

# Assessing the Impact on Equality Characteristics, the Welsh language and the Socio-Economic Disadvantage

Please see the sheet *How to Make an Equality Impact Assessment* for assistance to complete this form. You are also welcome to contact Delyth Williams, Policy and Equality Officer on ext. 32708, or [DelythGadlysWilliams@gwynedd.llyw.cymru](mailto:DelythGadlysWilliams@gwynedd.llyw.cymru), for further assistance.

The Council is required (under the Equality Act 2010) to consider the impact that any change in any policy or procedure (or the creation of a new policy or procedure) will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relationships. Therefore, a timely assessment should be made before any decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

The Council is also required, under the requirements of the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011), to consider the impact that any change in policy or procedure (or the creation of a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English. This document therefore ensures that these decisions safeguard and promote the use made of the Welsh language.

From 1 April 2021, the Council has a duty to give due attention to addressing socio-economic disadvantage in strategic decisions.

## 1) Details

### 1.1 What is the name of the policy / service in question?

Gwynedd Welsh Language Strategy 2023 - 2033

### 1.2 What is the purpose of the policy / service that is being created or amended? What changes are being considered?

There is a statutory requirement on the Council, as a part of the Welsh Language Standards, Welsh Language Measure (Wales) 2011, to create a 5-year strategy outlining the Council's vision for promoting the use of the language in the county.

A new Language Strategy is being written 2023, as a follow-up to the first strategy published under the requirements of the Standards in 2018. The strategy will identify specific projects and work streams to promote the use of the Welsh language by the residents of Gwynedd.

The work has been divided under the following headings:

Increase the number of speakers;  
Language of the early years;  
The Language of Learning;  
The Language of Work and Services;  
The Language of the Community, and;  
Research and Technology

A number of plans and projects have been identified under each heading, which are mainly based on the work that the Council itself is responsible for, but also include joint work with some key partners.

The intention is to look beyond providing bilingual services, and also beyond the interventions being implemented in associated policy and strategic fields, and to find opportunities to promote the Welsh language, and contribute to the national objectives (Cymraeg 2050) of increasing the number of Welsh speakers and the day-to-day use of the Welsh language.

As this strategy is a continuation and review of the previous strategy, some of the projects and plans mentioned are already being implemented, but we have also held discussions and a public consultation period during the last few months in order to collect ideas about what can be done in addition to these plans to promote the use of the Welsh language and how we can strengthen the strategy.

A number of plans had been included in the draft version of the strategy which have already been approved and which are already being implemented as part of the Council's work (the ones that have been included in the Gwynedd Council Plan have gone through an approval process and are subject to individual impact assessments.

### **1.3 Who is responsible for this assessment?**

Gwenllian Williams, Language Advisor, Language and Scrutiny Unit, Cyngor Gwynedd

### **1.4 When did you commence the assessment? Which version is this?**

Version 1 - Pre-consultation version, March 2023

Version 2 – Post consultation period/before presenting to the Cabinet – September 2023

## **2) Action**

### **2.1 Who are the stakeholders or partners whom we will have to work with to carry out this assessment?**

Council's Cabinet Members  
Officers and Heads of Departments, Cyngor Gwynedd  
Language Committee  
Residents  
Members of the Gwynedd Language Forum

## **2.2 What steps have you taken to engage with people with protected characteristics, regarding the Welsh language or with communities (either due to location or due to need), who are living with a socio-economic disadvantage?**

A public consultation period was held during May 2023, following the Council's usual consultation arrangements. The data collected as part of the consultation shows us that more women than men answered the questionnaire (54.7%), that there was a good cross-section of replies from the different age groups in the 35-44, 45-54, 55-64 range, and there was also a variety of replies from different nationality and National identity. 13.2% of the respondents considered themselves a person with a disability according to the definition in Section 6 (1) of the Equality Act 2010.

It is noted that the response from young people was limited in the consultation, so work is in hand to collect opinions about the general direction of the strategy and possible interventions. As one of the key aims of the strategy is to increase the use of the Welsh language amongst young people, it was felt that doing this is the best use of the resources available to us at this time.

It was not possible to hold focus groups with particular characteristic groups, and with the Council's Equality Group, but we will consider how to collect opinions from particular groups while implementing the strategy, and keep an eye to see if comments are made by particular groups, and in relation to language issues, in other consultations by the Council.

Before the public consultation period, we held initial discussions with the Council's Language Committee and with members of the Gwynedd Language Forum (representatives of partner organisations that implement Welsh language promotion plans and which collaborate with the Council on specific plans) in order to identify possible priorities.

The Council's Language Committee also had a chance to look at the analysis of the consultation results during June 2023, and to offer possible reviews to the final strategy.

## **2.3 What was the outcome of the engagement?**

Some priorities have been identified as a result of the initial discussions with the Language Committee and the Gwynedd Language Forum, and those have been incorporated into the consultation draft of the strategy.

These include the need to give specific attention to young people's use of language, and try to increase their use of the language outside the classroom and while using social media.

The results of the public consultation was positive on the whole, with a high number of respondents agreeing with the priorities identified.

[Adroddiad Canlyniadau Ymgynghori Strategaeth Iaith Gwynedd 2023.pdf \(llyw.cymru\)](#)

72% of the respondents agreed with the intention to increase the number of Welsh speakers.

Over 50% agreed with every one of the challenges that had been identified, with the largest percentage agreeing that the Influence of Technology and Creating New Speakers were the two main challenges to the development of the Welsh language in Gwynedd.

When asked to prioritise the action areas that were being suggested, 65% of the respondents said they believed that the Early Years was the main area that needed focus,

When looking at the general themes raised in the written comments, the main themes were ensuring adequate opportunities for people to learn Welsh and to gain confidence in speaking Welsh, and these themes appeared numerous times, and in response to different questions.

At the same time, numerous negative comments were received, with a number of comments that asserted that the Council does not give job opportunities to people who do not speak Welsh, and that jobs should be given to the “most appropriate” people, that the Council should concentrate on English as an international language, and that promoting the Welsh language is a waste of money and that other matters should be priorities, like roads, education and health.

## **2.4 On the basis of what other evidence are you acting?**

The challenges and objectives of the draft strategy are based on an understanding of linguistic planning principles and the factors affecting language use. A good understanding exists of the socio-economic challenges that affect Welsh in the communities, and the actions are based on the officers' awareness of the work that the Council is doing to address the different factors and challenges.

The different operational fields are ones that have been identified by experts on a national level as key fields to sustain and promote the language.

We also have some evidence from the Council's other consultations which gives us an idea of the challenges that exist in terms of trying to promote the use of Welsh, as well as some attitudes towards the Welsh language.

Complaints received by the Language and Scrutiny Unit, and comments received in other Council consultations (consultations of the Equality Unit and Ardal Ni and Council Plan consultations are such examples during the past year), e.g. have highlighted negative attitudes towards the language and a view that the Council discriminates against individuals who do not speak Welsh or individuals who have moved to the area. This opinion was reinforced by some of the responses received in the consultation. By creating an inclusive strategy, that tries to secure a chance for all residents of Gwynedd to have a positive experience of the Welsh language, we hope to have a chance to tackle some of these attitudes.

The consultation did not produce any other ideas about areas that we should consider giving attention to, which suggests that there is a general agreement about the areas already identified.

## **2.5 Are there any gaps in the evidence that needs to be collected?**

Even though the consultation was conducted following the usual procedures of the Council, and that we tried to share the information widely, there was an obvious gap in the responses from young people. Only 3 responses were received from people under 34 years old. As increasing the use of the language amongst young people is such an important part of the strategy aims, it will be important for us to gather their opinions as we move on with implementing the strategy. Work is already underway to collect opinions about increasing use, and what kind of interventions would work. This work will be reflected in the implementation programme for the strategy.

Many of the new plans that have been identified as ones that contribute to the objectives of the strategy are plans proposed in the latest version of the Council Plan, but as no individual impact assessments have been carried out on those projects yet, a gap exists in our assessment. We hope to gather further information about these projects in order to fill the gap and identify any opportunities to improve the work's positive impacts as we implement the final strategy.

The Research and Analysis service have been working on comparing the different data sets from the Census in order to give us a more detailed picture of the changes that have happened. Even though further work needs to be done on this yet, the evidence does seem to support our opinion that particular attention needs to be given to increasing the number of speakers and language use amongst the younger

age groups (under 25 yrs old). The menter iaith have identified geographical areas that are considered to be “sensitive” in language terms, and which have seen a decrease in the percentage of Welsh speakers between the last two census.

Also, we can not give full statistical evidence to support our views at this time as the full analysis of the Cnesus data has not yet been done. We hope to add to our evidence base over the next months as more data sets can be compared.

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### 3) Identifying the Impact

#### 3.1 The Council must duly address the impact that any changes will have on people with the following equality characteristics. What impact will the new policy/service or the proposed changes in the policy or service have on people with these characteristics? There is also a need to consider the impact on the socio-economic disadvantage and on the Welsh language.

Characteristics	What type of impact? *	In what way? What is the evidence?
<b>Race (including nationality)</b>	<b>Positive</b> / negative / none	<p>Although language is not a protected equality feature, this is often directly linked to the race aspect.</p> <p>Information gathered from surveys and public consultations by the Council shows that some negative attitudes exist regarding the Council's language policy and its efforts to promote the Welsh language, and there is an assumption that those efforts are discriminating against people of a different race or from ethnic minorities (i.e. people who are not "native" residents). These attitudes have been seen in feedback recently received from fellow officers, as a result of a public consultation by the Equality Unit, and engagement by the Website Team on public use of the website, and from comments received during consultation on the Council Plan and Wellbeing plan.</p> <p>We saw the same opinions being expressed in the consultation for the strategy. A number of people had expressed the opinion that the Council is missing opportunities to employ talented people and that people are being stopped from applying for jobs because of the need to be Welsh speakers.</p> <p>A number of responses to the consultation also reinforced the opinion that some members of the public feel that the Council wastes money when promoting the Welsh language, noting that this shows favouritism towards the Welsh speakers and having a negative impact on inward migrants and those who do not speak Welsh.</p> <p>Similarly, some could consider that the strategy treats other languages less favourably, and consequently differentiates against residents of ethnic minorities (who possibly speak languages apart from Welsh and English), as it does not consider opportunities to promote other languages.</p>

		<p>As the strategy is drawn-up as a part of the statutory requirements of the Welsh Language Measure 2011, it is not intended to deal with/address the needs of the population regarding other languages.</p> <p>A number of the strategy's objectives, nevertheless, seek to address the need to increase opportunities for people from all backgrounds to learn Welsh, and ensure that parents receive appropriate support to introduce Welsh to their children and to support their children by means of a Welsh medium education. Therefore, the objectives of the strategy seek to ensure that Welsh is available to all.</p> <p>The Council also addresses the needs of other languages through its Equality responsibilities, and has committed to offer a provision where needed, e.g. interpretation needs in well-being meetings. This is underlined in the Equality and Inclusion Policy.</p>
<b>Disability</b>	Positive / negative / none	<p>We do not consider that anything is included in the strategy that would lead to a negative impact on disabled people and no particular issues were highlighted in the consultation.</p> <p>Observations were made about producing bilingual materials and the viability of services in general when consulting with the Core Equality Group on the new Language Policy in 2022, and therefore, some of the work identified under the Language of Work and Services section seeks to respond to the need to simplify the language being used when communicating with the public.</p> <p>One of the problems raised (more details included in the Policy's impact assessment), was that there was a potential negative impact on people with cognitive difficulties if the Council does not produce materials that follow the principles of Cymraeg Clir.</p> <p>A view was expressed that the Council use language that is too formal and jargonistic, and that we needed to consider producing more straightforward and clear materials.</p> <p>As the Council's work under the Welsh Government's More Than Just Words Framework also contribute to the Strategy's objectives, a positive impact has been identified on groups of disabled people also, since the Council's care and social services follow the Active Offer principle. The Council recognises the fact that offering services in the first language of individuals can be key in the event of illness or disability, that individuals are better able to express themselves in their own language, and is therefore a key part of offering quality care and service. The internal More Than Just Words forum has been established, which will look at opportunities to expand the positive impact.</p>
<b>Gender</b>	Positive / negative / none	No impact identified at this time
<b>Age</b>	Positive / negative /	A more detailed analysis of the results of the 2021 census will be needed over the next months in order to understand the changes

	none	<p>that have occurred in terms of language use in different age groups, but the Strategy aims to be inclusive and ensure that opportunities are offered to people from all ages to use the Welsh language across the county.</p> <p>Even though language use amongst young people is a specific problem that has been identified, no responses were received from young people in the public consultation, and this has been identified as a gap in the evidence base. Work has already started on this issue.</p> <p>The strategy notes that we need to tackle the barriers that exist and to try and address the challenges and have a positive impact on language use in the future - this includes interventions in the field of education and seeks to address the informal and community opportunities for young people to use the Welsh language -but we will need to ensure the evidence base is stronger in order to implement the most effective interventions.</p>
<b>Sexual orientation</b>	Positive / negative / none	No additional impact identified at this time
<b>Religion or belief (or non-belief)</b>	Positive / negative / none	No additional impact identified at this time
<b>Gender reassignment</b>	Positive / negative / none	No additional impact identified at this time
<b>Pregnancy and maternity</b>	Positive / negative / none	No negative impact identified at this time. Particular attention is given in the strategy to develop the use of Welsh in the early years. This will include trying to influence parents, before children reach school age, share information with pregnant parents about the advantages of multilingualism, and ensure opportunities to introduce Welsh to the family during the first months of life. Therefore, there is a specific intention to have a positive impact.
<b>Marriage and civil partnership</b>	Positive / negative / none	No additional impact identified at this time
<b>The Welsh language</b>	Positive / negative / none	. The sole intention of the strategy is to find opportunities to have a positive impact on the Welsh language and to encourage more use of the language amongst the residents of the county.
<b>Socio-Economid Disadvantage</b>	Positive / negative / none	<p>A number of points were raised in the Equality Core Group when consulting on the Language Policy last year, about accessibility of services and information by the Council in general. It was noted that there is a potential impact for some groups in terms of access to services as more services go online.</p> <p>We have also drawn attention in the strategy to the problem that some people might be missing out on the opportunity to see and</p>

		use the language because of the cost of resources. We note that we will be considering ways to address this problem.
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\* Delete as required

**3.2 The Council has a duty under the Equality Act 2010 to contribute positively to a fairer society through advancing equality and good relations in its activities in the fields of age, gender, sexual orientation, religion, race, transgender, disability and pregnancy and maternity. The Council must duly address the way any change impacts on these duties.**

<b>General Duties of the Equality Act</b>	<b>Does it have an impact?*</b>	<b>In what way? What is the evidence?</b>
<b>Eliminate unlawful discrimination, harassment and victimisation</b>	Yes / <b>no</b> / possible	It is not considered that there is any unlawful discrimination because the strategy is being developed under the statutory requirements of the Welsh Language (Wales) Measure 2011 which notes the need for the Council to provide services through the medium of Welsh, and to create a strategy which outlines the intentions to promote Welsh within the county.
<b>Promote equal opportunities</b>	Yes / No / <b>possible</b>	We believe that the actions being outlined in the strategy correspond with those requirements and seek to ensure equal opportunities to people of all ages and backgrounds to use the Welsh language.
<b>Foster good relationships</b>	Yes / No / <b>possible</b>	<p>It will be important that we communicate our intentions in terms of the strategy clearly in order to foster good relationships and ensure that the residents understand why we are taking action.</p> <p>A part of the strategy also addresses the need to raise people's awareness to the advantages of bilingualism and the importance of offering services through the medium of Welsh. We hope that this will foster goodwill and positive attitudes towards our work and to the language more generally.</p> <p>Fostering a good working relationship with partners and other organisations will also be key in order to implement the strategy successfully.</p> <p>We have created a County language forum, which brings together representatives from different organisations and community groups, in order to facilitate the work of fostering a good relationship (with partners and the public).</p>



\* Delete as required

**3.3 How does your proposal ensure that you work in accordance with the Welsh Language Standards (Welsh Language (Wales) Measure 2011), to ensure that the Welsh language is not treated less favourably than the English, and that every opportunity to promote the Welsh language is taken (beyond providing bilingual services) and increase opportunities to use and learn the language in the community?**

The Strategy has been written to reflect the statutory requirements of the Welsh Language Standards and the Council's commitment to promote Welsh in the county.

**3.4 What other measures or changes could you include to strengthen or change the policy / practice so as to have a positive impact on people's opportunities to use the Welsh language, and to reduce or prevent any detrimental impacts that the policy/practice could have on the Welsh language?**

Small changes were made to the strategy following the consultation period, mainly to give clarity on some issues that we felt had been misunderstood by people in the draft version. For example, the wording of the target to increase the number of Welsh speakers amongst children and young people has been changed in order to show clearly that there are opportunities to introduce the language to children who are not part of mainstream education.

The emphasis on technology has also been changed, with attention being given to how the use of technology and social media and how they influence language use under each action area heading (rather than being a part of a separate action area).

As already noted, we will continue to try and gain opinions from different groups in order to ensure that the implementation programme for the strategy has the most positive influence possible. The implementation programme will be reviewed yearly in order to prioritise the work that responds to the aims of the strategy.

**3.5 How does the proposal show that you have given due regard to the need to address inequality due to socio-economic disadvantage? (Please note that this relates to closing the inequality gap, rather than improving outcomes for everyone only).**

The strategy tries to address inequality due to socio-economic disadvantage by trying to ensure that every resident of Gwynedd get adequate opportunities to use the Welsh language. We have noted in the draft strategy that the current financial situation (the Council's operational budget) and the cost of living crisis can have an effect on people's ability to access opportunities and resources and to use the Welsh language. Even though there are no specific plans identified yet to tackle this issue, it will be a matter we will need to consider when we review and create yearly work programmes for the strategy.

**3.6 What other measures or changes can you include to strengthen or change the policy / practice to demonstrate that you have given due regard to the need to reduce disproportionate outcomes as a result of socio-economic disadvantage, in accordance with the Socio-Economic Act?**

When we have received all the census data from the 2021 Census we will try and identify if there is a need for particular support for some communities or groups of people who are experiencing socio-economic disadvantage to help increase their use of the Welsh language.

As noted above, we will need to consider if the Council needs to implement specific plans during the period of the strategy to try and ensure that no one is missing out on opportunities to use the Welsh language as a result of socio-economic barriers.

**4) Analysing the results**

**4.1 Is the policy therefore likely to have a significant, positive impact on any of the above? What is the reason for this?**

Positive impact on the Welsh language.

**4.2 Is the policy therefore likely to have a significant, negative impact on any of the above? What is the reason for this?**

No  
The strategy reflects a statutory requirement and the need to respond to the linguistic needs of the public across the county.

**4.3 What should be done?**

Select one of the following:

Continue with the policy/service as it is robust	x
Revise the policy to remove any barriers	
Suspend and abolish the policy as the harmful impacts are too great	
Continue with the policy as any harmful impact can be justified	
No further steps at present, it is premature to decide, or there is insufficient evidence	

**4.4 If you continue with the plan, what steps will you take to reduce or mitigate any negative impacts?**

We will consider carrying out a campaign that show the benefits of the strategy and the implementation programme when it is appropriate.

**4.5 If you are not taking any further action to remove or reduce the negative impacts, please explain why here.**

**5) Monitoring**

**5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?**

We will revisit the impact assessment following the consultation period and after we have the results of the consultations and changes proposed by the Language Committee.  
An action plan/work programme will be created along side the final strategy, and monitoring arrangements will be established which will include reporting on elements through Performance Challenging arrangements, departmental reports to the Language Committee and an annual report to the Cabinet.