

WALES & WEST HOUSING ASSOCIATION
REPORT TO BOARD – 10 APRIL 2025
WELSH LANGUAGE COMMISSIONER – ANNUAL UPDATE

1.0 Introduction

- 1.1 Wales & West Housing Group has a Welsh Language Scheme (WLS) that was approved by the Welsh Language Commissioner (WLC) in February 2023. This Scheme is prepared under Section 21 of the Welsh Language Act 1993, which states that public bodies that provide services to the public in Wales must prepare a Scheme specifying the measures it will take to treat the English and Welsh languages on a basis of equality. The aim of the Scheme is not only to fulfil our legal requirements, but to ensure a parity of quality between our Welsh and English services – this means setting the same exacting expectations of our services in both languages and clearly demonstrating how we aim to deliver our legal responsibilities in Wales.
- 1.2 Annually the Board must review and approve the WLS annual action plan ([Appendix 1](#)), which covers nine areas with a series of associated tasks. This report covers the period from March 2024 to February 2025. This report includes all activities throughout the Group.
- 1.3 It is the view in this report that the Association continues to maintain its commitment to the Welsh language by providing bilingual communication and services to residents. The Association also actively encourages and promotes the use of the Welsh language within the Association.

2.0 Welsh language skills

- 2.1 There are currently 233 Welsh speaking staff in the Association, 76 of which are first language Welsh speakers. In addition, several Board members have varying degrees of Welsh language knowledge.
- 2.2 Fluency levels of new employees are captured as part of induction process and existing staff members have completed a self-assessment of their Welsh language skills. The four categories - speaking, listening, reading and writing skills - have been recorded separately on the Association's HR system, Cascade, and staff can update fluency levels as they change. This is in line with recommendations from the WLC's Recruitment Good Practice advice guide and the Association's commitment to adopt the European Framework of Reference for languages (CEFR).
- 2.3 Effective recruitment arrangements enable WWH to have a workforce with the necessary Welsh language skills to support the provision of bilingual services. The CEFR framework provides a base level of understanding of existing skills and will assist to identify service areas which require increased capacity to deliver services going forward. Meaningful assessment of language needs is essential for every vacancy and post, together with appropriate advertisement, regarding the necessary skills required. As the requirement term 'essential' in Welsh language skills may deter or limit the potential pool of candidates,

adopting the CEFR framework provides clarity on the specific and unique categories required such as holding a conversation in Welsh to limit the potential impact.

- 2.4 Consideration will be given, during 2025, on how to strengthen current practices and will be supported by the inclusion of relevant guidance or training for managers as appropriate. In addition, work will extend to looking into the induction training and enhancing Welsh taster offerings through that process.
- 2.5 The Welsh Government's strategy for the Welsh language, Cymraeg 2050, sets out the vision for achieving a million Welsh speakers by 2050. It also includes the target of doubling the daily use of the Welsh language during the same period, including using Welsh socially and in the workplace. To support the Association's commitment to the delivery of services through the medium of Welsh, and to assist with developing linguistic skills and increasing the awareness of the Welsh language, a review of two existing posts was undertaken and the Welsh Language and Translation Officer roles were created which places sole focus on the translation, training, promotion, compliance and monitoring service provision internally and externally.

3.0 Welsh language training

- 3.1 WWH has continued to support learning and increasing the use of the Welsh language through the online app 'Say Something in Welsh' (SSiW) and the 'Work Welsh' programme. SSiW learning is funded by WWH.
- 3.2 During the reporting period, five members of staff were registered on the 'Work Welsh' courses and three new learners commenced the twelve months 'Say Something in Welsh' (SSiW) option. Feedback from current learners have noted that the introduction of the newly developed SSiW mobile app provides greater flexibility and increased use during commute times.
- 3.3 A number of Board members are learning Welsh and are utilising the SSiW app and attending classes.
- 3.4 To encourage and promote learning opportunities, a Welsh language taster course was created with content based on the 'Work Welsh' learning material. The three 30-minute internal taster training sessions were introduced and commenced in February 2024. There have been a number of promotional events, which have resulted in 74 members of staff signing up to the training sessions. The aim of the sessions is to reignite and encourage members of staff to commence or re-commence their Welsh language learning journey.
- 3.5 The success of take up, is in part, due to the ability to undertake the training during work time and work to implement future learning provision will be based on feedback obtained and future requirements of the Welsh language standards, which will be undertaken during 2025.
- 3.6 Work has also commenced on creating content for the Welsh language awareness training which will be a requirement within the Welsh language standards on implementation.

- 3.7 19 learners suspended their learning during previous reporting periods and they have been contacted to encourage and discuss the opportunities to recommence learning. As a result seven members of staff completed the taster sessions, two continue to learn via Duolingo and work to follow through with expressions of interest in relation to future learning will be undertaken during 2025.
- 3.8 Alongside these optional courses, consideration will be given to introduce courtesy Welsh language training as mandatory during 2025. The pilot programme to introduce courtesy level Welsh will be run for new recruits in the first instance. Upon a thorough evaluation of the pilot, consideration will be given to introducing courtesy level Welsh to all current employees.
- 3.9 To promote a bilingual workplace, the 'Learn Welsh' tile on Sharepoint continues to be given a prominent position on the front page and was reviewed to update information and capture new resources during the reporting period. The page provides details of all learning and support opportunities. The glossaries have been updated to include greetings, phrases and housing specific terms to assist with learning and Menter Iaith glossaries will also be retained and made available. In addition, it provides details of all Welsh speakers within the Association which aids informal mentoring, useful resources, dates and details of Welsh cultural events, phrase of the week (following feedback from learners), a bilingual template for out of office emails together with bilingual email signatures and activities and opportunities to support and increase confidence levels in using the Welsh language.
- 3.10 Mentoring provisions were reviewed in 2024/25 and a new network for Welsh language learners commenced in June 2024, following internal promotion on Sharepoint. The sessions ceased in December 2024 due to lack of participation. Consideration to re-ignite interest and how best to support learners will be given during 2025 following feedback from the pilot training sessions.
- 3.11 Two members of staff completed a Train the Trainer Welsh Language Awareness course which supports trainers to develop skills, understanding and knowledge to enable planning, creating and presenting high quality Welsh Language Awareness training within the workplace. The aim during 2025 is to develop course content and commence delivery of the training.

4.0 Promotion of the Welsh language

- 4.1 In the period covered by this report, there have been several instances where Welsh has been promoted internally and announcements to promote numerous cultural events, such as St David's Day, Santes Dwynwen, Eisteddfod Genedlaethol, Eisteddfod yr Urdd, Welsh Language Music Day, "Defnyddia dy Gymraeg" and "Shwmae Su'mae" Day was celebrated with 'Welsh Cakes' and promoted on social media. WWH also took part in the national Welsh Language Rights Day to celebrate and promote the Welsh language service offered by WWH by sharing a video to highlight the rights people have to use the Welsh language when dealing with WWH. Monthly internal announcements in the 'Did you know' section on SharePoint continued which included, word/phrase of the week, Welsh news and bilingual cultural facts, promoting Welsh language events, such as Menter Iaith events, and

information in relation to Welsh history and Welsh traditions. During 2024/2025, the posts collectively received over 1,500 views.

4.2 The Cymraeg 2050 Strategy was promoted with a view of supporting and increasing the number of Welsh speakers, increasing the use of Welsh and to create favourable conditions, infrastructure and context.

4.3 Various events and opportunities were promoted during 2024 to support Welsh learning:

- 'Work Welsh' reading club
- S4C's 'Iaith ar Daith' series
- the week-long celebration of learning Welsh 'Wythnos Dathlu Dysgu Cymraeg'
- Menter Iaith's phrases posters, and
- raising awareness of the new Welsh language digital reading platform

4.4 The Welsh language has also been promoted in the following ways:

- The promotion of Welsh language services by using the Iaith Gwaith brand to identify Welsh language speakers and Welsh language learners. The email footer showing that correspondence is welcomed in both Welsh and English is included on all fluent Welsh language speakers' external and internal emails. Welsh language learners are also able to identify themselves on internal emails, which assists and encourages the use of the Welsh language whilst working virtually. In addition, Iaith Gwaith badges and lanyards are offered to all staff who would be happy for others to start conversations in Welsh.
- WWH continues to support events and to develop partnership working with Menter Iaith and education sectors such as Mudiad Methrin and Secondary Schools.
- WWH worked in partnership to deliver and support a number of bilingual community events which included:
 - 8 bilingual digital sessions at Llys Owen, Cardigan and Llain Las, Fishguard in partnership with Age Cymru
 - Free weekly bilingual Summer of Fun events over the school holidays in Cardigan
 - Various bilingual gardening projects at four schemes in St Clears, Lampeter, Cardigan and Fishguard
 - Staff volunteered to assist with painting at Platform 1 Project (Men Shed Newtown) using their 'Giving Something Back Day'
 - Bilingual Easter Treasure hunt at Golwg y Castell, Cardigan
 - Bilingual Fun Days at two schemes in Carmarthen and St Clears
 - Supported bilingual speaking schools with career related events i.e., supported mock interviews (by staff using their 'Giving Something Back Day' and contractors' support) at Ysgol Gyfun Gymraeg Plasmawr and Bro Edern
 - Worked with WWH contractors and suppliers to attend a Careers Event at Ysgol Morgan Llwyd
 - Welsh language coffee mornings at Maes y Môr Extra Care scheme to celebrate Shwmae day and wreath making (by staff using their 'Giving Something Back Day')

- WWH sponsored several groups during the reporting period to assist with the delivery and promotion of the Welsh language. WWH spent nearly £29,000 on the following activities:

- Menter Iaith's Gŵyl Canol Dre in Carmarthen
- Urdd Gobaith Cymru Eisteddfod in Powys
- Clwb Hoci Castellnewydd Emlyn
- Eglwyswrw Community Council Noticeboard
- Disability Sport Wales Paralympic homecoming
- Platform 1 Project (Men Shed Newtown) to transform an old Railway station into a community hub which will deliver Welsh language sessions
- Rubicon Dance a Welsh medium dance charity

4.5 The Welsh Language Scheme was promoted during the reporting period on the staff intranet and a Welsh language information document continues to be included within the Managers' Induction process and provides information and links to the Welsh Language Scheme, Welsh Language Protocols and Welsh Translation Procedure. The Welsh language continues to be promoted within the Corporate Induction presentations.

4.6 An audit of the signage at all three offices and all extra care schemes has been undertaken and actions to address inconsistencies continue to receive attention as part of a wider ongoing signage review.

5.0 Communication in Welsh

5.1 A small number of residents (56 in total) have stated that they wish to communicate with the Association in Welsh and have identified their preferences in relation to written, spoken or both. In addition, there are 619 residents who receive bilingual copies of In Touch, this number significantly decreased during the reporting period from 1,240 in 2023/24, as a detailed analysis of communication preferences was undertaken during 2024 resulting in an increase in English only copies.

5.2 Work will continue during 2025 to gather information in relation to language preference as part of resident profiling, which is part of the Diversity and Inclusion Strategy work. Language preference data is held for 59% of current residents. Language preference is available for all staff to see and correspondence, initiated by WWH, is in Welsh or English as indicated by the resident where preference details have been captured. All correspondence is sent bilingually and will continue until full preference information has been obtained for these residents.

5.3 WWH continues to welcome calls and communication in Welsh. When callers contact the main WWH telephone number, the first front end message gives people a choice of language. All in-hours callers who select the Welsh option are diverted to first language Welsh speakers. The volume of calls requesting Welsh slightly decreased from the previous reporting period with 887 calls received during 2024/25, compared to 968 in 2023/24. The Welsh language calls account for 0.92% of all in-hours calls. As the Welsh language emergency out of hours service is not currently available, a mystery caller exercise

confirmed that out of hours callers are informed of the Welsh language line's hours of operation.

- 5.4 WWH uses the services of professional Welsh translators in addition to utilising designated staff who respond and prioritise any work in line with the Association's needs. All proof reading is undertaken internally by a different translator which ensures that every piece of work is consistent, and that standard terminology is used. The translation procedure, which was introduced following the publication of the WLC's advice document, 'Bilingual Drafting, Translation and using Welsh face to face', was reviewed during the reporting period and is available on the staff intranet and is included in all automated translation requests responses.
- 5.5 During 2024, work concluded on increasing the memory on the translation software, CyfieithuCymru (TranslateWales). Increasing the memory supports the facilitation of the translation process, improves consistency whilst better meeting the Association's requirements.
- 5.6 A mystery shopper exercise was undertaken to ensure that the website continued to remain fully bilingual during 2024. Consideration was given to potential inconsistencies in the Welsh and English pages focusing on functionality in particular to Welsh language pages whilst ensuring that the Welsh language is not treated less favourably. Consideration was given during the reporting period on how best to address the anomalies, and to ensure accuracy and consistency going forward. As a result, the Welsh language team received training on updating the website which has resulted in the streamlining of the process, diminishes the margin for error and supports effective ongoing monitoring and rectification of any identified inconsistencies or anomalies. A review of the recruitment platform on the website identified that the current system in place does not effectively support the bilingual element of advertising and work remains ongoing to identify an alternative solution to support this requirement.
- 5.7 During 2024/2025, the English version received just over 311,000 page views and nearly 5,000 page views in the Welsh version compared to just over 333,000 (English) and 3,000 (Welsh) page views in 2023/2024. The page viewed most frequently in the Welsh language was in relation to the Privacy Policy, followed by Homepage and Find a home. The approved WLS document and the Welsh Language Annual Update Report are both available on the website.
- 5.8 The Association also uses a number of social media platforms including Facebook, Instagram and LinkedIn to share corporate messages, news and jobs in Welsh and English. The mystery shopper exercise in relation to these platforms provided reassurance that equal consideration was given to both languages during the reporting period. During the reporting period, the Association also shared 11 internally produced bilingual videos on social media platforms.
- 5.9 The internal and external protocols on the Welsh language have been in place since September 2017 and were reviewed in 2024. The protocols, which are available on the staff intranet, provide guidance on how WWH delivers Welsh language services both internally and externally. The protocols build on the approved WLS with greater use of Welsh in both internal and external documents.

- 5.10 Consideration to introducing Welsh Language Awareness Training as mandatory training has commenced as this is a consistent standard across all schedules of Welsh language standards. The training will provide a greater understanding of historical and cultural aspects, Welsh language issues, such as the legislative and policy framework, and the rationale behind bilingualism. The training centres on appreciating language choice as an integral part of effective communication and optimising customer service. The aim of the training will also assist when considering service planning and resourcing considerations whilst increasing due regard to the consequences on the use of Welsh language when developing or updating policies and procedures.
- 5.11 In accordance with the guidance and self-regulation checklist issued by the WLC, the number of new and vacant posts during the reporting year has been included within the 2024/2025 annual update. Between March 2024 and February 2025, approximately 144 new or vacant posts were advertised, all of which were advertised with bilingual job titles. All categorised the Welsh language as being desirable. A section to assess Welsh Language requirements for existing and new posts has been included within the internal Recruitment Request Form which requires Managers to give due consideration to Welsh language service delivery requirements. A translated glossary, which includes all current roles, phrases and terms for recruitment adverts, is updated on a regular basis and is available on the internal Welsh language page. As noted above, work remains ongoing to adopt a consistent approach in relation to advertising vacancies on the Association's website.
- 5.12 The work to compile information, in relation to all internally produced documents and publications, remains ongoing. The aim of the exercise is to ensure that all documents are available bilingually and that the Welsh language is not treated less favourably. During this reporting period, the streamlining of Extra Care documentation and publications across all schemes was completed. Bilingual templates of standard notices and communication are available and all extra care scheme brochures will also be available bilingually.

6.0 Complaints

No complaints were received in relation to the Welsh language during the period.

7.0 Welsh Language Commissioner communication and action plan

There were no recommendations or amendments following the submission of the 2023/2024 annual monitoring report and action plan to the WLC. If approved by Board, the monitoring report and updated plan in [Appendix 1](#) will be submitted to the WLC in the usual way. As reported above, the reviewed and the newly approved WLS is available on the WWH website and will be promoted internally shortly.

8.0 Update on the implementation of Welsh Language Standards

- 8.1 Consultation for the proposals to bring six bodies and Special Health Authorities as a category of persons under Welsh Language Standards (standards) concluded in 2024 and the summary of responses were made available in January 2025. The 14 months' imposition process has now begun with the timeline set for a compliance date in May 2026.

- 8.2 The WG remain committed to deliver a set of standards for the Housing sector by the end of this term and are currently collaborating with WLC to create a draft set of standards for the sector. Although no specific timelines have being communicated for the sector, it is expected that the three months' consultation period for the proposals will commence later in the summer. Based on the current tranche, an indicative timeline has been included below

June 2025 – October 2025	Welsh Government Consultation period
January 2026	Welsh Government publish Summary of Responses
March/April 2026	Each individual Introductory meeting with WLC and Welsh language standards questionnaire
June 2026	WLC receive responses to questionnaire
July 2026	Draft Compliance notice sent to each individual Housing Association. 12-week consultation period commences.
November 2026	Final Compliance notice
May 2027	Earliest possible compliance day

- 8.3 A degree of proportionality and reasonableness will be applied during the WLC consultation process and hence no two organisations will have the same set of requirements. The proposed measure for future regulation will adopt a co-regulation approach. The risk profile for each individual association will determine the level of regulatory requirements.
- 8.4 It is possible to gain an understanding of possible requirements and ongoing work will continue to clearly identify areas of current compliance, part compliance and identify specific areas of focus to meet compliance. An update and an action plan will be produced in September 2025 to provide insight and inform future policy.
- 8.5 WWH will continue to attend any Welsh language Commissioner events to make connections and to ensure that we adopt a proactive approach through the imposition stage and, in addition, learn from organisations that are currently or have gone through the process. It is also expected that CHC will form a working group to support the sector during the transition.

9.0 Recommendations

It is RECOMMENDED that the Board: -

- i. Notes this report; and
- ii. approves the action plan in [Appendix 1](#).

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2 April 2025