



Ein cyf/Our ref: ATISN 26823

28 May 2026

Dear ,

Complaint in respect of ATISN 26823 – Variable Message Signs

You requested an internal review of the Welsh Government's handling of a Freedom of Information request (ATISN 26823) dated 24 April 2026. Your request for an internal review was received on 24 April 2026.

In ATISN 26823 you requested:

- “1. The written policy, guidance document, or operational procedure that governs the selection of language (Welsh, English, or bilingual) on Variable Message Signs (VMS) on the motorway and trunk road network in Wales. This includes any document setting out the three-point system described to me by the South Wales Trunk Road Agent on 24 March 2026, namely: (a) the first VMS after each junction must display Welsh, (b) bilingual display where space allows, and (c) Welsh-only display where space is constrained.
2. Any memorandum of understanding, agreement, formal correspondence, or ministerial direction between the Welsh Government, Traffic Wales, and/or the South Wales Trunk Road Agent regarding Welsh language requirements specifically for VMS.
3. The date on which the policy described in point 1 was adopted, and by whom it was formally approved.
4. Any risk assessment, safety analysis, or impact assessment conducted on the use of monolingual Welsh VMS for safety-critical messages (such as road closures, lane closures, or diversions) on the M4 or any other Welsh motorway.



Llywodraeth Cymru / Welsh Government
Parc Cathays / Cathays Park
Caerdydd / Cardiff
CF10 3NQ

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

5. Any analysis or consideration of the proportion of road users able to read Welsh when determining VMS language policy on the M4.

6. VMS message logs for the M4 eastbound between Junction 49 (Pont Abraham) and Junction 23 (M48) on 21 March 2026, showing what messages were displayed on each VMS board and in which language.

7. The number of complaints received in the past 24 months regarding monolingual Welsh VMS messages on the Welsh motorway and trunk road network.

8. Any recorded incidents or near-misses where a road user is reported to have missed safety-critical information due to a VMS message being displayed only in Welsh."

The response to the request was issued on 24 April 2025.

Your grounds for requesting an internal review are as follows:

"I am writing to request an internal review of the response to my Freedom of Information request, reference ATISN 26823, dated 24 April 2026.

I am dissatisfied with the response for the following reasons:

1. Questions 1, 2 and 3 were not properly answered

I asked for the written policy, guidance document, or operational procedure that governs language selection on VMS, including the three-point system described to me by SWTRA (Welsh first after each junction, bilingual where space allows, Welsh only where constrained). I also asked for any memorandum of understanding or ministerial direction, and the date the policy was adopted.

The response did not provide any of this. Instead, it cited the Welsh Language (Wales) Measure 2011 and Standards 61 and 62. However, neither of these standards provides for Welsh-only signage. Standard 61 explicitly contemplates English text being present alongside Welsh. Standard 62 deals with the positioning of Welsh text so it is read first, which assumes a bilingual sign. Neither standard says "if there is not space for both languages, display Welsh only."

The response then states: "The Standards have been drafted in a way to allow just the use of Welsh in some situations, without corresponding English text." This is an interpretation, not something written in the standards themselves. If there is a policy document, operational guidance, or correspondence that sets out this interpretation and how it should be applied to VMS specifically, it should have been disclosed. If no such document exists, the response should have stated "no information held" for questions 1, 2 and 3, as it did for questions 4 and 5.

I am requesting that you either disclose the specific document that authorises Welsh-only VMS for safety-critical motorway messages, or confirm that no such document exists and that the practice is based on an informal interpretation of the standards.

2. The response to questions 4 and 5 raises serious concerns

The Welsh Government confirmed that no risk assessment, safety analysis, or impact assessment has been conducted on the use of monolingual Welsh VMS for safety-critical messages, and that no analysis has been done on the proportion of road users able to read Welsh on the M4.

I accept that this is a factual answer to the FOI question. However, I raise it here because the operations log provided in response to question 6 demonstrates why this is a serious problem.

3. The operations log provided for question 6 reveals a significant safety issue

Having analysed the log, it shows that on 21 March 2026, the M48 bridge closure was communicated to M4 eastbound drivers almost exclusively by a single VMS device (M4/4072B), which displayed "PONT M48 AR GAU" (Welsh only) approximately 3,852 times throughout the day. The English version "M48 BRIDGE CLOSED" appeared almost entirely on device M48/2984M3, which is on the M48 itself — by which point drivers have already reached the junction.

Only two other M4 devices (M4/4227B and M4/4066B1) briefly displayed the English version, and only a handful of times between them.

This means that for the vast majority of the day, the only advance warning available to M4 eastbound drivers about the M48 closure was in Welsh only. There was no effective English-language warning on the M4 approach. This is not a case of alternating Welsh and English across multiple signs as SWTRA described to me — it is a single Welsh-only warning on the entire M4 approach.

Given that the Welsh Government holds no safety assessment for this practice (questions 4 and 5), and the operational data shows that safety-critical information was effectively unavailable in English to the overwhelming majority of road users, I believe this matter warrants a thorough review."

I was appointed to undertake that internal review as Head of Rail and independent to the SRN Division who undertook the original response. I have conducted my own independent research to understand the process undertaken in relation to your request.

Here are my findings in response to you.

In considering your complaint I have considered your original FOI request, the response provided to you from the Welsh Government SRN Division and the items you have raised in your complaint letter.

As your complaint has been raised in relation to the FOI request it's important to outline two rights created by the Freedom of Information Act (FOIA) against which I used to consider the threshold:

1. *The right to know – the right to be told if we hold the information requested; and*
2. *The right of access – to be provided with a copy of the information, if we hold it.*

These are the tests I have used as a threshold in considering your complaint which are as follows:

Point 1 – relating to FOI request questions 1,2 and 3 being not properly answered.

In your original request you asked for the written policy, guidance document, or operational procedure that governs language selection on VMS, including the three-point system described to you by SWTRA. You also asked for any memorandum or ministerial direction, and the date the policy adopted.

In their response to you, the Strategic Road Network (SRN) outlined to you legislative requirements which includes the Welsh Language Measures which became effective in 2012 and the Welsh language commissioner standards. These standards set out the duties for public bodies in Wales, including Welsh Government, local authorities and SWTRA should provide services to the public in Welsh. In particular, standards 61 and 62 set out clearly by which the bodies in Wales who provide services to the public.

Determination - Complaint not upheld.

Point 2 – relating to FOI request questions 4 and 5.

The response indicated no information held which upon review is correct. As indicated above, the FOI Act relates to rights to be told if WG hold the information and to be provided with the information if we hold it. In this instance I can confirm that no information is held by Welsh Government in relation to the questions raised.

Determination – complaint not upheld.

Point 3 – relating to FOI question 6.

Similarly to my consideration to point 2, in considering your original request in this case I have determined the information was held by Welsh Government and that the information was supplied to you in the form of the log of those messages. In which case the SRN Division complied with your FOI request and the only conclusion I can reach is that your complaint is not upheld in respect of that part.

Determination – complaint not upheld.

Therefore, in considering the complaint you have raised in relation to the FOI ATISN 26823 I have reached the conclusion that your complaint is not upheld as the SRN Division have complied with the requirements under the FOIA. They have searched

for the information requested and where that is held they have provided that information to you.

I appreciate that outcome might be disappointing, however, as indicated my internal review was limited to the FOI request. The nature of your complaint might relate to policy and operational decisions and rationale for those decisions which are not captured within the scope of an FOI request. In which case you might wish to write to those respective teams about those matters to raise those concerns.

I have considered your complaint in accordance with the procedure outlined in the Welsh Government's Practical Guide for Making Requests for Information which is available by post on request or via the internet at: [Welsh Government's Practical Guide for Making Requests for Information](#)

If you remain dissatisfied with this response you have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

Yours sincerely

Stuart M A Evans

*Pennaeth y Rheilffordd – Head of Rail
Rheilffyrdd a TrC – Rail and TfW
Cysylltedd Trafnidiaeth a Digidol – Transport and Digital Connectivity
Grŵp Menter, Cysylltedd ac Ynni – Enterprise, Connectivity & Energy Group
Llywodraeth Cymru - Welsh Government*