



Welsh Government
By email to:
Cymraeg2050@gov.wales

27/09/2024/

Dear friends

Technology and the Welsh language: call for information

We are pleased to have the opportunity to formally contribute to this call for information and to support your efforts to understand the needs of people who want to use Welsh language technology, and look for ideas on what is needed to make Welsh language technology easier to use.

Constant collaboration in the field

Our response is an attempt to capture the regular discussions between us. These conversations are an opportunity for us to emphasise the challenges – and opportunities – that organisations experience when trying to implement Welsh language standards. They are also an opportunity for us to hear from you about the significant developments in this field, and cascade that information back to the organisations. It is clear from the information we present in this response that we have more work to do to raise awareness of what is already available, and to ensure that planning within organisations improves.

One of the things we have tried to do this year to address this knowledge gap is to work with you to host two conferences about Technology, Digital Services and the Welsh language for organisations. These sessions were an opportunity for us to gather feedback from the organisations about the challenges they face and what support they would like to receive. We summarise the issues identified in an appendix for your convenience.

We know that this list will not be 'new' to you per se, but we hope that summarising the points in one place is useful and will facilitate discussions about how we can solve them collaboratively. As well as not being 'new', we recognise that some of the solutions to

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these problems already exist and that there is further work to be done to improve awareness of them.

We feel that we have a key role to play in this and are very keen to discuss how we can work with you – and the Centre for Digital Public Services – to design bespoke opportunities and events to address the issues identified. For example, we could do more together to encourage organisations to share resources, including translation memories, amongst themselves and openly through permissive licences.

As you know, we are now implementing a co-regulatory approach – an approach that involves working more closely, and engaging in more meaningful discussions with the people and organisations we work with. This allows us to be more supportive, providing practical support and guidance to organisations to ensure compliance and continuous improvement. Our aim is to help organisations operate in a way that promotes efficiency and effectiveness, creating an environment where they can thrive whilst meeting regulatory requirements. We anticipate this will be ongoing work for us, and technology is a fertile area for offering such support.

In addition to recognising the current challenges, we are also alert to the challenges of the future. In our recent report [Delivering Change Together](#) we stated the following:

Technological advancements, including the emergence of Artificial Intelligence (AI) for general purposes, raise several new considerations for regulating the Welsh language standards effectively in the future. While such technological advancements offer new opportunities to support the delivery of high-quality services, there is also a risk that the Welsh language will not be embedded in such advancements.

In accordance with our commitment to co-regulation, and acknowledging the collective benefits of mutual understanding and managing any potential risks to compliance as technology evolves and innovates, we will work with organisations, Welsh Government and other stakeholders to better understand the implications of technology for the delivery of public services. We will also consider how we as a regulator can support organisations as they trial new ways of working before implementing them more widely.

The above work will form a sound basis for us to develop a policy position on regulating AI in relation to the Welsh language during the coming year.

We acknowledge, of course, that you are the lead on this policy area, but as this response makes clear, it is an area of great interest to us, and relevant to our regulatory role, and we are keen for you to take every opportunity to work with us. Our international contacts through the International Association of Language Commissioners may prove useful as you push for solutions from the big international companies, for example.



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I wish you well with this work, and look forward to seeing your plans in due course.

Yours sincerely,

Efa Gruffudd Jones
Welsh Language Commissioner



Appendix

A summary of the challenges organisations experience:

1. Planning and collaboration

- A lack of consideration for the Welsh language at the outset of a process impedes developments later in the process.
- Neither the Welsh language – nor considerations about collecting data about the Welsh language – are prioritised in systems design.
- There is a perception that similar organisations aren't currently sharing enough information amongst themselves.
- Organisation leaders need to be targeted and made aware of the need to plan carefully in this area and look for opportunities for innovative collaboration.
- There is a desire to see the Government and the Commissioner do more to encourage organisations to share resources, including translation memories, together and openly through permissive licences.
- And there is certainly a desire to collaborate across organisations and sectors to jointly procure systems or services, but recognition that a central body needs to lead on an ambitious purchasing exercise of this nature.

2. Lack of user feedback

- There is a general feeling that not enough research is undertaken to gather feedback or input from Welsh-speaking users, including prior to service launch.
- The lack of data about consumer behaviour and habits is a challenge and there is a desire to see more sharing of data and statistics about consumer behaviour.
- Many organisations are finding that users are reluctant to use Welsh versions despite their availability, and further research is needed to understand why and how to change that.
- They stressed the need to engage specifically with children and young people to understand their priorities. It is essential to understand how they use technology and what choices they make in relation to language choice in order to plan future provisions.
- There is also a need to engage specifically with vulnerable users or users who have additional needs.



3. Developing the skills of the IT workforce

- There is a general sense that there is a widespread lack of awareness amongst technical officers about the requirements of the standards and language schemes. This, in turn, means they lack knowledge of good practice in Welsh technology. We anticipate that there is a role for us to assist here.
- Training specifically tailored to IT officers to raise awareness of the need to develop technology in Welsh and educate them on the requirements. This is another area where we would be keen to agree who should lead and coordinate.
- There has been a suggestion that technical officers are generally reluctant to attend relevant events and do not engage with important stakeholders in Welsh technology. This can be even more obvious for bodies operating across the UK, and particularly so when the officers are not based in Wales.
- There is also a feeling that technical officers often use technical language that policy officers do not understand and need to be communicated with using appropriate language and technical terminology – one must know how to speak their language, as it were.
- A network of digital Welsh language champions needs to be established. Establishing communities of practice to interconnect good practice and make it easier to discover others who have already solved a problem would be helpful. Again, we would like to discuss whether we have a role to play here.
- The special characters of the Welsh language continue to be an obstacle, especially how to deal with yes/no questions in Welsh. A central place to share practical approaches and solutions is needed to support bodies to address these issues.

4. Developing the skills of the general workforce

- We need to better market and promote Welsh language digital resources and keep language officers, and others, up to date with the latest developments.
- There is also a need to educate the wider workforce who will use the solutions in due course and raise their confidence. This could take the form of practical short sessions (possibly pre-recorded) on specific resources.
- Further examples of effective practice need to be circulated and a series of short sessions highlighting these would be welcome.
- There is a need to increase the confidence of Welsh speakers to use Welsh interfaces and other commissioned Welsh language resources.



5. Advice, guidelines and templates

- People aren't sure where to turn for guidance so it would be good to have a one-stop-shop for all the relevant resources and guidelines.
- The guidance already available from the Welsh Government and from the Commissioner needs to be updated, ensuring that they are relevant and accessible and supporting the procurement process to the fullest, for example by reconciling and summarising requirements for inclusion in tenders and providing clear templates for final product testing. These should be mainstreamed through centralised purchasing services.
- The relevance of the guidance also needs to be reviewed given the significant advances in artificial intelligence.
- More specific guidelines for IT officers need to be developed.
- It would be helpful to set up a single point of contact, or one-stop-shop for queries relating to bilingual digital services to match developers or IT officers with relevant experts.

6. Dealing with third party providers

- It remains challenging to get suppliers to understand the real needs of bilingual consumers (despite the guidance that exists). There is also a lack of awareness of the language and its context.
- Courses or opportunities need to be provided to educate technology companies about the requirements of existing technological standards and resources. We would like to discuss how we could help deliver this.
- A lack of Welsh language skills amongst external companies and providers makes it challenging to develop material, and companies sometimes commit to creating Welsh versions but experience difficulties later in the process.
- There is a lack of choice of providers with sufficient expertise in this area and there is a desire to see a public list of specific providers who have proven to be qualified/specialised.
- We need a handy directory of companies that have successfully created Welsh language software (e.g. HR systems or booking at an event). It would be advantageous to mainstream Welsh-language considerations to platforms such as [Digital Marketplace](#), for example.

7. Language tones and terminology

- Knowing how to write easy-to-understand content in a simple, engaging tone remains a challenge and people are uncertain about the appropriateness of using local dialect in informal registers.
- It was also noted that there was a lack of consistency in the use of technical terms and the need for an authoritative source of standard terminology. More needs to be done to type and standardise/harmonise terminology in this domain to facilitate the user experience.



- There needs to be continued investment spelling and grammar checkers, ensuring that they are widely distributed.

8. Accessibility

- Too often organisations find it challenging to consider accessibility requirements when preparing bilingual services – successful and innovative practices in this area need to be celebrated to allay fears.
- Creating videos with English and Welsh subtitles is a particular challenge and requires further guidance around best practice – as well as ensuring technology supports the work and delivers efficiencies.

9. Social media

- There are ongoing frustrations with some of the main platforms, for example, the lack of Welsh interfaces and also challenges about how they handle Welsh language content (including erroneous and problematic automatic translations).
- It was also emphasised that the whimsical nature of these media presents challenges in the creation and publication of Welsh-language content.

10. Websites

- Organisations continue to struggle to control content uploaded to websites and block English-only content from being published.
- The number and size of websites contributes to the challenge and there is a feeling that too many staff have access to the back of websites.
- A particular challenge was identified in the context of the gov.uk website operating at the UK level.

11. Apps

- The fact that an app's language is often determined by language choice in device settings makes Welsh less accessible and visible.
- There is also a feeling that more bilingual apps are needed rather than separate English and Welsh versions.
- Third-party companies hold the core information for apps in certain sectors, but that information is in English only.

12. Telephone and conversational systems

- Creating a new automated system for telephone services to be able to proactively offer Welsh can be challenging and costly.
- A number of organisations have experienced challenges in designing chatbot services.



13. Artificial intelligence

- There is real concern that this area is developing so rapidly that it is almost impossible to predict what will come next. There is also concern that the Welsh language will be left behind and seen as irrelevant if it is not included in these developments.
- The biggest concerns have been raised in relation to the education field. Artificial intelligence is increasingly being used in this sector. Provision in Welsh must be aligned with provision in English to avoid undermining the value of the Welsh language as a medium of education.
- Organisations want to innovate in this area to design services but need further clear leadership. There is uncertainty about the use of technology in handling sensitive data, for example.

14. Funding developments

- The lack of demand for Welsh language technology makes it difficult to justify the cost and investment.
- Organisations feel that a lack of financial support is a barrier to them developing and improving systems.
- As well as funding systems, there is a shortage of funding to create original Welsh content or to translate existing resources – for example digital training resources.
- A number of organisations felt the need to fund national systems jointly and that a procurement system needed to be developed in this area to serve the whole of Wales so that organisations do not have to buy in a vacuum. There is a sense that there is currently an unrealised potential to commission joint solutions and that a resource is needed to develop a framework to do this.

15. Lack of provision

- There is frustration that Welsh language software cannot always be bought off the shelf – for example, project management software – and that there is an over-reliance on large international companies to enable the use of Welsh.
- Some of these large companies provide part – but not all – of their service in Welsh and this impairs the user experience and the ability of organisations to offer their users a real and consistent language choice.

16. Lack of power

- Organisations feel they need support to persuade companies that there is commercial value to developing Welsh and bilingual resources.
- They want to receive more guidance on how to convince people of the need to invest in technology.
- Further lobbying needs to be done collaboratively to achieve new Welsh language systems and to ensure that Welsh is incorporated as a core language by the big companies.



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- A number of organisations set out their commitment to working with the Government to make the case to major technology providers and developers and there was a feeling that umbrella bodies could also do more to support this campaign.