

Assessment of Effect on Gwynedd Residents.

This document assesses the impact that the policy, procedure, plan etc will have on the population of the county and operates on the basis of a number of laws.

- **The Equality Act 2010.** It places a duty on public organisations to pay due attention to the impact of any new policy, procedure, scheme etc (or in adapting them) on people with protected characteristics. We are asked
 - abolish unlawful discrimination, harassment and persecution and other conduct prohibited by the Act.
 - promote equal opportunities between people who share a relevant protected feature and those who do not.
 - foster good relationships between people who share a protected trait and those who don't.

In Wales the specific duty sets out the need to carry out an impact assessment following specific guidelines to consider the impact that a change in any policy or procedure (or the creation of a new policy or procedure) will have on people with protected equality characteristics. A timely assessment must be made before a decision is made on any material change (i.e. affecting people with a protected feature).

- **Socio-Economic Duty.** Wales has now implemented this duty which is part of the Equality Act 2010 giving a duty to address socio-economic disadvantage in strategic decisions.
- **Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011).** The Council is required to consider the impact that a change in any policy or procedure (or the creation of a new policy or procedure) will have on opportunities for people to use Welsh and to ensure that the Welsh language is not treated less favourably than English. This document therefore ensures that these decisions protect and promote the use of the Welsh language.

- **Well-being of Future Generations Act 2015.** The Council has a duty to implement the five ways of working, and to respond to the 7 national well-being goals.
- **The Armed Forces Act 2021.** Councils must give due regard to the impact of this proposal on those serving or having served in the Armed Forces, as well as their families.

Author: Siwan Llwyd Roberts (EDUCATION)

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STAGE 1 - Main Aims and Objectives of the Policy or Practice

1. What kind of document or procedure is being assessed?

New or revised policies, practices or procedures (involving a change in service provision or employment practices)

2. What are the goals, objectives and intended outcomes of the policy or practice?

It is planned to evaluate potential models and opportunities identified by Estyn and Bangor University to develop the Immersion Education Scheme for the future.

3. Who are the main advisory groups (stakeholders)?

Pupils

Parents

Immersion Centre Staff

Gwynedd schools

STEP 2 - Engagement Data and Impact Assessment

4. Has an attempt been made to comply with the duty to engage in accordance with what is described above and has sufficient information been gathered to proceed?

Yes

Details of engagement. Please note any consultation or engagement you have made or intend to do

Operation	Dates	Knowledge
Bangor University Report	2024 - 2025	Information about engagement embedded in the report
Headteacher Focus Group	September 17th, 2025	Verbal consultation with the Headteachers who have referred learners to the centres during the Autumn Term 2025
Gwynedd Secondary Headteachers (GCSU)	October 15th, 2025	Consultation on the recommendations of the reports
Gwynedd Primary Headteachers (GYDCA)	October 14th, 2025	Consultation on the recommendations of the reports
Staff at Gwynedd immersion centres	September 2024	Further consultation following the publication of the Bangor University report , July 2025

5. What information is available about the impact on each of the features and topics below?

	Relevant Evidence, Information and Data	Potential Positive and/or Negative Impact
Race	The aim of the Language Centres is to provide an intensive course in Welsh to all newcomers to Gwynedd to enable them to integrate into and participate fully in the bilingual society.	No effect has been identified from any possible remodelling.
Disability	No new information to submit. Schools refer new pupils to Gwynedd and the IDP and IMP are shared with the centres to ensure that the action is in line with the child or young person's targets. The centres are accessible spaces that have been designed to provide easy and full access to learners with any physical and medical needs. Suitable transportation to the immersion centers is arranged.	No discrimination on the basis of disability has been identified and any possible remodelling is unlikely to have any impact.
Sex	The centres offer provision for all children between years 2 and 9 moving to Gwynedd. The provision ensures full access to facilities for all individuals.	No change to the current provision is anticipated when considering remodelling and therefore no impact has been identified.
Age	The Immersion Education Scheme provides a late immersion course at centres for pupils between years 2 and 9. It works with schools to deliver up-to-date resources for older learners.	By remodelling, it is not anticipated that there will be a change to the current provision for pupils from years 2 to 9 so no impact has been identified. The provision of late immersion resources for older learners - years 10 and 11 in particular - could have a positive impact on their ability to learn Welsh as new speakers.
Religion and belief	All children from years 2 to 9 have access to the Immersive Education Provision. Schools will provide information about dietary requirements, dress code and about holidays or religious activities. Periods of fasting are responded to through a shared fasting policy with parents. Every child is encouraged to feel positive about their family, culture and faith.	Remodeling is not anticipated to have any known impact.

Sexual Orientation	The centres offer provision for all children between years 2 and 9 moving to Gwynedd. The provision ensures full access to facilities for all individuals without exception - following Gwynedd Council's policies.	As there will be no change to the provision by remodelling, no impact has been identified.
Gender reassignment	The centres offer provision for all children between years 2 and 9 moving to Gwynedd. The provision ensures full access to facilities for all individuals without exception - following Gwynedd Council policies.	No effect has been identified as a result of any possible remodeling.
Marriage and Civil Partnership	This has not been identified as a consideration relevant to the Immersion Education Regime.	No effect has been identified
Pregnancy and Maternity	The Immersion Education Regime follows the guidelines of Gwynedd Council's Contracts and Wages Unit and any remodelling will not change statutory or occupational rights.	No effect has been identified
Iaith Gymraeg	<p>One of the recommendations of the Bangor University report is that: - <i>The current immersion model needs to be reviewed to ensure adequate contact hours for pupils in an immersion setting.</i></p> <p>The Estyn report states that "<i>staff provide a rich range of interesting and creative experiences that support pupils to make constructive progress in acquiring Welsh. Through this, from their starting points, almost all pupils (including pupils with additional learning needs and those who have been affected by poverty) make remarkably solid progress in their Welsh language skills within the course duration.</i>"</p> <p>Following the above findings and the consultation that has taken place with schools, pupils, parents and staff at the immersion centres we will be planning the next steps to ensure that pupils make full use of the Welsh language, particularly when returning to schools on Fridays.</p>	<p>Positive</p> <p>Increasing hours within the immersion centres could ensure that pupils are more confident when returning to schools and more willing to use Welsh in their lessons and socially. Facilitating access to training and resources could increase the opportunities to use the Welsh language as immersion pupils return to schools.</p> <p>Changing the arrangements when regime staff go to schools on Fridays could increase the use of Welsh by facilitating practical support in the lessons for immersion learners.</p> <p>Negative</p> <p>Increasing the hours in the immersion space could lead to negative impacts on pupils' wellbeing as there would be no opportunities to keep in touch with their school and peers. Increasing the hours in the immersion space could lead to less collaboration between the Regime and the schools, less sharing of expertise in terms of immersion principles and fewer opportunities for the Immersion Education Regime to be able to provide guidance, support and share resources with schools to</p>

		enable them to support learners to make further progress in terms of their confidence/skills in Welsh
Socio-Economic Considerations	The centres are strategically located in six areas across the County in order to provide convenient access. Three sites offer provision for primary age learners and three sites offer provision for year 5 and 6 learners and secondary age learners up to and including Year 9. Flexibility between sites is ensured as per demand. Transport is provided to all immersion centres and pupils eligible for free school meals will receive those meals. Each centre provides breakfast every morning to ensure that all pupils are offered a meal on arrival.	Remodelling the weekly provision is unlikely to have any identifiable socio-economic impact.
Those who serve or have served in the armed forces, together with their families	The Immersion Education Regime follows County policies and procedures. A place is offered to all pupils who are enrolled at a school in Gwynedd.	No effect has been identified given the options for change.
Skip to footer	Human Rights and the articles are considered in accordance with all Gwynedd Council services.	It is not anticipated that there will be any change from the adoption of a new model.
Other	The Immersion Regime gives access to all children from years 2 to 9 who apply. Full consideration is given to each pupil's situation and how access can be facilitated is always discussed.	It is not possible to predict any impact as the change to the model will not influence these factors.

6. Are there any data or information gaps and if so, what are these and how are they intended to be addressed?

Data has been collected as part of Bangor University's research and the Estyn inspection. Since the Regime was remodelled data has been retained on many aspects including levels of achievement, confidence levels, numbers, attendance, satisfaction, participation. Questionnaires are shared at the beginning and end of each course and provision is adjusted according to seasonal findings. A meeting with the schools is held at the beginning of each course and feedback from those meetings facilitates adjustments to arrangements. Staff at the centres visit the schools weekly and take advantage of opportunities to discuss progress, wellbeing and support.

7. When considering other key decisions affecting these groups, is there a incremental effect (cumulative effect)?

Bangor University's recommendations suggest that returning to school on a Friday is not a successful arrangement at all schools.

The view of Headteachers within the focus group is that an arrangement ensures weekly contact with the school and also an opportunity to work with the staff of the immersion centres.

Staff at the immersion centres believe that increasing the hours in the immersion centres at the start of the course would ensure that the language is practised and rooted before pupils return to schools but they question whether this would have a negative impact on wellbeing and on families' willingness to engage.

8. What does the proposal include to show that you have given due regard to the Public Sector Equality Duty (to promote equal opportunities; help to eliminate discrimination, harassment or unlawful victimisation and foster good relationships and wider community cohesion) as covered by the 3 aims of the General Duty in the Equality Act 2010?

Positive Impact on Equality – Increasing hours at Immersion Centres

- Elimination of discrimination: An extra day reduces the risk of pupils being negatively impacted due to time constraints
- Promoting equal opportunities: Increasing access for all
- Building good relationships: Reduces stress at schools on Fridays and supports a positive experience in the centres

Negative Impact – Increasing hours at Immersion Centres

- Elimination of discrimination: An extra day increases the risk of pupils being excluded from the school curriculum and increases the risk that pupils are not ready to practise their Welsh in schools.
- Nurturing good relationships: Temporarily reduces stress at schools on Fridays but does not address the need for pupils to form positive relationships with their peers at schools as pupils' Welsh skills increase.

9. How does the proposal show that due attention has been given to the need to address inequalities in the cause of socio-economic disadvantage? (Note that this is about closing inequality gaps rather than just improving outcomes for all)

The potential modelling does not close gaps in inequality, rather, it changes provision for all.

Model 1: Continue with the current model of 10 weeks at the Immersion Centre - 4 days at the Centre, Friday at the school.

Model 2 : Modify the current model 10 weeks at the Immersion Centre - 4 days at the Centre, Monday at the school. . . .

Model 3 : Adaptation of the current model - 10 weeks at the Immersion Centre - 5 days at the Centre for 5 weeks , then equivalent to 3 days at the Centre and 2 days at school for 5 weeks

Model 4: Increase the time in the Immersion Centres by 10% - 10 weeks at the Immersion Centre - 5 days at the Centre for 5 weeks, then equivalent to 4 days at the Centre and 1 day at school for 5 weeks.

10. How does the proposal demonstrate action in accordance with the requirements of the Welsh Language Standards (Welsh Language (Wales) Measure 2011), not to treat the Welsh language less favourably than English, and to ensure opportunities for people to use Welsh? Also how will action be taken in accordance with the Council's language policy and strategy to take advantage of every opportunity to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

Gwynedd Council's Language Policy is based on the principle that Welsh is the Council's natural language and that Welsh is the primary administrative and public language, with all services, meetings, correspondence and signage bilingual but with priority given to Welsh. It ensures that the public and staff are given services in Welsh, that Welsh skills are essential to all jobs, and organisations that receive support from the Council are also expected to promote the Welsh language. In relation to education, the policy emphasises the central role of schools and education providers in passing on the Welsh language to the next generation and reinforcing its use as the main language of learning and community. The models all contribute to this principle and introduce options to modify the provision somewhat, in order to develop the service.

11. How does this proposal meet the requirements of the Well-being of Future Generations Act by implementing the five ways of working, and responding to the 7 national well-being goals including creating a More Equal Wales?

The **arrangements of the Immersion Regime** contribute directly to the Act in several ways:

1. **A prosperous Wales** – bilingual skills increase job opportunities and strengthen the economy.
2. **A resilient Wales** – the language is part of our identity.
3. **Healthier Wales** – immersion supports emotional wellbeing and positive identity, which is linked to strengthening mental health
4. **A more equal Wales** – access to immersion ensures linguistic and social equity for all children, regardless of their background.
5. **A Wales of cohesive communities** – the language connects people to their communities and fosters a sense of belonging.
6. **Wales with a vibrant culture where the Welsh language is flourishing** – this is the main direct link: immersion is one of the main means of achieving this goal.
7. **Wales has a global responsibility** – by protecting a minority language, Wales contributes to the world's linguistic and cultural diversity.

The five ways of working are in place

Long-term – building solid linguistic foundations in order to maintain the Welsh language for future generations.

Prevention – ensuring that children do not miss the opportunity to become fluent in Welsh through early action.

Integration – linking to education, culture, health and equality.

Collaboration – partnerships between schools, local authorities, parents to provide immersion pathways.

Content – giving families and learners a voice in the formulation and development of immersion arrangements.

PHASE 3 - Procurement and Partnerships

12. Will this policy or practice be carried out in whole or in part by contractors or in partnership with other organisation(s)?

No

What action will be taken to comply with the General Equality Duty, Human Rights and Welsh language legislation and the Socio-Economic Duty in relation to procurement and/or partnerships?

Procurement:

Partnership:

STEP 4 - Dealing with Negative or Unlawful Impact and Strengthening the Policy or Practice

13. In considering proportionality, does the policy or practice cause a significant positive or negative impact or create unequal outcomes?

Significant Positive Impact:

The models need to be considered to see which should have the greatest positive impact on pupils' ability to acquire Welsh but it is not possible to predict what the impact will be and if that impact will be significant. Immersion pupil achievement levels have remained robust over the period of the restructure. The inclusion of Year 2 pupils in the current model has not had a significant impact on achievement.

Significant Negative Impact:

The models need to be considered to see if there would be a negative impact on pupils' ability to integrate back into schools. It is not possible to predict what the extent of the impact will be and if that impact will be significant.

14. Any intentional negative impact and why it is believed that there is justification for such action (for example, on the basis of improving equal opportunities or fostering good relationships between those who share a protected characteristic and those who do not or because of objective justification or positive action)

While there is a possibility that parents would not be as supportive of sending their children to immersion provision that is carried out with less contact with the schools, there are linguistic benefits in terms of acquiring the basics of the language at the start of the immersion course. There are two possible different models, which are attending the immersion centres for 5 days for 5 weeks at the start of each course and then either 3 days at the centre and 2 at school for 5 weeks or 4 days at the centre and 1 at school for 5 weeks.

15. Will any of the negative impacts identified count as unlawful but unavoidable discrimination (e.g. reduction of funding)?

No

Please note the reason for saying so and the justification for continuing

n/a

16. What other measures or changes could be included in order to strengthen or change the policy/practice to demonstrate that due consideration has been given to promote equal opportunities; helping to eradicate unlawful discrimination, harassment or persecution and foster good relationships and wider community cohesion; as addressed in the General Duty of the Equality Act 2010?

We will look at the results of consultation and consider any further action.

17. What other measures or changes could be included to strengthen or change the policy/practice to demonstrate that due attention has been given to the need to reduce unequal outcomes as a result of socio-economic disadvantage?

These considerations clearly demonstrate that the Immersion Regime has **given due regard to reducing inequality** and is in line with the duties of **the Well-being of Future Generations Act** and **the Equality Act**:

- Ensure transport for pupils and consider expanding immersion opportunities within the centres
- Adapting teaching methods and offering additional support to pupils experiencing disadvantage
- Ensure that the voices of families from all backgrounds are involved in the development and evaluation of provision.

- Carry out equality impact assessments before introducing new policies or plans.
- Measuring the impact of immersion not only on language skills but also on social participation, confidence and fairness of opportunity.

18. What other measures or changes could be included to strengthen or change the policy/practice to demonstrate that due regard has been given to the need to increase opportunities for people to use the Welsh language and not to treat the Welsh language less favourably than English in accordance with the Welsh Language (Wales) Measure 2011 and to reduce or prevent any adverse effects that the policy/practice may have on the Welsh language?

Any changes in the provision of the Immersion Regime are due to a commitment to ensure linguistic and social equity for all children, regardless of their background. The language is part of our identity, bilingual skills increase job opportunities and strengthen the economy. The aim is to build strong linguistic foundations in order to maintain the Welsh language for future generations, to ensure that children do not miss the opportunity to become fluent in Welsh through early action, to link to education, culture, health and equality, to maintain partnerships between schools, local authorities and parents to provide immersion pathways. To give families and learners a voice in the formulation and development of immersion arrangements.

19. Is there enough information to form a balanced view and move forward?

Yes

STEP 5 - Decide to Go Ahead

20. Given the information gathered at Steps 1-4, is it possible to proceed with the policy or practice, and if so, on what basis? Choice of:

Continue the exercise.

PHASE 6 - Actions and Arrangements for Monitoring Results and Reviewing Data

The AEC process is an ongoing one and does not end when the policy/practice and the AEC have been agreed and implemented. There is a specific legal duty to monitor the impact of the policies/practices on equality on an ongoing basis to identify whether the outcomes have changed since you introduced or modified this new policy or practice. If you do not have the relevant data, you should be taking action to correct this in your action plan. To view the EHRC's guidance on data collection you can review their [Measurement Framework](#)

21. What actions identified in Steps 1-5 or any additional data collection work will assist in monitoring the policy/practice when implemented:

Operation	Dates	Timetable	The Responsibility of Arewiniol	Add to Service Plan
None				No

22. What arrangements to monitor and review the ongoing impact of this policy or exercise will be implemented, including timescales for when it should be formally reviewed:

Monitoring and Review Arrangements (including where the results will be recorded)	Timetable and Frequency	Responsibility of	Addition to Service
Education and Economy Scrutiny Committee	October 16th	Head of Immersion Regime	
to be determined following scrutiny	to be specified	Head of Regime	