of translation services, wherever possible. Where no member of staff with the necessary Welsh language skills was available to hold the meeting, a simultaneous translation service was provided.

### **Standards for information technology and support materials provided by a body and regarding the intranet [118-124]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 29% of commitments corresponded to the standards in relation to information technology and support materials provided by a body, and regarding the intranet.<sup>28</sup>

Her Majesty's Chief Inspector of Education and Training in Wales noted that they provided computer software for checking Welsh spelling and grammar for employees and workers.

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<sup>26</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>27</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>28</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

In addition, confirmation was given that they provided Welsh language interfaces, and also operated a bilingual intranet system.

It was confirmed that they complied with standards 118-122. However, it was noted that there was no page or pages on their intranet set aside for providing support services and materials to promote the Welsh language and to help members of staff to use the Welsh language.

### **Standards for a body developing Welsh language skills through workforce planning and training [125-133]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 89% of commitments corresponded to the standards in relation to developing Welsh language skills through workforce planning and training.<sup>29</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they assessed the Welsh language skills of their employees.

In responding to the requirements attached to standard 126, it was noted that they did not provide training for staff on recruitment and interviewing. This was reinforced by noting that the only training they currently provided bilingually was the induction element, as well as the way in which staff should deal with the public.

### **Standards for recruiting by a body [134-138]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to recruiting.<sup>30</sup>

Her Majesty's Chief Inspector of Education and Training in Wales noted that they conducted an assessment of the need for Welsh language skills in relation to all new or vacant posts advertised. In conducting the assessment, the organization's business needs were considered alongside the requirements of the existing Welsh language scheme.

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they complied with the requirements of all other aspects of standards 134-138.

### **Standards for signs displayed in a body's workplace [139-141]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to signs displayed in a body's workplace.<sup>31</sup>

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they displayed signs within the organization's buildings in Welsh, and that the Welsh language had been situated so that it was likely to be read first.

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<sup>29</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>30</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>31</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

### **Standards for audio announcements in a body's workplace [142]**

When analysing current commitments in the Welsh language scheme of the person in question, none of the commitments corresponded to the standards in relation to audio announcements in a body's workplace.<sup>32</sup>

Her Majesty's Chief Inspector of Education and Training in Wales noted that announcements were made in the lift servicing all the organizations that were tenants in the building. This was reinforced by noting that the Chief Inspector did not have direct responsibility for this. However, it was confirmed that the messages were bilingual with the English first.

### **Standards dealing with supplementary matters in relation to operational standards [170-175]**

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they recorded the requirements attached to the operational standards within the existing Welsh language scheme, and that the scheme had been published on the organization's corporate website. This was reinforced by confirming that it would be possible for them to comply with the requirements attached to standards 171-175.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to operational standards, together with the supplementary matters, specifically applicable to them would be reasonable and proportionate.

### **Promotion standards [143-144]**

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that he did not consent for promotion standards to be potentially applicable to him.

### **Record keeping standards [145-157]**

When analysing current commitments in the Welsh language scheme of the person in question, an average of 100% of commitments corresponded to the standards in relation to record keeping standards.<sup>33</sup>

In providing information on the organization's current corporate arrangements, Her Majesty's Chief Inspector of Education and Training in Wales noted that data on existing aspects of the language scheme were collected by the relevant corporate services.

It was noted that all members of staff were required to complete a self-assessment of their Welsh language skills annually. In advertising for posts, it was confirmed that the Directors' group considered the number of posts upon which essential language requirements should be imposed, submitting recommendations to the Chief Inspector and the Executive Board.

This was reinforced by noting that they would be able to keep records in accordance with the requirements of standards 153-157.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to record keeping standards specifically applicable to them was reasonable and proportionate.

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<sup>32</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

<sup>33</sup> The average percentage of commitments found in Welsh language schemes of persons in question, which correspond to the standards, be that partially or fully.

**Standards dealing with supplementary matters in relation to the record keeping standards [178-179]**

In considering the requirements attached to standards 178-179, Her Majesty's Chief Inspector of Education and Training in Wales noted that he could produce a document recording the record-keeping standards with which they are required to comply, and that any information the Commissioner wished to receive would be provided.

Her Majesty's Chief Inspector of Education and Training in Wales considered that making standards in relation to supplementary matters in respect of the record keeping standards specifically applicable to them would be reasonable and proportionate.

## 5 Evidence received from members of the public

### Persons exercising, on behalf of the Crown, functions conferred by or under an Act or Measure

291 responses were received from members of the public to the standards investigations carried out by the Welsh Language Commissioner in relation to persons exercising, on behalf of the Crown, functions conferred by or under an Act or Measure. 155 responses to the standards investigation were received by individuals who chose to complete the questionnaire provided for them by the Welsh Language Commissioner on the website.

A further 136 responses were received based on a template of a standard response published for use by Cymdeithas yr Iaith Gymraeg; in this case, all of the responses were the same. In 14 cases, responses were received from individuals twice. This happened because individuals via the Commissioner's consultation as well as completing Cymdeithas yr Iaith Gymraeg's template. 4 responses were received from other organizations or movements.<sup>34</sup> The Commissioner has noted every response received.

A full list of respondents who were willing for their responses to be published can be seen in Appendix B.

Figure 1 indicates where the respondents came from according to their group and geographical location.

**Figure 1 Number of responses to the standards investigation by location<sup>35</sup>**

Locations	Number	Percentage (%)
Swansea	16	5%
Blaenau Gwent	1	0%
Vale of Glamorgan	7	2%
Caerphilly	5	2%
Newport	0	0%
Neath Port Talbot	2	1%
Ceredigion	30	10%
Conwy	9	3%
Cardiff	32	11%
Gwynedd	72	25%
Merthyr Tydfil	3	1%
Bridgend	3	1%
Powys	9	3%

<sup>34</sup> A list of those movements / organizations has been included within Appendix B of the standards report.

<sup>35</sup> These statistics include all the responses received via the questionnaire, and the Welsh Language Society template.

Rhondda Cynon Taf	13	4%
Pembrokeshire	4	1%
Denbighshire	22	8%
Monmouthshire	2	1%
Carmarthenshire	21	7%
Flintshire	10	3%
Torfaen	1	0%
Wrexham	4	1%
Isle of Anglesey	19	7%
Outside Wales	6	2%
No information	0	0%
<b>Total</b>	<b>291</b>	<b>100%</b>

## The public's response to the standards investigation carried out in relation to Public Bodies: Government

### Service Delivery Standards

In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the service delivery standards, they were asked to respond to the following question for each activity in the questionnaire:

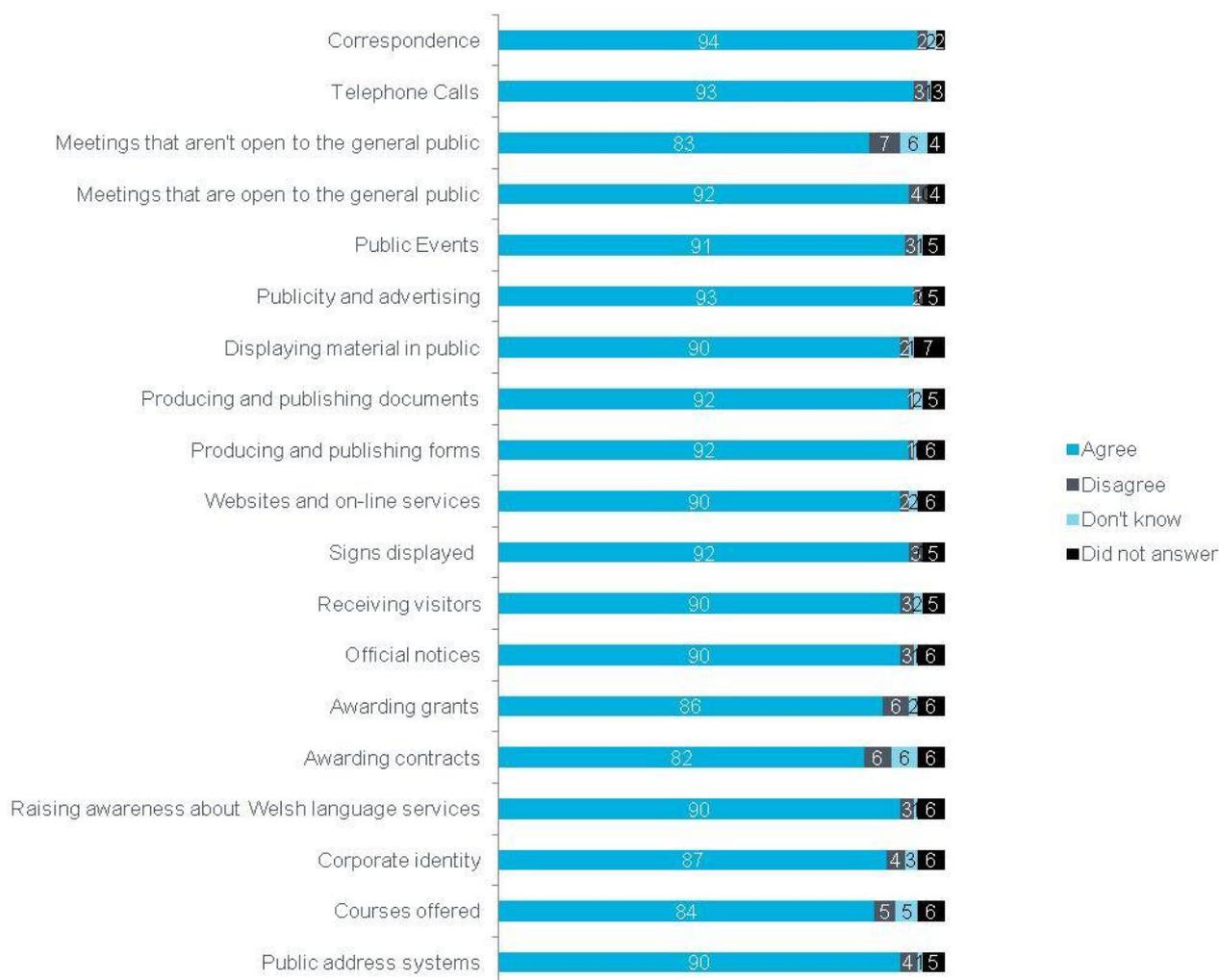
Do you agree or disagree that the organizations in question should carry out service delivery standards activities in the Welsh language, in order to enable you as a member of the public to use the Welsh language in the following situations?

In answering this question as part of the questionnaire, the public were given the opportunity to respond per activity within the scope of the service delivery standards.

Figure 2 indicates the variety of the responses received.

### Figure 2 Response to question 1 of the questionnaire – Service Delivery Standards

## Welsh Language Commissioner Standards Report – Public Bodies: Government – Section 64 Welsh Language Measure (Wales) 2011



### Policy making standards

In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the policy making standards, they were asked to respond to the following question in the questionnaire:

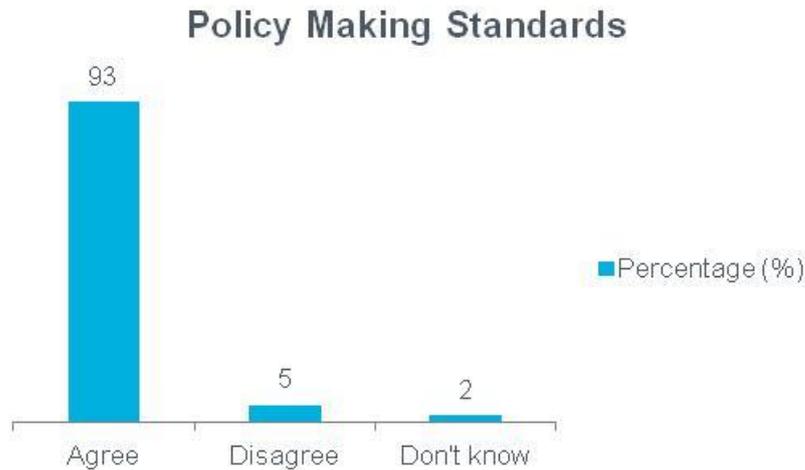
Do you agree or disagree that the policy decisions of the organizations in question should improve the opportunities for you to use the Welsh language and ensure better treatment for the Welsh language?

Of the 155 that responded via the questionnaire on the Welsh Language Commissioner's website, 95% (147) had answered this question. Of the 147 that responded, 93% (136) agreed that the relevant persons in question should have to consider the effect of their policy decisions, and ensure, or contribute to ensuring better opportunities for persons to be able to use the Welsh language as well as ensure better treatment for the Welsh language.

The figure below indicates how members of the public responded to this question.

The figure below indicates how members of the public responded to this question:

**Figure 3** Response to question 3 of the questionnaire – Policy making standards<sup>36</sup>



### Operational standards

In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the operational standards, they were asked to respond to the following question in the questionnaire:

Do you agree or disagree that the organizations in question should have to facilitate the use of the Welsh language in accordance with the operational standards?

Of the 155 that responded via the questionnaire on the Commissioner's website, 95% (147) had answered this question. Of the 147 that responded, 93% (136) agreed that the relevant persons in question should have to facilitate the use of the Welsh language in accordance with the definition of the operational standards in the Welsh Language (Wales) Measure 2011.

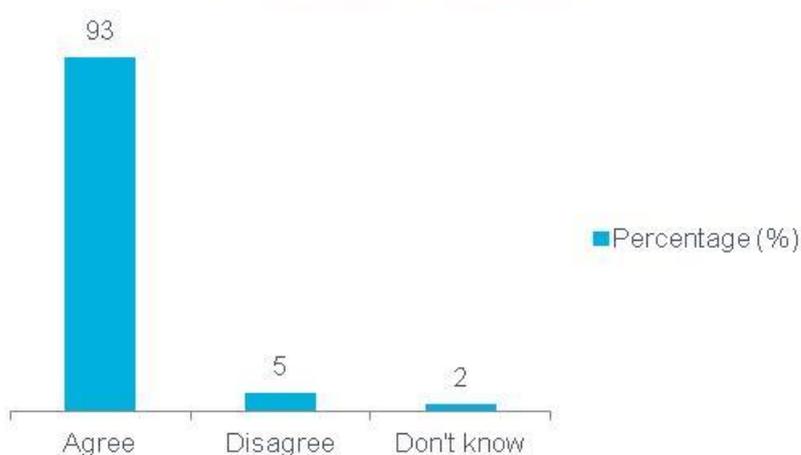
The figure below indicates how members of the public responded to this question:

**Figure 4** Response to question 4 of the questionnaire – Operational standards<sup>37</sup>

<sup>36</sup> Note that these statistics relate to the respondents who answered this question.

<sup>37</sup> Note that these statistics relate to the respondents who answered this question.

### Operational Standards



### Record keeping standards

In seeking the public's opinion regarding the reasonableness of the requirements attached to the record keeping standards, they were asked to respond to the following question in the questionnaire:

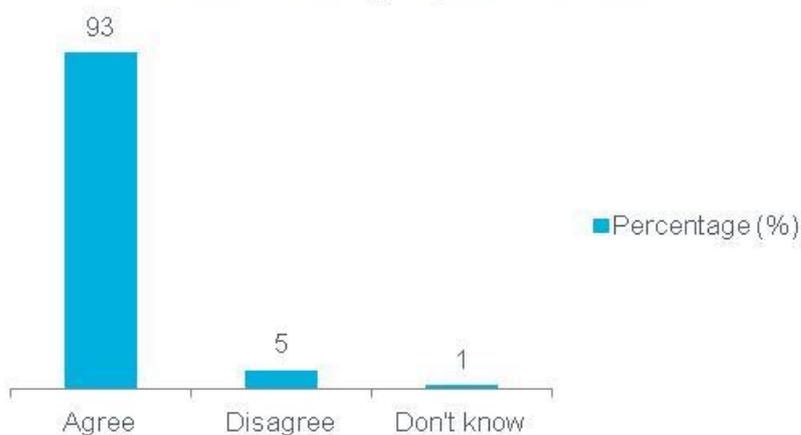
Do you agree or disagree that the organizations in question should have to keep a record of how they adhere to the Welsh language standards and keep a record of complaints?

Of the 155 that responded via the questionnaire on the Welsh Language Commissioner's website, 95% (148) had answered this question. Of the 148 that responded, 94% (138) agreed that this duty should be imposed on the relevant persons in question.

The figure below indicates how members of the public responded to this question:

**Figure 5** Response to question 5 of the questionnaire – Record keeping standards<sup>38</sup>

### Record Keeping Standards



<sup>38</sup> Note that these statistics relate to the respondents who answered this question

## Further comments

As well as providing responses to specific questions on the subject of the standards investigation, the public were given the opportunity to note any additional standards they believed should be specified and made specifically applicable to the relevant persons in question, together with any further comments relevant to this standards investigation.

Of the 155 that responded via the questionnaire on the Commissioner’s website, 49% (76) provided additional comments to be considered by the Welsh Language Commissioner as part of the standards investigation.

**Figure 6** Further comments provided by members of the public



## 6 Evidence received by the Welsh Language Commissioner's Advisory Panel

Evidence was received from the Advisory Panel in accordance with the requirements outlined in section 63 (3) Welsh Language (Wales) Measure 2011.

The responses received from the Panel indicated support for the purpose of the regulations, namely to realise the fundamental objectives of the Welsh Language (Wales) Measure 2011; that Welsh is an official language in Wales and that it should not be treated less favourably than the English language.

Similarly to what was noted in relation to the persons in respect of whom standards investigations were carried out in round 1, the Panel was of the opinion that consideration should be given to the reasonableness and proportionality of making the standards specifically applicable to the relevant persons alongside the context. This, in their view, included the intention of the legislation and desire of the Legislature in respect of the legal status of the Welsh language; the size of the persons in question; their involvement with the public; and the difference between imposing standards and the timetable for complying with those standards.

This was reinforced by noting that reasonableness and proportionality could be considered in one of two ways, namely; specifying different standards for persons in different areas of Wales, reflecting the linguistic nature of the relevant areas or specifying common standards across Wales, stating different imposition days when they will be required to comply with the standard(s) e.g. where an element of staff training is needed in order to comply with the standard, more time is given to comply with the standard than for a person which already has appropriate staff resources. The Panel was again strongly of the opinion that the second method was the most appropriate for the Welsh Language Commissioner to implement in the majority of cases, bearing in mind that ensuring consistency between persons in terms of providing Welsh language services is one of the main objectives of the Welsh Language (Wales) Measure 2011.

However, comments were received from the Panel regarding the reasonableness and proportionality of making the standards specifically applicable to persons whose headquarters are outside Wales; requiring them to comply with them across the UK. It was emphasised that it should be ensured that any requirements imposed on similar persons note those circumstances in which they will be expected to comply with the standard(s).

## Persons exercising, on behalf of the Crown, functions conferred by or under an Act or Measure

### **Service delivery standards**

The Panel agreed that the service delivery standards relating to all the activities should be made specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales, enabling members of the public to use the Welsh language in the situations in question.

In reaching that conclusion, the Panel noted that they were of the opinion that there was no reason why the persons shouldn't be able to carry out and comply with the majority of the activities in question, and thus deal with the public increasingly through the medium of Welsh. However, the Panel was of the opinion that some flexibility should be allowed in relation to some activities, drawing specific attention to producing and publishing documents, grant applications as well as courses. It was emphasised that flexibility would be required in exceptional situations or circumstances, drawing specific attention to documents which would be restricted in terms of the subject or presumed target audience.

Similarly, the Panel was of the opinion that more consideration should be given to the location of the headquarters or offices of the persons in question, when serving compliance notices. This was reinforced by noting that there would be a need to consider whether it would be reasonable for such persons to comply with a selection of such standards where they had no presence in Wales. The relevant clauses in section 44(3) of the Measure were emphasised as a means of the Commissioner being able to overcome such situations.

### **Policy making standards**

The Panel welcomed the policy making standards specified in the draft regulations. This was reinforced by noting that these standards should be imposed on all persons regarding whom a standards investigation is carried out in round 2, emphasising the importance of compliance with them at all levels.

The Panel agreed that the policy decisions of Her Majesty's Chief Inspector of Education and Training in Wales should improve the opportunities for persons to use Welsh and ensure better treatment for the Welsh language, and that policy making standards should be made specifically applicable to them.

### **Operational standards**

The Panel agreed that Her Majesty's Chief Inspector of Education and Training in Wales should have to facilitate use of the Welsh language in accordance with the operational standards and that the operational standards should be made specifically applicable to them.

### **Record keeping standards**

The Panel was unanimous that making record keeping standards specifically applicable to persons in round 2 is completely necessary in order to ensure compliance with the remainder of the standards with which they will be required to comply.

The Panel agreed that the relevant persons should keep a record stating how they adhere to other specific standards, and keep a record of complaints. The conclusion was reached that record keeping standards should be made specifically applicable to them.

## 7 Conclusions of the standards investigation

### General comments

The following conclusions were reached based on the evidence received from the relevant persons, the public and the Advisory Panel on the subject matter of the standards investigation, together with independent advice gathered by the Welsh Language Commissioner in the context of the language scheme of the relevant person in question.

It is noted in the Explanatory Memorandum on the Welsh Language (Wales) Measure 2011 that one of the main objectives of the legislation was to modernise and build on the system of Welsh language schemes created under the 1993 Act. Similarly, it is noted that the aim of the Welsh Government in legislating was to ensure better consistency between persons, especially between persons in the same sector, in terms of providing Welsh language services.

Similarly, it is noted that section 42 of the Measure imposes a duty on Welsh Ministers to ensure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to the relevant person if the person,, and to the extent that the person, carries out those activities.

However, it should be noted that they do not have to do so if the Commissioner indicates in a standards report, or if the Welsh Ministers are of the opinion that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity. It should be noted that this section in the Measure does not prevent regulations under section 39 from providing for other service delivery standards to be specifically applicable to a person.

In accordance with the above, if the standards investigation identifies that an organisation carries out the activity<sup>39</sup>, be that to a lesser or a greater extent, the Welsh Language Commissioner will conclude that all standards relating to that activity should be made specifically applicable. These conclusions were reached due to the fact that the standards introduced by the Welsh Government are interdependent on each other within a scope of activity.

We also note that the way in which a service is delivered under an activity can change in the future and that it would be necessary to adapt to reflect that by varying the compliance notice, rather than going back to regulations.

However, where evidence exists that a person does not carry out an activity at all, whether by means of evidence acquired as part of the standards investigation, or by other means, the Welsh Language Commissioner will conclude that standards in relation to that activity should not be specifically applicable to them, unless there are valid reasons to do so.

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<sup>39</sup> Service delivery activity as defined in section 28 of the Welsh Language (Wales) Measure 2011.

## Standards that should be made specifically available to persons exercising, on behalf of the Crown, functions conferred by or under an Act or Measure

### Service delivery standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that Her Majesty's Chief Inspector of Education and Training in Wales should be able to deliver services in relation to the activities included in the draft regulations.

Once again, the Commissioner wishes to note the importance of clearly differentiating between the commitments of the organisation (what is expected of them) and performance (to what extent they currently comply with those expectations). All Welsh language schemes carry the full authority of the person in reaching agreement on its content. Not specifying equal standards, and making them specifically applicable to the person would be a step back, and would go against the intention of the Welsh Language (Wales) Measure 2011.

It is noted that performance, along with to what extent an organisation can comply with a standard at a particular period in time, is a practical matter. Those extents may improve, deteriorate or remain the same. The Welsh Language Commissioner is of the opinion that commitments should meet the needs of the Welsh users they serve, with a reasonable timetable specified for dealing with any existing obstacles. The Welsh Language Commissioner will consider those obstacles when determining the contents of compliance notices issued under section 44, Welsh Language (Wales) Measure 2011.

Although some examples of lack of compliance, or concerns regarding some of the requirements attached to the service delivery standards were received, Her Majesty's Chief Inspector of Education and Training in Wales considered in general that making the standards specifically applicable to them was reasonable and proportionate.

**Conclusion 1: The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales.**

- correspondence sent by a body
- telephone calls made and received by a body
- meetings held by a body that are not open to the general public
- a body's publicity and advertising
- displaying material in public
- a body producing and publishing documents
- a body producing and publishing forms
- a body's websites and on-line services
- signs displayed by a body
- a body receiving visitors at its buildings

- official notices made by a body
- a body deciding on tender applications for contracts
- raising awareness about Welsh language services provided by a body
- a body's corporate identity
- public address systems used by a body

**Conclusion 2:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that Her Majesty's Chief Inspector Of Education of Training in Wales' role in carrying out inspections, including inspection visits to all relevant settings are included when specifying standards in regulations.

In relation to the following activities, evidence was received from Her Majesty's Chief Inspector of Education and Training in Wales noting that they did not carry out some activities, due to the fact that these activities were not delivered to the public. However, as outlined in Part 4 of the report, there appears to be a lack of clarity regarding the exact definition of the term "persons" in the draft regulations, and whether that would extend beyond the public as defined in the Welsh Language Act 1993. In specifying standards under section 39, Welsh Ministers should ensure that the final regulations clearly outline the audience in question in relation to all activities.

**Conclusion 3:** The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the following activities to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales in the context of their activities.

- meetings arranged by a body that are open to the public
- public events organised or funded entirely by a body

Similarly, it appears that there was uncertainty as to the exact definition of an 'education course'. The draft regulations note that an education course is "any seminar, training, workshop or similar provision which is provided in order to educate members of the public or to improve the skills of members of the public; but does not include activities or courses provided as part of the curriculum in accordance with any enactment."<sup>40</sup>

The Welsh Language Commissioner will further consider these factors when determining the contents of compliance notices issued under section 44 of the Welsh Language (Wales) Measure 2011.

**Conclusion 4:** Based on the present definition in the regulations, the Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for service delivery standards in relation to the activities below to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales.

<sup>40</sup> Paragraph 37, Part 3, Welsh Language Standards (Welsh Ministers, County and County Borough Councils and National Park Authorities) Regulations 2015

○ courses offered by a body

Her Majesty's Chief Inspector of Education and Training in Wales confirmed that they did not issue or display any official notices. Similarly, it was noted that the awarding of grants was not an activity relevant to them. No further evidence was provided to confirm whether this was due to constitutional/legislative reasons or not.

The draft regulations note that the definition of an official notice is 'any notice issued by a body to inform persons of the body's service delivery activities or changes to those service delivery activities'. With this in mind, the Commissioner concludes that it can be an activity applicable to Her Majesty's Chief Inspector of Education and Training in Wales.

**Conclusion 5:** The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for service delivery standards in relation to the following activities to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales, to the extent to which the person has the power and the function to do so:

○ a body awarding grants

### Policy making standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that Her Majesty's Chief Inspector of Education and Training in Wales's policy decisions should improve the opportunities that exist for persons to use the Welsh language and ensure that Welsh is not treated less favourably than English.

The Commissioner's reasons for reaching that conclusion are that Her Majesty's Inspector of Education and Training in Wales is already expected to assess the linguistic implications of new policies and initiatives during the process of creating and reviewing them. All this was confirmed in the evidence received from them as part of this standards investigation.

The required measures that are the basis for the content of Welsh language schemes can be seen in the form of statutory guidelines approved by the House of Commons (Guidelines on the Form and Content of Language Schemes were passed by the UK Parliament on 19 July 1995). It is noted in those guidelines that organizations should have to specify the measures they intend to take in assessing the impact of new policies, strategies and initiatives and in implementing them.

**Conclusion 6:** The Welsh Language Commissioner has reached the conclusion that Welsh Ministers should ensure that regulations provide for policy making standards to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales.

## Operational standards

Section 30 of the Welsh Language (Wales) Measure 2011 states that the meaning of operational standards is:

*a standard that is intended to promote or facilitate the use of the Welsh language*

- (i) by A in carrying out A's relevant activities,*
- (ii) by A and another person in dealings between them in connection with A's relevant activities, or*
- (iii) by a person other than A in carrying out activities for the purposes of A's relevant activities, or in connection with them.*

The Welsh Language Commissioner acknowledges that some elements attached to the operational standards are new to Her Majesty's Chief Inspector of Education and Training in Wales. To the same end, some examples were received where there are no arrangements in place to ensure full compliance with the requirements at the present time. As a result, it is inevitable that they will need to secure sufficient time in order to ensure full compliance with the requirements,

Despite the above, it should be noted that a number of the requirements are things that persons are expected to carry out under Welsh language schemes. These include specifying measures to ensure that workplaces having contact with the public in Wales try to obtain enough Welsh speakers with the appropriate skills; measures to earmark those posts where the ability to speak Welsh is considered essential and those where it is considered desirable; as well as measures to assess the need for training and to provide it for employees.

To this end, and based on the evidence received, the Commissioner concludes that it is reasonable and proportionate for Her Majesty's Chief Inspector of Education and Training in Wales to enable persons to carry out their relevant activities through the medium of Welsh.

As regards those elements that have not been embedded in the Welsh language scheme or operational at present, the Welsh Language Commissioner concludes that it would be reasonable and proportionate to allow them sufficient time to achieve this new policy aim.

**Conclusion 7: The Welsh Language Commissioner has reached the conclusion that Welsh Ministers should ensure that regulations provide for operational standards to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales.**

## Record keeping standards

As a result of carrying out this standards investigation, and based on the evidence received, the Welsh Language Commissioner concludes that Her Majesty's Chief Inspector of Education and Training in Wales should keep a record stating how they adhere to standards with which they are expected to comply, and also complaints. It is a requirement under Welsh language schemes for the organizations in question to specify actions to be taken to publish information on the organization's performance against the

statutory requirements.

This was confirmed in the evidence received; with Her Majesty's Chief Inspector of Education and Training in Wales noting that the record keeping standards were, in principle, operational to a considerable extent, and current practice. Therefore, they considered that making the standards specifically applicable to them was reasonable and proportionate.

**Conclusion 8: The Welsh Language Commissioner has reached the conclusion that Welsh Ministers should ensure that regulations provide for record keeping standards to be specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales.**

### Promotion standards

Her Majesty's Chief Inspector of Education and Training in Wales did not wish for promotion standards to be potentially applicable to them.

### Standards which deal with supplementary matters

There are provisions in the Welsh Language (Wales) Measure 2011 regarding monitoring arrangements and reporting requirements for the standards system (Section 27 - Supplementary Provisions). Following the passing of 'The Welsh Language Standards Regulations (No.1) 2015'<sup>41</sup> in the National Assembly for Wales Plenary Meeting, standards which deal with supplementary matters were specified under section 26 of the Measure.

The Commissioner notes that it is a requirement under Welsh language schemes to determine actions to be taken to publish information on the organization's performance against the statutory requirements.

The Welsh Government policy document 'Inspection, Audit and Regulation'<sup>42</sup>, explains that the role of inspectors is to "investigate independently using professional expertise and legal powers". This is supplemented by the Crerar Report on inspection in Scotland which notes that the role of external inspectors is to provide independent assurance that services are being managed well and are fit for purpose. According to Crerar, the five main principles are public focus, independence, proportionality, transparency and accountability. Crerar's proposals are consistent with the principles of Hampton which note that inspection should take place on the basis of risk; that inspections should not be carried out for no reason and that regulators should be able to provide authoritative and accessible advice. In the same way, there is also an acknowledgment that it is not possible for inspection bodies to oversee everything that service providers do. There is a growing expectation that service providers have robust internal audit and scrutiny arrangements. Further to that, self-assessment plays an increasingly important role in the external inspection arrangements.

**Conclusion 9: As a result of carrying out this standards investigation, and in consideration of the above, the Welsh Language Commissioner has reached the conclusion that Welsh Ministers should ensure that regulations provide for standards which deal with supplementary matters to be made specifically applicable to all relevant persons within this standards report.**

<sup>41</sup> <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

<sup>42</sup> <http://gov.wales/docs/dpsp/publications/inspectionpolicystatement/090930inspstatementen.pdf>

## Additional standards that should be specified and made specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales

The following is noted in section 64 (3) Welsh Language Measure (Wales) 2011:

If -

- (a) the conclusions of the standards investigation are (in whole or in part) that any standards should be specifically applicable to a person, and
- (b) any or all of those standards are not specified by the Welsh Ministers under section 26 (1), the standards report must set out the standards that are not specified.

The Welsh Language Commissioner concludes that additional standards to those published by the Welsh Government on 7 November 2014 should be specified. This judgement was partly made after receiving evidence from the public as part of the standards investigation.

### Activities: social media; self service machines.

Since the end of the standards investigation, a draft version of the Welsh Language Standards (Wales) Regulations (No. 1) 2015 was presented to the Table Office on 3 March 2015. The Welsh Assembly Government accepted these Regulations in the Plenary Meeting on 24 March 2015. Service delivery standards in relations to a body's use of social media, as well as self-service machines were seen as additional to the range of activities which are subject to this standards investigation. These standards are 58, 59 and 60 within the Welsh Language Standards (Wales) Regulations (No. 1) 2015.<sup>43</sup>

**Conclusion 10:** The Welsh Language Commissioner has reached the conclusion that it should be ensured that regulations provide for service delivery in relation to the activities detailed below to be made specifically applicable to Her Majesty's Chief Inspector of Education and Training in Wales, if Welsh Ministers are of the opinion that the following activities are ones that the person could undertake now or in the future:

- a body's use of social media
- self service machines

<sup>43</sup> <http://www.legislation.gov.uk/cy/wsi/2015/996/made/data.pdf>

## 8 The next steps

In preparing this standards report, the Welsh Language Commissioner has considered all the responses submitted to the standards investigation. This report will be submitted to the following in accordance with section 64(4) of the Welsh Language (Wales) Measure 2011:

- all relevant persons
- Advisory Panel to the Welsh Language Commissioner
- all persons who participated in the Commissioner's consultation in accordance with section 63;
- Welsh Ministers.

Alongside the standards investigations of the Welsh Language Commissioner, Welsh Ministers are expected to carry out regulatory impact assessments in respect of relevant secondary legislation they intend to create, using their own secondary legislation powers.

The Government of Wales Act 2006 notes that a regulatory impact assessment is as follows:

A regulatory impact assessment is an assessment as to the likely costs and benefits of complying with relevant Welsh subordinate legislation.<sup>44</sup>

In this respect, a regulatory impact assessment may be considered:

- a process to help Welsh Ministers to consider the effect of the proposed regulation on the interests of individuals, groups, organizations etc
- a means of enabling Welsh Ministers to weigh up the costs and benefits of all the options available to them before implementing a policy; and
- a means of submitting the relevant evidence on the positive and negative effects of such interventions for the purposes of scrutinizing that evidence.<sup>45</sup>

Welsh Ministers will be expected to consider the evidence they collected for the purposes of the regulatory impact assessment, alongside the Welsh Language Commissioner's conclusions in a standards report in deciding whether or not to exercise the powers granted to them under Part 4 Welsh Language (Wales) Measure 2011.

The Rt Hon. Carwyn Jones AM, First Minister of Wales confirmed in a statement on 24 March 2015 that it is currently foreseen that the process of introducing regulations for all relevant persons noted within this report will begin by the end of 2015, with a debate and vote on approval of regulations at a Plenary Meeting of the National Assembly for Wales.

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<sup>44</sup> Section 76(2)(a) Government of Wales Act 2006

<sup>45</sup> <http://gov.wales/docs/legislation/guidance/091020riacodeen.doc>

## Appendix A – General comments received from members of the public in relation to round 2 standards investigations

The responses received were generally supportive of the concept of specifying standards, in order to secure clear rights for Welsh speakers in relation to Welsh language services provided by all the organizations included in round 2.

Once again, the public expressed a considerable desire to ensure that the standards specified are clear, robust and intelligible to ordinary people. This was reinforced by stating that this is the only way it can be ensured that the rights of Welsh speakers are protected.

Outlined below are the main themes of the responses received that were in favour of making the standards specifically applicable:

- The need to ensure that the standards specified fully reflect the recommendations of the Welsh Language Commissioner's Health Inquiry.
- The need to ensure that standards ensure the unsolicited provision of Welsh language services, ensuring that the concept of a proactive offer is consistent throughout.
- To ensure that the process of deciding upon or dealing with a tender or contract is above the need for imposing Welsh language conditions on the grants/contracts distributed by organizations included in round 2.
- The need to ensure that standards in relation to face-to-face service go beyond main reception areas and personal meetings organised in advance
- The need to ensure clarity that the definition of personal meetings includes all face-to-face contact.
- The need to specify a standard that imposes clear requirements in the recruitment policies of organizations.

Some responses were received from members of the public expressing a general objection to language duties.

Outlined below are the main themes of the responses received that were against making the standards specifically applicable:

- The need to consider the present economic climate, and the way public money is spent on the Welsh language
- That other policy areas should be prioritised over the Welsh language
- Relevance of the Welsh language in Wales
- Disagreement with the requirement that the Welsh language should appear first or be published first

### Service delivery standards

Comments were received from members of the public calling for the need to ensure that standards are specified for the health bodies, which reflect the Welsh Language

Commissioner's findings in the report 'My Language, My Health: The Welsh Language Commissioner's Inquiry into the Welsh Language in Primary Care'. This was reinforced by stating that standards should be specified in relation to national contracts with general practitioners and primary care providers.

Comments were received noting that there was an unintentional weakness in the draft regulations in their view, in that the standards in relation to receiving a Welsh language service face-to-face did not go beyond personal meetings arranged in advance and service in main reception areas. Similarly, it was noted that it was vital that regulations in relation to health bodies specified standards for personal meetings encompassing appointments, consultations and all other such face-to-face contact.

The importance of personal meetings in the areas of health, education and justice were emphasised, drawing attention to the fact that they were not of the opinion that the draft regulations would ensure face-to-face Welsh language provision beyond personal meetings and in reception areas. This was reinforced by noting that the definition should be expanded to various other contexts.

A number of responses were received which supported the standards in relation to meetings that are not open to the general public, bearing in mind that a number of organizations in the justice area had been included in round 2. Although the standards refer to personal interest or well-being, some expressed concern that it was not totally clear whether that would include a person's right to be interviewed in Welsh in the above context.

In the context of signs, some respondents were of the opinion that it should be ensured that electronic signs and audio-visual displays in locations such as museums were encompassed within the definition of this activity. Similarly, it was noted that surtitles and subtitles in dramas and performances should also be within the definition of signs, with a view to imposing standards on persons such as the National Theatre and Welsh National Opera.

Regarding the standards in relation to courses, a number of respondents emphasised the importance of professional training in the area of health as well as other sectors, and the need to specify standards that would guarantee professional development courses through the medium of Welsh. Also, concern was expressed regarding the clarity of the definition of courses, with a danger that courses open to the public could be seen as courses for members of the bodies or which are managed by the bodies only. One respondent noted the importance of these standards in relation to the Wales Council for Voluntary Action.

In responding to the standards relating to deciding on grant applications, a number of individuals referred to the importance of specifying standards that would ensure Welsh language conditions were imposed on the grants distributed by the organizations included in round 2. Emphasis was placed on bodies such as Sports Wales, the Arts Council and the Big Lottery Fund, noting that they were organizations where the distribution of grants was vital in terms of increasing use of Welsh and Welsh language provision.

To the same end, some respondents noted that an additional standard should be specified in relation to deciding upon tenders for contracts with a view to ensuring that independent

production companies responsible for supplying services on behalf of S4C also came under a duty to move towards internal use of the Welsh language in their activities under contract to the Welsh Channel.

Concerns were expressed by a number of members of the public that no standard had been specified in the draft regulations for public appointments. This was reinforced by noting that the former Local Government Minister had stated that there would be standards relating to the public appointments process in order to specify thresholds for the number of Welsh speakers.

In considering the standards relating to official notices, a number of respondents noted that it should be ensured that those standards were made specifically applicable to all organizations included in this round. This was reinforced by one respondent who noted that it should be ensured that prescriptions should be included within the definition of this activity. However, some comments were received that questioned the appropriateness of issuing notices on specialist subjects in both languages, and went on to question the need to issue official notices at all in those cases.

One respondent noted that the standards in relation to education corporations (further and higher) should require them to commit to educational provision through the medium of Welsh and bilingually, using their own resources as well as resources received via external streams. This was reinforced by noting that the bodies in question should also inspire a demand from students, as well as responding to it. Noted in the Welsh Language Standards Regulations 2015<sup>46</sup> is the following:

For the purposes of standards 84, 85 and 86 (courses), an education course means any seminar, training, workshop or similar provision which is provided in order to educate members of the public or to improve the skills of members of the public; but does not include activities or courses provided as part of the curriculum in accordance with any enactment.

Welsh Ministers should ensure clarity on the above when specifying standards, and making them specifically applicable to further and higher education corporations in regulations.

### **Policy making standards**

One respondent referred to the importance of imposing the above standards on all bodies in round 2, considering that the policies are the basis for all their activities. Another respondent referred specifically to organizations such as the Police and Crime Commissioners, Sport Wales, the Millennium Centre and the Equality and Human Rights Commission noting that they should give more consideration to the Welsh language in making policy decisions.

To the same end, one respondent referred to the importance of making the policy making standards specifically applicable to the Commissioners named in round 2, noting that there are a number of reports from them where there is no mention of the Welsh language at all, in areas in which language rights are trampled upon on a regular basis.

Specific comments were received in relation to the Office of Communications, noting its

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<sup>46</sup> Paragraph 37, Part 3, Schedule 1, Welsh Language Standards (Welsh Ministers, County and County Borough Councils, and National Park Authorities) Regulations 2015

crucial role in awarding radio and television licences. With this in mind, the respondent in question was of the opinion that a standard imposing language conditions on licences should be specified under the policy making standards or the standards in relation to the awarding of contracts.

From the evidence received from members of the public, there were references to a number of the professional regulatory bodies in round 2 noting that it should be ensured that standards are specified for them that will lead to better workforce planning for the purposes of a bilingual Wales.

One respondent expressed concern regarding the limited effectiveness of the policy making standards it was proposed to specify. This was reinforced by noting that not many policies could exist at local level only, and that they should be part of a wider context, often a national one.

### **Operational standards**

Emphasis was placed by one respondent on the role of organizations such as the National Museum, the Wales Millennium Centre, S4C, Natural Resources Wales, the National Library of Wales and the Books Council in terms of contributing towards the Welsh language as a working language. They noted that the organizations in question, among others, should be working towards carrying out their internal administration through the medium of Welsh. Therefore, he was of the opinion that additional operational standards to those in the draft regulations should be specified that would enable these organizations, among others, to work towards that aim.

Similarly, a number were of the opinion that higher-tier standards should be specified in relation to recruitment, making it a requirements for organizations that already carry out their administration through the medium of Welsh to recruit Welsh-speaking staff only.

A number of responses were received from the public noting the need to specify standards that would impose duties on universities to offer and provide opportunities for their students in Welsh (and for non-Welsh speakers to learn the language fluently), together with a standard that would ensure there was a duty upon them in relation to training the workforce of the future.

In submitting comments regarding the Local Democracy and Boundary Commission for Wales, one respondent noted that a standard should be specified that would ensure that a proportion of the people appointed to the Commission were Welsh speakers, in order to reflect what was expressed when reforming the relevant legislation. A number of comments were received noting the importance of specifying a standard of this kind across the organizations in question, in order to ensure that organizations can operate and comply fully with the requirements. To the same end, one respondent noted that it should be ensured that a standard was specified in order to impose a duty upon organizations to offer intensive programmes to learn Welsh.

Some comments were received that were of the opinion that institutional offices outside Wales should be exempted in the context of the operational standards.

### **Record keeping standards**

A number of responses were received that were strongly of the view that organizations should have to keep records, in order to ensure public accountability and transparency in relation to compliance with the requirements.

However, some respondents emphasised that the duty to keep records should be proportionate, and that it would be a better investment for organizations to improve the range and quality of their Welsh-medium services. This was reinforced by noting that it was the Welsh Language Commissioner's responsibility to determine that appropriate balance.

### **Further and higher education corporations' students' unions**

In responding to the standards investigation held in relation to further and higher education corporations, a number of comments were received that noted the need to make standards potentially applicable and specifically applicable to the students' unions. One respondent emphasised the vitally important part students' unions play in providing services to the students jointly with the corporations in question, referring specifically to academic support and representation together with safeguarding the welfare and interests of the students.

The respondent in question referred to the direct and far-reaching influence the unions had on the experiences of students, together with the fact that they received substantial sums of money from the corporations in question. This was reinforced by noting that the existing Welsh language scheme of one corporation acknowledged the relationship between them and the union, and the responsibility they have to that end.

A number of examples of students' unions operating bilingually during the last academic year were submitted. However, considering the requirements attached to the draft regulations, one respondent emphasised that this was patchy, and often the result of a great deal of pressure imposed by students. With this in mind, concern was expressed regarding the lack of strategic and central planning for developing the Welsh language within students' unions, causing the Unions to treat the Welsh language less favourably than English.

To this end, one respondent was of the opinion that Welsh Ministers should ensure that specific standards are specified and made specifically applicable to education corporations, in order to recognise the crucially important relationship with the Unions, together with the range of services they provide to students on behalf of the corporations in question. The respondent in question went on to note that he was of the opinion that not specifying standards of this kind would mean that the linguistic rights of Welsh students would not be safeguarded, and that, from the point of view of those students, any attempt to impose standards at corporate level would be in vain.

## Appendix B - List of the respondents to the standards investigation

Below is a list of the relevant person(s) in respect of which a standards investigation was carried out, the Advisory Panel, together with the members of the public who were willing for us to publish their comments.

### Relevant person

- Her Majesty's Chief Inspector of Education and Training in Wales

### Members of the public

- Alun Jones
- Alun Ceri Jones
- Eifion Jones
- Elin Walker Jones
- Eiliw Alwyn
- Selwyn Lloyd-Jones
- Hywel Wyn Jones
- John Arwel Griffiths
- Lloyd Evans
- Anthony Barry
- Sharon Roberts
- Sion Jobbins
- Owen Saer
- Einir Sion
- Sian Gwenllian
- Lisbeth McLean
- Amanda Evans
- Rhys Glyn
- Anthony Barnard
- Anthony Caradog Evans
- Tim Jones
- Yasmin Morris
- Llinos Jones
- Aled Jones
- Dewi Snelson
- Emrys Wynne
- Curon Wyn Davies
- Bethan Harvey
- Mair Edwards
- Kathryn
- Helen Thomas
- Geraint Brython Edwards
- Rhodri Williams
- Ruth Evans

- Penri Williams
- Huw Jones
- Emyr Tomos
- Bethan Williams
- Llyr ap Gruffydd
- Robin Farrar
- Robert Jones
- Iago ap Steffan
- Sophie Hughes
- Huw Alun Roberts
- Chris Andrew
- Heledd Gwyndaf
- John Wynn Jones
- Manon James
- Gill Stephen
- Gwyn Williams
- Daron Pierce
- Sian Wyn Jones
- Emma Lloyd
- Neville Evans
- Diane Jones
- Jane Aaron
- Emyr Puw
- Harri Bryn Jones
- Liz Saville Roberts
- Craig ab Iago
- Rhian Davies
- Gwyn Sion Ifan
- Anna Williams
- Dyfan Jones
- Dai Hawkins
- Trefor Jones-Morris
- Dilwyn Morgan
- Rev. Emyr Wyn Thomas
- Bryn Davies
- Dr Ceridwen Lloyd Morgan
- Howard Thomas
- Connor
- Lydia Jones
- Rhodri Jones
- Bob Gaffey
- Angharad
- Ruth Williams
- Nic Daniels
- Jeffrey Jones
- Pablo Dubois
- Gareth Wood
- Llinos Roberts
- Bethan Jones

- Sian Mererid Jones
- Duncan Brown
- B Griffiths
- Awen M G Schiavone
- Osian Wyn Owen
- Robin Owain
- Judith Griffith
- Richard John Griffith
- Clive James
- Sion Williams
- Mathew Rees
- Thomas John Davies
- Ben Screen
- Mari Williams
- Enfys Jones
- Thomas Shaw
- Dafydd Thomas
- Angharad Brown
- John Jones
- Iago Sion
- Dafydd Williams
- Ieuan Parry
- Huw Thomas
- William Schleising
- Huw Roberts

**Organizations/Movements**

- Cymdeithas yr Iaith
- Dyfodol i'r Iaith
- Mentrau Iaith Cymru
- Welsh Language Officer, Cardiff University Students Union and the Welsh Society Committee, Cardiff University
- Coleg Cymraeg Cenedlaethol

**Advisory Panel to the Welsh Language Commissioner**

- Dr Ian Rees
- Gareth Jones
- Professor Gwynedd Parry
- Bethan Jones Parry
- Carl Cooper