



promoting equality in housing
hybu cydraddoldeb ym maes tai

Tai Pawb

Response to:

**“Welsh Language Standards (Registered Social Landlords)
Regulations”**

(For Welsh Government)

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Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: www.taipawb.org

Charity registration no. 1110078

Company No. 5282554

1. Introduction

- 1.1. Tai Pawb welcomes the opportunity to respond to this consultation on Welsh Language Standards (Registered Social Landlords) Regulations. Tai Pawb supports the proposal to extend Welsh Language Standards to Registered Social Landlords (RSLs) and to add Community Housing Cymru (CHC) to the Regulations. Strengthening the rights of Welsh speakers is a positive and necessary step that aligns with our mission to advance equality, diversity and inclusion (EDI) across housing in Wales.
- 1.2. Our response is framed through an EDI lens, promoting the rights of Welsh speakers whilst ensuring fair, proportionate and reasonable implementation and avoiding unintended barriers for tenants, communities and the workforce. We see this as an opportunity to embed the Welsh language within a broader cultural competence approach alongside other accessibility and equality duties (e.g., other accessibility and language needs, digital inclusion, anti-racism, etc.).
- 1.3. Through discussions with CHC, third sector partners and RSL members, we understand that RSLs and the wider sector are broadly supportive of these Regulations. Many RSLs already incorporate Welsh language commitments; the Regulations can bring consistency and clarity for organisations and enforceable rights for tenants.
- 1.4. In this response, we confirm our support in principle, outline key EDI implications and mitigations, and set out practical recommendations to make implementation equitable and sustainable, so that the Regulations strengthen the rights of Welsh speakers and advance fairness for all.

2. Benefits for tenants, staff and communities

- 2.1. Tai Pawb is supportive of the Regulations as we believe that extending Welsh Language Standards to RSLs will strengthen rights for Welsh speakers, create clarity and accountability by setting shared

expectations across the sector and reinforce cultural identity and inclusion as part of the wider equalities landscape in Wales.

2.2. We know from [evidence](#) that the ability to use Welsh in everyday interactions has clear benefits:

- For tenants and service users, receiving services in Welsh can improve understanding, trust and satisfaction, allowing them to express themselves fully, especially when discussing sensitive or complex housing or health issues. This is especially important for vulnerable groups, such as older people, as using their first language is strongly linked to better wellbeing and outcomes. The Regulations also provide a legal recourse mechanism, giving tenants enforceable rights to use Welsh in their interactions with RSLs.
- For staff, being able to work and communicate in Welsh can strengthen confidence, job satisfaction and career progression, whilst signaling that organisations value linguistic diversity equally alongside other forms of diversity.
- At a societal level, promoting use of Welsh in key services helps to normalise bilingualism, recognises the link between language and identity, and aligns with Welsh Government's Cymraeg 2050 Strategy and the Well-being of Future Generations (Wales) Act 2015, as well as the Social Model of Disability.

2.3. Many RSLs already take proactive steps to provide services in Welsh, and the Regulations will build on this good practice by ensuring a consistent baseline across the sector. These benefits will be fully realised through careful implementation and monitoring, ensuring that services genuinely reflect and meet the needs of tenants and communities. Strengthening Welsh also has wider benefits for non-Welsh speakers, by fostering community cohesion, promoting mutual respect, and reducing barriers between groups.

- 2.4. Ensuring tenants can access services in Welsh supports the **Right to Adequate Housing**, as recognised in international human rights and a key campaign priority for Tai Pawb, as effective housing includes access to services in the language in which people can fully engage.

3. EDI implications

- 3.1. It is important to consider the potential EDI implications of Regulations to ensure implementation maximises benefits whilst minimising unintended negative impacts.

3.2. Workforce Implications

The Regulations may have implications for staff recruitment, retention, and progression within RSLs, particularly for customer-facing front-line roles where Welsh language skills are most frequently required. Given existing shortages in these roles, this could place additional pressure on providers. While it is vital to support and strengthen the use of Welsh in housing services, care should be taken that language expectations are proportionate to the role and the operational context of the organisation. This will help ensure that the sector continues to attract and retain a wide and diverse workforce, including individuals who may not yet have Welsh language skills or confidence but are willing to develop them, and who may also come from groups already facing barriers to employment.

- 3.3. Language skills take time to develop and access to Welsh language education has not always been equal. Disparities exist between socio-economic groups, and additional challenges are faced by people from ethnic minority backgrounds, older people, people with learning differences or neurodivergences, and those with other communication and accessibility needs. Any encouragement or requirement for

candidates and staff to develop Welsh language skills must accommodate for different learning styles and accessibility needs and be supportive rather than punitive.

- 3.4. Training and development which is required by the employer should take place within work hours and should not impose costs on individual staff. Language development should focus on improving confidence as well as competence, as we know lack of confidence can be a limitation even for individuals who already have some Welsh language skills. Regulations should avoid creating or exacerbating other language hierarchies, ensuring people from all backgrounds are supported to fully participate in the workforce and have equal access to career opportunities.

3.5. **Service Access and Tenant Inclusion**

Ensuring tenants can access services in their preferred language has clear benefits for understanding, trust, and satisfaction. However, there are risks that:

- Small or under-resourced RSLs may struggle to comply, leading to inconsistent service standards between regions or service areas.
- Areas with fewer Welsh speakers may experience lower quality Welsh-language services compared with regions where Welsh is more widely spoken.

- 3.6. Clear guidance and flexible, proportionate implementation are essential to ensure equitable access and to avoid inadvertently creating disparities between tenants who speak Welsh and those who do not.

3.7. **Digital Inclusion and Accessibility**

Any move toward digital service provision to meet Welsh language

standards must consider the intersection between language and digital exclusion. Tenants with lower digital literacy or limited internet access, particularly in rural areas, may face barriers. Digital services, including websites, apps, tenant portals or staff intranets, should be designed to be accessible, mobile-friendly, easy-read, and inclusive. Welsh versions must be carefully integrated to ensure content remains navigable and compatible with assistive technologies such as screen readers. Non-digital options should also continue to be available to ensure equitable access for all tenants.

3.8. Monitoring, Support and Compliance

Effective implementation of the Regulations will require ongoing monitoring to understand their impact through an EDI lens. It is important to assess how the Regulations affect tenants and staff across different groups, considering protected characteristics under the Equality Act 2010, as well as broader inclusion issues such as socio-economic status, neurodivergence, mental health and lived experience. Monitoring should examine whether the benefits of Welsh language provision are equitably experienced across all groups and should actively encourage the facilitation of input from people with lived experience. This will help ensure that implementation is carried out with communities rather than to them, embedding the principles of co-production and lived experience at the heart of practice.

- 3.9. Similarly, it is important to evaluate the impact on workforce well-being, recognising that front-line staff may experience additional pressures in delivering bilingual services. Accountability for Welsh language provision and the associated culture change should be shared across all levels of an organisation, ensuring that responsibility is not disproportionately placed on front-line staff.

3.10. Data collection and reporting structures should be designed to identify differences in outcomes and highlight areas where additional support or adjustments are required. This should include qualitative insights from tenants and staff, alongside quantitative data, to ensure that intersectional needs are visible and addressed. Monitoring should also inform wider organisational learning and support RSLs in embedding inclusive practice, ensuring that Welsh language standards complement, rather than conflict with, other equality and well-being priorities.

4. Support, funding and practical considerations

4.1. Whilst the Regulations provide an important legal framework to strengthen rights for Welsh speakers, their success will depend on practical and financial support for RSLs in implementing them. Adequate support and funding should be made available to enable RSLs to deliver high-quality Welsh language services without placing disproportionate burdens on staff or diverting resources from other essential services. This could include:

- Access to shared resources, guidance, and best practice examples across the sector
- Financial support to implement changes, as well as for translation, interpreting, and Welsh language training
- Collaborative approaches to staff development and learning opportunities
- Support for accessible digital solutions that meet the needs of tenants with varying levels of digital literacy and access

4.2. Support structures should be designed to promote consistency, reduce inequalities across regions, and ensure that the Regulations complement existing equality and well-being commitments. In developing Welsh

language provision, it is important to ensure that the wider communication needs of other minority groups are also considered, so that no group feels overlooked, especially in contexts where resources are limited. By investing in these measures, the Welsh Government and sector bodies can help ensure that the Regulations deliver meaningful benefits for tenants, staff, and communities, whilst maintaining fairness, inclusivity, and proportionality in their implementation.

5. Conclusion

- 5.1. Tai Pawb welcomes the proposed Welsh Language Standards (RSLs) Regulations and supports their potential to strengthen rights for Welsh speakers, provide consistency across the sector, and reinforce cultural identity and inclusion. We recognise the positive impact that access to Welsh language services can have for tenants, staff, and communities, and the role the Regulations can play in supporting the Right to Adequate Housing and broader equality objectives.
- 5.2. To ensure these benefits are fully realised, it is essential that implementation is carefully monitored through an EDI lens, workforce pressures are recognised and supported, and practical resources and guidance are made available to RSLs. With proportionate, collaborative, and well-supported implementation, the Regulations can advance linguistic rights, improve outcomes, and promote fairness, accessibility, and well-being across the housing sector.