

Welsh Language Standards (Registered Social Landlords) Regulations

Consultation response form

Your name: Hayley Macnamara

Organisation (if applicable): Community Housing Cymru

email/telephone number: hayley-macnamara@chcymru.org.uk

Your address: Community Housing Cymru, 14 Neptune Court, Office 26, Vanguard Way,
Caerdydd/Cardiff, CF24 5PJ

Responses should be returned by **16 September 2025** to:

Cymraeg 2050 Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to: email: Cymraeg2050@gov.wales



Summary

Community Housing Cymru (CHC) is the voice of housing associations (HAs) in Wales. We represent 30 not-for-profit housing associations that provide almost 165,000 homes to 10% of the Welsh population. Our collective vision is to make Wales a country where good housing is a basic right for all. We welcome the opportunity to respond to the Welsh Government's consultation on draft Regulations to make Welsh language standards specifically applicable for Registered Social Landlords (RSLs) as providers of social housing in Wales.

We support the Welsh Government's aspirations to nurture and grow the use of the Welsh language within Wales. RSLs already have a strong track record of supporting the Welsh language. Many provide bilingual services through their existing Welsh language schemes, ensuring that tenants can engage with them in the language of their choice. In many cases, this has resulted in housing associations offering bilingual communication and services as part of their ongoing commitment to accessibility and inclusion. The new regulations would enhance this existing offer.

While we support the principle of the proposed standards, we must highlight the significant financial burden they will place on RSLs, that ultimately needs to be met by tenants' rent payments and so divert investment from new and existing social homes. Implementation will require substantial ongoing investment in translation, digital infrastructure, and IT systems alongside comprehensive reviews of service designs, procurement and recruitment activities. We urge a proportionate, flexible and phased approach to setting and implementing these standards which acknowledges the current demand for Welsh language services.

The proposed Welsh language standards introduce significant financial burdens on RSLs, which will ultimately be covered by tenants' rent payments, diverting crucial investment from new and existing social housing. This comes at a time when the sector's financial capacity is already severely constrained due to unavoidable cost increases in areas such as repairs, maintenance, and new housing developments over the past five years. RSLs also face considerable regulatory and strategic demands, all of which carry cost implications.

We echo TPAS Cymru's concerns about cost and proportionality, urging the Welsh Government to ensure that these regulations are tenant-focused, proportionate, and adequately supported. This approach will allow the regulations to both strengthen the Welsh language and enable RSLs to continue their vital work of providing safe, affordable homes in diverse communities across Wales.

Considering RSLs' regulatory duty to provide value for money to tenants, the significant additional costs associated with these standards (particularly in regions with minimal or no demand for Welsh language services) raises substantial concerns regarding regulatory alignment. The investment in time and resources, diverted from frontline and core services, is disproportionate to the actual demand for Welsh language services in many areas of Wales. Even RSLs operating in predominantly Welsh-speaking communities have expressed concerns about the cost and resource implications.



Absorbing these compliance costs would strain the sector's capacity to build and improve homes, diverting resources from essential housing and support services at a critical time. With over 94,000 individuals currently on housing waiting lists, this could exacerbate the housing crisis.

It is imperative that the Welsh Government supports this transition by maintaining a supportive funding environment and providing practical tools and accessible language training to mitigate the impact.

We are also concerned that the measures outlined could constitute increased control by the Welsh Government over the operation of RSLs, which brings the risk of reclassification. RSLs are and should remain independent organisations guided by a social purpose. This is one of their unique characteristics, allowing the sector to leverage private investment - currently this private finance totals £3.5bn, rising to £4.5bn by 2027. Increased intervention by national and local government could give rise to the ONS reviewing the classification of RSLs and deciding that their debt should sit on the public balance sheet. Should the alignment of RSLs to the public sector continue to be progressed in multiple legislative environments, they run the risk of being reclassified by the ONS. This could lead to the UK Treasury placing borrowing limits on HAs, which would impact their ability to deliver new social homes at scale.

CHC has engaged extensively with our members to gather views from across this diverse sector in preparing our submission. We have also encouraged individual RSLs to provide their own responses to illustrate the specific impacts on their services. Our response aims to provide a collective perspective from the sector as a whole, while recognising the importance of flexibility to reflect different operating contexts.

We provide a summary of the key points we highlight throughout the document here:

- **Proportionate and flexible implementation:** All RSLs advocate for a proportionate and flexible approach to applying the standards, taking into account their operational capacity and tenant needs.
- **Alignment with tenant needs and demand:** Standards should allow RSLs the flexibility to align their services with existing Welsh language demand. We echo TPAS Cymru's concerns, urging the Welsh Government to ensure that these regulations are tenant-focused, proportionate, and adequately supported.
- **Harmonised digital standards:** The standards should be consistent across all digital platforms (websites, online chats, apps, and self-service machines), employing a tiered standards approach.
- **Realistic implementation and support:** To ensure compliance we request realistic implementation timeframes supported with clear pathways for compliance. We also require free and accessible Welsh language skills development support, and a supportive funding environment from the Welsh Government.
- **Enhanced Guidance:** Both CHC's and individual RSL responses underscore the need for further clarity. We seek clear and enhanced guidance on interpreting the standards, which is essential for sector-wide consistency and to mitigate negative impacts. Support and



examples of compliance prior to the next stage of commissioner consultations would be welcomed.

- **AI Translation Recognition:** AI translation tools can aid compliance, reduce operating costs, and support longer implementation timeframes. We seek clarification on whether AI-generated translations are accepted for compliance.
- **IT Market Reliance:** We urge the Welsh Government and the Commissioner to ensure that the Standards' requirements reflect the realities of the IT supplier market. For some RSLs, the current proposed technology standards are unachievable until tech providers advance.
- **Regulatory Alignment Clarity:** Our response highlights several areas where regulatory compliance must align. We seek clarification on how RSLs should navigate alignment with the Welsh Government Regulatory Framework and requirements from other bodies.

We hope that this consultation will result in regulations which both strengthen the use of the Welsh language and enable RSLs to continue delivering positive outcomes for tenants across the full range of their functions and obligations.

Question 1 – Do you have any comments on the service delivery standards proposed in the draft regulations for registered social landlords (RSLs)? (You are welcome to make reference to matters raised in the consultation document, or to any other matter.)

Welsh Registered Social Landlords (RSLs) are diverse in scale, scope, and service delivery. Our members range from organisations operating within a single local authority to larger bodies with a regional or pan-Wales footprint.

Beyond the core function of providing and managing affordable housing, their service portfolios are equally varied; some deliver specialist care and support services, develop market as well as social housing, student accommodation, and manage repairs through either in-house teams or external contractors. Uniting this diverse sector is a profound commitment to social purpose, with all RSLs delivering vital community regeneration projects and welfare support for the most vulnerable in society.

The level of tenant demand for Welsh language services is not uniform, it varies significantly across Wales from one locality to another. In some areas, particularly in urban regions, demand for other language services far outweighs the demand for Welsh.

Bron Afon provides a stark example, identifying just one customer out of 17,777 residents who speaks Welsh, contrasting this with an RSL like Adra in Gwynedd, which would expect much greater demand. Many of our members report that demand for other languages including Polish, Tigrinya, Spanish, and Slovak, Somali, Arabic, Urdu, and Bengali etc. far outweighs the demand for Welsh. In Cardiff, 30% of CCHA's tenants' first language is not English and only one tenant currently requests information in Welsh.



Following the same pattern, the proportion of Welsh-speaking staff differs greatly between organisations and service areas, with many RSLs facing recruitment challenges where local demand is minimal. RSLs ensure that their staff can accommodate the diverse language preferences of their communities. For instance, at CCHA in Cardiff approximately 30% of tenants speak community languages such as Arabic. Therefore, a proportionate and flexible approach to implementing these standards is essential to allow RSLs to effectively serve the varied linguistic needs of their tenants, staff and communities across Wales.

It is therefore imperative that the proposed Welsh Language Standards are designed with the flexibility to accommodate these different operating contexts. We urge the Welsh Government and the Welsh Language Commissioner to ensure that standards imposed must reflect the current demand for Welsh services so that RSLs can successfully plan and adapt services in a phased manner.

We acknowledge that many of the draft standards provide for this flexibility, and that the upcoming consultations with the Welsh Language Commissioner will allow for discussion on the application of the standards. However, to ensure the Standards are both practical and proportionate, and following consultation with our members, we have identified several proposed amendments to the service delivery standards within Schedule 1. These are outlined below.

Standards 25-29: simultaneous translation for meetings open to the public

RSLs regularly host open meetings for tenants and the public, including for example community consultations, feedback sessions, one-to-one drop-in sessions with Housing Officers, and tenant groups. The provision of simultaneous translation for every single one of these open meetings when requested would incur a considerable cost, and in some areas there would be consistently low demand for the service. We suggest that these standards should provide the same flexibility afforded in standards 24, where there are various standards stating a range of minimum % requests for Welsh language provision at a meeting, rather than the minimum of one person (standard 27) for open public meetings which would incur huge costs for all RSLs.

We also strongly urge consideration of more pragmatic and cost-effective solutions, such as leveraging remote or AI-powered translation services like Language Line, to avoid imposing unfeasible costs on RSLs.

Standards 30 and 31: public events

It would be useful to set a minimum funding threshold to accompany the standards rather than a percentage as the range of funding can vary greatly depending on the types of grants/financial support that RSL's offer. It would not be possible to justify staff time and resources to ensure that small community events, for example, comply with the requirements of these two standards.

Standard 32: publicity and advertising materials



We support the principle of ensuring publicity and advertising materials are fully bilingual. However, we seek clarification on the application of Standard 32 to ensure it is implemented in a practical and proportionate manner.

As currently written, the standard could be interpreted as a retrospective requirement, mandating the replacement of all existing materials. This creates an inconsistency with the more pragmatic, phased approach applied to other areas, such as Standard 50 for signage, which applies the requirement when items are "new or renewed." A retrospective application would place a significant and disproportionate financial burden on RSLs, leading to unnecessary cost and environmental waste from the disposal of current stock.

To address this and ensure a consistent framework, we propose that an Interpretation of "publicity and advertising material" is included within the standards. This interpretation should specify that the requirement applies to all newly produced or substantively revised materials.

Standard 45: Apps published by a body

We recommend that the requirements for apps under Standard 45 are amended to ensure consistency with the more flexible and proportionate standards applied to websites.

The current regulations create a disparity between two key digital channels. While Standards 40-44 and 87 provide a tiered framework for websites, ranging from bilingual homepages to fully bilingual sites, Standard 45 mandates that all apps must be *fully* functional in Welsh.

This presents a challenge for the sector for two key reasons:

1. **Third-Party Development:** Many housing apps are developed and maintained by specialist third-party suppliers, often based outside of Wales, many of whom do not currently offer Welsh language functionality.
2. **Technical Complexity:** We are not aware of any app currently available to the sector that provides full Welsh language functionality, particularly concerning the integration required with core housing management systems for services like rent accounts and repairs logging.

To create a realistic and achievable pathway for compliance, we propose that the tiered approach available for websites is replicated for apps. This would allow RSLs to introduce Welsh language functionality in a phased manner. We also recommend that Standard 45 is applied to newly created or substantially revised apps (as with signage), rather than retrospectively, and that the standard would not apply to those provided by a third party but branded by the RSL.

Standard 46: Online chat facilities

We recommend amending the proposed standards for online chat to ensure consistency with the flexibility offered for other communication channels, particularly telephone calls.



As currently drafted, the standard implies a requirement for immediate, live-time Welsh language provision. This presents a significant operational and resource challenge, demanding a level of instant staffing capacity that may not be required for telephone services (the standards permit callbacks, for example). Many RSLs lack the Welsh-speaking staff or the specific technology to meet this immediate demand across all service hours. While some RSLs use AI-driven chat facilities, this technology has known limitations in handling complex or sensitive tenant queries, frequently requiring a handover to a human agent.

To create a more practical and proportionate framework, we propose that the tiered compliance options available for telephone calls under **Standards 11 and 19** are replicated for online chat. Adopting this model would allow for more flexible implementation pathways. For instance, an RSL could offer an initial Welsh language interaction with the clear option to arrange a continuation of the conversation with a Welsh speaker via another channel if a live agent is not immediately available.

This approach would ensure consistency across communication standards, respect the user's choice of language, and allow RSLs to develop their bilingual services sustainably.

Standard 49: Self service machines

The regulations do not define what constitutes a "self-service machine." This ambiguity is a significant issue because modern practices are moving away from traditional, single-purpose kiosks. Many RSLs now use versatile, cost-effective hardware like tablets or iPads in reception areas. These devices function as self-service points but are not purpose-built "machines." The standard needs to clarify whether these multi-use devices fall under its scope.

In addition, the requirement for "full" Welsh functionality is much stricter than the tiered and flexible approach afforded to websites, as stated previously. A tablet in a reception area is often just a device used to sign into the building or to access an RSL's website or a dedicated tenant app. It is illogical for the standards for a tablet to be stricter than the standards for the website or app it is accessing. We therefore suggest that the standards should be harmonised and consistent across all digital platforms, allowing for the same tiered approach for websites, online chats, apps and self service machines.

Standards 63 and 64: Courses offered

We suggest that these standards must clarify the definition of 'education' courses and clarify whether these standards apply to all levels of training or courses delivered by an RSL, or specifically to education courses provided by external education providers. Furthermore, we suggest greater flexibility within these standards to address the difficulties in securing Welsh-speaking course tutors, especially for highly specialised subjects.



Question 2 – Part 3 of Schedule 1 to the Regulations includes interpretations for some of the service delivery standards. Do you have any comments on the interpretation of standards as set out in Part 3?

We have highlighted opportunities to improve clarity under Question 1 of the consultation. In addition, we have identified several areas where further clarification would support RSLs in complying with the proposed service standards.

Firstly, it would be helpful to define whether the terms “*individuals*” and “*members of the public*” refer specifically to residents or contract-holders and the general public, as opposed to professional stakeholders such as contractors, suppliers, or local authorities. RSLs have indicated that extending the standards to professional audiences would create significant and unmanageable resourcing pressures.

We also welcome further guidance on how the standards would apply to **text messaging**. Text messages are frequently used by RSLs as an initial point of contact with tenants, for example, to share service updates or arrange discussions regarding tenancies. Greater clarity on whether these communications fall within the scope of the standards would be beneficial.

In relation to **Part 3 of the Standards (specifically clauses 25a-c)**, which note that compliance is not required in the event of an emergency, we suggest including a clear **definition of “emergency”** to ensure consistency of interpretation across RSLs.

We also seek confirmation that **Standards 23 to 24CH** (relating to public meetings) would not apply to **online meetings**. Given that automated translation tools are widely available for virtual settings, it may not be proportionate or necessary to apply the same standards as in-person meetings.

Regarding **Standards 35 to 39** (Documents and Forms), we suggest that these should apply only to documents and forms produced by the RSL, such as tenancy applications or occupancy contracts, and not to externally generated documents such as planning applications or court documentation. The additional time and resources required to translate large, external documents could result in delays and impact service delivery.

Recent advancements in **AI translation technologies** present an opportunity to reduce the financial and operational burden associated with traditional translation services. We would welcome clarity on whether AI-generated translations, when used alongside robust quality assurance processes, will be accepted as compliant under the standards.



Question 3 – Do you have any comments on the policy-making standards proposed in the draft regulations for RSLs?

These standards would apply to strategic decisions and the development of strategic plans, research and consultation undertaken by RSLs.

We seek clarity on what constitutes “consultation” versus informal engagement, and what qualifies as ‘research’. This is particularly relevant where informal discussions with small groups of customers precede formal consultations.

We would also like to note that decisions about the ‘content of legislation’ as specified in 2(a) within Part 2 ‘interpreting the policy standards’ would not apply to RSLs.

Standard 72: policy on awarding grants

We have concerns about the unintended consequences of Standard 72 when applied to hardship and community benefit grants.

During 2025/26 RSLs will provide access to approximately £1.235m through their hardship funds. These are a critical safety net for tenants facing acute financial distress. They are a last resort to assist with essential living expenses when a tenant is struggling financially. Consequently, the sole criterion for awarding these grants must be the applicant's level of need which is determined at the discretion of the RSL.

Standard 72 requires the Welsh language to be a determining factor in awarding grants. Applying this standard to hardship funds could create a disproportionate and inequitable outcome. It risks penalising society's most vulnerable individuals by making their access to emergency support conditional on a factor unrelated to their crisis.

Many RSLs also provide community grants as part of their community benefit programmes. In certain areas where the proportion of Welsh language speakers is very low, applying this standard could lead to a disproportionate outcome where Welsh speakers receive preference over others who may have a greater need for support. As an example, in Cardiff Welsh speaking is primarily contained within more affluent communities and not within the communities in which RSLs work, such as Butetown.

We request that the regulations provide clarity on this matter. We recommend that the standards be amended to include a specific exemption for grants awarded on the basis of demonstrable hardship. This would ensure that support continues to be distributed fairly to those in need.



Question 4 – Do you have any comments on the operational standards proposed in the draft regulations for RSLs?

Many RSLs have highlighted that the operational standards will require significant changes to their business functions and services.

Adhering to the proposed operational standards will have significant cost implications and place additional strain on resources, particularly for translating HR policies and intranet content, and procuring or developing Welsh-language training modules.

There are concerns about limited internal capacity, especially in HR and L&D teams, to deliver Welsh-language services without external support.

Achieving the standards will necessitate a significant increase in Welsh language proficiency across RSLs. While tools like translators and software offer some support, they are not a substitute for genuine linguistic skill. To meet these new requirements, RSLs will need to undertake a comprehensive assessment of current language capabilities across all services. Following this, a substantial effort will be required to upskill the workforce, which is particularly challenging in areas where the demand for Welsh language services has traditionally been low. Targeted support from the Welsh Government is essential. Given the substantial financial burden, we propose that the government assists by providing free, accessible Welsh language training for existing RSL staff. This would empower employees with the skills they need.

There is concern regarding the current capacity of the workforce within some RSLs to comply with these new standards from the outset. The challenges are twofold: recruiting new staff with the required Welsh language skills is already difficult in a competitive market, and upskilling existing, experienced staff presents its own set of practical and financial hurdles. The resource and cost implications of providing the necessary training, backfilling to support services while staff are learning, and developing bilingual resources will be significant for many housing associations, potentially diverting funds from other essential frontline services that tenants rely on. For many RSLs, it would take years to achieve the required level of Welsh language proficiency amongst staff to comply with the proposed standards.

To ensure these important standards are successfully implemented without negatively impacting RSLs' core services, we would like to see a flexible approach to the implementation of these standards, with a phased approach to compliance.



Standard 79: Staff policies As currently written this could be interpreted as all policies becoming bilingual from the compliance date. We suggest that flexibility is provided here so policies are translated only when **formed or revised**.

Our members have also raised concerns and seek clarity on how the proposed standards will **align with other bodies**. The new proposed operational standards could introduce a range of challenges across key areas.

For example, in complaints management, the need to translate written acknowledgements and responses may affect compliance with the Public Services Ombudsman for Wales (PSOW) standards on response times. In health and safety, translation of verbal and written materials could delay incident investigations and the gathering of witness statements. In corporate governance, the translation of large Board and Committee packs could hinder timely distribution and potentially impact board effectiveness by lengthening meetings. Data protection is also a concern, as translating documents for Subject Access Requests (SARs) could significantly increase response times and costs, potentially affecting compliance with Information Commissioner's Office (ICO) requirements.

There is a pressing need for clarity on how to manage these overlaps and which regulatory body's requirements would take precedence in cases of conflict.

Standard 102 requires an assessment of the need for Welsh language skills in a new or vacant post. If this was assessed as essential, we seek clarity on whether this could be considered indirect discrimination by putting certain people at a disadvantage because of a protected characteristic. We would welcome clarification on whether this could be considered under Schedule 9, paragraph 1 of the Equality Act 2010 as a genuine occupational requirement.

Question 5 – Do you have any comments on the record-keeping standards and standards dealing with supplementary matters proposed in the draft regulations for RSLs?

While some record-keeping related to Welsh language skills and recruitment can be integrated into existing systems, new processes will be needed, and the availability of appropriate system replacements with Welsh language packs available in the IT market pose a concern.

The requirements will also lead to significant translation costs to adjust policies and procedures.



Question 6 – Do you have any comments on how the standards proposed in the regulations for RSLs might apply to RSL subsidiaries or commercial activities?

There are mixed views amongst our members on the application of the standards to subsidiaries and commercial activities, however many RSLs are of the view that applying the standards to these should be a **voluntary matter**, aligning with the parent company's internal Welsh Language Policy rather than being enforced by regulation.

Operating in commercial circumstances presents significant viability challenges. Adding the operating costs associated with these Standards to the work of subsidiaries would be disproportionate.

Encouraging further action at commercial subsidiaries, stemming from the parent company's commitment, would be a more effective approach. The work carried out by the parent RSL will naturally support and influence the provision of services by its subsidiaries.

We are also concerned about the impact these regulations will have on third-party suppliers, particularly local SMEs in the construction sector that RSLs use for services like repairs and maintenance. Extending these regulations to them could create a disproportionate compliance burden due to their limited resources, without consultation or sector-specific impact assessment.

This additional burden will disproportionately affect contractors appointed prior to the regulations' implementation. Therefore, we recommend that this requirement only applies to contracts procured after the regulations come into effect.

Many third-party suppliers are small and medium-sized enterprises (SMEs) in the construction sector. These businesses often operate with limited administrative capacity and may not have the resources - financial, linguistic, or operational - to meet the requirements of Welsh Language Standards. If Welsh Language Standards become a prerequisite for contracting, SMEs unable to comply may be excluded, reducing supplier diversity, increasing costs, and limiting RSLs' ability to work with trusted local providers. RSLs can promote the Welsh language through their own practices without imposing statutory duties on unequipped suppliers.



Question 7 – Do you agree with the proposal to add Community Housing Cymru (CHC) to the Welsh Language Standards (No.2) Regulations? (If your answer is no, please feel free to list another set of existing Welsh language standards regulations you feel might be more appropriate for the body.)

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

Community Housing Cymru is a small, independent, charitable organisation that provides support and services directly to its member housing associations. It provides no public services, nor takes any public funding. It represents independent housing associations, not public bodies.

We strongly oppose the proposal to include CHC in the regulations as we believe it is a disproportionate burden. CHC has engaged with its Board and membership, and this view is unanimous. CHC can continue to support its members effectively and efficiently by strengthening its voluntary scheme. We have written separately to officials to explain our position.

Question 8 – Do you agree with the proposal to make all standards within the Welsh Language Standards (No.2) Regulations specifically applicable to CHC? (If not, please explain why.)

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

We strongly disagree with the proposal to include CHC in the regulations, as explained in our answer to question 7.



Question 9 – What, in your opinion, would be the likely effects of the proposals on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

The proposals have the potential to increase opportunities to use the Welsh language in everyday interactions with RSLs and to ensure that Welsh is not treated less favourably than English. By embedding bilingual requirements across correspondence, digital platforms, and tenant services, the standards can normalise the use of Welsh, support tenant choice, and strengthen confidence among Welsh speakers and learners alike.

The introduction of Welsh Language Standards will have a varied impact on current and future staff. For fluent Welsh speakers and learners, the changes are likely to be welcomed, offering more opportunities to use the language in the workplace. However, for others who do not speak Welsh, there may be uncertainty around how the standards will affect their roles, progression, and confidence at work. This reflects broader recruitment difficulties in areas with lower levels of Welsh language proficiency. We are concerned that these challenges may intensify, affecting the ability to fill roles and maintain bilingual service delivery.

There are clear opportunities to promote positive effects, particularly through integrating Welsh into core housing services, providing staff training, and phasing in bilingual functionality for digital services.

However, the benefits can only be realised if the standards are phased and implemented proportionately. There may be challenges in recruiting and retaining Welsh-speaking staff, particularly in areas with smaller language pools, which could in turn create inconsistencies in tenant experience if smaller or localised RSLs are held to the same expectations as larger organisations.

Without support, the additional financial and resource burden risks diverting funding away from essential housing services and creating difficulties in staff recruitment. These adverse effects can be mitigated by support from Welsh Government, accessible Welsh language training for staff, and a phased, flexible approach to compliance tailored to the diverse contexts in which RSLs operate.



Question 10 – In your opinion, could the proposals be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Yes. We believe the proposals could be strengthened to achieve more positive effects on the use of the Welsh language, while also reducing potential adverse impacts on RSLs and tenants.

Positive effects could be enhanced by ensuring that implementation is phased and proportionate so that progress is achievable and sustainable. Providing free and accessible Welsh language training for RSL staff at all levels would help build capacity across the sector and embed Welsh more naturally into everyday service delivery. There is also scope to encourage collaboration across the sector through shared tools, resources, and best practice, and reducing duplication of effort whilst ensuring consistency in the tenant experience. Community Housing Cymru would like to work collaboratively with the Welsh Government and the Welsh Language Commissioner to support our members to achieve this.

Negative effects could be mitigated by the continuation of a supportive funding environment for RSLs to support the significant translation, IT, and training costs. In addition, clarity on the scope and interpretation of specific standards as highlighted within our response would help ensure that requirements are realistic, consistent, and do not create unnecessary financial or operational burdens.

Enabling flexibility in how RSLs comply with the standards, while recognising the diversity of operating contexts, local demand, and workforce capacity across the sector, will be critical to ensuring that the proposals are both fair and deliverable.

These changes would ensure the regulations both advance the Welsh Government's ambition to grow the use of Welsh and remain proportionate for housing associations, enabling them to continue their core mission of tackling the housing crisis while supporting the language to thrive.



Question 11 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Care and supported living services

Many RSLs deliver care and supported living services, including older persons' accommodation, extra care schemes, and specialist housing for people with complex needs. These services are often delivered in partnership with or commissioned from non-RSL providers, who are not subject to the same Welsh language standards. This creates an unfair and unbalanced regulatory environment, particularly in a sector already constrained by limited and highly competitive funding.

In regulated care settings where services are already subject to oversight by Care Inspectorate Wales (CIW) the proposed standards may duplicate or conflict with existing person-centred approaches. Many providers are already working towards or have achieved the Active Offer of Welsh language services, in ways that are responsive and proportionate to individual needs. In these settings, the broad application of the Standards risks undermining flexibility and person-led care. We believe a tailored approach, developed in conversation with the Welsh Language Commissioner, is essential to ensure the Standards enhance rather than hinder care delivery.

Operationally, there are also serious practical and resource implications. In Care and Support services, colleagues often work rota-based shifts, making it difficult to accommodate structured Welsh language training within working hours. The cost and capacity required to provide training, alongside backfilling roles to maintain safe staffing levels, could divert funding from frontline support. This is particularly challenging at a time of national workforce shortages in the social care sector, and for colleagues who may themselves face language or literacy barriers.

For RSLs working with specialist managing agents in supported housing, such as mental health services, crisis provision, or emergency accommodation, the situation is equally complex. For example, 14% of United Welsh's properties are supported housing, managed by external partners who may lack the infrastructure or capacity to meet the full Welsh language standards. Requiring compliance could lead to increased costs or the withdrawal of providers, further straining an already fragile market.

We therefore recommend a bespoke approach for Care and Supported Housing settings that recognises the unique regulatory context, operational realities, and needs of residents and does not compromise the person-centred principles of care.

Tenant literacy and community cohesion

Social housing tenants are among the most vulnerable in society. Many face intersecting disadvantages including financial stress, health issues, or disability, and a notable proportion also experience significant literacy challenges. Around [36% of UK adults](#) report struggles with reading, writing, grammar, comprehension, or spelling, and more than one in five (22%) find it hard to



understand important documents or contracts. It is reasonable to assume similar or higher levels of difficulty in the social housing sector.

RSLs understand their tenants' unique needs and are well placed to shape services in ways that are accessible, for instance choosing plain language or prioritising visual or spoken communication. The introduction of additional Welsh language requirements risks undermining this tailored approach.

Tenants with literacy difficulties might feel confused or embarrassed when faced with complex bilingual introductions on telephone calls or dense Welsh-English documentation. These communications can feel overwhelming, especially when English is already a challenge. RSLs are concerned that this could result in reduced engagement, heightened anxiety, and limiting access to important services.

We must prioritise making information understandable and accessible to all tenants regardless of their reading or language skills. One practical path forward would be to incorporate implied consent or use Census-based language preference data into standards, where clear tenant preferences are unknown. This flexibility would allow RSLs to adapt communications appropriately, ensuring services remain inclusive for those most at risk of being left behind.

Tenant feedback

Tenant consultations conducted by some RSLs indicate that there is support for the principles of the proposals, yet significant concerns persist regarding costs and value for money.

We echo TPAS Cymru's concerns about cost and proportionality, urging the Welsh Government to ensure that these regulations are tenant-focused, proportionate, and adequately supported. This approach will allow the regulations to both strengthen the Welsh language and enable RSLs to continue their vital work of providing safe, affordable homes in diverse communities across Wales.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: