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Consultation – summary of responses

Welsh Language Standards: Regulations

Improving services for Welsh speakers

Date of issue: March 2015

Welsh Language Standards: Regulations

Audience	Members of the public, the organisations that will be subject to the first set of standards, and anyone else with an interest in the regulations.
Overview	This document summarises responses received to the consultation on the Welsh Government's proposed Welsh Language Standards Regulations, which was conducted between 7 November and 5 December 2014.
Action required	None – for information only.
Further information	Enquiries about this document should be directed to: Welsh Language Unit Department for Education and Skills Welsh Government Cathays Park Cardiff CF10 3NQ e-mail: UnedlaithGymraegWelshLanguageUnit@wales.gsi.gov.uk
Additional copies	This document can be accessed from the Welsh Government's website at www.wales.gov.uk/consultations
Related documents	Welsh Language Standards Regulations <i>Welsh Ministers' response to the Welsh Language Commissioner's standards reports and advice note</i> (2014) Welsh Language (Wales) Measure 2011

Contents

Introduction and overview	2
Responses to the consultation – breakdown	3
Consultation with children and young people	5
Consultation feedback	6
Conclusion	19

Introduction and overview

This document summarises the responses received by the Welsh Government to the consultation on the Welsh Language Standards Regulations. The consultation took place between 7 November and 5 December 2014.

The consultation sought views on the draft regulations to specify the first Welsh Language Standards. These Standards will enable the Welsh Language Commissioner to place duties in relation to the Welsh language on County Borough and County Councils in Wales, National Park Authorities in Wales, and Welsh Ministers.

We invited comments from organisations subject to the first set of Standards and members of the public with an interest in the Standards. The consultation was published on the Welsh Government website and publicised through the Welsh Government's social media feeds. Policy officials met with organisations subject to the first set of Standards and lobby groups throughout the consultation period. A discussion was also held with young people to collect their views.

Draft Standards referred to in this report are the Standards consulted upon which can be found in this document:

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

Responses to the consultation – breakdown

A total of 188 written responses to the consultation were received.

- **Organisations subject to the first set of Standards (17):** All 26 organisations subject to the first set of Standards were invited to respond and reminded of the closing date for the consultation. The following responded:

Blaenau Gwent County Borough Council, Carmarthenshire County Council, Ceredigion County Council, City and County of Swansea, Conwy County Borough Council, Flintshire County Council, Isle of Anglesey County Council, Neath Port Talbot County Borough Council, Newport City Council, Pembrokeshire County Council, Powys County Council, Torfaen County Borough Council, Vale of Glamorgan Council, Wrexham Council, Brecon Beacons National Park Authority, Pembrokeshire Coast National Park Authority, Snowdonia National Park Authority.

- **Other organisations (12):** Bridgend College, Centre for Welsh Legal Affairs, Coleg Gwent, Coleg Sir Gar, Colegau Cymru, Gower College Swansea, Grwp Llandrillo Menai, Health and Care Professions Council, Mobile Broadband Group, Museum Wales, St David's College, S4C.
- **Lobby / Interest Groups (9):** Cymdeithas yr Iaith Gymraeg, Cymdeithas Cyfieithwyr Cymru, Dyfodol yr Iaith, Mentrau Iaith Cymru, Monitor Iaith, Plaid Cymru, Mudiad Dathlu'r Gymraeg, Grwp Syr IfanC yr Urdd.
- **Individuals (150)**

Respondents were asked to consider 8 specific questions. They were also given an opportunity to comment on related issues which may not have been specifically addressed in the consultation document.

The format of the responses varied – all of the organisations subject to the first set of Standards and all but one of the other organisations have responded using the questionnaire supplied, although not all have indicated whether they agree, disagree, or do not agree nor disagree with each question. None of the lobby groups used the questionnaire – they responded by submitting a document or email. Five of the individuals used the questionnaire to respond, with the remainder responding by email. **136** of the individuals responded by submitting a response based on a template prepared by Cymdeithas yr Iaith Gymraeg.

At the start of each response, the number and percentage of respondents who agreed, disagreed, or did not agree nor disagree with the question is provided. This is based on all respondents and is not separated by group.

Quotes taken from consultation responses received in Welsh have been translated into English, and are attributed to organisations / individuals, where that organisation or individual has given their permission. Some respondents asked that their personal details not be published and they are described below as 'anonymous.'

Consultation with children and young people

Although the consultation was available to all through the Welsh Government website, we wanted to ensure that the views of children and young people were represented. To aid this, a youth friendly version of the consultation document was prepared and we contacted organisations comprising and representing young people to ensure that they were aware of the consultation process.

We are grateful to Urdd Gobaith Cymru for arranging for board members of the Syr IfanC group to discuss the draft regulations. The meeting was attended by young people aged from 14 to 20 from all over Wales.

The group were in favour of the Standards and raised many of the same points as were received in other consultation responses. Their specific points are noted below.

With regard to telephone calls, the group felt that it was important to use simple language that could be understood by someone learning Welsh, to start every conversation in Welsh, and for people to wear badges that showed that they were learning or could speak Welsh.

Where an individual wanted to use Welsh in a meeting, the group didn't feel that using an interpreter and interpretation equipment was ideal. However, they felt that it was more appropriate than holding a meeting in English. There were some issues that people may feel more comfortable discussing in English, but generally people would feel more comfortable speaking in their first language.

At public events, the group felt they would be more likely to speak Welsh if the event had been advertised bilingually. They also felt that they would be more likely to attend an event advertised bilingually.

The group felt that it was sometimes hard to find Welsh versions of forms. They also felt that the language used on forms should be clear and simple,

‘The Welsh wording on these forms needs to be easy to understand, as it can put people off.’

With regard to courses, the group felt that where they received Welsh medium education, it was natural to want to receive any courses through the medium of Welsh too. Swimming lessons were discussed, with the group agreeing that they would be more comfortable taking these lessons in Welsh.

The group felt that specific Standards should be prepared for social media.

Consultation feedback

Question 1 – Service delivery standards

Do you agree with the proposed service delivery standards (contained in the draft regulations) in Schedule 1 of the regulations document?

30 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 15 respondents (50%) agreed, 7 respondents (23%) disagreed, and 8 respondents (27%) neither agreed nor disagreed with the question.

Many respondents, particularly those organisations subject to the first set of Standards, felt that the Service Delivery Standards reflected the content of their current Welsh Language Schemes and that they would be able to comply with the majority of them.

‘The service delivery Standards are very similar to the requirements of the Welsh Language Scheme and so, on the whole, Ceredigion County Council are comfortable with the requirements.’

Ceredigion County Council

Other responses were more negative and focused on the percentage of Welsh speakers in the area, the number of Welsh speakers employed by the organisation, the low demand for Welsh language services, the possible additional costs, and the potential for additional costs and bureaucracy.

‘While there appears to be a belief that the introduction of the standards would be cost neutral given the fact that we, like other bodies in Wales, have already a Welsh Language Scheme in place. However, in reality the standards will place undue pressures on services which will squeeze the financial and staffing levels even more. There appears to be a whole new level of bureaucracy attached to these standards which will need to be financed at the expense of actually providing the services – whether in English or Welsh.’

Neath Port Talbot County Borough Council

The following Standards were a concern for respondents:

Most respondents raised concerns regarding the amount of record keeping activity and technology required to satisfy draft **Standards 2 and 21**. It was felt that this could be unnecessarily onerous and that for larger organisations, a centralised system would be required. Some organisations suggested that this could work better on a departmental basis rather than an organisation-wide approach. A number of respondents (organisations and individuals) made the point that that people may wish to receive calls / correspondence about some matters in Welsh and other matters in English.

With regards to draft Standard 21 Cymdeithas yr Iaith Gymraeg and Dyfodol i'r Iaith, among others, felt that asking if someone wished to speak Welsh when the conversation had begun in Welsh could put someone under pressure to switch language and gives the impression of an opt-in service.

Draft **Standard 26** - Cymdeithas Cyfieithwyr Cymru and several others noted the variation in terminology concerning translation and interpretation throughout the Regulations and asked that this be standardised. Their comments are considered in more detail under question 9. Several respondents stated that it was not their organisation's current practice or policy to provide interpretation from English into Welsh and there were concerns around the costs associated with interpretation.

'In general, the Standards relating to meetings presume that a translation service can be called on at any time without considering the financial implications.'

Anonymous

Cymdeithas Cyfieithwyr Cymru felt that consecutive translation as proposed would be a step back after years of good practice in interpretation.

Draft **Standard 41** was a concern for almost all respondents, even those that already produce some bilingual papers. Lack of demand, turnaround time and cost were cited as the main reasons for considering this standard to be unreasonable.

'We are not of the opinion that it would be practical to translate every document and report that goes to Council Cabinet meetings..... We don't feel that this would be a sensible use of the Council's translation resources.'

Powys County Council

Two respondents felt that the definition of an app in draft **Standard 57** needed to be clearer and broader. It was also noted that there were a number of Standards relating to websites, but only one to apps and that this could be short-sighted given the important role apps are likely to play in on-line commerce and service provision in the future.

Draft **Standard 59** regarding the positioning of Welsh language text on new signs raised concerns. Some felt that this Standard was disproportionate and ignored the demographics of certain areas. Others felt that it could increase safety concerns for motorcyclists and other vehicles and that decisions regarding which language came first should be left to the organisation's discretion.

'As English is the language in predominant use, and because we are a border county with a significant daily visitation of commuting workers, there is no justification for language primacy.'

Flintshire County Council

Several respondents felt that draft **Standards 62A, 63 and 64** were less than some organisations' current provision through their Welsh Language Schemes.

'I am very disappointed with the Standards. They appear weaker than many current language schemes, and this is a step back, especially in areas where Welsh is still strong as an everyday community language. Public bodies have special moral and practical responsibilities and duties to promote the language in such places; this is widely acknowledged.'

Anonymous individual

It was also felt that the definition of a 'reception' needed to be clearer.

Cymdeithas yr Iaith Gymraeg and others felt strongly that there was a need to add an additional Standard to the section on Grants (draft **Standards 69 – 73**) requiring organisations to set language conditions on any individual or organisation awarded a grant.

A number of respondents felt that draft **Standard 74** would be an issue due to procurement systems and European Union procurement regulations.

'The timescales imposed on the authority to agree contracts, particularly those progressed through EU rules, would make the production in Welsh of background documentation – much of it technical and of little or no interest to members of the public – disproportionate and could lead to delays, and ultimately, missing of deadlines with a possible loss of funding to the authority.'

City and County of Swansea

'We note that the 'Sell2Wales' procurement system is not fully bilingual and so ensuring equal treatment of both languages through using this system is impossible at present.'

S4C

Cymdeithas yr Iaith Gymraeg and many individual responses also suggest that a duty requiring organisations to set language conditions on contractors should be added to the Regulations.

Many concerns were raised regarding draft **Standards 82 – 84**. Some respondents felt that these Standards should be applied to all courses, not just 'educational courses' as referred to in the Regulations. However, there were concerns from many respondents regarding having / recruiting suitable staff to provide these courses, the potential increase of costs where a course would need to be held in English and in Welsh and the demand for Welsh language courses. A number of respondents welcomed the impact of these Standards on services provided for

children and young people, for example through local authority provided swimming lessons.

Questions were raised regarding announcements (draft **Standard 85**) and what should happen in the event of an emergency. Many respondents felt that this could endanger lives and questioned what would happen if a Welsh speaker was not available to make an emergency announcement.

Question 2 – Policy-making standards

Do you agree with the proposed policy-making standards in Schedule 2 of the regulations document?

30 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 25 respondents (83%) agreed, 1 respondent (3%) disagreed, and 4 respondents (13%) neither agreed nor disagreed with the question.

The policy-making Standards were broadly welcomed by respondents. For many, the actions proposed in the Standards are existing practice and, for others, they will strengthen internal processes.

‘We welcome the policy making standards and it is a positive step towards formalising the policy making process that currently happens on an ad-hoc basis. There is a significant difference between this Standard and the language schemes as the company becomes more accountable for policy making decisions.’

Coleg Sir Gâr

One organisation mentioned the difficulties a largely non-Welsh speaking workforce assessing the effects of a policy on the Welsh language may have. A number of respondents noted that a methodology to assist officers undertaking impact assessments would be helpful.

‘We would welcome the Commissioner’s Office providing or developing a methodology that our officers could use to enable them to do justice to the important task of assessing the effects of policy decisions on the Welsh language.’

Conwy County Borough Council

The main criticism of the policy making Standards was that they seemed overly complicated and repetitive. Some respondents suggested merging some of these Standards and provided suggestions of how they could be simplified.

Question 3 – Operational standards

Do you agree with the proposed operational standards in Schedule 3 of the regulations document?

30 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 18 respondents (60%) agreed, 4 respondents (13%) disagreed, and 8 respondents (27%) neither agreed nor disagreed with the question.

A large number of respondents felt that the ability to comply with these Standards depended on organisations having enough Welsh speaking staff. Given the current financial constraints on most public sector organisations, external recruitment is limited and many organisations would be reliant on translation or interpretation to be compliant.

‘We ask that you consider the resources (in terms of translation and the number of staff who are able to communicate in Welsh) and the internal ability of bodies whilst allocating Standards where appropriate.’

Coleg Sir Gâr

The production of Welsh versions of employment policies for internal use only (draft **Standards 103 – 109**) was not seen as good use of resources by some respondents.

Draft **Standards 110 – 117** – many respondents commented that meeting these standards would only be possible if the employee’s line manager was a Welsh speaker.

Several respondents commented on the cost of Welsh language software such as Cysgliad (Draft **Standard 118**) and that this was difficult to justify when take up was quite low. It was suggested that a corporate licencing arrangement may be helpful.

Many respondents felt that creating a fully bilingual intranet (draft **Standard 119**) would be a huge undertaking and was not the best use of resources, especially where the organisation involved employed a very small number of Welsh speakers.

‘Making and maintaining the whole of our intranet as bilingual would be a huge (and ongoing) task with a disproportionately small effect on members of staff – although (#123) providing bilingual pages to help staff undertake their work in Welsh could be valuable.’

City and County of Swansea

Another respondent commented that the Standards for intranet pages appeared to be stricter than the Standards for external websites and that consistency was needed.

Draft **Standard 126** – Some respondents said that training normally took place in the language of the majority of the participants and that they felt this was reasonable and proportionate. Others mentioned issues around lack of trainers with suitable Welsh language skills, the costs of buying in training and costs of training materials.

Draft **Standard 134** – A number of respondents felt that this Standard should be strengthened to denote posts as either ones where Welsh language skills were essential or desirable.

‘We believe that this Standard needs to be strengthened by keeping the present guideline of stating that Welsh is essential or Welsh is desirable for jobs. This standard should be improved by making this clear when advertising posts.’

Plaid Cymru

Question 4 – Promotion standards

Do you agree with the proposed promotion standards in Schedule 4 of the regulations document?

30 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 21 respondents (70%) agreed, 4 respondents (13%) disagreed, and 5 respondents (17%) neither agreed nor disagreed with the question.

Responses to this question varied greatly. Some respondents felt that these Standards were ambitious given the financial climate and the workload of organisations.

‘This Standard is ambitious considering the financial climate and the implications on the organisation’s capacity to promote and facilitate the use of Welsh in the wider area.’

Ceredigion County Council

Other felt that opportunities for them to influence the use of the Welsh language in their area were limited and that the definition of an area was not clear enough.

‘...opportunities for us to have any direct influence on the number of Welsh speakers in the Park are very scarce, although there will be a number of opportunities for us (through the medium of our work) to promote the Welsh language and its use locally.’

Snowdonia National Park Authority

‘There is no definition of ‘your area’ at present, and the term is quite open to misinterpretation in several ways. What about using a more specific term such as ‘your operational area’ or ‘your authority area.’

Mentrau Iaith Cymru

Others questioned whether it was the role of their organisation to facilitate the use of the Welsh language.

‘Whilst we feel it is reasonable to require us to write a strategy it is not reasonable to require us to include a target for either increasing or maintaining the number of Welsh speakers in the area.’

Anonymous

Many respondents mentioned the partnership approach that would be required for any strategy to be effective and that efforts could be better targeted at joint local and national campaigns.

‘Local and national campaigns can be more effective than holding events and activities and the use of social media can contribute to this.’

Carmarthenshire County Council

‘..... individual bodies cannot achieve this without having their own language planning department, and it is very unlikely that they will have a department of this type now, or in the future. There is an obvious need here for a national language authority, and despite the support that we would like to offer the standards, the context within which the standards operate is sure to be insufficient without a body of that sort to provide leadership based on language planning best practice.’

Dyfodol i'r Iaith

The potential for local authority mergers was also a concern and many felt that it was unwise for local authorities to produce 5-year strategies when local authorities would almost certainly be merged during that period.

‘Although we agree with the basic principle at the root of these standards, we disagree with the need to comply with these standards within the timescale noted and consideration will be given first to the effect of merging local authorities on these standards and appropriate steps taken in light of this.’

Conwy County Borough Council

The other main concern raised in relation to draft **Standard 144**, is that organisations are largely reliant on the census for data regarding the Welsh language and this only happens once every ten years making data collection difficult. A number of

respondents queried whether the Welsh Government or Welsh Language Commissioner would be commissioning extra research between censuses.

Question 5 – Record-keeping standards

Do you agree with the proposed record-keeping standards in Schedule 5 of the regulations document?

29 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 19 respondents (66%) agreed, 3 respondents (10%) disagreed, and 7 respondents (24%) neither agreed nor disagreed with the question.

A large number of respondents felt that the record-keeping Standards were onerous, overly bureaucratic and would greatly increase workloads.

‘A large number of staff are in daily contact with members of the public and managing and keeping a record of every contact would be a huge task.’

Carmarthenshire County Council

A number of respondents felt that a record keeping system or database would be required to comply with these Standards.

Some respondents felt that draft **Standards 150, 152, 153 and 154** in particular were unreasonable and disproportionate.

‘I cannot imagine that any public authority is going to be able to completely comply with standards 150, 152, 153 and 154. These standards are not reasonable or proportionate. The essential resources for keeping these records are significant, and during a time of strict financial cuts. Having to keep such records will create an unnecessary bureaucratic burden on any Authority.’

Snowdonia National Park Authority

One respondent queried how the Commissioner would know if the records kept were accurate and the impact this could have.

‘You need to consider how the Commissioner will know if accurate records are not kept. Failure to comply with Schedule 5 could undermine the whole aim of the Measure, through an organisation appearing not to have received many complaints due to the record keeping process.’

Centre for Welsh Legal Affairs

Question 6 – Supplementary standards

Do you agree with the proposed supplementary standards (contained in the draft regulations) in Schedule 6 of the regulations document?

28 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 20 respondents (71%) agreed, 3 respondents (11%) disagreed, and 5 respondents (18%) neither agreed nor disagreed with the question.

Few respondents provided detailed answers to this question. Of those who did, the majority were positive, for example:

‘The supplementary Standards appear to be suitable to provide a framework to ensure that our obligations are suitably recorded and publicised; and to give an open and transparent view of the processes available to members of the public.’

City and County of Swansea

There were some concerns about repetition of earlier Standards and some respondents made suggestions for Standards which could be merged.

A number of respondents suggested that templates to assist with record keeping would be helpful.

‘We propose that the Welsh Language Commissioner and / or Welsh Government devise a library of templates / guidelines / best practice to aid compliance on completing the varying reports and for aid in supplying the correct data and for consistency purposes e.g.

- Annual Report template
- Record keeping standard documentation

Colegau Cymru

Two respondents mentioned the need for clarity in the complaints process.

‘We would like confirmation that there is no need for a body to set up a separate complaints procedure for the standards and that there would be a way to adapt an existing complaints procedure to deal with complaints relating to the standards.’

S4C

Question 7

Does the fact that the proposed standards (contained in the draft regulations) are on a statutory basis mean that they will encourage more people to use Welsh language services?

28 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 10 respondents (36%) agreed, 3 respondents (11%) disagreed, and 15 respondents (54%) neither agreed nor disagreed with the question.

Generally, respondents felt that if people knew what their rights were regarding the Welsh language, and knew what services were available to them through the medium of Welsh, they were more likely to speak Welsh and to use those services.

‘We feel that the arrival of the standards is a very positive development in terms of promoting and encouraging the use of the Welsh language, to the many people who provide and receive a service. It will clearly outline how organisations and individuals can expect to provide and receive these services, and give people the confidence to use their Welsh.’

Powys County Council

Some respondents stressed that it was essential that Welsh language services were reliable, and that only by receiving a good standard of service would they use that service again and recommend it to others. Some felt that demand for services would increase in the long term as people became more aware of what is available.

‘It is likely that more people will know that they have a right to speak Welsh but if the Welsh medium service is second-rate and they have to wait for it, that will not encourage people to use it.’

Carmarthenshire County Council

‘The standards will better define and detail what to expect from a regulated body and so encourage service users to request those services and challenge any shortfall in provision. Welsh language service provision should become more visible, and better promotion over time will lead to a greater expectation of Welsh language service availability and an increased take-up.’

City and County of Swansea

However, some respondents felt the Standards alone would not be enough to lead to an increase in the number of people using Welsh language services.

‘There are a number of complex reasons for Welsh speakers being reluctant to use Welsh in various situations. Purposeful language planning initiatives must be implemented to change this, but imposing statutory standards on local authorities is only one means amongst several different interventions

that need to be put in place to ensure more use is made of Welsh. On their own, we fear that the service delivery standards will not lead to a lot of change in the use made of Welsh language Services.'

Conwy County Borough Council

'It is not possible to reverse people's attitude to language suddenly through an act, although the act could provide a basis to do so. A significant and continued campaign is needed to increase the use of Welsh as a work language until it is seen as acceptable and practical, and there is a need for a coordinated programme of policies that aim to promote the language in different fields.'

Dyfodol i'r Iaith

Some respondents commented on the Commissioner's power to enforce the Standards and the significant difference between Welsh Language Schemes and the Standards in this respect. A number of organisations raised concerns however that, due to lack of Welsh speakers in their workforces and the lack of recruitment due to financial constraints, they would be unable to meet some of the Standards and that the prospect of investigation by the Commissioner could lead to services (both Welsh and English medium) being removed altogether.

Finally, a number of respondents suggested that no great increase in use of services would be seen as there is currently little demand for Welsh language services.

Question 8

Are the proposed standards (contained in the draft regulations) clear as to what level of service can be expected if the standard is placed on an organisation?

28 respondents answered the Agree / Disagree / Neither Agree nor Disagree question. 16 respondents (57%) agreed, 6 respondents (21%) disagreed, and 6 respondents (21%) neither agreed nor disagreed with the question.

The main comment on this question from respondents was that, while the Standards themselves are quite clear, the Commissioner will decide which Standards to place on individual organisations and it is likely that there will be variation between organisations in the same sector or in the same geographical area which could lead to confusion.

'We believe that one of the original intentions of the standards was to ensure that one could expect to receive a similar service all over Wales, but it is a worry to us that the door is open to this not being the case.'

Conwy County Borough Council

‘Different standards could be set for similar bodies across Wales or even on different geographical areas within the same authority. This could create confusion in trying to understand the situation in your area when listening to discussions on the standards on the national radio and television.’

Huw Roberts

People will also need time to become familiar with the Standards they can expect an organisation to be subject to and the level of service they can expect to receive. Members of Cymdeithas yr Iaith Gymraeg have stressed the importance of making sure that people know what their rights are with regards to the Welsh language.

‘The Standards need to provide clarity to the public regarding the rights that come from the Standards.’

136 individuals

A number of respondents commented that the Standards assume that all members of the public want the same things and that all of their needs can be met which may not be the case.

‘... They tend to assume that service users are a homogenous group who will all have needs met from a single tier of service.’

City and County of Swansea

A number of respondents reiterated their suggestions about Standards which were not clear, which were repetitive, or which could be merged with other Standards. Others thought that the format and structure of the Regulations could be improved. There was also some criticism of the language used in the Measure and the Regulations, with one respondent describing it as ‘punitive and austere.’

Question 9

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

Many respondents from organisations that will be subject to Standards commented that it was difficult to respond to this consultation without knowing which Standards will eventually be imposed on them by the Welsh Language Commissioner. Most added that they hoped the Standards applied to them would be reasonable and proportionate. Some respondents mentioned the work that they did with partners

who may or may not be subject to Standards in due course and asked for guidance / clarification on their responsibilities when working with these partners.

Translation and interpretation was an issue for many respondents in a number of ways. Many felt that complying with the Standards would require increased reliance on translation and interpretation services. They feared additional pressure on translators and interpreters – both those already working in the public sector, and those who work as contractors.

Cymdeithas Cyfieithwyr Cymru noted the number of different terms used to refer to translation and interpretation throughout the Regulations and suggested that the Terms ‘translation / cyfieithu’ and ‘interpretation / cyfieithu ar y pryd’ only were used.

Cymdeithas yr Iaith Gymraeg noted that the Standards do not refer to social media, online platforms and self service machines and suggest that new Standards are drafted to address these gaps.

‘There is no certainty that the standards are going to keep up with technological developments in the future and this needs to be resolved with a standard that encompasses new developments.’

Cymdeithas yr Iaith Gymraeg

In addition to earlier comments about asking people for their language choice and keeping a record of this, some respondents felt that this could cause a problem, especially in areas where many people speak Welsh.

‘A number of the standards ignore the norms of living and working in a bilingual community where the Welsh language is strong. In naturally Welsh speaking workplaces, they create unnecessary bureaucracy which sometimes leads to very unnatural situations. The standards are much more suitable for situations where Welsh is not naturally used and is not available unless that service is asked for.’

Grŵp Llandrillo Menai

‘Using the Welsh language should feel normal, as far as possible. People don’t always want to be asked to make decisions about their language preference. There comes a point where the risk exists of labelling people as Welsh-speakers rather than just people.’

Monitor Iaith

Conclusion

The Welsh Government is grateful to everyone who has taken the time to respond to this consultation. This summary of responses will have been considered by the First Minister as part of his consideration of the Welsh Language Standards Regulations. The Regulations will be laid before the National Assembly for Wales in March 2015.

The Welsh Language Commissioner will in due course issue Compliance Notices to Welsh Ministers, County and Borough Councils, and National Park Authorities.