

Number: **WG53756**

Welsh Government Consultation – summary of response

Draft Welsh Language Standards (Registered Social Landlords) Regulations

A consultation was held on draft regulations to specify Welsh language standards for Registered Social Landlords and on a proposal to add Community Housing Cymru to Schedule 6 to the Welsh Language (Wales) Measure 2011, and then to the Welsh Language Standards (No.2) Regulations between 24 June and 16 September 2025.

10 February 2026

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

The consultation sought views on proposals to bring Registered Social Landlords ('RSLS') as providers of social housing under Welsh language standards ('standards'), and on a proposal to add Community Housing Cymru ('CHC') to Schedule 6 to the Welsh Language (Wales) Measure 2011 ('Measure'), and then to the Welsh Language Standards (No.2) Regulations ('No.2 Regulations'). If made, the Welsh Language Standards (No.10) Regulations ('Regulations') will enable the Welsh Language Commissioner ('Commissioner') to place duties on RLSs and CHC. This report provides a summary of the responses received to the consultation.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:

Cymraeg 2050 Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: Cymraeg2050@gov.wales

Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Welsh Language Standards \(Registered Social Landlords\) Regulations | GOV.WALES](https://gov.wales/Welsh-Language-Standards-(Registered-Social-Landlords)-Regulations)

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1. Introduction

This document provides an overview of the responses to the consultation on draft Regulations. The purpose of the consultation was to seek views on the draft Regulations which will bring RSLs as providers of social housing in Wales under standards, and a proposal to add CHC, the representative body for RSLs, to Schedule 6 to the Measure and then to the No.2 Regulations.

2. The consultation

Views were invited during a twelve-week consultation period which began on 24 June and ended on 16 September 2025.

The consultation was published on the Welsh Government's website. Respondents were able to submit their views and comments on paper, by email or online, and in Welsh or English. A link to the consultation was emailed to a range of stakeholders including RSLs via CHC, wider stakeholders from the housing sector, and Welsh language policy stakeholders.

During the consultation period we identified an issue with the English version of the draft Regulations. We assessed the issue and judged that it was unlikely to have materially affected responses. We took steps to correct and highlight the issue to relevant stakeholders and included the following note on the consultation webpage for clarification and transparency:

“Some minor inconsistencies between the English and Welsh versions of the draft Regulations were identified after publication. This has since been corrected. This has been assessed and judged unlikely to have materially affected responses. A clarification has been issued via representative networks and added to this consultation webpage for transparency.”

3. Who responded to the consultation

The consultation received a total of 38 unique responses. All responses have been considered and analysed. The responses came from the following interest groups:

Category of Respondent	Number
Members of the public	7
Registered Social Landlords	19
Housing stakeholders	3
Welsh language stakeholders	3
Local Authorities	4
Other (Unknown)	2
Total	38

15 responses were received via the online form accessed via the Welsh Government's website, and 23 responses were received by e-mail. Several respondents requested that their response be kept anonymous, including some

bodies. Some responses provided comments that did not specifically answer the questions in the consultation response form. Their comments have been included under the most appropriate question. One RSL did not provide their own unique response; instead they referred to CHC's response which they had fed into.

This document aims to present the broad views and themes that were provided in responses to the consultation, rather than to summarise every individual response. The responses have been summarised according to the interest groups noted in the above table.

The Welsh Government is grateful to everyone who has submitted a response. As a summary document, not all issues outlined in responses may have been reflected fully, but each response has been considered carefully. The absence of specific issues or suggestions in this summary does not mean they have been disregarded.

4. Summary of Responses

Question 1 - Do you have any comments on the service delivery standards proposed in the draft regulations for registered social landlords (RSLs)?

Members of the public

4 members of the public did not respond or provide comments to this question.

3 members of the public provided comments which objected in general to the policy proposal. Respondents largely viewed the proposal as an unnecessary, bureaucratic use of time and resources during economic hardship, arguing that efforts should focus on housing and social issues. 2 respondents acknowledged the cultural value of Welsh, however felt the policy imposed burdens without meaningful benefits.

RSLs

17 RSLs provided comments which related specifically to this question; 16 submitted comments in relation to specific standards or activities; some RSLs provided comments on a small number of standards whilst others submitted comments on a broader range of standards. 1 RSL referred to CHC's response, and 1 other RSL did not respond specifically to this question.

RSLs broadly supported the principle of standards, recognising their potential to enhance bilingual services and promote the Welsh language. They welcomed the flexibility in the draft Regulations and the further opportunity to engage with the Commissioner, but stressed the importance of proportionality and phased implementation to reflect varying local demand. Key concerns included cost implications (e.g. translation, IT upgrades, staff training), and recruitment challenges, stating the need for clear guidance, realistic timeframes, and support from Welsh Government.

Some of the common themes across responses included:

- Calls for flexibility, tiered or threshold-based approaches, and phased implementation.

- Requests for clarity on definitions (e.g. correspondence, self-service machines, education courses).
- Suggestions to use implied consent or Census data.
- Calls for clearer guidance on the use of AI translation tools and exemptions for third parties or specialist contexts.

Below is an overview of the comments received by RSLs in relation to specific service delivery standards. For the purpose of this summary, some responses to question 2 have been grouped with this question to ensure that similar comments in response to separate questions are considered together. References to standard numbers are to the numbers within the draft Regulations subject to consultation.

- **Correspondence (Standards 1–7):** Concerns about delays, cost and IT limitations to support bilingual functionality and clarification sought on whether emails, texts, and verbal communication are considered correspondence. There were also requests for flexibility in implementation, including exemptions where language preference is unknown.
- **Telephone (Standards 8–22):** Reported challenges in recruiting Welsh-speaking staff, making it difficult to meet telephone standards, and suggesting alternatives such as translation services or resource-sharing. Some also highlighted technical limitations within current phone systems and requested that compliance be linked to renewal of systems. Clarification was also sought on the definition of “individual” and how standards relating to direct calls to staff apply to mobile or personal phones.
- **Meetings not open to the general public (Standards 23–24CH):** Clarification sought on whether meetings with tenants fall within the term “public” and some concerns around logistical challenges of organising Welsh-speaking staff for meetings involving multiple participants or held at tenants’ homes.
- **Meetings open to the public (Standards 25–29):** Concerns were raised about the high cost of providing simultaneous translation for all meetings open to the public, especially where demand is low, suggesting a threshold-based approach and / or use of remote or AI-powered translation. Some also sought clarification on whether the standards apply to online meetings and informal visits, with a small number requesting specific exemptions (e.g. for welfare, tenancy support, and safeguarding meetings).
- **Public Events (Standards 30–31):** Proposals for a minimum funding threshold to be used to determine when these standards apply, rather than a percentage, to avoid disproportionate burdens on small community events.
- **Publicity & Advertising (Standard 32):** Supportive of bilingual materials but requested clarification on retrospective application. Many advocated for an interpretation within the Regulations that the standard only apply to new or renewed material, following a similar approach to standards relating to signs.
- **Documents & Forms (Standards 35–39):** Requests for the standards to apply only to documents produced by the RSL.
- **Websites (Standards 40–44):** Clarification sought on whether standards apply to embedded content, third-party platforms, and republished materials.

- **Apps (Standard 45):** RSLs noted technical and financial challenges to ensure apps are fully bilingual; proposals for tiered approach and that the standard only applies to new or substantially revised apps.
- **Live Chat Facility (Standard 46):** RSLs noted staffing, and technical challenges, suggesting a tiered approach and use of AI translation tools with disclaimers and human follow-up.
- **Social Media (Standards 47–48):** Requests for clearer guidance on bilingual requirements for social media (e.g. whether standards apply to closed groups). There were also some concerns about duplication and practicality, suggesting that separate Welsh accounts could lead to missed updates.
- **Self-Service Machines (Standard 49):** Several requested a clear definition and alignment with website standards to ensure consistency and avoid disproportionate requirements for devices with limited functionality.
- **Signs and Notices (Standards 50–51):** A request for specific exemptions (e.g. signage in shared supported living) and questioning the requirement for Welsh to appear first.
- **Receiving Visitors (Standards 52–56):** RSLs reported difficulties recruiting Welsh-speaking reception staff and requested flexibility, noting higher demand for other languages and seeking continued use of language line services, while also asking for clarity on what constitutes as a “service location”.
- **Corporate Identity (62):** Guidance sought on scope of the standard and concerns noted regarding cost and disproportionality, with proposals to apply the standard only to new or revised branding.
- **Courses (63–64):** Clarification sought on what qualifies as an “education course,” whether internal staff or volunteer training is included, and requests for flexibility for specialist subjects where Welsh-speaking tutors are unavailable.
- **Public Address Systems (65):** Clarification on whether temporary or informal use at community events fall under the standard.

While supportive of the ambition to strengthen Welsh language provision, RSLs urged a pragmatic, context-sensitive approach to ensure standards are workable, inclusive, and do not divert resources from core housing services.

Housing policy stakeholders

CHC was the only stakeholder to respond specifically to this question. CHC’s response emphasised the need for a flexible and proportionate approach to standards, reflecting the diverse scale, services, and linguistic needs across Wales. They highlighted significant variation in tenant demand for Welsh, with some areas showing minimal use compared to other community languages. CHC urged the Welsh Government and the Welsh Language Commissioner (‘the Commissioner’) to ensure standards accommodate local contexts and allow for phased implementation, noting that many draft standards already provide for this flexibility. However, CHC noted concerns and proposed some changes to the following service delivery standards within the draft Regulations subject to consultation:

- **Meetings open to the public (Standards 25-29):** adoption of a minimum % approach, and urging more cost-effective solutions such as remote or AI-powered translation;
- **Public events (Standards 30 and 31):** recommended setting a minimum funding threshold instead of a percentage approach;
- **Publicity and advertising material (Standard 32):** concerns regarding retrospective application of the standard, suggesting that the Regulations include an interpretation which specifies that the requirement only applies to newly produced or substantively revised materials;
- **Apps published by a body (Standard 45):** highlighted compliance challenges with apps provided by third parties and technical complexity, suggesting a tiered approach similar to websites and that the standard is also applied to newly created or substantially revised apps;
- **Live chat facility (Standard 46):** request for a tiered approach to allow for more flexible implementation to address operational and resources challenges;
- **Self service machine (Standard 49):** request for the Regulations to provide a definition of a "self service machine", and also a tiered approach;
- **Courses (Standards 63-64):** clarification sought of what qualifies as an "education course" and whether these standards apply to all levels of training or courses delivered by RSLs, or specifically to education courses provided by external education providers. There was also a request for greater flexibility.

TPAS Cymru and Tai Pawb did not respond using the consultation response form template. TPAS Cymru saw an opportunity through digital services such as portals, apps, social media and chatbots to reinforce the use of Welsh, warning the need to mitigate against tokenistic approaches and inferior communications. They stressed the need for clear guidance and sufficient resources for RSLs.

Tai Pawb supported the proposal to bring RSLs under standards, stating that there is an opportunity to embed Welsh language within broader cultural competence approach alongside accessibility and equality duties. They considered that the Regulations can bring consistency and clarity for bodies and enforceable rights for tenants. Tai Pawb highlighted the importance of ensuring that Welsh versions are carefully integrated alongside considerations for digital accessibility and inclusive design when designing websites, apps and tenant portals, especially for tenants with lower digital literacy. They also stressed that non-digital options also need to be available.

Welsh language policy stakeholders

All 3 respondents submitted comments relevant to this question.

Dyfodol i'r Iaith noted that they welcomed the policy proposal and that it was a step in the direction to ensure linguistic fairness and equality.

Cymdeithas yr Iaith welcomed the standards relating to apps and live chat facilities. They also considered that there was no provision for automatic text messages, and that the Regulations should include standards relating to awarding contracts. In addition, they suggested a new standard that would require RSLs to use information

regarding language preference to make every reasonable effort to provide a maintenance and repair worker who is able to speak Welsh to tenants in order to meet that wish. They also noted some comments on Part 2 of the service delivery standards, including which standards relating to correspondence and receiving visitors should or should not be dependent on each other.

The Commissioner considered that there should be additional standards in relation to wellbeing to ensure tenants' linguistic needs are fully met when they require care and support. The Commissioner also suggested creating a specific standard for platforms such as portals and reconsidering the wording of the social media standards to ensure that they provide for platforms that are more dependent on photos, videos and live streaming rather than written material.

Both Cymdeithas yr Iaith and the Commissioner suggested that a specific standard be created for video and audio clips to ensure that there is Welsh language provision for this material. Cymdeithas yr Iaith also believe that there should be a requirement to include Welsh language subtitles on English videos created for the public.

Local Authorities ('LAs')

4 LAs responded to this question.

Responses from LAs were broadly similar with all 4 LAs supporting the inclusion of service delivery standards for RSLs. They emphasised the importance that communication standards are clear in terms of communicating with people in different formats and that Welsh language services are available to everyone in Wales, regardless of where the company is established and the size of their housing stock. They highlighted opportunities for collaboration with experienced bodies that are already subject to standards to share good practice, resources, and services such as translation and training. 1 LA noted that standards will require RSLs to adjust service delivery for Welsh speakers which may increase costs and resource demands but could also improve service access and support the language by giving greater confidence to Welsh speakers.

Other (Unknown)

2 'other' respondents provided comments in response to question 1. 1 respondent noted that expecting housing staff to be able to speak Welsh was unreasonable and that the level of demand should be considered.

Another respondent suggested removing or amending some standards relating to correspondence, and websites as they considered them unnecessary or unclear. They also requested greater clarity with regards to some of the terminology used within the draft Regulations (e.g. "member of the public", "individual", and "subject matter") and confirmation to what extent the different terms apply to a tenant.

Welsh Government Response:

Changes made to the draft Regulations as a result of the comments raised:

- **Standard 4 (correspondence)** has been amended to note that there is a requirement to provide a Welsh language version of correspondence to several persons (and at least one of those persons is a member of the public) unless all of those persons who are members of the public in Wales have informed the body that they do not wish to receive that correspondence in Welsh. This means that a body will not be required to send a Welsh language version of correspondence to several persons if it knows that all members of the public in Wales receiving the correspondence do not want to receive that correspondence in Welsh.
- **Standards 36 and 37 (forms and documents)** now include a reference to documents. This will enable RSLs to send documents as well as forms to individuals in accordance with their language preference.
- **Standards relating to websites and online services**, now include a reference to portals. This means that standards 40-47 can also apply to portals, including web-based and app-based portals (e.g. tenant portals).
- **Standard 47 (live chat facility)** is an additional standard that has been included in the Regulations to recognise the challenges that an immediate, live service presents but also ensures that an RSL has to provide a Welsh language service via a live chat facility until such a point that there is no member of staff available who is able to deal with the specific subject matter in Welsh.
- **Standards 50 (audio and video content)** is a new standard introduced to provide clarity on the requirements for any audio or video content produced by a body.
- **Standard 62 (corporate identity)** has been split into two standards (now Standards 64 and 65). This is to acknowledge that some bodies subject to the Regulations currently do not have a 'Welsh' equivalent of their corporate identity. If the Commissioner chooses to impose Standard 64 on those bodies they will need to ensure that they do not treat the Welsh language less favourably when they form or revise their corporate identity.

Further comments:

There were several requests to ensure that the standards are proportionate, flexible and allow for a phased implementation approach. We have made some changes to the Regulations whilst other remain unchanged. For example, we considered whether a tiered approach could be adopted within the Regulations for apps. However, we had concerns as to how this would work in practice and the service user experience. The Commissioner has powers to set conditions outlining under which circumstances a body must comply with a standard and to impose a later imposition date.

Many of the comments highlighted by bodies are matters around the reasonableness and proportionality of the standards, how they would apply to a specific body, and in specific circumstances. We believe that these matters are more appropriate to discuss with the Commissioner as part of the process of issuing a Compliance Notice, as such we do not propose to respond to each query raised in the responses.

The draft Regulations subject to consultation did not include standards relating to the activity of 'awarding contracts'. We believe that the focus of the Regulations

should be to provide services to the bodies' main users and to increase the opportunities to use Welsh, and, as such, there are no standards for awarding contracts within the Regulations.

We have not taken forward Cymdeithas yr Iaith's proposal to include a new standard to use information regarding a tenant's language preference to make every reasonable effort to provide a maintenance and repair worker who is able to speak Welsh to tenants who have noted a Welsh language preference. We consider that it would be difficult for RSLs to implement the desired standard in practice. The exemption for repair and maintenance visits in the Regulations only applies to the visit itself. This means that standards will continue to apply to associated activities (e.g. correspondence or telephone calls arranging a repair or maintenance visit).

We considered the option of including standards relating to wellbeing. However, we consider that RSLs efforts would be better focused on improving their ability to provide Welsh language services directly without the need for translation services, by increasing their ability to deal with tenants in Welsh. This can be achieved through recruitment when filling vacant posts, or by investing and improving the Welsh language skills of existing staff. The Regulations, therefore, do not include specific standards relating to 'wellbeing'.

With regards to courses, staff training would come under operational standards as opposed to standards relating to courses (standards 66-67) whilst volunteer training could also fall under the scope of these standards 66-67.

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?

Members of the public

5 members of the public did not respond to this question; 2 respondents provided comments on this question.

1 respondent questioned the necessity and benefit of such detailed interpretations – they had concerns that they may, instead of clarifying, add further complexity and administrative burden for RSLs.

1 respondent suggested removing or amending some standards relating to meetings, websites and forms as they considered them unnecessary or unclear. They also requested greater clarity with regards to some of the terminology used within the draft Regulations (e.g. "member of the public", "individual", and "subject matter").

RSLs

13 RSLs submitted comments in response to this question specifically; 5 RSLs either did not have any comments or referred to their comments in response to question 1. 1 RSL referred to CHC's response.

Several RSLs sought greater clarity and practical guidance on the interpretation of the standards, particularly regarding definitions of terms such as “self-service machines”, “emergency”, and “members of the public”. Some RSLs raised concerns about the scope of standards relating to text messages, third-party services, and the applicability of requirements to documents and forms not produced by the RSL. There were also calls for exemptions or clearer guidance regarding home visits, online meetings, and social media. 2 RSLs expressed concern about the broader implications of the standards on the sector’s classification and regulatory burden. Additionally, 2 RSLs sought clarification on how the standards apply to reception areas and signage in Extra Care and shared supported living settings.

Housing policy stakeholders

2 stakeholders submitted comments relevant to this question.

CHC’s response called for clearer definitions of terms such as “individuals” and “members of the public” and “emergency”. CHC also sought guidance on the applicability of standards to text messaging and online meetings, suggesting that automated translation tools may mean that it is not proportionate or necessary to apply the standards for virtual settings. CHC also recommended that standards 35 to 39 (documents and forms) within the draft Regulations subject to consultation should only apply to forms and documents produced by RSLs and proposed that AI-generated translations, when quality assured, be accepted as compliant to reduce operational burden.

TPAS Cymru considered the exemptions to repair and maintenance visits and in situations where there is a potential risk to life, as reasonable.

Welsh language policy stakeholders

Dyfodol i'r laith did not have any comments in relation to this question.

The Commissioner welcomed that the draft Regulations clarify which standards should apply to documents in HTML format and suggested that there may also be scope to provide better clarification within the interpretation section in relation to interactive forms as well as better differentiation between course, public event and public meeting.

Cymdeithas yr Iaith accepted the need for an exemption for emergencies however emphasised that it should only be applied in exceptional circumstances. They did not agree with some of the exemptions for online chat, social media, links to documents, and audio and video clips.

Local Authorities ('LAs')

4 LAs responded to this question.

1 LA stated that the interpretations are generally appropriate and helpful.

3 responses were broadly similar, noting that paragraph 3.2 of the consultation document conflicts with Schedule 1, Part 3, Paragraph 28 (standards 23–24CH) which provides an exemption for repair and maintenance visits and requested a

definition of advertising material on apps, including when it must be bilingual. All 4 respondents emphasised the need for clarity as to when standards should apply and to whom, particularly in relation to third parties.

Other (Unknown)

1 respondent noted that printing and sending large volumes of paperwork can be wasteful if there is no demand for a Welsh version. This did not appear directly relevant to this question. Another respondent referred to their response to question 1.

Welsh Government Response:

Changes made to the Regulations as a result of the comments raised:

- **Paragraph 35, Part 3 of the service delivery** clarifies that standards relating to forms also includes interactive forms.
- **Paragraph 37, 40, 42 Part 3 of the service delivery standards** confirms that standards relating to websites, social media, live chat facilities do not apply to documents and forms. This is to clarify that other standards apply to forms and documents.
- Some **technical changes**.

Further comments:

Part 3 of Schedule 1 of the Regulations provides interpretations for specific standards, which can include a definition of a particular term or sets out circumstances when certain standards apply or do not apply, for example. The interpretation section is not intended to be an exhaustive list. If deemed necessary, the Commissioner may choose to prepare a Code of Practice that will give further advice in relation to the practical application of standards.

Many of the comments related to requests for clarification around certain standards or terms used within the draft Regulations. The Regulations define an “individual” as “a natural person ordinarily resident in Wales acting in their personal capacity; but does not include an individual acting in their capacity as a volunteer”. We consider that RSLs predominantly engage with people who fall within the definition of an “individual”. An “individual” is intended to include current and prospective contract holders, residents and service users. However, we also recognise that RSLs may also engage with other members of the public and those that do not fall within the definition of an “individual”, such as community groups. We consider that a “member of the public” also includes an “individual”.

The standards are not generally intended to extend to RSLs dealings with public authorities (e.g. Local Authority or Health Board), unless those dealings also involve a member of the public. For example, the standards are not intended to apply when a RSL only corresponds or meets with a public authority (e.g. Local Authority).

The Regulations do not specifically exempt correspondence standards from applying to emails and text messages. Similarly, the Regulations do not exempt

the standards from applying to online meetings. There will be an opportunity for RSLs to discuss any specific concerns with the Commissioner during the process of issuing a Compliance Notice.

Standards relating to correspondence are not intended to apply to social media as there are specific standards for social media (standards 48-49) within the Regulations. The exemption is included to provide clarity as to which standards apply.

Part 3 of the service delivery standards notes that a body does not have to translate text produced by others (e.g. a third party). However, if the text is produced by a third party **on behalf of** the RSL then the relevant standards would continue to apply. For example, if a body commissions a third party to prepare an information leaflet on its behalf, then the relevant standards would apply.

We note the calls for greater clarity regarding the emergency exemption. We do not consider that the interpretation within the Regulations needs to be amended. However, we wish to clarify that the intention is for the emergency exemption to apply when there is a risk of immediate harm to life or a property (e.g. risk of death or serious safeguarding concerns).

We recognise the potential opportunities linked to the use of AI. We consider that it is a matter for the Commissioner to advise bodies on whether, and to what extent, the use of AI is accepted as a form of compliance. We are aware that the Commissioner has recently published a policy statement regarding AI and the Welsh language which may be of interest to bodies: [20250722-datganiad-polisi-rheoleiddiol-deallusrwydd-artiffisial-ar-gymraeg-saesneg.pdf](https://www.gov.wales/20250722-datganiad-polisi-rheoleiddiol-deallusrwydd-artiffisial-ar-gymraeg-saesneg.pdf).

In relation to standards relating to receiving visitors, the following definition of “service locations” was included in the draft Regulations: “(c) “*service locations*” include advice centres, community centres and drop in centres”. This list is not intended to be exhaustive. Given the diverse nature of these bodies, it would be impossible to include a full list of service locations.

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

Members of the public

5 members of the public did not respond to this question; 2 members of the public submitted comments.

1 respondent expressed concern that the proposed policy-making standards would introduce unnecessary bureaucracy for RSLs and argued that the focus should be on practical outcomes rather than procedural obligations.

A second respondent suggested that the section interpreting “policy decision” should be made more useful for bodies by including more practical and relevant examples.

RSLs

16 respondents provided specific comments to this question; 2 did not submit any specific comments and 1 RSL referred to CHC's response.

14 RSLs noted concerns about standard 72 within the draft Regulations subject to consultation. RSLs argued that making Welsh language a determining factor in awarding grants was disproportionate and could disadvantage vulnerable individuals and conflict with the purpose of hardship funds. Many called for a specific exemption for grants based solely on financial need. Other comments included concerns about the application of these standards to community grants, and requested clarity on definitions of "consultation" and "research". 1 RSL noted concerns about the practicality of applying policy-making standards across numerous internal policies. 1 RSL also suggested that there was scope to simplify and combine standards. In relation to standards 66-71 within the draft Regulations subject to consultation, 1 RSL requested that an initial impact assessment on the relevant policies be sufficient in the first instance.

Housing policy stakeholders

2 respondents did not submit comments specific to this question.

CHC noted the application of these standards to strategic decisions and development of strategic plans, research and consultation but requested clarity on the definitions of "consultation" and "research," particularly in relation to informal engagement. They suggested that the interpretation of "policy decision" should not include "content of legislation" as it does not apply to RSLs.

CHC raised similar concerns to RSLs about standard 72 within the draft Regulation subject to consultation, and the unintended consequences of applying this standard to hardship and community benefit grants. They argued that making the Welsh language a determining factor in awarding grants could lead to inequitable outcomes, penalising vulnerable individuals by introducing criteria unrelated to their financial need or leading to a disproportionate outcome where Welsh speakers receive preference over others who may have a greater need for support. They recommended that the Regulations provide greater clarity and include a specific exemption for grants awarded based on demonstrable hardship.

Welsh language policy stakeholders

Dyfodol i'r laith welcomed these standards without further comment.

Cymdeithas yr Iaith did not submit any specific comments relating to the policy making standards.

The Commissioner suggested that the standards could be simplified to improve clarity around the requirements and noted that the wording of standards 66-68 within the draft Regulations subject to consultation implies that they only apply when a policy is formulated as opposed to when a body makes or comes to a policy decision. They also noted that the interpretation section only defines a "policy decision".

Local Authorities ('LA')

4 LAs responded to this question; 3 responses were almost identical.

The responses supported the policy-making standards, stating that such standards are essential for embedding the Welsh language into strategic decision-making.

They highlighted the use of impact assessment templates by LAs to help mitigate negative effects and ensure that the Welsh language is considered at all stages of policy development.

1 LA welcomed the proposed standards and supported formalising Welsh language duties for RSLs to ensure consistency across sectors and strengthen the visibility and use of Welsh in everyday services.

Other (Unknown)

2 respondents provided comments to this question.

1 respondent recommended providing examples of “policy decisions” in the interpretation section of the Regulations, such as: RSLs must assess the impact of decisions related to the location and size of new developments, and the placement of tenants in specific areas, particularly where such decisions could affect the use and viability of the Welsh language in a community.

Another respondent expressed concern about fairness, suggesting that while staff should be enrolled on Welsh language training, other languages should be treated equally.

Welsh Government Response:

Changes made to the Regulations as a result of the comments raised:

- **Paragraph 2(a), Part 2 of the policy making standards** has been amended to include a more relevant example of a policy decision.

Further comments:

We do not consider that standard 72 within the draft Regulations subject to consultation (now standard 75) requires the Welsh language to be a determining factor in awarding grants. The standard requires a body to produce and publish or amend an existing policy on awarding grants and is intended to ensure that the Welsh language is treated no less favourably than the English language and to ensure that there are more opportunities to use the Welsh language. This includes considering whether there are opportunities to increase the positive effects and to decrease adverse effects. In the example of hardship grants, we would expect the Welsh language to be a considered but not necessarily a determining factor.

We considered whether there was scope to streamline these standards. However, we concluded that combining standards would result in lengthier standards. We considered that fewer but longer standards would potentially create greater confusion rather than clarification.

We do not consider that the wording of standards 66-68 within the draft Regulations subject to consultation (now standards 69-71) need amending.

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

Members of the public

5 members of the public did not respond to this question; 2 respondents submitted comments to this question.

1 respondent expressed concerns that the proposed operational standards add unnecessary regulatory burdens on RSLs, potentially diverting resources from core priorities such as meeting housing demand and supporting vulnerable tenants. While acknowledging the importance of promoting the Welsh language, they argued this should not compromise operational efficiency, especially during a cost-of-living crisis.

Another respondent suggested replacing the term “employee” with “member of staff” in standard 78 and strengthening standard 101 within the draft Regulations subject to consultation to require staff providing face-to-face services to wear a badge.

RSLs

18 RSLs provided comments relevant to this question; 1 RSL referred to CHC’s response. 14 RSLs submitted general comments; whilst others submitted both general and / or standard specific comments.

General comments showed a broad support for the aims of the proposed operational standards to promote the Welsh language. However, some expressed concerns about the practical challenges of implementation, particularly around workforce capacity, recruitment, and training. Several RSLs highlighted the difficulty of recruiting Welsh-speaking staff and the significant time and resources required to upskill existing staff. There were calls for flexibility in applying the standards, especially in areas with low Welsh language demand, and for realistic implementation timescales. Some respondents emphasised that translation tools and software, while helpful, cannot replace genuine language proficiency. Financial implications were a recurring theme, with concerns about the cost of training, translation services, and system upgrades. Some RSLs requested support from Welsh Government, including funding for training, guidance on technology use, and clarity on definitions and expectations within the standards.

Concerns were also raised about standards relating to complaints and disciplinary procedures, specifically around using external translators for sensitive HR matters, conflicts with other regulatory deadlines (e.g. Public Services Ombudsman for Wales (‘PSOW’), Freedom of Information Act), and risks of misuse or delays. For IT and intranet standards, some RSLs pointed to technical and financial barriers to achieving bilingual functionality and requested guidance on AI tools and modern communication platforms. With regards to workforce training, RSLs supported the principle but flagged issues around learner confidence, cost, and service disruption, calling for Welsh Government-funded training and clearer guidance. Recruitment standards also drew concern, with RSLs highlighting risks of indirect discrimination, system limitations, and translation delays.

Housing stakeholders

2 stakeholders provided comments relevant to this question.

CHC stated that implementing the proposed operational standards will require substantial changes to RSLs' business functions and services, with significant financial and resource implications. Key concerns included the cost of translating HR policies and intranet content, developing Welsh language training modules, and the limited internal capacity, particularly within HR and Learning & Development teams, to deliver these services without external support. CHC noted challenges in achieving the required Welsh language proficiency across the workforce, along with recruiting Welsh-speaking staff, and upskilling existing staff. CHC stressed the need for targeted support from Welsh Government, including free and accessible training, and called for a flexible, phased approach to implementation to avoid negatively impacting core services.

CHC requested flexibility for RSLs to be able to translate staff policies only when formed or revised. CHC also raise concerns about how the proposed standards will align with other regulatory requirements, noting potential conflicts and delays in key areas such as complaints management (impacting PSOW response times), health and safety (incident investigations), corporate governance, and data protection (SAR response times and ICO compliance). CHC stressed the need for clarity on managing overlaps and determining which regulatory body's requirements take precedence.

CHC also sought clarification on whether assessing the need for Welsh language skills in new or vacant post as essential could amount to indirect discrimination, and whether such a requirement could be justified under Schedule 9, paragraph 1 of the Equality Act 2010 as a genuine occupational requirement.

Tai Pawb noted that there may be implications for staff recruitment, retention and progression that could cause additional pressures, stating that it is important that expectations are proportionate to the role and operational context of bodies. Tai Pawb emphasised that training and development should occur during work hours without any cost to staff, stating that language development should prioritise building confidence as well as competence. They also stressed the importance of avoiding new language hierarchies and ensuring inclusive practices (e.g. accommodating different learning styles and accessibility needs) that support equal workforce participation and career progression for individuals from all backgrounds.

Welsh language policy stakeholders

Dyfodol i'r Iaith welcomed the standards with no further comment.

The Commissioner noted that their regulatory work has indicated that there continues to be confusion and inconsistency in the way organisations approach identifying the Welsh language skills required when recruiting. They noted that they were aware of the provision within the Welsh Language and Education (Wales) Act 2025 to conduct a review of standards relating to assessing and improving Welsh

language skills of the workforce and considered that it would be useful to reference the review within the Explanatory Memorandum to the Regulations.

Cymdeithas yr Iaith noted that the Regulations should include standards relating to internal signage and proposed new operational standards requiring a RSL to prepare a Five-Year Strategy, to be reviewed and updated every five years, outlining how they will increase internal use of Welsh and report on progress made during the previous five-year period. They proposed draft wording for the requested standards.

Local Authorities ('LA')

4 LAs responded to this question; all responses were broadly similar.

They noted that operational standards should reflect service delivery in practice. It was suggested that RSLs adopt similar approaches to LAs who have experience in embedding Welsh language responsibilities, by drawing on existing good practice. Opportunities to share training and collaboration with local authorities on recruitment and service sharing was also recommended.

1 LA stated that there might be potential cost implications and changes required to RSLs procedures, suggesting that a gradual implementation should be adopted to ensure the intended benefits of the Regulations can be achieved.

Other (Unknown)

2 'other' respondents submitted comments to this question.

1 respondent proposed introducing a standard requiring organisations to collect and record tenants' Welsh language skills to enable RSLs to assess the linguistic impact on the viability of Welsh in an area and enable informed decisions in the future (e.g. such as tenant placement or development of a new estate) that could positively contribute to maintaining and strengthening Welsh in the community.

Welsh Government Response:

Changes made to the Regulations as a result of the comments raised:

- **Standard 82 (internal policies)** has been amended so that the requirement to publish a Welsh language version of a policy applies when it is created or revised.
- **Paragraph 11, Part 3 of operational standards** confirms that standards relating to intranet also do not apply to forms. This is to clarify that there are other specific standards in relation to forms.
- **Paragraph 13, Part 3 of the operational standards** confirms that reference to "forms" in standards 81, 106A, 107 and 108 includes interactive forms.

Further comments:

The Regulations do not include standards relating to internal signage. It is reasonable to believe that the signage requirements under the service delivery standards would capture most workplace signs, and that there would be limited benefit in imposing separate operational standards.

With regards to Welsh Language training, The National Centre for Learning Welsh has a “Cymraeg Gwaith” (Work Welsh) scheme which offers varied and flexible training to strengthen Welsh language skills in the workplace. Tailored courses for workplaces are available to allow employees to learn Welsh or improve their existing Welsh language skills. Specific online taster courses for RSLs are already available. This provision is available free of charge and allows both employees to learn Welsh or improve their Welsh language skills. The offer also improves the ability of bodies to provide services to their users in Welsh.

We have not taken forward proposals for new operational standards. The Welsh Language and Education (Wales) Act 2025 ('the Act') places a duty on Welsh Ministers to review standards which are specified under section 26 of the Measure. The purpose of the review will be to determine whether amendments are necessary to any of the standards relating to improving or assessing the Welsh language skills of the workforce to reflect the Code to describe Welsh Language ability and facilitate achieving targets set in a revised Welsh Language Strategy. We have also noted in our response to the “Empowering Communities, strengthening the Welsh language” report that we propose to give consideration to a recommendation which calls for certain public bodies under standards to state the extent of their use of Welsh internally, and the steps that they will take to move along a language continuum when conducting the review required by the Act. We consider that it would be premature to amend or add any relevant standards before undertaking the review.

We have also not taken forward the proposal to introduce a new operational standard requiring RSLs to collect and record tenants' Welsh language skills to enable them to assess the linguistic impact on the viability of Welsh in the area. Whilst we appreciate the importance of collecting data regarding language preference, we do not consider that there should be a requirement to record the language skills of tenants.

Other bodies (e.g. Local Authorities) are also required to comply with other regulatory requirements (e.g. Public Services Ombudsman for Wales and Subject Access Requests). These standards relate to services provided to staff. We consider that the implementation issues and the comments regarding that reasonableness and proportionality of the standards raised by bodies are matters best dealt with in discussions with the Commissioner as part of issuing the Compliance Notice.

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?

Members of the public

6 members of the public did not submit any comments to this question.

1 member of the public expressed concern that the proposed standards would increase administrative burdens on RSLs without clear benefits for tenants and wider

public. They suggested that resources would be better spent on improving housing stock, reducing waiting lists and supporting those in financial difficulty and noted potential costs associated with new systems and staff training may divert funds from more urgent priorities.

RSLs

11 RSLs noted that they either welcomed or had no specific concerns with these standards; 1 RSL referred to CHC's response.

6 RSLs submitted comments specifically on this question.

Overall, respondents welcomed the intent of these standards however noted concerns about the administrative burden, system limitations, and resource implications. There were calls for phased implementation, clarity regarding standard 111 within the draft Regulations subject to consultation, including guidance from the Commissioner on annual reports.

On complaints and reporting, 2 RSLs advocated for streamlined processes, such as managing Welsh language complaints under a single policy and integrating Welsh language reporting into existing regulatory frameworks to avoid duplication.

1 RSL also raised practical issues with surveying the Welsh language proficiency of staff and suggested reporting Welsh-essential roles as they arise.

Housing policy stakeholders

2 respondents did not submit specific comments to this question.

CHC noted that while some record-keeping can be integrated into existing RSL systems, new processes and system replacements would be needed. They also considered that there would be significant translation costs associated with adjusting policies and procedures.

Tai Pawb provided a general suggestion that data collection and reporting structures should be designed to identify differences in outcomes and highlight areas needing additional support.

Welsh language policy stakeholders

Dyfodol i'r laith welcomed these standards with no further comments.

The Commissioner welcomed the inclusion of a standard requiring bodies to publish oversight arrangements, viewing it as a key tool for assessing compliance and promoting self-regulation.

Cymdeithas yr Iaith did not submit any comments that were deemed relevant to this question.

Local Authorities ('LA')

Las emphasised the importance of effective record-keeping for monitoring compliance and enabling improvement, outlining the detailed records they maintain. They recommended that RSLs consider maintaining and recording similar data,

including language skills of existing staff in order to understand the challenges and gaps in service provision, particularly for frontline services.

Other (Unknown)

1 'other' respondent suggested that standard 107 within the draft regulations subject to consultation should include a requirement to provide a summary of the types of complaints received and confirmation of actions taken in response.

Welsh Government Response:

- No changes have been made to the Regulations as a result of these comments.

Further comments:

We consider that the implementation issues and the comments regarding the reasonableness and proportionality of the Regulations raised by bodies are matters best dealt with in discussions with the Commissioner as part of the Compliance Notice.

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?

Members of the public

6 members of the public did not submit comments to this question.

1 member of the public expressed concern that extending standards to RSL subsidiaries or commercial activities would introduce unnecessary complexity and costs.

RSLs

16 RSLs submitted comments in relation to this question; 1 RSL referred to CHC'S response and 1 other RSL did not provide specific comments to this question. 1 RSL noted that it did not have any comments at this stage.

2 RSLs expressed support for extending the standards to subsidiaries and commercial activities, whilst 1 RSL did not expect significant customer interaction with its subsidiaries or commercial activities. 1 RSL did not agree that standards should apply to commercial activities.

Other respondents highlighted the complexity of organisational structures, noting that subsidiaries often operate independently or outside the scope of public service delivery, and requested clarity on whether standards would apply in such cases. Some raised concerns about the financial and operational impact of compliance, particularly for small subsidiaries or those with limited public interaction, citing translation costs, and staffing challenges. Several RSLs advocated for a proportionate and phased approach, suggesting that standards should only apply

where subsidiaries deliver services directly to the public or on behalf of the parent organisation and welcomed further discussions with the Commissioner prior to receiving their compliance notice. Some RSLs proposed alternative approaches, such as aligning subsidiaries with the parent organisation's Welsh language policy on a voluntarily basis rather than through statutory regulation.

Other comments included concerns around the difficulties in applying standards to contractors and third-party suppliers, especially SMEs, due to limited Welsh language capacity and resources.

Housing policy stakeholders

2 respondents did not submit specific comments to this question.

CHC noted that there were mixed views among its members but raised concerns about the viability of applying standards to subsidiaries and commercial activities. CHC noted that many RSLs believe this should be a voluntary matter, guided by the parent organisation's internal Welsh Language Policy rather than enforced through regulation.

There were also concerns about the impact on third-party suppliers, particularly SMEs in the construction sector that RSLs use for repair and maintenance services, who may lack the resources to comply. CHC considered that extending the standards to third-party suppliers without consultation or sector-specific assessment could place an unfair and disproportionate compliance burden. To avoid excluding local providers and increasing costs, CHC recommended that any new requirements apply only to contracts procured after the Regulations come into force.

Welsh language policy stakeholders

3 respondents indicated that they were supportive of applying standards to subsidiaries and commercial activities.

Dyfodol i'r Iaith noted that agreements or service level agreements between RSLs and subsidiaries should clearly state that they are expected to comply with standard when dealing with the public and staff.

The Commissioner suggested that the Regulations should specify to what extent it is reasonable and proportionate for standards to apply to subsidiaries and commercial activities to ensure consistency across the sector. They noted that there is a risk that agreeing what is reasonable and proportionate through individual consultations with bodies could lead to inconsistencies, and cause delays in implementing the duties, creating uncertainty for both the public and the bodies themselves.

Cymdeithas yr Iaith noted that the draft Regulations subject to consultation did not exempt commercial activities provided by RSLs arguing that since RSLs will be expected to provide Welsh-language services for social tenants, the same should apply for any commercial services they provide. They also believe the Regulations should not give the Commissioner discretionary power on this matter.

Local Authorities ('LA')

4 LAs submitted comments in response to this question.

4 LAs supported extending standards to subsidiaries and commercial activities where public services are affected, highlighting the importance of consistency for Welsh speakers regardless of the service provider. 3 LAs asked for clearer definition of the term "Landlord" noting that Councils own assets such as business units, shops etc and could be considered "Landlords". They also raised a question about community asset transfers arrangements. Some of these comments did not seem relevant to the specific question.

Other (Unknown)

No 'other' respondents submitted a response to this question.

Welsh Government Response:

We continue to consider that the Commissioner should be able to decide whether it is reasonable and proportionate for standards to apply to RSL subsidiaries and commercial services.

The Commissioner already has powers to set conditions outlining under which circumstances an individual body must comply with a standard. Some RSLs have noted in their responses that they welcome further discussion with the Commissioner with regards to subsidiaries and commercial activities. We believe that this approach is more appropriate than including specific exemptions within the Regulations themselves. This approach also provides flexibility for the Commissioner to require RSLs to increase their capacity over time. A blanket exemption or an exhaustive list within the Regulations of the types of subsidiaries that could be subject to standards would mean that this would not be possible. There is also the risk that the nature of subsidiaries could change over time.

Question 7 – Do you agree with the proposal to add Community Housing Cymru (CHC) to the Welsh Language Standards (No.2) Regulations?

	<i>Agree</i>	<i>Disagree</i>	<i>Neither agreed nor disagreed</i>
Members of the public		4	1
Registered Social Landlords	2	9	6
Housing policy stakeholders		1	
Welsh language policy stakeholders	3		
Local Authorities	4		
Other (Unknown)	1	1	
Total	10	15	7

6 (2 housing stakeholders, 2 members of the public and 2 RSLs) did not express an opinion on the proposal.

Members of the public

1 member of the public did not submit any comments to support their indifferent view on the proposal.

4 members of the public provided comments which objected to the general policy proposal. Comments focused on concerns about cost, administrative burden, and the need to prioritise pressing social issues such as housing affordability and poverty. Respondents felt that imposing additional requirements on CHC would detract from its core mission of supporting housing associations.

RSLs

2 RSLs noted that they agreed with the proposal, 1 on the basis that there is flexibility to meet the standards and the other stated that it should be a matter for CHC.

9 RSLs did not support the proposal, 7 of which provided comments to support their response. They cited CHC's status as a small, independent, charitable membership organisation that does not provide public services or receive public funding. Several of those RSLs considered that the standards would impose a disproportionate burden and instead suggested that CHC strengthen its existing voluntary scheme or adopt standards on a voluntary basis.

3 respondents who neither agreed nor disagreed with the proposal stated that the matter should be left to CHC or proposed alternative approaches such as adopting a language charter. 3 RSLs did not provide any comments to support their view.

Housing policy stakeholders

2 respondents provided comments relevant to this question.

Tai Pawb was supportive of the proposal to bring CHC under Welsh language standards Regulations.

CHC strongly opposed the proposal. CHC stated that it does not deliver public services or receive public funding, and its role is to represent independent housing associations rather than public bodies. It considered that its inclusion in the No.2 Regulations would be a disproportionate burden and noted that its Board members unanimously share this view. CHC believes it can best support its members by continuing to strengthen its voluntary scheme. The Board of CHC also provided a written response separately to further outline its position on this proposal.

Welsh language policy stakeholders

3 respondents indicated that they supported the proposal; 2 provided no further comments to support their views.

The Commissioner noted CHC's representative role for RSLs and drew comparisons with other umbrella organisations already subject to the Welsh Language Standards (No.2) Regulations.

Local Authorities

4 LAs responded to this question supporting the policy proposal, stating that it would ensure that CHC's communications and policy work reflects the same linguistic standards expected of its members. They considered that its inclusion would promote consistency and leadership in Welsh language service provision across the sector. Some also noted that it presented another opportunity to share good practices and collaborate in delivering Welsh language services.

3 LAs raised a question about landlords who have a portfolio of houses that they let. This did not seem relevant to the specific question.

Other (Unknown)

1 respondent did not submit comments to support their agreement to the proposal.

1 respondent opposed the proposal and expressed concern about additional pressures on RSLs and the potential negative impact on staff retention. Some comments did not relate to the proposal in question.

Welsh Government Response:

We have held further discussions with CHC on the proposal following their consultation response and intend to move forward with bringing them under standards.

Question 8 – Do you agree with the proposal to make all standards within the Welsh Language Standards (No.2) Regulations specifically applicable to CHC?

	<i>Agree</i>	<i>Disagree</i>	<i>Neither agreed nor disagreed</i>
Members of the public	1	4	1
Registered Social Landlords	1	10	6
Housing policy stakeholders		1	
Welsh language policy stakeholders	2		
Local Authorities	4		
Other (Unknown)	1	1	
Total	9	16	7

6 (2 housing stakeholders, 1 Welsh language stakeholder, 1 member of the public and 2 RSLs) did not express an opinion on the proposal.

Members of the public

2 members of the public did not submit any comments to support their response.

4 members of the public provided comments which objected to the general policy proposal.

1 respondent expressed concern that applying all standards to CHC would be excessive and misaligned with its strategic role stating that a more proportionate approach would be to apply only those standards that are directly relevant to CHC's public-facing functions, if applicable. Another respondent stated that the proposal would ultimately be a cost to tenants or taxpayers.

RSLs

1 RSL noted that it agreed with the proposal however stated that it should be a matter for CHC.

10 RSLs disagreed with the proposal, 5 RSLs referred to their response to question 7; and 1 RSL did not provide any comments to support its response.

4 RSLs provided comments similar to question 7. They felt that applying all standards would be disproportionate and burdensome.

6 RSLs neither agreed or disagreed with the proposal. 3 RSLs either referred to their response to question 7 or noted that they considered this a matter for CHC. 1 RSL noted comments similar to those who disagreed with the proposal.

1 RSL referred to CHC's response.

Housing policy stakeholders

CHC strongly disagreed with the proposal, referring to their response to question 7.

Tai Pawb and TPAS Cymru did not provide specific comments relevant to this question.

Welsh language policy stakeholders

Dyfodol i'r laith agreed with the proposal without providing further comment.

The Commissioner's response noted that it agreed with the proposal to make all standards within the Welsh Language Standards (No.2) Regulations applicable to CHC.

Cymdeithas yr Iaith's response did not explicitly state whether it supported the proposal or not. However, its response implies that it expects standards relating to awarding contracts to be made specifically applicable to CHC.

Local Authorities

4 LAs supported the proposal. They noted that applying all standards ensures comprehensive compliance and avoids any ambiguity. They also state that their experience of standards helps strengthen accountability and improves service quality.

Other

1 'other' respondent did not submit comments to support their agreement to the proposal.

The other respondent submitted comments which suggested that language provision should be broader and not limited to Welsh. This comment did not seem directly relevant to this question, and outside the scope of the consultation.

Welsh Government Response:

We have held further discussions with CHC on the proposal following their consultation response and intend to move forward with bringing them under standards.

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.

Members of the public

5 members of the public responded to this question.

1 respondent submitted comments which objected to the general principle of standards.

1 respondent saw potential for limited positive impact but questioned the proportionality of the approach, proposing that there are more effective and community-focused ways to promote the language (e.g. Welsh-medium education and grassroots cultural initiatives). 1 respondent suggested that it made them look less favourably at efforts to promote the Welsh language. 1 respondent noted that there should be greater focus on education and that using Regulations to enforce the use of Welsh language is unreasonable.

1 respondent suggested that letting agencies providing on behalf of landlords should offer tenancy agreements and services in Welsh to those who request them.

RSLs

17 RSLs responded to this question specifically; 1 RSL referred to CHC's response and another RSL did not provide a response using the consultation response form.

The majority of RSLs welcomed the proposals as a means of promoting the Welsh language and ensuring it is not treated less favourably than English. Many highlighted opportunities to normalise bilingualism, improve tenant choice, and support Welsh-speaking staff. However, concerns were raised about the financial and resource implications, particularly in areas with low demand or limited Welsh-speaking staff. Several RSLs called for a phased and proportionate implementation, with support from Welsh Government in the form of funding, training, and shared resources.

Housing policy stakeholders

1 responded specifically to this question.

CHC noted that the proposals had the potential to increase the use of Welsh in everyday interactions with RSLs as well as embed bilingual requirements across services to normalise the use of Welsh and support tenant choice. CHC stated that the impact on staff may vary, with Welsh speakers likely to benefit whilst non-Welsh speakers may feel uncertain around how the standards will affect their roles, progression and confidence at work. Recruitment challenges and risks to consistent service delivery were noted, particularly for smaller RSLs. CHC emphasised the need for a phased, proportionate approach, supported by Welsh Government funding and training, to avoid diverting resources from core housing services.

Tai Pawb's response also suggested that there would be positive effects on the Welsh language noting the positive impact of Welsh language services on tenants, staff, and communities. They welcomed the proposed Regulations, recognising their potential to strengthen Welsh speakers' rights, ensure consistency across the sector, and promote cultural identity and inclusion, while also supporting the right to adequate housing and wider equality objectives.

TPAS Cymru considered that there is potential to significantly increase opportunities to use the Welsh language and ensure it is not treated less favourably than English.

Welsh language policy stakeholders

Dyfodol i'r Iaith highlighted opportunities to increase use of Welsh among tenants and improve linguistic data collection. It also suggested that the proposals could help align housing provision with the needs of Welsh-speaking communities, particularly in areas of linguistic significance.

Cymdeithas yr Iaith and the Commissioner also considered that there would likely be positive effects on the Welsh language. The Commissioner is of the opinion that the proposal would increase opportunities to use the Welsh language, and improve the quality and range of Welsh language services that are available, making expectations clearer to the public and the bodies.

Local Authorities

4 LAs provided almost identical responses to this question.

They noted that the proposals are likely to have a positive impact, citing their own experience of implementing standards. They noted that proactive implementation increases public confidence and use of Welsh and that staff training and promotion of bilingual services are key. They stated that everyone who lets housing in Wales should be subject to the standards, regardless of their location.

Other (Unknown)

1 'other' respondent submitted comments expressing scepticism about any positive effects, particularly if they are perceived as being imposed on staff but supported the encouragement to learn Welsh.

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?**

Members of the public

4 members of the public submitted responses to this question.

1 respondent suggested that proposals could be improved by shifting from a regulatory approach to voluntary, community-led initiatives, with incentives and support from Welsh Government. To mitigate negative effects, they suggest that the Government should consider conducting a cost-benefit analysis of these proposals, and ensure that any new requirements are proportionate, flexible, and responsive to the economic realities facing both bodies and the public.

2 respondents did not consider that the proposals could be improved, one calling for the proposals to be scrapped entirely, and another expressing concern about prioritisation and relevance in the current socio-economic context.

1 respondent proposed using 'Cymraeg Clir' (the equivalent of Plain English) and drafting Welsh and English versions simultaneously rather than translating, referencing practices in New Brunswick.

RSLs

16 RSLs responded specifically to this question; 2 RSLs referred to earlier responses; 1 RSL noted that it had no comments; 1 RSL referred to CHC's response and another RSL did not provide a response via the consultation form.

Respondents emphasised the need for free and accessible Welsh language training for staff at all levels, alongside funding support to cover translation, IT, and training costs. There was strong support for sector-wide collaboration, including shared tools and best practices. Flexibility in compliance was seen as essential, with recognition of local demand, workforce capacity, and operating context.

Housing policy stakeholders

1 responded specifically to this question.

CHC echoed many of the points raised by RSLs, including support for phased implementation, training, supportive funding environment, and greater clarification on scope and interpretation of specific standards. CHC noted that it was open to working with Welsh Government and the Commissioner to support members and emphasised that the proposals need to be flexible and proportionate so as to not detract from RSLs' core mission of addressing the housing crisis.

Welsh language policy stakeholders

1 responded specifically to this question.

Dyfodol i'r iaith was supportive, noting that the proposals could positively influence the scoring system for social housing applications in Welsh-speaking communities.

Local Authorities

4 LAs provided comments to this question.

Responses were broadly aligned in content suggesting that staff training and development of Welsh language, bilingual digital platforms and signage, and stronger engagement with Welsh-speaking communities would enhance positive impacts. To mitigate potential challenges, they recommended adequate resources for translation, conducting skills audits, and ensuring a robust complaint procedures. 3 LAs also stressed the importance of consistency stating that standards should also apply to landlords based outside Wales.

Other (Unknown)

No 'other' respondents responded to this question.

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:

Members of the public

3 members of the public submitted comments to this question.

1 respondent wanted to know the cost of the consultation process.

1 respondent suggested that the Welsh Government should prioritise economic and social issues over language regulation.

Another respondent requested clarity on the scope of the standards, particularly regarding RSLs that provide care home, support services, and community and development activities, and asked for confirmation that all aspects of their work will come under the standards.

RSLs

7 RSLs did not respond to this question; 1 RSL referred to CHC's response; 2 RSL responses seemed more relevant to other questions.

RSLs who provided comments generally supported the principle of standards but raised concerns about proportionality, cost, and operational impact. Key issues included the need for phased and flexible implementation, especially in areas with low Welsh language demand, and concerns about staff capacity, training, and the diversion of resources from core services. Respondents also called for clearer compliance frameworks for RSLs operating across multiple local authorities, raised worries about reclassification risks affecting borrowing and investment, and highlighted the importance of recognising community languages to avoid excluding non-Welsh speakers. Several RSLs requested funding and guidance from Welsh Government to support implementation.

Housing stakeholders

3 stakeholder provided comments that were deemed relevant to this question.

TPAS Cymru, Tai Pawb, and CHC expressed support for the standards, highlighting the importance of tenant choice, linguistic equality, and cultural inclusion. They emphasised the need for proportionate, well-supported and phased implementation and recommended government-funded support with free and accessible training, digital development, and practical guidance.

CHC 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. CHC considered that the proposed standards for RSLs may duplicate or conflict with existing person-centred approaches within regulated care settings. CHC suggested that a tailored approach, developed in conversation with the Commissioner, is essential to ensure the standards enhance rather than hinder care delivery.

CHC also stated that a notable proportion of social housing tenants face literacy challenges and emphasised the importance of ensuring information is understandable and accessible. CHC proposed incorporating implied consent or use Census-based data into standards where tenant preferences are unclear, giving RSLs flexibility to keep communications inclusive.

TPAS Cymru stated that there was also an opportunity to align standards with the forthcoming changes to Social Rent Policy.

Welsh language policy stakeholders

Dyfodol i'r laith raised concerns about the lack of consideration for Welsh language ability in housing allocation systems and called for a national discussion to enable change in this area.

Cymdeithas yr Iaith stated that standards should apply to all housing associations providing services to tenants in Wales, regardless of where they are registered. They highlight that excluding English-registered landlords with properties in Wales could create linguistic inequality within Welsh-speaking communities. They called for discussions between the Welsh and UK Governments to enable the application of standards to such landlords.

Cymdeithas yr Iaith also raises concerns about the provision when RSLs are delivering services on behalf of another body, as the standards of that commissioning body would apply instead. They argue this could lead to inconsistencies if the commissioning body has lower or no standards, resulting in unequal Welsh-language services for tenants. They recommend that, in such cases, the RSL's own standards should apply unless the nature of the service is fundamentally different and the commissioning body's standards better protect language rights. They also call for clarity on the meaning of "acting on behalf of," as housing associations often work as agents, contractors, or in partnerships, including with private companies that have no standards at all.

Cymdeithas yr Iaith also considers that there should be specific promotional standards for RSLs.

Local Authorities

3 LAs responded to this question specifically.

Local authorities asked for clarity on how compliance notices would apply to RSLs operating across multiple council areas. They recommended that RSLs adopt structured compliance programmes and that language standards be integrated into broader equality and diversity frameworks.

Other (Unknown)

No 'other' respondents responded to this question.

Welsh Government Response:

Promotion standards are not a category of standards listed against providers of social housing in Schedule 6 to the Measure. Promotion standards can only be made specifically applicable to these bodies with their consent.

The Regulations do not extend to housing units in Wales owned by English housing providers. Latest Welsh Government data that shows that in March 2025 English housing providers owned 209 social housing units in Wales¹, therefore we do not consider that it would be reasonable for them to be subject to standards.

In relation to how standards apply to services provided "on behalf of" the body and those the body provides "on behalf of" another body, the Regulations align with the approach taken in most previous Regulations.

We consider that the risk of reclassification of bodies is very low.

5. Next Steps

An Order and Regulations will be laid before the Senedd and must be approved in a Plenary vote. The Order and Regulations, if they come into force, will not have a direct effect on bodies and they will not, by themselves, create rights for Welsh language users. The Order will add CHC to Schedule 6 to the Measure so that it can be added via the Regulations to the No.2 Regulations. The Welsh Language Standards (No. 10) Regulations 2026 will make standards specifically applicable to RSLs. This will enable the Commissioner to require these bodies to comply with standards. It will be for the Commissioner to choose which standards to impose on bodies by way of a Compliance Notice. The Regulations set the range of standards which could be imposed on a body. A body may have to comply with the standard only in some circumstances and not in others – depending on what is stated in their compliance notice. The Compliance Notice will also set the date by which the body is required to comply with a standard. Welsh Government do not generally provide additional

¹ [Social landlord housing stock and rents: as at 31 March 2025 \[HTML\] | GOV.WALES](#)

funding for bodies to comply with standards. There will be an opportunity for bodies to discuss with the Commissioner which requirements are reasonable and proportionate to impose on individual bodies as part of the process of issuing a Compliance Notice.