



Llywodraeth Cymru  
Welsh Government

# Language, Work and Bilingual Services

Summary of responses to the  
Report of the Working Group  
on the Welsh Language and  
Local Government

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

## Summary of responses to *Language, Work and Bilingual Services*, report of the Working Group on the Welsh Language and Local Government

### 1. Overview of responses

Nine responses were received

1. Welsh Language Commissioner (WLC)
2. Sheenagh Rees, Head Of Human Resources, Neath Port Talbot County Borough Council (NPTCBC)
3. Isle of Anglesey County Council (IACC)
4. Cymdeithas yr Iaith Gymraeg (CIG)
5. Robat Trevor, Bangor University (RTBU)
6. Professor Mac Giolla Chríost Prys Jones & Dr Patrick Carlin, Language Policy and Planning Research Unit, School of Welsh, Cardiff University (CU)
7. The National Centre for Learning Welsh (NCLW)
8. Cymdeithas Cyfieithwyr Cymru (CCC)
9. Carmarthenshire County Council Members' Advisory Panel on the Welsh Language (CCCMAP)

The responses are published in full on the Welsh Government website.

### 2. Summary of responses to the recommendations

#### General

The number of responses does not allow for statistical analysis and not every response offers comments on each recommendation. The majority of respondents welcome the report:

*"The Welsh National Learning Centre welcomes this report."* (NCLW)

*"Isle of Anglesey County Council welcomes the publication of this report."* (IACC)

*"Acting on the report ... will offer a firm and practical way forward for us."* (RTBU)

*"Early action on these recommendations is needed."* (CIG)

*"Cymdeithas Cyfieithwyr Cymru welcomes the report and believes that it contains valuable and practical recommendations."* [CCC]

*"Councillor Mair Stephens and Carmarthenshire County Council Members' Advisory Panel on the Welsh Language wish to support the recommendations in the Report"*

*'Language, Work and Bilingual Services' [...] The recommendations offer the kind of firm leadership which is needed in order to make a real difference to the situation of the language.'* (CCCMAP)

There is more concern by others, in particular regarding recommendations 2 and 3.

*"I am concerned about whether or not the recommendations [i.e. recommendations 2 and 3], as set out, can be in practice implemented by all local government employers in Wales "* (CBSCNPT)

The respondents from Cardiff University challenge some of the assertions in the report and note the significance of the fact that the report is not unanimous, concluding

*"Prima facie, recommendation 2 (a) and recommendation 3 are incompatible with the Equality Act 2010"* (PC)

**RECOMMENDATION 1 (a): The Welsh Government should articulate an ambitious vision and publish a new strategy for the Welsh language as a matter of urgency.**

There is recognition in many responses that the Welsh Government is consulting on a draft strategy *A million Welsh speakers by 2050*.

Anglesey County Council welcomes the recommendation to create a language powerhouse within the Welsh Government which would offer strategic leadership, expertise in the field of strategic language planning, prepare legislation, support and promote the language and provide leadership in the field of research and digital developments. They note that

*"there has been a gap in this area over the last few years since the Welsh Language Board to come to an end."*

The Council would also see the benefit of setting up an national language observatory which would include statistics and sharing good practice in the field of the language.

**RECOMMENDATION 1 (b): the Welsh Government, on the basis of its long-term strategy for the Welsh language, should revise and introduce amendments to the 2011 Measure and introduce a Welsh Language Bill in the Assembly during the term of the fifth National Assembly (2016 – 2021).**

Cardiff University respondents note the Assembly can't bind its successors to policies or strategies in the future. However, their conclusion is that

*"there are a number of good reasons for introducing such a Bill including, in particular, reform of the role of the Welsh Language Commissioner's Office and redesigning the nature of the related regulatory regime on the Welsh language"*

referring to the publication of Mac Giolla Chríost, *The Welsh Language Commissioner in Context: Roles, Methods and Relationships* (Cardiff 2016).

The Commissioner notes the statement of the Minister for Lifelong Learning and the Welsh Language that

*"it is timely to review the Welsh Language (Wales) Measure 2011 and would start work during this year. I will contribute as appropriate to discussions about reviewing the Measure."*

**RECOMMENDATION 1 (c): The Welsh Government should support these measures with a visible campaign to raise awareness of the position and importance of the Welsh language in our public life.**

The Commissioner notes that a number of the standards relate to raising awareness of the importance of the Welsh language in our public life, and that the Welsh Government's draft strategy deals with the prominence of the Welsh language.

**RECOMMENDATION 2 (a): The Welsh Government should legislate to ensure that a statutory level of proficiency in Welsh is essential for the following posts in Local Government in Wales: the head of paid service and chief executive; the corporate director with responsibility for human resources; the director of education; the director of social services.**

Recommendations 2 and 3 stimulate the most comments by respondents.

Cymdeithas yr Iaith welcomes recommendations 2 and 3:

*"The recommendation to make Welsh an essential skill for all new posts in the areas of education and local government is welcome."*

The Cardiff University respondents see the issue from a different perspective:

*"No evidence is presented in the report to justify this recommendation other than the assertion that proficiency in Welsh is an essential requirement for all holders of such posts because it is the only way in which such post-holders can demonstrate their commitment to the values and principles of bilingualism (Welsh-English). The*

*linguistic requirement as presented in this report relates, therefore, to the symbolic rather than the practical; it is a demonstration of adherence to a particular value. "*

They cite evidence from New Brunswick where the Commissioner of Official Languages tried to implement a similar policy only for it to be rejected by the Federal Government. The respondents note that the recommendation goes against the advice/guidance of the previous Welsh Language Board and Commission for Racial Equality , and the Welsh Language Commissioner, and should be, rather

*" linguistic requirements must be based on a clear and objective assessment of the language skills needs of the post."*

They raise doubts about legislating in this area:

*"Also, were the Assembly minded to bring forward legislation so as to implement Recommendation 2 (a) it is hard to see how that could be reconciled with the Equality Act 2010 "*

The respondent from Neath Port Talbot Council expressed concerns about the practicality of recommendations 2 and 3:

*"I am concerned about whether or not the recommendations [2 and 3] as set out, can be implemented in practice by local government employers in Wales. For example, how available the skills sets required will be in the relevant job markets, particularly in relation to some of our most senior "and technical/professional posts, which can already be hard to fill? The job market for the Director and Chief Executive level is a UK wide market, and about the impact concerned that, if these recommendations are enacted upon, could be, not the intended impact as set out in the Working Groups report, but rather presenting candidates who do not meet the essential criteria or worse, not presenting candidates at all. It will potentially restrict further an to times already small pool of suitably qualified and experienced individuals "*

Robat Trevor from Bangor University recommends implementing the recommendation in stages, based on the percentage of Welsh speakers in the area:

*"Recommendations 2, 3 and 4 should be implemented immediately for the counties of Anglesey, Gwynedd, Ceredigion and Carmarthenshire [...]The main elements of recommendations 2, 3 and 4 should be adopted as a goal in principle in the other counties with a relatively high percentage of Welsh speakers and which include Welsh-speaking communities: Conwy, Denbighshire, Powys, Pembrokeshire and Neath Port Talbot [...] and a three year timetable should be drawn up to achieve this [...] Consideration should also be given to including in this pattern councils where there is evidence of recent growth in the language: Cardiff, Rhondda Cynon Taf, Caerphilly and Swansea "*

The remainder should

*"have to draw up a three year timetable for implementing what is possible of the recommendations in their areas."*

Anglesey County Council supports the recommendation broadly in their general comments without specific reference to this recommendation:

*"[The report] notes that legislation and standards are not sufficient and that the Government should legislate to ensure that some posts within local authorities have some level of proficiency in the language. This is to be welcomed "*

The Welsh Language Commissioner notes that Local Authorities must already comply with standards relating to recruitment and appointment.

*"Standard 136 makes it a requirement on organisations in assessing the needs of new jobs or vacancies, to assess the need for language skills, and subsequently to categorise the linguistic skills that need the post holder must have. In addition, if the organisation has categorised a job as one for which language skills are essential, desirable or that they must be learned, this must be specified when advertising the post and the post must be advertised in Welsh. This standard does not specify that certain jobs must have language skills requirements as in this recommendation. However, under the standards regime the Commissioner has the ability to ask to see assessments undertaken by organisations and in due course it will be possible to learn what kind of assessments are being conducted and the extent to which organisations are responding to the duty positively "*

The Commissioner comes, in part, to a conclusion similar to that of the Cardiff University respondents:

*"If the Welsh Government were to legislate in this area, it should ensure that the level of proficiency specified is consistent with the requirements of the jobs under consideration."*

**RECOMMENDATION 2 (b): If you do not already possess the required linguistic skills, the legislation should place statutory duties on Local Authorities to provide suitable training and set aside time for the individuals in question in order to enable them to acquire the essential language skills.**

The Isle of Anglesey County Council is supportive and share their experience:

*"The key point is "and make time for the designated persons". It should be recognised that time to release officers to attend training is becoming more difficult. Developing online courses would be a way to mitigate this. Here on Anglesey, providing one to*

*one lessons has also been successful for developing the language skills of senior officials"*

The Council makes some other points about training, related to being realistic in measuring progress, the different levels that exist, the barriers faced by certain groups, the need for more digital resources and appeal of recognised certificates.

The Commissioner sets out the scope of the existing legislation:

*"Standards 130 and 131 makes specific requirements in relation to language training. In particular standard 130 notes that Local Authorities must provide opportunities during work hours for employees who manage other people to obtain training on the use of Welsh in their role as managers, and for employees to have basic Welsh lessons. This goes some way towards implementing this recommendation. "*

**RECOMMENDATION 2 (c): The Welsh Government should direct Academi Wales (and any other national institution which provides leadership training for the public sector in Wales) in order to ensure that the Welsh language is given prominence in the principles of One Public Service and that Academi Wales provides training for leaders of the public service on the challenges and responsibilities facing leaders in a bilingual country.**

Only the Welsh Language Commissioner commented on this recommendation:

*"A Wales of vibrant culture and thriving Welsh language' is already one of well-being goals of One Welsh Public Service. I wonder if what is meant here is that Welsh should receive greater prominence in terms of the values of the public services themselves.*

*"I agree that there is a need to train public service leaders on the challenges and responsibilities facing leaders in a country of two languages. Standards 132 and 133 go some way towards training public service leaders on the challenges and responsibilities facing leaders in a country of two languages. In the case of standard 132, it notes that local authorities must provide training courses in order for their employees to develop an awareness of Welsh; an understanding of the duty to act in accordance with the Welsh language standards and an understanding of the ways Welsh can be used in the workplace. In the case of standard 133 local authorities must provide information in order to raise new employees' awareness of the Welsh language.*

*" Academi Wales will be expected to comply with standard 84 of the Welsh Language Standards (No.1) Regulations from 30 September 2016 onwards, that is ' If you offer an education course that is open to the public, you must offer it in Welsh '. Education course is interpreted in Schedule 1, Part 3, clause 44 of the Regulations as ' any*



*seminar, training, workshop or similar provision which is provided in order to educate or improve the skills of members of the public. "*

**RECOMMENDATION 3: Welsh language skills should be essential for all new posts in every Local Authority in Wales.**

A number of the comments made under recommendation 2 (a) above are relevant. Two Councils recognize the obstacles to implementing a policy of this kind.

*"We agree in principle with this recommendation but will need to be clear what is the expectation of level 1 language skills when recruiting so that we do not lose talent. A difficulty that may arise is that people can feel that their Welsh is not "good enough". This needs to come from positive bias so it doesn't reduce our recruitment pool, particularly in fields where jobs are already difficult to fill. " (IACC)*

*"In relation to recruiting to the wider workforce, the Welsh speaking population of Neath Port Talbot County Borough Council is 15.3%. As the majority of our workforce live within the County Borough, a requirement that Welsh language skills are essential for all new posts will be extremely difficult for this Council to adhere to. Also on a practical note, I would like to flag up the funding and capacity requirements which implementing these recommendations will require, particularly in relation to the significant programme of language training and assessment that local government employers will have to put into place. If funding is not made available, meeting these requirements will place significant pressure on some Councils. The recommendations will require some practical input if they are to be implemented, and if they are to achieve what the Working Group hope they will achieve - I would suggest that working with local government employers and seeking to understand how employers can be appropriately and adequately supported is absolutely essential." (NPTCBC)*

The Cardiff University respondents say:

*"The aim of the creation of a bilingual workforce is entirely laudable, indeed such a workforce is necessary to the effective implementation of the duties placed on public bodies by law, by the Welsh Language Act 1993 and the Welsh Language (Wales) Measure 2011. That said, the report seems to understand the term bilingual workforce to mean that all individual members of that workforce must be bilingual in some sense, if not in the first instance then at least on an incremental basis. "*

The authors contrast this recommendation with policies in other bilingual jurisdictions which are broadly similar to Wales. In the Basque Country, for example, linguistic requirements of jobs must be '*equitable and proportionate* ', which means in practice they

are sensitive to the local linguistic demography. The authors also note that the main justification for the various language policies of North Wales Police, and councils of Anglesey, Gwynedd, Ceredigion and Carmarthenshire, is to be found in the demography of the Welsh language and its specific strength in these jurisdictions. Policies similar to those proposed in recommendation 3 have

*"demonstrably, been a failure "*

in other places and under circumstances similar to those in Wales (without specifying where). Nevertheless, and taking into account the doubts they have about discrimination, they note in their conclusions:

*"Recommendations similar to Recommendation 2 (a) and Recommendation 3 could be applied in a non-discriminatory manner on the basis of the language planning and policy principle of territoriality, that is in those parts of Wales where the local demography of the Welsh language provides a robust basis for their justification."*

The Welsh Language Commissioner locates the rationale for a bilingual workforce in the rights of individuals to use the language and the duties on bodies to provide services through the medium of Welsh in response to those rights:

*"Planning a workforce with the necessary skills in the Welsh language to meet the needs for the provision of services to the public are certainly an essential part of Local Authority workforce planning and for the rest of the public sector as well. Setting a minimum level of language skills as recommended here is one approach that could be adopted to do this. "*

The Commissioner also notes the need to plan for the supply of language skills, as did the Councils above:

*"Further, before legislating in this area it would be necessary to ensure that the current educational system in Wales can meet these language needs. The Welsh Language Commissioner's 5 year Report draws attention to shortcomings in this regard stating that 'Education is the main source of Welsh speakers today .. Based on the evidence available, it appears that there has not been a significant increase in the numbers receiving education or care through the medium of Welsh in recent years."*

As well and highlight the role of the standards (136 assessing the requirements for new or vacant posts, 130/131 training), the Commissioner refers to conclusions about current recruitment practices of bodies included in *the Welsh Language Commissioner's Assurance Report 2014-15*.

*"The report's findings show that the general recruitment practices of the bodies involved in the survey work shows a situation which would make it difficult for them to meet this recommendation at this time. In addition, the report highlights a*

*situation where there is in sufficient connection between the language requirements of posts and the wider duties and competencies of the posts. "*

The Commissioner confirms again the key connection between the needs of the post and the language requirements:

*"If steps are taken to implement this recommendation, I think that would need to be refined in order to ensure that the language requirements of posts are in line with the requirements of the position itself. By doing so, it would be possible to give clarity to applicants regarding the language requirements and it would also be a means to raise the minimum requirement in several places. "*

**RECOMMENDATION 4: Local Authorities, including in their function as Local Education Authorities, should be under a statutory duty to undertake workforce planning in terms of linguistic skills, and where required, to provide suitable training to meet those needs.**

The Welsh language Commissioner notes the importance of workforce planning and the number of standards relating to this (127-131, 136, 170, 98 and others).

*"It is true to say that there is a great need for workforce planning in terms of language skills across the public sector and other sectors in Wales in order to ensure that they can offer services through the medium of the Welsh language to the public and perform their functions and the conduct of public business, thereby increasing the opportunities for people to use the Welsh language."*

**RECOMMENDATION 5 (a): The National Centre for Learning Welsh should develop a national strategy for Welsh in the workplace by the end of 2016, to be introduced by providers from the beginning of September 2017.**

The Commissioner states:

*"The National Centre for Learning Welsh has published a Strategic Plan 2016-2020. As part of Objective 2 of the strategy (Develop innovative schemes to secure opportunities and contexts where learners can use their Welsh with confidence), the Centre will 'draw up a Welsh in the Workplace Strategy to support employers in preparing meaningful Welsh learning programmes in the workplace. This is one of the first priorities for the Centre. ' The Commissioner will contribute to the work of the Centre in the most appropriate way. "*

**RECOMMENDATION 5 (b): Commercial suppliers of Welsh language training in the workplace intended for use by the public services should be contracted within the strategic framework set by the National Centre for Learning Welsh.**

No comments.

**RECOMMENDATION 5 (c): The Welsh Government should adopt a single national standard Welsh language proficiency framework to be used by the whole of the public sector in Wales.**

The Welsh Language Commissioner supports this recommendation:

*"It would be useful to organisations and individuals alike if one proficiency framework was adopted by the whole of the public sector in Wales to meet workforce requirements and provide services to the public in Welsh."*

Anglesey County Council links this recommendation with recommendation 5 (a):

*"The aim should be to develop training for the workplace that is compatible with the language skill levels which are agreed."*

**RECOMMENDATION 6: The Welsh Government should work with the Coleg Cymraeg Cenedlaethol and Welsh Universities to ensure that the Welsh-medium MPA/MBA courses are available to future Local Government leaders, and fund 8 places every year for the next five years.**

*"I do not object to this recommendation in principle. However, I believe that there is room for wider consideration of how the education system and the system of post-16 education in particular is designed in order to ensure it meets the requirements of the bilingual workforce in Wales. Part of this is to ensure there are suitable courses at all academic levels and in multiple fields to meet the diverse needs of the public services and other sectors in Wales. " (WLC)*

**RECOMMENDATION 7: The Welsh Government should establish a Language Technology Board and a language technology fund to provide leadership in this area.**

There is general support for the role of digital technologies

*"We welcome this recommendation to create a board and language technology fund. The influence and potential of technology to promote the Welsh language and facilitate its use can be an asset for the future. Information technology can contribute*

*significantly to avoid duplication (e.g. memory translation) in a climate where resources are declining. " (IACC)*

*"We very much welcome the attention to machine translation [...] We should ensure that all authorities are making the best use of technology and sharing resources. " (CCC)*

The Welsh Language Commissioner warns against duplication:

*"The Welsh Government already has a Welsh Language Technology and Digital Media Group which has published a 'Welsh language technology and digital media action plan '. In addition, the Government has funded a pool of digital developments. It would be a matter for the Government of course to establish a Language Technology Board and new language technology fund but I think that it would not be wise to duplicate effort in this area. "*

She also notes the commitment in *A million Welsh speakers by 2050* to "invest in plans to create a technological infrastructure (computer aided translation, artificial intelligence (AI,) voice recognition technology, etc.) so that the Welsh language can be used on electronic devices."

**RECOMMENDATION 8 (a): Increasing the uptake of Welsh-medium services should be a specific aim in the Welsh Government's next strategy for the Welsh language.**

The Commissioner notes this is the intention of the 2011 Measure:

*"The Welsh language Commissioner states in the 2015-2017 Strategic Plan that the objective is to ensure that all the changes to the landscape of Welsh public life which will result from implementing the Welsh Language (Wales) Measure 2011 will lead to an increase in the use of the Welsh language."*

She also notes this is at the heart of *A million Welsh speakers by 2050* , that is "to create a situation where it is perfectly normal for people to use the language in their dealings with the state and with public institutions in Wales."

**RECOMMENDATION 8 (b): The Welsh Government should Commission a qualitative research to understand the factors and conditions that influence the choices of individuals and) when using the Welsh language at work and b) when using services through the medium of Welsh.**

The Commissioner notes the importance of evidence and research and

*"welcomes further research to understand the factors and conditions that influence individuals' choices to use Welsh in the workplace or in the choice of Welsh services."*

Anglesey County Council agrees

*"that a strong research base is essential in this complex area. Seeing an increase in the use of Welsh services would serve to justify further investment in services through the medium of Welsh. "*

**RECOMMENDATION 8 (c): On the basis of this research, the Welsh Government should fund effective behavioural change interventions to increase the uptake of Local Government services in Welsh, including digital services, and to promote bilingual administration.**

The Commissioner would welcome this recommendation:

*"Research into behavioural interventions is a matter that warrants research because it is imperative that interventions are introduced which are appropriate for the circumstances; intervening in the wrong way for example have a negative impact on the situation. "*

She also states that

*"the Welsh language standards in themselves are standards of behaviour which have been introduced by law in order to change the behaviour of organisations and the way in which they use the language .... there are particular standards relating specifically to the task of promoting use [of the Welsh language] and raising awareness."*

**RECOMMENDATION 9: The Welsh Government should place a statutory duty on Local Government to promote local economic development, and ensure consideration of the growth and prosperity of the Welsh language as part of that duty.**

Anglesey County Council is supportive:

*"The County Council supports this recommendation and the content of the report which looks at the economy agrees with the methodology being adopted here on the island to deal with the challenge of young people leaving to follow educational courses and due to lack of employment. We understand that the Welsh Local Government Association is already trying to lobby the Government to make the economic development duty a statutory one, and in conducting this discussion, account should be taken of the prosperity of the language as well. It would make*

*sense to incorporate this discussion into any process to review the role of local government for the future. "*

Robat Trevor links economic development and housing:

*"Housing policies in themselves were not part of the remit of the working group, but ... it is essential that there is alignment between economic development and house building and that local needs are considered ... rather than house building being considered as a machine to drive the economy at the expense of the consideration of the sociology of language."*

Under the 2011 Measure regime, the Commissioner states that:

*"Local Authorities are required to prepare a 5-year strategy setting out how they will go about promoting the Welsh language and facilitating its wider use within their area ..... Local Authorities and National Parks are expected to publish their [first] 5 year strategies by 30 September 2016."*

**RECOMMENDATION 10: The Welsh Government, in a full and equal partnership with Local Government, should develop and implement a linguistic-economic strategy for the counties of Anglesey, Gwynedd, Ceredigion, Carmarthenshire and adjacent and relevant areas, based on the towns of Bangor, Aberystwyth, Carmarthen and Llanelli.**

The Commissioner States:

*"This recommendation is consistent with the argument of the Language and Economy Group in 2014 which recommended the designation of certain areas as ' special language economic zones'; and the argument of the Welsh Language Communities Group in 2013 which judged that new development plans should be introduced for the areas of Bangor, Carmarthen and Aberystwyth. I am also of the view that any economic-linguistic strategy should be entirely clear about its targets and objectives and that there is an appropriate means of measuring its achievement and of reporting on that achievement. "*

Robat Trevor notes

*"the fundamental importance of towns and relatively populous areas with high percentages of speakers where more jobs must be created if the language to thrive and grow, e.g., Llangefnï, Caernarfon, Porthmadog, Pwllheli, Tregaron, the Amman Valley, the Gwendraeth Valley. One consideration is to offer a more important role for the Mentrau Iaith. "*

The Commissioner also notes the importance of the universities, the Mentrau Iaith and other partners in this work, and in addition,

*"In this regard it is interesting to note the contents of the speech of the Education Secretary Kirsty Williams on 8 September 2016 that now is the time for Welsh universities to reconnect with the communities that surround them."*

Cymdeithas yr Iaith notes

*"the reference in the section on the economy to a previous report, 'The Welsh Language and Economic Development ' the report of the Task and Finish Group of the Minister for Economy, Science and Transport, January 2014. We note in particular the reference which states that, "it is not clear to the Working Group the extent to which the recommendations have been acted upon". This speaks volumes. "*

**RECOMMENDATION 11: The Welsh Government should monitor the development of the Swansea Bay City region to ensure that the prosperity of the Welsh language in east Carmarthenshire (including Llanelli and the Gwendraeth and Aman Valleys) is a specific priority.**

The Commissioner states:

*"The Government made a commitment in 2014 to 'ask the boards that oversee the two City Regions to identify the specific intervention methods which would have a positive impact on the Welsh language and the economy in their regions'. At present it is difficult to say to what extent this requirement was met. It appears that the Welsh language is not a visible consideration in the development of the Swansea Bay City region at the moment. There is not a single reference to the Welsh language in Growth Strategy for the Swansea Bay City Region (which is available in English only), Swansea Bay City region: City Plan 2016-2035, or in the Terms of Reference of the Board of Swansea Bay City Region. There is no reference to the Welsh language on the website of the City-Region for example, nor is the website available in Welsh. "*

**RECOMMENDATION 12: The Welsh Government and our Universities should invest in fundamental research to develop a model which describes the essential elements of an effective linguistic- economic strategy as a basis for further policy development.**

The Commissioner notes (in answer to the previous recommendation)

*"The Committee is right to question the extent to which a linguistic-economic strategy based on a ' hand in hand ' method of planning the relationship between language and the economy is sufficient rather than a more integrated approach to planning."*

She notes that lessons should be learned from previous experience:



*"Already therefore a number of practical recommendations for the Welsh language and the economy have been made in previous documents and strategies, but it is not always clear which have been implemented nor which have been measured for their effectiveness. Side by side with developing a model, therefore, the effectiveness of previous recommendations should be considered and lessons learned from the experience of those which have been implemented, ensuring they become an integral part of any new strategy if they were effective. "*

It is not clear to the Commissioner whether the Welsh Government acted on the recommendation of the Language and Economy Group on maintaining networks with those who migrate out of Wales, or a recommendation relating to the acquisition and provision of services bilingually. Nevertheless, she states that

*"Section 5 of the Welsh Language Standards (No.1) Regulations notes that references to any activity or service being delivered or provided by a body in accordance with the standards apply if the activity or service is provided by a third party."*

**RECOMMENDATION 13: The Welsh Government should include a section on the trends for the geographical distribution of Welsh speakers over the next 25 years in its first report on likely future trends under the Well-being of Future Generations Act 2015.**

The Commissioner notes some of the deficiencies in the data that emerged in the preparation of the *5-year Report on the position of the Welsh language*, and shortcomings in data about the use of the language in the context of the national well-being goals.

*"I would welcome further information on the geographical distribution trends of Welsh speakers over the next 25 years."*

**RECOMMENDATION 14: The Future Generations Commissioner should have regard to linguistic-economic policy and good practice in her work plan, including in the context of the city regions, and report on it in her first Future Generations Report.**

The Commissioner identified some inconsistencies in the Working Group's recommendations and

*"as part of the work of monitoring policy which affects the Welsh language in Wales the Welsh Language Commissioner already keeps a watching brief on developments in the field of language-economics."*