



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Welsh Language Commissioner's Standards Report – Section 64 Welsh Language (Wales) Measure 2011

Schedule 8: Qualifying persons who provide the public with passenger railway services

Contents

1	Background and context	1
2	Standard investigation in relation to qualifying persons who provide the public with passenger railway services	2
3	Reasonableness and proportionality	4
4	Evidence received from the relevant persons	7
5	Evidence received from members of the public	24
6	Evidence received from the Welsh Language Commissioner's Advisory Panel	32
7	Conclusions of the standards investigation	33
8	Next Steps	37
	Appendix A - List of the respondents to the standards investigation	38

1 Background and context

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011 ('the Measure'), is to promote and facilitate the use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organisations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the Commissioner's work:

- in Wales, the Welsh language should be treated no less favourably than the English language
- persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so

The Welsh Language Commissioner has now conducted standards investigations in relation to 209 organisations. The Measure refers to 'persons liable to be required to comply with standards'. A 'person' in this context refers to organisations and sectors belonging to the category of persons specified in Schedules 5 and 6, or Schedules 7 and 8.

The investigation into the bus and train sector is in addition to that number. This is the second investigation into the sectors identified in Schedule 8 of the Measure. An investigation has already been conducted into qualifying persons who provide post office services to the public and water and sewerage undertakers. The Commissioner is also undertaking an investigation into the gas and electricity sectors.

The Commissioner has used the activities identified in Schedule 9 of the Measure as the basis for this investigation.

2 Standard investigation in relation to qualifying persons who provide the public with passenger railway services

In accordance with section 62 of the Measure, an exploration notice was presented on 7 March 2016 to the relevant companies.

For this investigation, the Commissioner decided to prioritise passenger railway services provided through a franchise established under the Railway Act 1993. There are four franchises in Wales run by four companies, namely:

- Arriva Trains Wales
- First Great Western
- Virgin Trains
- Cross Country Trains

This investigation does not examine passenger services provided on a narrow gauge or heritage railway. All references to train companies or railway service providers in this report relate to the four franchises.

An exploration notice is a notice in writing stating the Welsh Language Commissioner's intention to carry out a standards investigation, and which specifies the subject matter of the standards investigation. The Commissioner may not carry out a standards investigation unless she has given an exploration notice to each relevant person (organisation), at least 14 days before beginning the investigation.

The purpose of this standards investigation was to determine:

- which standards (if any) should be specifically applicable to persons (whether or not the standards are already specified by the Welsh Ministers under section 26(1))

The explanatory memorandum to the Proposed Welsh Language (Wales) Measure states that 'duties that are capable of being imposed upon those persons listed in Schedule 8 - and who fall within Schedule 7 - of the proposed Measure are limited to duties falling within two classes of standard only: service delivery and record keeping'.¹

Therefore, the investigation sought evidence on the activities listed as service delivery and record keeping standards in Schedule 9 of the Welsh Language Measure.

This standards investigation commenced on 31 March and it concluded on 30 June 2016.

As part of this standards investigation, information was collected from train companies in Wales via a completed questionnaire. Evidence was also gathered from the Commissioner's Advisory Panel and the public.

¹ Explanatory memorandum to the Proposed Welsh Language (Wales) Measure

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

Two briefing sessions on the investigation's remit and terms of reference were also held for the bus and train companies. One took place on 12 April 2016 at Conwy Business Centre and the other on 15 April 2016 at Cardiff City Hall.

3 Reasonableness and proportionality

In accordance with section 63(1) of the Measure, the Commissioner must have regard to the need to secure that requirements for persons to comply with standards by virtue of section 25(1) are not unreasonable or disproportionate. Reasonableness and proportionality were considered in producing this standards report and they will continue to be considered throughout the following steps.

Step 1: Standards investigation

The production of a standards report following consultation with the sector concludes the first step of the process.

In carrying out a standards investigation, the Commissioner must consider the following:

- a) whether, in respect of each of the activities specified in Schedule 9 which a person carries out, it is reasonable and proportionate for service delivery standards to be specifically applicable to a person, and
- b) respects each such activity, if it is reasonable and proportionate for service delivery standards to be specifically applicable to a person, conclude that service delivery standards should be specifically applicable to a person in relation to that activity.

Step 2: Presenting regulations

The Measure places a duty upon Welsh Ministers to secure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to a person if, and to the extent that, the person carries out those activities.

But Welsh Ministers need not secure that regulations provide for service delivery standards to be specifically applicable to a person in relation to an activity specified in Schedule 9 if, or to the extent that:

- a) a standards report under section 64 indicates that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity, or
- b) Welsh Ministers think it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity.

This does not prevent regulations from providing for other service delivery standards to be specifically applicable to a person.

Step 3: Voting on the draft regulations in the Senedd

A debate and vote on approval of the draft regulations will take place in the National Assembly's plenary session. A vote to approve the regulations will make the standards specifically applicable to the organisation or sector, and will allow the Commissioner to issue them with a compliance notice.

Step 4: Draft and final compliance notices

By making regulations under this Measure exercisable by statutory instrument, the Commissioner is authorised to give a compliance notice to a person.

A compliance notice is a notice given to a person by the Commissioner which:

- a) sets out, or refers to, one or more standards specified by the Welsh Ministers under section 26 (1), and
- b) requires a person to comply with the standard or standards set out or referred to.

The Welsh Language Commissioner will consider the evidence provided in reaching a decision on the content of a compliance notice given to a person.

The fact that a standard is made specifically applicable to a person does not mean that there is a duty to comply with that standard. A duty to comply with a standard will only be in force if the Commissioner gives a compliance notice to the person, and that notice makes it a requirement to comply with the standard on an imposition day.

The Commissioner will consult with a person on the content of a draft compliance notice. This will provide an opportunity to consider the reasonableness and proportionality of any specific requirements within the notice and will allow the organisation to submit further evidence in that respect.

Based on that consultation, the Commissioner will give a final compliance notice to a person. The failure of a person to participate in a consultation does not prevent the Commissioner from giving the person a compliance notice.

After the Commissioner has given a compliance notice to a person, that person may apply to the Commissioner asking her to determine whether or not the requirement to comply with that standard, or to comply with it in that respect, is unreasonable or disproportionate. Should the Commissioner inform the person that the requirement to comply with the standard is not unreasonable or disproportionate, they have the right under the Measure to appeal to the Tribunal for determination.

The Welsh Language Commissioner's criteria

In reaching a conclusion on the subject of this standards investigation, in accordance with the requirements outlined in Part 4, Chapter 8 of the Measure, the following criteria were considered alongside the evidence received as part of the standards investigation. Each criterion need not be considered in each case, and no criterion is of more importance than any other.

- Is the relevant person liable to be required to comply with standards – does the relevant person come within Schedule 7 and also within Schedule 8?
- Is the class of standard (service delivery; record keeping) applicable to the relevant person?
- Does the relevant person carry out the activity in question?
- Has the relevant person already undertaken to provide the activity or action in question, in part or in full, via their Welsh language scheme or policy?
- Does the relevant person already provide the service in Welsh (whether this corresponds exactly to the requirements included in the standard or not), or carry out the activity in accordance with the standard?

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

- Does the majority of other relevant persons within the same sector provide services in Welsh, or carry out the activity?
- Are there any other reasons, for or against, making the standard specifically applicable to the relevant person?

4 Evidence received from the relevant persons

Evidence was received from all four train companies in Wales. Responses were given to the 36 questions asked in the questionnaire. The questionnaire was available online and in hard copy and was posted to all relevant companies. The questions were both open-ended and multiple choice and there was also an opportunity to make further comments.

A summary of the evidence received from the respondents is provided in the following section of this report. The evidence submitted included information on the nature and structure of the companies in question, what activities they carry out and what activities they carry out through the medium of Welsh.

In the absence of any draft standards or standards approved by the Welsh Ministers relevant to this particular sector, the questionnaire did not ask the organisations to evaluate their ability to operate in accordance with any particular standard.

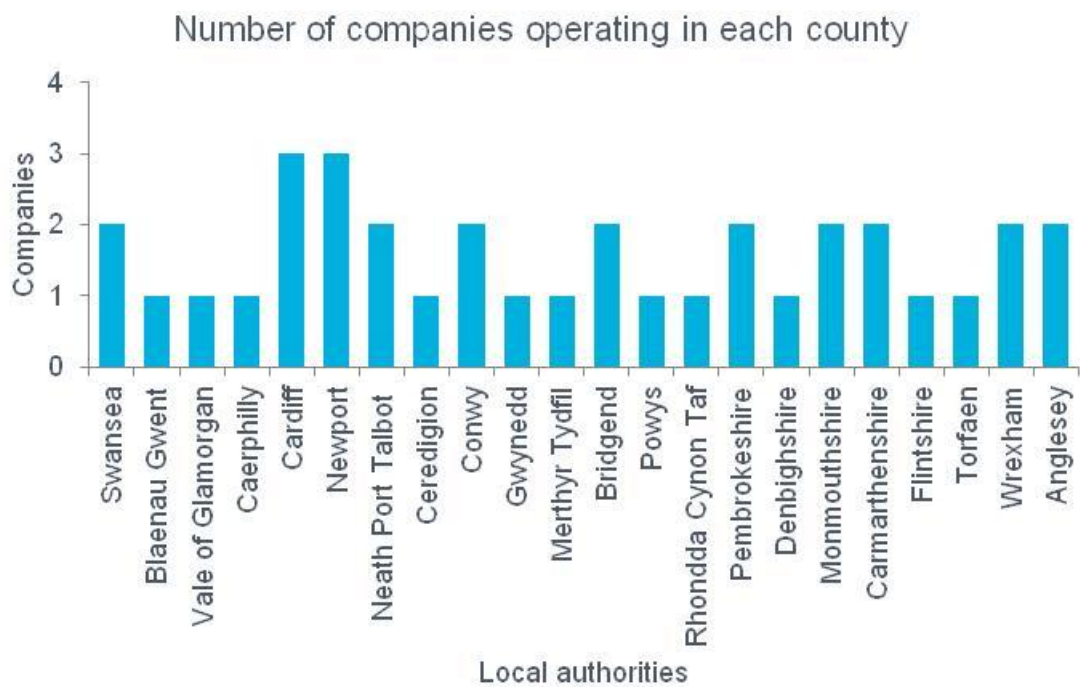
Qualifying persons who provide the public with passenger railway services

Part 1: General Information

Here is a summary of the responses:

Please note in which counties your services are operational.

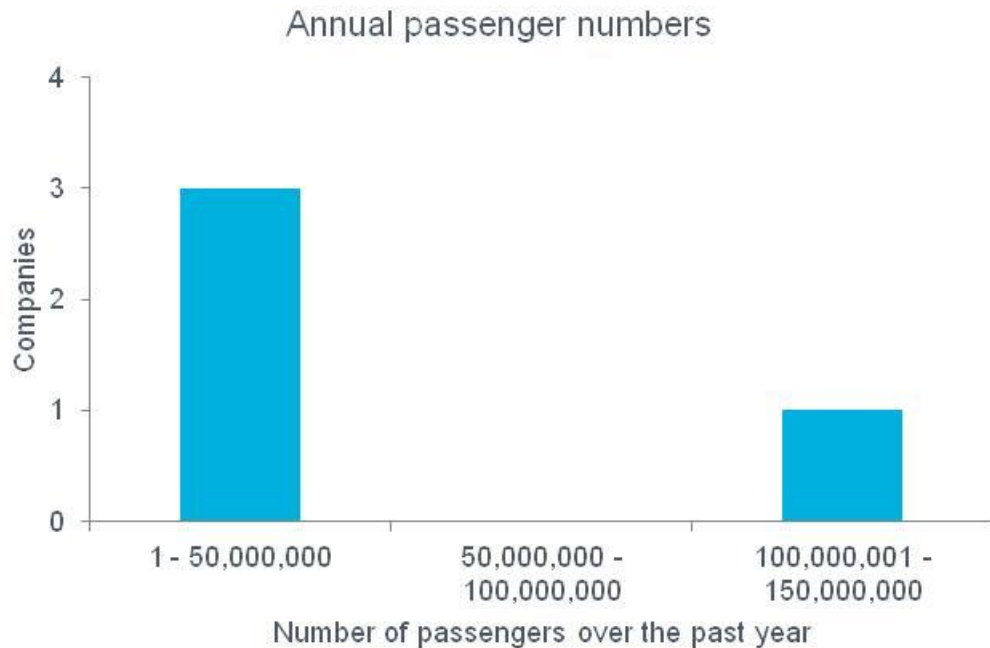
Based on the responses received, the following table shows the number of companies providing railway services to the public according to county across Wales.



Conclusions

The chart shows that train companies operate in every county in Wales with a fairly consistent spread across all counties. The highest number of companies operate in Cardiff and Newport which is understandable considering the size of the population in those counties.

How many passengers used your services in the past year?



Conclusions

The ranges used above refer to the number of passengers using services on a yearly basis. Three companies ranged from 30-40 million passengers a year. Please note that the figures represent the number of passengers using services across the UK.

Only one company was able to offer a detailed analysis of the different kinds of journeys undertaken by the public. Analysis was undertaken on a Wales-only basis, a Wales and England basis and also based on a number of other factors involving the start and end point of the journey. The company noted that some journeys were counted twice as passengers were able to use any service running on the same line.

Others noted that they did not base their figures on Wales-only journeys as passengers travelled between Wales and England.

Comments were received explaining that a number of journeys started in Wales and ended in England. It was also explained that some journeys started in England and ended in Wales crossing the border between Wales and England a number of times during the journey. This therefore highlighted the complex nature of journeys and the cross-border nature of the service.

How many staff members do you employ in Wales?

According to the responses, the number of staff working for the train companies in Wales varies significantly from three to 515 and 1775 members of staff.

The above information is supported by further comments which offer significant variation in the way in which the data is measured. One company uses the home address of its staff members, others base their information on those staff working in Wales including the numbers working for supplementary catering services.

How many staff members have Welsh language skills?

Three out of the four companies had arrangements in place for measuring staff language skills. One company reported that they had 15 Welsh-speaking members of staff, and added that the company only collected such information on public-facing staff members. One company noted that 20 out of 56 members of staff in Wales could speak Welsh, around 36%.

Another company noted that only one member of staff could speak Welsh. Two of the three companies with Welsh-speaking staff explained that they did not feel that their data was entirely reliable.

It appears that each company can measure staff skills to some extent and some employ a relatively high percentage of Welsh speakers.

How many companies have sub-contracted services in the past year?

All of the companies responded that services are sub-contracted to other companies. These include advertising, marketing, cleaning and catering services. Some companies reported on the relationship with other train companies in terms of train maintenance work, advertising timetables, and the commercial services provided by some stations.

How many companies award grants to a third party?

One of the four companies reported that they had arrangements in place for awarding grants to third parties. The companies offer customer and community funding. Grant applications can be made to develop community resources across the company's network.

Part 2: Welsh medium services

How many companies currently operate a Welsh language scheme or policy of any kind?

Two of the four companies reported that they currently had a Welsh language scheme or policy in place. Both these companies provided updated versions of their language policies as part of their responses to the investigation.

The first policy showed that the responses to the questionnaire were consistent with the commitments identified in the language policy, with two main exceptions:

1. In relation to correspondence, the language policy is committed to sending bilingual newsletters and standard correspondence. The questionnaire notes that the company will only *'[send] correspondence to several people at the same time e.g. newsletter'* in English.
2. The second exception relates to the company's website. The response to the questionnaire notes that the company's website is in Welsh or bilingual at all times. The language policy notes 'We are working to provide increased Welsh language content on our website, however some information is 'fed' through common rail industry systems which are only programmed centrally to provide information/data in the English language.' This suggests that there has been an increase in provision between the adoption of the policy and the completion of the questionnaire.

Consideration was given to the language policy of the next company. The policy was compared to the feedback received via the standards investigation questionnaire. On the whole, the commitments made in the language policy are more robust than the response to the questionnaire. Here is an overview of the differences identified:

Dealing with the media

- the policy is committed to providing Welsh language statements for publications and other public media
- the policy is committed to publishing political and public affairs statements in Welsh on request

Advertising

- the policy makes further commitments to considering the use of Welsh as part of advertising campaigns in Wales

Dealing with customers

- the policy refers to the availability of the National Rail Enquiries Service's Welsh language helpline for enquiries.
- the policy states that, following a telephone conversation in Welsh, any subsequent written correspondence will also be in Welsh (unless there is a written request to receive correspondence in English)

Public image

- the policy makes a commitment to support the Welsh language by maximising opportunities to use the language as part of the company's public image
- the policy proposes that the company will provide formal documentation in Welsh on request

Website

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

- the policy makes a commitment to creating a Welsh language section on the company's website. This section will contain those documents already available in Welsh along with guidance on how to request translations of documents not currently available in Welsh
- the company's response to the standards investigation proposes that the company's provision on social media has developed since the publication of the language policy, especially in terms of the use of Facebook in Welsh

How many companies offer language training to staff?

Only one company noted that language training is available to staff.

That company reported that Welsh lessons had been available at one point via a shared learning agreement with the relevant trade unions. This service is no longer available to new recruits. The same company went on to refer to the arrangements which are in place for considering requests for additional learning in terms of business needs as part of annual performance reviews with line managers. The company notes that any requests are discussed carefully and, where practical, a discussion will be held with the union representative in order to allow study time and possibly course funding.

Activity 1: Correspondence sent by a body

The question on correspondence was divided into three parts:

- sending correspondence direct to an individual
- responding to Welsh language correspondence received
- sending correspondence to several people at the same time

Here are the responses received:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Sending correspondence direct to an individual	0	1	3	0
Responding to Welsh language correspondence received	0	2	2	0
Sending correspondence to several people at the same time	2	0	1	1

2.4 Further comments

One company reported that all recognition emails from the Customer Relations Team were bilingual and that any Welsh language correspondence sent to customer relations or senior managers would receive a response in Welsh. Tweets posted in Welsh will receive a response in Welsh when resources are available. The newsletter is in English only but factsheets will be available in Welsh. According to the company, email responses to the

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

web and telesales teams will be in English only. Booking confirmations will only be available in English.

Another company noted that the customer relations, marketing and communications teams were based outside Wales and that the vast majority of correspondence sent via email, in the post or via social media arrived in English. The company has not seen the need to provide bilingual services nor translation thus far. If correspondence does arrive asking for a Welsh language response, then the company will attempt to respond in Welsh. According to the company, the same service will not be possible in terms of oral communication.

Another company reported that they have an agreement with a Welsh translation company that can assist them by translating correspondence or providing a written response in Welsh. The company noted that at least one member of staff is able to provide Welsh language services on behalf of the customer relations, public affairs and commercial development teams.

Conclusions

Every company undertakes the activity in question, but one company reported that sending correspondence to several people at the same time was not applicable. One company used some Welsh when sending correspondence directly to an individual. Two out of the four used some Welsh when responding to Welsh language correspondence received and two companies sent correspondence to several people at the same time in Welsh.

Activity 2.5: Phone calls, helplines and call centres

The section on phone calls, helpline and call centres was divided into four parts:

- answering general phone enquiries
- ticket lines
- answer phone messages
- making phone calls

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Answering general	2	0	2	0
Ticket lines	0	0	4	0
Answer phone messages	0	0	3	1
Making phone calls	2	0	2	0

2.6 Further comments

One company reported that calls to the Customer Relations service offered the opportunity to speak in Welsh. Should a call back be required, then it is possible that the call would only be available in English. Calls made to the telesales team were available in English only, as the team was based overseas. According to the company, calls made to the headquarters usually receive a response in English but they will seek to find a Welsh speaker if possible.

Another company referred to an agreement with a translation company and the ability to respond to calls or return calls in Welsh. Reference was made once again to the member of staff who provides assistance to teams by providing Welsh language services but that arrangements need to be made in advance in order to provide that assistance. It was claimed that the customer relations team did not receive any calls in Welsh in 2015-16. One letter was received in Welsh during the same period and the company was contacted in Welsh once via social media.

Conclusions

Every company undertook the activity, but one company reported that they did not use answer machines. Two companies answered general phone enquiries and made phone calls bilingually, in Welsh only or with some Welsh. None of the companies offer ticket lines nor answer machines in Welsh.

It appears from the responses that customers are able to connect by phone with companies in various ways e.g. to call centres abroad. Welsh Ministers should take this into account when setting the regulations in respect of telephone calls to and from the body and to make provisions for these various types of telephone lines.

Activity 2.7: Meetings and public events

The section on meetings and public events was divided into two parts:

- conducting meetings with more than one member of the public
- conducting events that are open to the public

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Conducting meetings with more than one member of the public	0	2	2	0
Conducting events that are open to the public	0	2	2	0

2.8 Further comments

One company noted that the Welsh language service offered in relation to meetings and public events varied depending on the availability of Welsh speakers.

Another company noted that they did not have any managers who can speak Welsh, therefore they cannot provide services in Welsh. If bilingual services were required as part of a meeting or public event, then the company would seek to use an external agency. According to the company, they have not needed to provide Welsh language services yet.

Another company explained that their Wales manager could speak Welsh and English. This would be the officer attending public events. The company's development manager who also attends public events is learning Welsh.

Conclusions

Every company undertook the activity. Two companies explained that they used some Welsh when conducting meetings with one or more members of the public or public events.

2.9 Publicity, advertising and displaying material in public

The section on publicity, advertising and displaying material in public was divided into nine parts:

- timetables
- tickets
- travel cards / passes
- posters
- press releases
- health and safety information
- travel rules / transport conditions
- notice of changes to services
- publications

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Timetables	1	1	2	0
Tickets	0	1	3	0
Cards / Passes	0	0	4	0
Posters	1	1	2	0

Press releases	0	2	2	0
Health and safety information	1	1	1	1
Travel rules/ transport conditions	0	1	3	0
Notice of change to route	1	1	2	0
Publications	1	1	2	0

2.10 Further comments

One company noted that information regarding timetable changes considered as a part of long-term plans was published bilingually. The company does not feel that it is possible to provide information bilingually in special circumstances e.g. disruptions to information services available electronically via sources such as smartphones and tablets. The company notes that information services for trains, tickets and commercial services are run based on a UK-wide database which is only available in English.

Another company noted that their public information and publicity material were produced for the whole of the UK and for the company's entire network. The company will only produce this information in English.

Another company noted that a Wales manager could speak and write Welsh. This allowed the company to conduct press interviews in Welsh and helped in terms of conducting stakeholder and community engagement events. The company stated that this was important in relation to partnership working and consulting on improvements or changes. In addition, the company ensured that any events held in Wales, including the Royal Welsh Show, were fully bilingual. The company's passenger charter, disability policy and complaints policy are available in Welsh on request.

Conclusions

Two out of the four companies offered timetables, posters, press releases, health and safety information, notice of changes to services and publications bilingually, in Welsh only or with some Welsh.

One company offered travel rules and tickets containing some Welsh. None of the companies offered travel cards in Welsh.

2.11 Producing and publishing forms

The section on producing and publishing forms was divided into three parts:

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

- complaint forms
- lost property forms
- registration forms e.g. for season tickets

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Complaint forms	0	0	2	2
Lost property forms	1	0	3	0
Registration forms e.g. for season tickets	0	0	3	1

Conclusions

Only two of the companies provided complaints forms. The only form provided in Welsh was the lost property form of one company.

2.12 Websites, online and self service tills

The section on websites, online and self service tills was divided into four parts:

- website
- social media e.g. Facebook or Twitter
- self service machines e.g. ticket machines
- apps e.g. for phones

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Website	1	0	3	0
Social media	0	2	2	0
Self service machines	0	1	0	3

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Apps	0	0	4	0

2.13 Further comments

One company noted that their websites were translated as far as possible within technical limitations. For example, they explained that real time information was administered by an English only system. Social media will depend on the availability of Welsh speaking staff. New ticket machines will include a Welsh language service option. It was noted that a significant number of the machines already offered this option.

Another company noted that the social media team did not always include Welsh speakers, but that the company sought to respond appropriately by using the external translation service. The company went on to note that the immediate nature of Twitter made it difficult to provide prompt responses in Welsh. They noted that Facebook proved less difficult in that regard. The company noted that they did not have any ticket machines in Wales, that another company provided these on their behalf.

Conclusions

One company explained that their website was always bilingual or in Welsh.

One company offered some Welsh on self service machines. It should be noted that three companies stated that self service machines were not applicable to them as the service was largely sub-contracted to another company.

None of the companies offered Welsh language provision via mobile apps.

2.14 Signage

The section on signage was divided into two parts:

- train station signs
- signs / displays on the train showing next stations

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Signs	1	0	0	3
Signs / displays	2	0	2	0

Three companies noted that they did not provide signage according to the Commissioner's definition of signage. However, it appears that this may not be accurate as signs of all kinds are displayed on trains. Some further comments were made by the companies as shown below.

2.15 Further comments

One company noted that 158 and 175 class trains displayed bilingual LED signs. The company went on to say that no other class of trains displayed such LED signs.

Another company noted that all of their trains provided information to customers in English, including the Welsh name of stations as part of an English translation. The company does not manage any stations, signs nor passenger information. The company responsible for maintaining the stations takes responsibility for this information.

Another company noted that they did not have responsibility for maintaining any stations in Wales, another company was responsible for maintaining the stations. The trains belonging to the company operating in Wales did not provide any electronic information signs to customers.

Conclusions

One company offered train station signs bilingually or in Welsh at all times. The other three companies noted that this was not applicable to them. The company offering train station signs bilingually or in Welsh at all times operates on behalf of other companies.

Two of the companies offered signs / displays on the train showing next stations bilingually or in Welsh at all times.

The companies use a combination of fixed and electronic signs to display information.

Welsh Ministers should consider the need to ensure that any regulations in relation to signs displayed by a body address the different kinds of signs used by train companies in Wales.

2.16 Public address systems

The section on public address systems was divided into two parts:

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

- announcements in train stations
- announcements on the train e.g. next stop

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Announcements in stations	0	2	0	2
Announcements on the train	0	1	3	0

2.17 Further comments

One company noted that software issues limited their use of Welsh.

Another company referred to a previous comment made that they do not operate any stations in Wales. The company went on to say that their services cross the border, and that none of their train services start and end in Wales.

Conclusions

Two companies made audio announcements in train stations in English with some Welsh. One company offered audio announcements on trains in English with some Welsh.

2.18 Receiving visitors

The section on receiving visitors was divided into three parts:

- receiving visitors to a site open to the public e.g. office reception
- information desks
- ticket sales desk

Here is a summary of the responses:

	Bilingually or Welsh only	English with some Welsh	English only	Not applicable
Receiving visitors to a site open to the public e.g. office reception	0	1	3	0
Information desks	0	1	0	3
Ticket sales desk	0	1	0	3

2.19 Further comments

One company noted that their ability to provide Welsh speaking staff depended on the location and availability of staff.

Another company noted that arrangements for meeting the public were only available at the headquarters outside Wales.

Once again, reference was made to arrangements whereby some companies provide information and ticket sale services on behalf of other companies.

Conclusions

One company offered an English language service with some Welsh to visitors to sites open to the public (e.g. receptions). The company also offered an English language service with some Welsh at information desks and ticket sale sites.

Three of the four noted that information desks and ticket sale sites were not services offered by them directly but by a third party.

The company which offers visitor reception services in English with some Welsh also offers the service on behalf of other companies.

2.20 Courses

The companies were asked to report on any courses or training organised by them for the public e.g. seminar or workshop. Every company noted that the activity did not apply to them.

2.21 Brand and corporate identity

The companies were asked to report on their brand and corporate identity.

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

One company reported that their brand and corporate identity was bilingual or in Welsh at all times, whilst the other two that responded reported that the company's brand and corporate identity was in English only.

2.22 Further comments

According to one company with an English only brand and identity, only 35 out of the 298 daily journeys take place in Wales.

Another company reported that their first class menu was available in Welsh.

2.23 Do you offer any other services?

Two companies noted that they did not offer any other additional services, beyond the activities listed in the questionnaire.

One company referred to their willingness to provide a Welsh language service at stakeholder events, if needed.

2.24 Offering those services in Welsh

No further comments were received on the question relating to other services.

2.25 Raising customer awareness about Welsh language services

One company referred to the provision of Working Welsh products for staff in order to denote Welsh speakers. The call centre provides an option to choose a Welsh language service and the website has a 'Cymraeg' button to choose pages in Welsh.

Another company noted that they do not currently offer any services through the medium of Welsh, therefore they do not raise awareness.

One company explained that all customer-facing employees who can speak Welsh (or any other language apart from English) display a Welsh flag (or other appropriate flag) on their work badge to show the languages spoken.

Part 3: Record Keeping

3.1 The questionnaire asked whether companies kept records of the following:

- staff language skills
- applications for Welsh medium services
- the Welsh language skills required for specific roles when recruiting
- complaints you receive

Here is a summary of the responses:

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

	Yes	No
Staff language skills	2	2
Applications for Welsh medium services	0	4
The Welsh language skills required for specific roles	2	2
Complaints you receive	3	1

3.2 Further comments

One company noted that they did not keep a record of staff language skills. They keep a record of the number of complaints made about their Welsh language services. Job advertisements denote that the Welsh language is desirable.

Another company noted that they did not have a policy of asking staff about their preferred language, they do not do so during the interview nor when the new recruit starts. A staff database includes a section for denoting an officer's main language. This is done voluntarily. The company keeps a record of the number of complaints received but there is no record of the language in which a complaint was made.

One company noted that there are arrangements in place for keeping a record of the language skills of customer-facing staff.

Conclusions

Two of the four companies had arrangements in place for keeping a record of staff language skills, but none of the companies reported that they currently had arrangements in place to measure requests for Welsh medium services.

Two companies reported that they had arrangements in place for assessing the Welsh language skills which are essential for a post.

Three of the four companies noted that they had arrangements in place for measuring the number of complaints in relation to Welsh language services made to the body.

5 Evidence received from members of the public

A total of 264 responses were received from the public to the investigations. 65 responses to the investigation were received from individuals who chose to complete the questionnaire provided for them by the Welsh Language Commissioner on the website.

A further 199 responses were received based on a template of a standard response published by Cymdeithas yr Iaith Gymraeg; in this case, all of the responses were the same.

A full list of respondents who were willing for their name to be published can be seen in Appendix A.

The following table indicates the location of the respondents.

Number of responses to the standards investigation by location²

Locations	Number	Percentage (%)
Swansea	6	2.3
Blaenau Gwent	3	1.1
Vale of Glamorgan	6	2.3
Caerphilly	4	1.5
Newport	3	1.1
Neath Port Talbot	6	2.3
Ceredigion	22	8.4
Conwy	11	4.2
Cardiff	33	12.6
Gwynedd	84	32.6
Merthyr Tydfil	5	2
Bridgend	1	0.4
Powys	8	3
Rhondda Cynon Taf	7	2.3

² These statistics include all the responses received via the questionnaire, and the template provided by Cymdeithas yr Iaith Gymraeg.

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

Locations	Number	Percentage (%)
Pembrokeshire	4	1.5
Denbighshire	5	1.5
Monmouthshire	2	0.8
Carmarthenshire	16	5.8
Flintshire	2	0.4
Torfaen	1	0.4
Wrexham	3	1.1
Isle of Anglesey	18	6.9
Outside Wales	11	4.2
Not answered	3	1.1
Total	264	100%

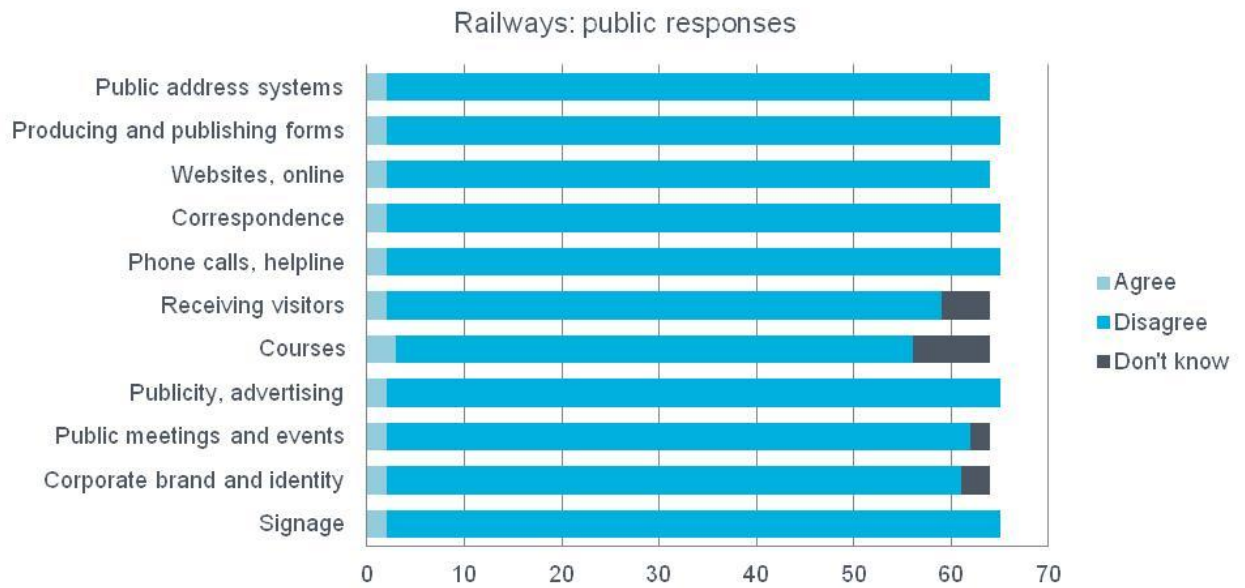
Service delivery standards

In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the service delivery standards, they were asked to respond to the following question in the questionnaire:

'Do you agree or disagree that the services which fall under the above categories should be offered in Welsh by the companies below?'

In answering this question as part of the questionnaire, the public were given the opportunity to respond per activity within the scope of the service delivery standards.

The following table shows the variety of the responses received:



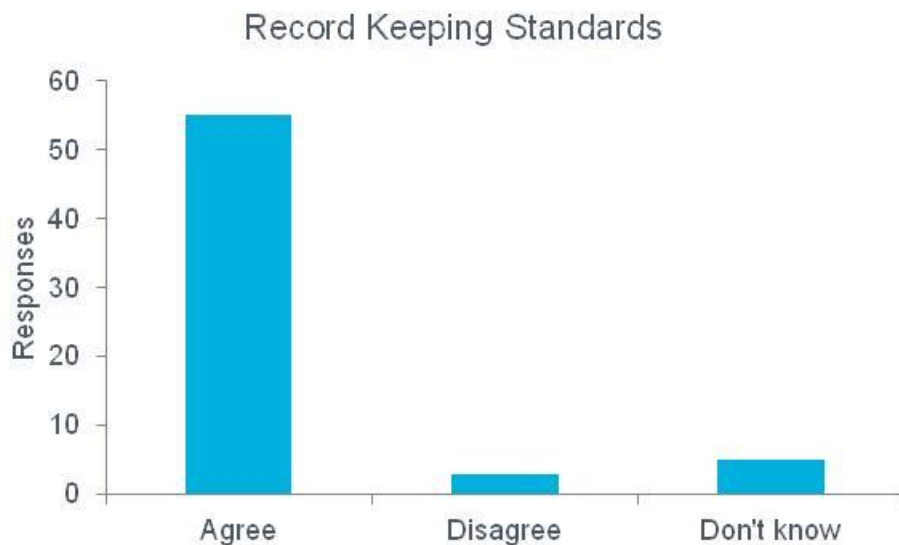
Record Keeping Standards

In seeking the public's opinion regarding the reasonableness and proportionality of the requirements attached to the record keeping standards, they were asked to respond to the following question in the questionnaire:

'Do you agree or disagree that the services which fall under the above categories should be offered in Welsh by the companies below?'

Of the 66 who responded via the questionnaire on the Commissioner's website, 63 answered this question, with 87% (55) agreeing that this duty should be imposed on the relevant persons in question.

The tables below indicate how members of the public responded to this question:



Further comments

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

As well as providing responses to specific questions on the subject of the standards investigation, the public were given the opportunity to note any additional standards they believed should be specified and made specifically applicable to the relevant persons in question, together with any further comments relevant to this standards investigation.

Of the 66 who responded via the questionnaire on the Commissioner's website, 29% (19) provided additional comments to be considered by the Welsh Language Commissioner as part of the standards investigation.

The responses received were generally supportive of the concept of specifying standards, to ensure that Welsh speakers have clear rights in relation to the Welsh language services provided by train companies.

The public were very keen to ensure that the specified standards impact the everyday life of the average person. What the public sees and hears when using train services is more important to them than internal paperwork.

Outlined below are the main themes of the responses received in favour of making the standards specifically applicable:

- the need to ensure that every company provides a default Welsh language service to passengers and is supportive of passengers' language choice
- the need to ensure that standards in relation to public-facing services go beyond the main reception areas and meetings
- ensure that the entire process of buying, receiving and checking tickets can be undertaken in Welsh
- the need for online Welsh language services and self service machines which operate in Welsh
- ensure that what is seen and heard by the public when using train services is bilingual, with Welsh first, and that this includes station car parks

In general, we did not find strong opposition from the public towards language duties.

Outlined below are the main themes of the responses received from the public against making the standards specifically applicable:

- the need to make a public announcement in English first if there is a sudden change in services
- disagree with the requirement to keep records in Welsh
- disagree with conducting meetings and courses bilingually, want them to take place separately; in English and Welsh according to demand

On the whole, the vast majority of responses received from the public agreed that train companies should be subject to the service delivery standards. A report-based response was provided by Cymdeithas yr Iaith's Grŵp Hawliau and by Cymdeithas members who sent an email in the form of a template. The report and questionnaires received from Cymdeithas members highlighted the need to ensure that train providers are subject to all of the standards in the Service Delivery Standards group.

The vast majority of responses believed that train companies should have to correspond with the public in Welsh in Wales. Those companies that do correspond in Welsh already were praised but a number expressed their disappointment with those companies that do not already use Welsh.

One respondent noted that it was a basic linguistic right in Wales to receive correspondence in Welsh and another respondent reiterated that all correspondence in Wales should be in Welsh or bilingual. However, one respondent was not supportive of receiving bilingual correspondence but thought that it was fair that correspondence received in Welsh by the companies was answered in Welsh.

In examining standards relating to phone calls, helplines and call centres, a vast number of respondents believed that these services should be available in Welsh. One respondent said: 'The standard of those existing services that are bilingual also needs to be improved.' Another respondent suggested that bilingual helplines needed to be monitored in order to ensure that they are operational. Another respondent believed that there should be separate phone numbers for Welsh and English helplines.

One respondent agreed that Welsh speakers should be able to converse in Welsh on the phone, but would be unhappy having to choose in which language to proceed with the call: 'I agree that Welsh speaking callers should be answered in Welsh, but I would be unhappy if I had to put up with bilingual greetings, or had 'Press 1 for English, 2 for Welsh' options to negotiate.' Another respondent commented on this point (in Welsh):

'Call centres should stop using 1 for Welsh and 2 for English, and instead employ bilingual staff who can handle calls in both languages naturally. This is what happened when setting up Traveline in Penrhyndeudraeth, and as a result the number of calls received in Welsh grew overnight.'

The majority of respondents believed that meetings and public events should take place bilingually or in Welsh. One respondent noted that public meetings should be conducted in English only, but thought it fair to conduct one-to-one meetings in Welsh if requested. Another respondent believed that public meetings should be conducted in Welsh, especially in those areas where the Welsh language is thriving. Another respondent supported the notion of conducting meetings in Welsh as it was easier for someone to express themselves in their preferred language.

Once again, the vast majority of respondents believed that publicity, advertising and displaying material in public should be undertaken bilingually or in Welsh only. There was much criticism that this did not already happen, with a number of comments such as 'this isn't difficult at all' and 'it should', reflecting the general consensus.

There were a number of concerns regarding tickets. The majority believed that tickets should be bilingual or in Welsh only, especially when noting place names on tickets. An individual also noted that station names should be written in Welsh only on tickets. A number also believed that the public should be able to buy their tickets over the counter in Welsh. Another respondent went on to say, 'I can see big problems if staff, eg selling tickets, cannot speak Welsh.' One respondent wanted to see place names outside Wales being displayed in Welsh: 'e.g. Caer/ Amwythig'.

More than one respondent wished to see bilingual or Welsh train seat reservation slips and another respondent wished to see bilingual concessions cards and season tickets, with Welsh taking prominence. Another respondent believed that notices, timetables and passes should be produced separately as bilingual printouts were 'heavy work to read'. However, one respondent believed that the use of Welsh in relation to publicity, advertising and displaying material in public was hugely beneficial to people with learning difficulties.

Welsh Language Commissioner's Standards Report – Schedule 8: persons who provide the public with railway services

A number believed that forms should be produced and published bilingually or in Welsh only. One respondent noted that Welsh and English forms should be available separately as bilingual forms were a waste of paper and difficult to understand. One respondent believed that Welsh and bilingual forms should be available on the companies' websites too. Cymdeithas yr Iaith noted that information leaflets and booklets should also be available bilingually, and that Welsh language versions should be available by default.

With regard to the websites and online services of train companies, there was strong support for bilingual or Welsh only versions of these. Another respondent wished to draw the Commissioner's attention to Euskotren.eus (the Basque Country's railway system) as an exemplary bilingual interactive website. Another respondent noted the need for a Welsh language app for tablets and smartphones.

There were a number of further comments on purchasing tickets online and from self service machines which insisted that these services should be available in Welsh. One respondent noted that it was possible to buy a train ticket in six languages on a self service machine in Wales, but that Welsh was not one of those. The main issue highlighted by the respondents was that websites and self service machines did not recognise Welsh place names nor different kinds of tickets. At present, it is not possible to buy tickets online nor from a self service machine in Welsh as a result.

Respondents wished to see the Welsh language being used on the train companies' websites as well as those instances where help and support is given to passengers on social media. One respondent believed that social media was more important, if anything, than the corporate website.

The majority of respondents believed that signs and screens should be bilingual or in Welsh only. There were concerns that a number of these are currently in English only, and it is often the case that if signs and screens are bilingual then English is seen first. The respondent believed that new stations should be given Welsh names only. Ensuring the accuracy of Welsh place names and the use of accessible Welsh when translating was a priority for respondents.

One respondent noted that English place names could cause 'confusion'. One respondent believed that place name signs outside Wales should be in Welsh 'e.g. Caer/ Amwythig'. One respondent also believed that the destination, and stops in between where relevant, should be bilingual on the front, inside, side and back of trains. Another respondent questioned why adverts on the train were not subject to the standards. On the other hand, one respondent believed that the English should come first on screens and signs as English was the main language spoken in the country.

In their report, Cymdeithas yr Iaith noted that every sign should be bilingual, including those in train stations and on the trains themselves. They also noted that the standards involving signs should refer to every sign and not just new ones. Furthermore, they noted that standards involving signs should include electronic displays on vehicles, electronic displays in train stations and signs on and the design of vehicles (inside and outside trains).

The vast majority of respondents believed that public address systems should be bilingual or in Welsh only, with one response claiming that not doing so showed a lack of respect. Cymdeithas yr Iaith also called for ensuring that audio announcements on trains and in stations were in Welsh too. Those companies which already address the public bilingually were commended and one respondent claimed that the system is practical and effective.

Others were concerned about the standard of existing public address systems and their pronunciations. Several respondents expressed their disappointment at the companies' current pronunciations, with the term 'disgraceful' used by another respondent to describe the general attitude of respondents towards the existing public address systems. They also asked for place names to be pronounced correctly. Another respondent believed that Welsh language announcements would enrich the experience of travelling across the country. One respondent stated his surprise at realizing that no audio announcements are made in Welsh in areas with a high percentage of Welsh speakers. Furthermore, another respondent asked for bilingual publications outside Wales, if the train is travelling to Wales, for example from the main stations such as Paddington in London, Birmingham and Chester.

Ensuring that a fluent Welsh speaker records public address system announcements was a priority for a number of respondents. Another respondent noted that a qualified local individual needed to review and update local place names on a regular basis in order to ensure that the correct ones were being used. On the other hand, one respondent believed that the announcements should be made in English first. They went on to say that English should be used if there is a last minute change in order to ensure that the majority understand the next steps at once. However, another respondent believed that health and safety announcements should be bilingual as well as other announcements over the tannoy.

The majority believed that visitors should be received bilingually or in Welsh only. One respondent believed that visitors should be greeted in Welsh first in the Welsh-speaking heartlands. Another respondent noted that ticket collectors across Wales should be able to greet passengers using simple Welsh phrases.

The majority of respondents believed that courses should be offered in Welsh. But a small number of respondents disagreed and some didn't know. One respondent strongly disagreed with courses being held bilingually but wouldn't mind Welsh courses were conducted separately.

A vast number of respondents believed that train companies' brand and identity should be bilingual or in Welsh. The respondents tended to believe that a company's identity, slogans and marketing material should be available in Welsh and that it didn't really matter if the company's name was not in Welsh. On the other hand, two respondents believed that the name should be in Welsh which expressed their Welshness whilst the other respondent believed that the standards should impose changing the existing brand name, if not already in Welsh. Welsh speaking staff should introduce themselves in Welsh and wear Working Welsh badges to show their ability to provide a service in Welsh.

Cymdeithas yr Iaith did not believe that the current standards addressed the situation and that public-facing Welsh language service standards needed to be adapted for this purpose. They also believed that these organisations needed to plan their workforce in order to offer a Welsh language service. They are calling for the reorganisation of standards so that a standard on recruitment is included with the 'Service Delivery Standard'.

Record keeping standards

Some comments were received which supported the need for organisations to keep records, in order to monitor compliance. However, some respondents believed that record keeping placed a burden on the companies and was unnecessary.

6 Evidence received from the Welsh Language Commissioner's Advisory Panel

Evidence was received from the Advisory Panel in accordance with the requirements outlined in section 63(3) of the Measure.

The responses received from the Panel supported the purpose of the regulations, namely to achieve the basic objectives of the Measure; that the Welsh language has official status in Wales and should be treated no less favourably than the English language.

Recognising that those regulated by the Commissioner will have concerns, emphasis was placed on developing a common understanding of the requirements of the Measure; the Legislation which led to these standards.

As was noted in previous standards investigations, the panel believed that the 'reasonableness and proportionality' of some of the standards should be considered in setting the requirements in compliance notices under section 44 of the Measure.

In general, the Panel agreed that the services identified in the questionnaire should be offered in Welsh by the companies. The Panel believed that all franchises should include the requirement to offer a bilingual service and that all publicly funded bodies should undertake to do the same.

However, in relation to some services, Panel members were not in agreement or raised further questions. One member questioned the reasonableness of asking organisations to hold bilingual meetings with individuals. Another member of the Panel questioned whether a bilingual public address service was realistic for those companies in question whilst another believed that it was important to normalise multilingualism. One member also raised concerns about the financial implications of receiving visitors bilingually.

One member of the Panel noted that companies should be encouraged to offer Welsh language courses rather than forced to do so, whilst another believed that this was a worker's fundamental right.

A further comment involved giving priority to issues directly related to the day-to-day delivery of the service to the public, rather than an ad hoc public event or service provided to an individual. They believed that such action would encourage the development of the use of Welsh in a cost-effective manner.

7 Conclusions of the standards investigation

General comments

The following conclusions were reached on the basis of the evidence received by all relevant persons, the public, and the Advisory Panel, in addition to independent evidence collected by the Welsh Language Commissioner.

The list is drawn from activities identified in Schedule 9 of the Welsh Language Measure, as well as those contained in previous regulations. Since commencing this investigation, further regulations have been published in relation to the Welsh language. The Commissioner did not consider that these applied to this sector.

It is noted that section 42 of the Measure imposes a duty on Welsh Ministers to ensure that regulations provide for service delivery standards relating to all of the activities specified in Schedule 9 to be specifically applicable to a person if, and to the extent that, the person carries out those activities.

However, it should be noted that they do not have to do so if the Commissioner indicates in a standards report, or if Welsh Ministers are of the opinion, that it would be unreasonable or disproportionate for service delivery standards to be specifically applicable to a person in relation to that activity. It should be noted that this section of the Measure does not prevent regulations under section 39 from providing for other service delivery standards to be specifically applicable to a person.

In accordance with the above, if the standards investigation identifies that a person carries out the activity³, be that to a lesser or a greater extent, the Commissioner will conclude that standards relating to that activity should be made specifically applicable. It is also noted that the way in which a service is provided in relation to an activity may change in the future and that it would be necessary to adjust to reflect that by varying the compliance notice, rather than going back to regulations.

However, where evidence exists that a person does not carry out an activity at all, be it via evidence gathered as part of the standards investigation, or by other means, the Welsh Language Commissioner will conclude that standards in relation to that activity should not be specifically applicable to them, unless there are valid reasons for doing so.

The Commissioner will consider the evidence provided in order to reach a decision on the content of compliance notices issued to relevant persons under section 44 of the Measure.

Service delivery standards

There should be clear differentiation between a person's commitments (what is expected of them) and performance (the extent to which they currently meet those expectations).

Performance, as well as the extent to which a person can comply with a standard at a particular time, is a practical matter. The extent to which they can do so may improve, deteriorate or remain the same. The Commissioner believes that commitments should meet the needs of the Welsh language users they serve, with a reasonable timetable

³ Service delivery activity as defined in section 28 of the Welsh Language (Wales) Measure 2011

specified for dealing with any existing obstacles. The Commissioner will consider those obstacles when determining the contents of compliance notices issued under section 44 of the Measure .

It is acknowledged that the companies identified potential challenges and obstacles in terms of ensuring full compliance with some of the service delivery standards. However, the Commissioner believes that commitments proportional to the needs of Welsh language users could be achieved with a reasonable timescale for action and dealing with any challenges.

The Commissioner will consider those inconsistencies further when determining the contents of individual compliance notices issued under section 44 of the Measure.

Although the extent to which train franchise companies currently provide services in Welsh varies, the evidence gathered during the investigation shows that all of the activities in Schedule 9 of the Welsh Language Measure are relevant to the sector. At least one of the four companies undertook each activity. Some other services were also examined as part of the investigation, as noted in conclusion 1.

Conclusion 1:

The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations providing for service delivery standards in relation to the activities below are specifically applicable to qualifying persons providing passenger railway services in Wales:

- correspondence sent by a body to several people
- correspondence sent by a body to an individual or company
- responding to Welsh language correspondence received by a body
- telephone calls made to a body's main contact number and to any helplines or call centres
- automated telephone calls
- meetings arranged by a body that are open to the public
- meetings between a body and one other invited person
- meetings between a body and more than one invited person
- publicity, advertising and displaying material in public
- a body displaying material in public
- a body producing and publishing documents
- a body producing and publishing forms
- a body's websites and on-line services
- a body's use of social media
- self service machines
- signs displayed by a body
- a body receiving visitors at its buildings
- apps published by a body
- official notices made by a body
- raising awareness about Welsh language services provided by a body
- awarding contracts to third parties
- standards relating to a body awarding grants
- a body's corporate identity
- public address systems used by a body

None of the companies who participated in the standards investigation noted that they provided courses which are open to the public such as a seminar or workshop. Due to the

nature and functions of the persons in question, along with their aim and objectives, the Welsh Language Commissioner concludes that this would not be a relevant activity to qualifying persons who provide the public with passenger railway services.

Record Keeping

Based on the evidence, the Welsh Language Commissioner concludes that those providing the public with rail services should keep a record of the way in which they uphold the standards they are expected to comply with, as well as a record of complaints.

Conclusion 2:

The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for record keeping standards to be specifically applicable to qualifying persons providing the public with passenger railway services

Standards which deal with supplementary matters

There are provisions in the Measure regarding monitoring arrangements and reporting requirements for the standards system (Section 27 – Supplementary Provisions). The purpose of the standards is to facilitate the reporting and monitoring of organisations' compliance and put in place measures to publish information on their performance against the statutory requirements. This recognises the fundamental principles of regulation which note that the organisation, as well as the inspecting or regulating body, has a role to play in meeting statutory requirements.

Conclusion 3:

The Welsh Language Commissioner concludes that Welsh Ministers should ensure that regulations provide for supplementary matters standards in relation to the service delivery and record keeping standards to be specifically applicable to qualifying persons providing the public with passenger railway services in order to ensure suitable reporting and procedural arrangements.

Other issues – operational standards

The Commissioner can't impose operational standards on Schedule 8 organisations. However, some operational activities such as training and recruitment are relevant to the success of service delivery standards.

Conclusion 4:

The Welsh Language Commissioner concludes that Welsh Ministers should consider how to ensure that standards on training and recruitment are included In draft regulations.

Rail service and network developments in Wales

On 22 January 2016 the Welsh Government published a consultation document: 'Setting the Direction For Wales and the Borders Rail'⁴. In the consultation document, the Welsh Government proposes that rail services operating in the Wales and Borders area should contribute to achieving a series of high level outcomes by 2030. The document contains commitments towards the Welsh Government's vision to see the Welsh language and

⁴ : [Setting the Direction For Wales and the Borders Rail: Welsh Government consultation \(January2016\)](#)

culture thriving in Wales. The document identifies 10 areas to consider in introducing Welsh language standards for qualifying persons providing the public with passenger railway services.

The conclusions of this standards investigation, as identified above, in relation to service delivery standards propose considering some additional areas beyond the 10 areas identified in the Welsh Government's consultation document.

A new rail franchise in Wales

The Welsh Government currently has joint responsibility for managing the franchise alongside the UK Government. The franchise agreement identifies the requirements which train companies are expected to meet in providing train services.

The rail franchise will be fully devolved to the Welsh Government from 2017 onwards. In 2017, Welsh Ministers will start the formal procurement process for the next franchise.

Conclusion 5:

The Welsh Language Commissioner believes that Welsh Ministers, in producing the new rail franchise for Wales, should give full consideration to the Welsh language standards.

8 Next Steps

In preparing this standards report, the Welsh Language Commissioner has considered all the responses submitted to the standards investigation. This report will be submitted to the following in accordance with section 64(4) of the Measure:

- all relevant persons
- Advisory Panel to the Welsh Language Commissioner
- all persons who participated in the Commissioner's consultation in accordance with section 63
- Welsh Ministers

Alongside the standards investigations of the Welsh Language Commissioner, Welsh Ministers are expected to carry out regulatory impact assessments in respect of relevant secondary legislation they intend to create, using their own secondary legislation powers.

The Government of Wales Act 2006 notes that a regulatory impact assessment is as follows:

‘A regulatory impact assessment is an assessment as to the likely costs and benefits of complying with relevant Welsh subordinate legislation.’⁵

In this respect, a regulatory impact assessment may be considered:

- a process to help the Welsh Ministers consider the impact of proposed regulation on the interests of individuals, groups, organisations etc
- a tool to enable Welsh Ministers to weigh the costs and benefits of all options available to them before implementing a policy; and
- a means of presenting for scrutiny the relevant evidence on the positive and negative effects of such interventions.⁶

Welsh Ministers will be expected to consider the evidence they collected for the purposes of the regulatory impact assessment, alongside the Welsh Language Commissioner's conclusions in a standards report in deciding whether or not to exercise the powers granted to them under Part 4 of the Measure.

⁵ Section 76(2)(a) of The Government of Wales Act 2006.

⁶ <http://gov.wales/docs/legislation/guidance/091020riacodeen.doc>

Appendix A - List of the respondents to the standards investigation

Below is a list of the relevant person(s) in respect of which a standards investigation was carried out, the Advisory Panel, together with the members of the public who were willing for us to publish their comments.

Relevant persons

- Arriva Trains Wales
- GWR
- Virgin Trains
- Cross Country

Members of the public

- Alaw Fôn Huws
- Ben Sulley
- Bethan Williams
- Clive Betts
- Clive James
- Curon Wyn Davies
- Councillor Jeff Smith
- Dafydd Lloyd
- David Subacchi
- Elan
- Elin Walker Jones
- Elwyn Vaughan
- Fred Jeffreys
- Gareth Clubb
- Gareth Popkins
- Gethin Rhys
- Helen Greenwood
- Huw Roberts
- Ieuan Parry
- Janice Rhisiart
- Judith Humphreys
- Liam Townsend
- Lowri Cunnington
- Lowri Price
- Lyn Williams
- Marc Evans
- Marged
- Meinir James
- Morgan Owen
- Nia Llwyd
- Paul Harley
- Phil Edwards
- Sali Burns
- Sion Jobbins
- Sioned Williams
- Steffan Bryn
- Steffan Rees
- Stephen Rule
- Wiliam Rowlands

Organisations

- Cymdeithas yr Iaith Gymraeg

Advisory Panel to the Welsh Language Commissioner

- Bethan Jones Parry
- Carl Cooper
- Dr Heledd Iago
- Meinir Davies
- Nick Speed