



Tenant apps that function fully in Welsh: seven questions for housing associations and their software suppliers

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Delivery is Claude-assisted. Rob Nash, director, reviews and signs off every finding. Emails you send us are not put through Claude.

What the Standard says

Standard 45 sits under heading 9 of the Regulations, "Standards relating to a body's websites and on-line services (including portals)", sub-heading (2) "Apps published by a body". It says:

"All apps that you publish for use by members of the public in Wales must function fully in Welsh, and the Welsh language must be treated no less favourably than the English language in relation to that app."

Websites, including portals, fall under Standards 40 to 44, sub-heading (1) "Websites published by a body" of the same heading. A service a supplier provides on the association's behalf, under its contract with the association, counts as the association's own, unless a compliance notice provides to the contrary.

[Binding: SI 2026/99, Schedule 1, Part 1, Standard 45 and heading 9; regulation 1(5)(a) and (b)]

The Standards bind an association only once the Welsh Language Commissioner gives it a compliance notice, and only from the imposition day that notice states for each standard.

[Binding: Welsh Language (Wales) Measure 2011, sections 25, 44 and 46]

Standard and paragraph numbers are those of the No.10 Regulations (SI 2026/99); numbers differ between Standards sets. "Binding" below means a legal duty once an association's compliance notice applies that standard. "Guidance" means advice, which is not law.

Seven questions

- 1 Language choice.** Can a tenant choose Welsh inside the app, without relying on the phone's language setting? Good practice is a Welsh/English switch that is always available, keeps the tenant's place and is remembered next time, without needing to sign in. On the iPhone I tested (iOS 27, October 2026), the phone's own menus were not available in Welsh [Apple, iPhone tech specs]. A tenant can add Cymraeg as a preferred language in Settings, and an app that includes Welsh then opened in Welsh. A tenant who has not set it gets English, so the app has to offer the choice itself. The Commissioner's 2026 guidance goes further and recommends setting Welsh as the default language on public service apps, while the 2023 toolkit says the app should never default silently to either language. Neither of those two is law.
[Binding: Standard 45; Commissioner decision CS1161 (16 February 2024, Welsh Ministers, Standard 57 of the No. 1 set), which found an app in breach for relying on the phone's language setting.
Guidance: toolkit 4.1, 4.3 to 4.7; older Commissioner guidance §1.5; Commissioner, Promoting the use of Welsh language services, 10 March 2026]
- 2 System text.** Are repair statuses, statements, appointment slots, and error messages from the housing system in Welsh too, not just the app's own labels?
[Binding: Standard 45. Guidance: toolkit 5.1]

- 3 **One preference, every channel.** Is each tenant's language recorded once and used for push notifications, emails, texts, and letters? Where a tenant's preference is not known, a Welsh version must be provided too.
[Binding: Standards 2 and 36 (record and use the preference); Standard 5 (correspondence) and Standard 37 (documents and forms) where it is not known. Guidance: older Commissioner guidance §11.13; toolkit 7.1]
- 4 **Welsh grammar in code.** Six plural forms, search that finds mutated words ("Caerdydd", "yng Nghaerdydd"), Welsh alphabetical order, and *ŵ* and *ŷ* surviving input, storage and search.
[Plurals: Unicode CLDR plural rules. Mutation: Bangor University, Welsh Proofing Tools. Guidance: alphabetical order, *ŵ* and *ŷ*, toolkit 3.1 and 3.4 to 3.6; older Commissioner guidance §10 and §11.12]
- 5 **Same day.** Does Welsh go live at the same time as English, including after updates?
[Binding: Schedule 1, Part 3, paragraph 39(b). Guidance: toolkit 1.2]
- 6 **Same look.** Same colour, size, font, and format, with no Welsh label cut short?
[Binding: Schedule 1, Part 3, paragraph 39(a). Guidance: toolkit 5.4]
- 7 **The edges.** Addresses in both languages, links out that land on the matching language, and documents and forms in the app covered too.
[Guidance: toolkit 5.6, 8.3. Binding: Standards 35 to 39]
Store listings are a known limit: neither App Store Connect nor Google Play Console offers a Welsh listing language. One workaround, Welsh text inside the English (UK) listing, is something to raise with your supplier, not a promise.
[Apple, App Store localizations; Google, Play Console Help 9844778]

Not covered by Standard 45: advertising (Standard 32), live chat (Standards 46 and 47), audio and video (Standard 50). [Binding: Schedule 1, Part 3, paragraph 38(2) to (4)]

Sharing this

This page may be shared with housing associations and their software suppliers. It is a resource for asking and answering the right questions. It is not legal advice and not a recommendation of any supplier.

Sources

- SI 2026/99, the Welsh Language Standards (No. 10) Regulations 2026: legislation.gov.uk/wsi/2026/99/made, [/regulation/1/made](https://legislation.gov.uk/regulation/1/made) and [/schedule/1/made](https://legislation.gov.uk/schedule/1/made)
- Welsh Language (Wales) Measure 2011, sections 25, 44 and 46: legislation.gov.uk/mwa/2011/1/section/25, [/section/44](https://legislation.gov.uk/mwa/2011/1/section/44) and [/section/46](https://legislation.gov.uk/mwa/2011/1/section/46)
- Welsh Language Commissioner, *Technology, Websites and Software: Welsh Language Considerations* (older advice document, pre-2019; guidance, not a statutory code): welshlanguagecommissioner.wales
- Welsh Government, Helo Blod *Bilingual technology toolkit for good user experience*, Version 3, October 2023 (guidance, not a Standard): gov.wales/bilingual-technology-toolkit-good-user-experience
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- Welsh Language Commissioner, enforcement action register 2023-24, case CS1161 (TrawsCymru app): welshlanguagecommissioner.wales/media/xbdgdcub/dg-s-cofrestr-camau-gorfodi-2023-2024.pdf
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- Apple, iPhone 17 tech specs, Languages: support.apple.com/en-gb/125089
- Apple Developer, App Store localizations: developer.apple.com/help/app-store-connect/reference/app-information/app-store-localizations
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Questions 1 to 4 in more detail: points 2 to 5 of async-digital.com/welsh-language-standards/housing-associations

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