

Senedd Cymru

Pwyllgor yr Economi, Masnach a Materion Gwledig

Ymchwiliad: Deallusrwydd Artiffisial ac Economi Cymru

Cyf: AI10

Ymateb gan: Comisiynydd y Gymraeg

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Welsh Parliament

Economy, Trade, and Rural Affairs Committee

Inquiry: AI and the Welsh Economy

Ref: AI10

Evidence from: Welsh Language Commissioner





Economy, Trade and Rural Affairs Committee

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28 November 2024

Dear Chair,

Consultation: inquiry into artificial intelligence and the Welsh economy

Thank you very much for the opportunity to participate in the above consultation. Advances in artificial intelligence (AI) are increasingly important to all aspects of our lives. It is a rapidly developing field that is bound to fundamentally change how we communicate with each other and the world around us, and how services are delivered. Ensuring that Welsh is included from the outset in today's AI developments and in the future will be central to increasing the opportunities for its use and for its preservation as a language relevant to modern society.

The main objective of our work is to promote and facilitate the use of the Welsh language. One of the ways we achieve this is by working with public organisations to increase their Welsh language services. A key part of this is to ensure that the workforce of these organisations has the capacity to offer services through the medium of Welsh. AI already has an influence on how organisations deliver different services and on ways of working. This influence will clearly increase significantly in the future and is bound to have a significant impact on the world of work and on the skills needs of the future workforce. For example, AI is already being used to create content, to facilitate translation, to provide automated services and to increase employee efficiency in a range of ways. If the Welsh language is central to AI developments from the outset, then there is great potential to significantly facilitate our work and Welsh public sector organisations in increasing opportunities to use the Welsh language. The opposite is also true, of course.

One of the main aims of the Welsh Government's (the Government) Welsh language strategy, [Cymraeg 2050](#), is to ensure that Welsh is at the heart of innovation in digital

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technology. To achieve this aim, the strategy commits to *'transform the Welsh digital landscape, with particular emphasis on language technologies'* (p. 60). In the context of this ambition, the [Welsh Language Technology Action Plan](#), that was published in 2018, has been an effective means of ensuring focus and accountability in this dynamic field. The scheme has now been finalised and the Government has launched [a call for information](#) to find out what kind of technology would help increase the use of the Welsh language. We believe the findings of this exercise will be very relevant to your investigation, and we encourage you to discuss with the Government to learn from what they have found through the work.

In [our response](#) to the exercise, we summarise what Welsh organisations told us in a series of seminars earlier this year. The purpose of the seminars was to understand the successes, challenges and good practices in the field of technology and the Welsh language. In the context of AI, the organisations said:

- That more and more use is being made of AI to provide, or facilitate the delivery of, public services.
- It has been recognised that it is not possible to use AI in some situations, as the technology does not enable the use of Welsh, and therefore does not comply with organisations' language duties. For example, our monitoring work has highlighted examples where a website search engine does not work as smoothly in Welsh and where the use of machine translation made Welsh more difficult to understand.
- There is a real concern that this field is developing so rapidly that it is 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 greatest concerns were expressed in relation to the field of education. AI is increasingly used in this sector. It must be ensured that the provision in Welsh coincides with the provision in English so as not to undermine the value of the Welsh language as a medium of education.
- Organisations want to innovate in this field to plan their services, but need more solid guidance.
- Challenges in trying to plan and design services using AI have been highlighted as there is a lack of data on the habits and behaviour of Welsh language service users.

The need to comply with language duties does not have to mean that it is not possible to offer the services through technology and AI. AI offers new opportunities to facilitate the use of the Welsh language and to support organisations as they deliver services. As the regulator for the Welsh language, we have stated our encouragement to organisations to implement innovative approaches in the field of AI to deliver services in Welsh. But the list above suggests that there are many barriers that need to be overcome to enable organisations to realise that. Recognising these challenges, we accept that organisations need to be given the opportunity to experiment with new ways of operating using AI. Our



[good practice study](#) on the Millennium Centre's experiences of moving to use bilingual online chat methods, or a 'chatbot', is a good example of this being implemented.

As AI use increases, our regulatory approach will inevitably need to evolve too. We are committed to implementing a co-regulatory approach with public organisations, which means we recognise the combined benefits of jointly understanding and managing any potential risks to compliance as technology evolves and innovates. We will therefore work with the Welsh Government and other stakeholders to better understand the implications of technology for the way public services are delivered. As part of this effort, we will consider how we can support organisations as they trial new ways of working before wider deployment. This work will provide a solid foundation as we develop a policy stance on the regulation of AI in relation to the Welsh language over the coming year.

In due course, it will be necessary to look at the suitability of the linguistic duties that derive from Welsh language standards to the field of AI technology. Welsh language standards should reflect the nature of public services considering the development of AI. The lack of flexibility in the current process of setting standards (through regulations) creates a risk that this will not happen in a timely manner, and that this may lead to gaps for a period. This is an issue that we will discuss with the Government, which is responsible for preparing the standards.

As well as regulating public sector language duties in Wales, we are working with the private and third sectors to promote an increase in the use of Welsh. Through that work, we can see that AI offers opportunities to improve Welsh language services to the public. A particular example of this would be banks and housing associations using AI to develop apps that would be able to offer Welsh language services. Developments of this kind would be positive, and welcomed, but we must be alert to the risks that exist from offering an inferior service in the Welsh language. For example, we are aware of a service that provides AI technology that translates websites where linguistic mistakes and errors cannot be edited. It is critical that AI is used responsibly to support the language skills of the workforce, not to replace them.

In summary, we see AI developments as a great opportunity to expand and improve Welsh language services in all sectors. It must be ensured that technology for the Welsh language moves on the same scale as English to ensure that the Welsh language is not treated less favourably than English in the provision of services. To realise this, it is vital to enable organisations to develop and innovate. We have a role to play in ensuring that we have open and constructive conversations with organisations as they experiment. As we develop our policy on the regulation of AI with the Welsh language, we will set out how we will encourage organisations to take advantage of the technology, while also managing the existing risks. Efforts across several organisations and sectors will also be needed to address some of the systemic barriers preventing AI developments to offer Welsh language services. The Welsh Government's intention to plan the next steps of the Welsh Language Technology Action Plan is a crucial step in this context.



**Comisiynydd y
Gymraeg
Welsh Language
Commissioner**

We hope you find the above comments useful in your consultation, and I am happy for my officers to meet with you for further discussion if needed.

Yours sincerely

Efa Gruffudd Jones

Comisiynydd y Gymraeg