

## **Integrated Impact Assessment (IIA)**

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

### **Version Control**

<b>Version</b>	<b>Author</b>	<b>Job title</b>	<b>Date</b>
e.g. Version 1	Rhian Headon	Corporate Policy Officer	

### **1. Details of the initiative**

	<b>Title of the Initiative: Welsh Language Promotion Strategy (WLPS)</b>
<b>1a</b>	<b>Service Area:</b> Corporate
<b>1b</b>	<b>Directorate:</b>
<b>1c</b>	<b>Summary of the initiative:</b>  This second iteration of the WLPS has been developed by a Cabinet Scrutiny Task and Finish Group with advice and support from Menter Iaith Castell-nedd Port Talbot. The strategy has taken into account a number of factors: a review of the current strategy (2018-2023); the advice and support of Menter Iaith Castell-nedd Port Talbot; consideration of content of current and proposed strategies and plans.  The Strategy aims to: <ul style="list-style-type: none"><li>• facilitate an increase in the number of people who speak Welsh in Neath Port Talbot</li><li>• establish the Welsh language as an integral part of people's everyday life in Neath Port Talbot</li></ul>

	<ul style="list-style-type: none"> <li>• facilitate an environment in which the Welsh language thrives</li> </ul> <p>The WLPS is developed under the Welsh Language Standards (No1) Regulations 2015.</p>								
<b>1d</b>	<b>Is this a ‘strategic decision’?</b> Yes								
<b>1e</b>	<p><b>Who will be directly affected by this initiative?</b></p> <table> <tr> <td>Residents of Neath Port Talbot</td><td>Employees of the Council</td></tr> <tr> <td>Schools – pupils and staff</td><td>Visitors to Neath Port Talbot</td></tr> <tr> <td>Third sector organisations</td><td>Elected Members</td></tr> <tr> <td>Businesses</td><td></td></tr> </table>	Residents of Neath Port Talbot	Employees of the Council	Schools – pupils and staff	Visitors to Neath Port Talbot	Third sector organisations	Elected Members	Businesses	
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<b>1f</b>	<p><b>When and how were people consulted?</b></p> <p>Feedback from a range of consultation exercises undertaken during the last two years has helped inform the strategy; including the Let’s Talk engagement, the Welsh in Education Strategic Plan (WESP) and the Public Service Board’s Wellbeing Assessment.</p> <p>The consultation exercises consisted of online questionnaires, hard copies of questionnaires distributed to libraries etc., as well as face to face engagement with local groups and organisations.</p> <p>Further consultation on the draft strategy is to be undertaken during April/May 2023</p>								
<b>1g</b>	<p><b>What were the outcomes of the consultation?</b></p> <p>Feedback from previous consultation exercises helped inform the strategy and identified the language as something that was close to people’s hearts, that it was inextricably linked to the culture and heritage of NPT and the nation, but although something to be proud of, was also a cause of irritation/annoyance as to its use in correspondence, signage and to a degree in education.</p> <p><b>Feedback post April/May 2023 - TBC</b></p>								

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## 2. Evidence

### What evidence was used in assessing the initiative?

#### Census 2011

Language profile of the area - according to the 2011 Census, around 15.3% of the county borough's population speak Welsh 20,698 individuals. Communities such as Gwaun Cae Gurwen, Cwmllynfell and Lower Brynamman are amongst the highest percentage of Welsh speaking areas in Wales.

There has been a significant drop in the number of people speaking Welsh in these, and other areas in the county borough, between the 2001 and 2011 Census. Trebanos and Crynant have seen the largest percentage comparable change, - 20.86% and -33.47% respectively.

#### Census 2021

While comprehensive Census 2021 data has yet to be released initial indications show a significant decrease in the number and percentage of Welsh speakers in Neath Port Talbot since the Census 2011:

Number who can speak Welsh			Percentage who can speak Welsh		
2001	2011	2021	2001	2011	2021
23,404	20,698	18,662	18	15.3	13.5

#### Annual Population Survey

Contrary to Census data the Annual Population Survey has historically and continues to indicate figures far above the Census data:

Neath Port Talbot						
	2011	2018	2019	2020	2021	2022
Total Population	134,400	136,100	137,800	136,400	135,400	137,900

Can speak Welsh	27,200	30,500	34,600	27,900	31,100	31,400
% who can speak Welsh	20.7%	22.4%	25.5%	20.5%	23%	22.8%

### Let's Talk consultation responses (2021)

Responses included many comments on Welsh language, culture and heritage including:

- Love for the 'Welshness' of their community.
- The presence of the Welsh language was a very positive attribute that Welsh speakers appreciate,
- General sense of Welsh culture and heritage.
- Welsh language alongside English is beneficial for their children's learning.

### Pupil Level Annual School Census (PLASC)

While the Census 2021 data indicates the decrease in the percentage of children and young people reporting the ability to speak Welsh, data from our pupil level annual school census (PLASC), more consistent with the annual population survey data, indicates an increase in the numbers enrolled in Welsh medium education.

PLASC - Years N1-11			
	2011	2021	2023 (projected)
No. in Welsh medium schools	2,993	3,321	3,329
No. in NPT schools	20,399	21,149	20,535
% in Welsh medium schools	14.7%	15.7%	16.2%

### 3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	✓			<p>It is anticipated that there will be a positive impact for adults and children and young people with increased opportunities to learn Welsh; opportunities to use Welsh in more social settings and provision of help and support to non-Welsh speaking families whose children are in Welsh medium education.</p> <p>Census 2021 data would suggest that there is a decrease in Welsh speakers particularly among school age children. The strategy aims to help address this in its support of the WESP and by enabling learners and speakers.</p> <p>In supporting the implementation of the WESP 2022-2032 and working with employers, organisations and the community, the strategy will help increase the awareness, knowledge, and Welsh language skills of people of all age groups.</p>
Disability	✓			<p>In supporting the implementation of the WESP and or teaching and non-teaching staff in learning Welsh there is likely to be a positive impact for children and young people in Welsh medium education.</p> <p>However, more generally it is considered there will be a neutral impact on people with this protected characteristic.</p>
Gender reassignment			✓	It is considered that there will be a neutral impact on people with this protected characteristic
Marriage & civil partnership			✓	It is considered that there will be a neutral impact on people with this protected characteristic
Pregnancy and maternity	✓			While the strategy aims to encourage the use of Welsh generally, raising awareness of bilingualism amongst young families is a key element. With increases in numbers

				attending early years provision there is likely to be an ongoing positive impact for people who share this characteristic.
Race	✓			<p>It is anticipated that there will be a positive impact with the aim to raise awareness of the language as a component of the area's heritage and culture. It is possible that pride in the language and identity will be regenerated even if not a Welsh speaker.</p> <p>It is acknowledged that promoting the Welsh language, culture and heritage could generate negative impacts, particularly from those who do not have a Welsh background, are non- Welsh speakers and/or those who perceive the strategy and action plan to be attracting limited resources for the benefit of a 'minority'.</p> <p>Working with our BME communities to better understand real or perceived barriers to learning Welsh will have a positive impact. There is a potential positive impact with increased understanding/take up of Welsh language training/education amongst members from our more diverse communities.</p>
Religion or belief			✓	It is considered that there will be a neutral impact on people with this protected characteristic
Sex			✓	It is considered that there will be a neutral impact on people with this protected characteristic
Sexual orientation			✓	It is considered that there will be a neutral impact on people with this protected characteristic

#### What action will be taken to improve positive or mitigate negative impacts?

Consultation to be undertaken which will help confirm/identify alternative impacts.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	✓			The Strategy is clear in its aims to promote the Welsh language and is likely to help eliminate historic 'discrimination' due to Welsh language services not being fully recognised as equal to English services, etc.
To advance equality of opportunity between different groups	✓			The Strategy is clear in its aims to promote the Welsh language and in so doing it is anticipated that the strategy will increase opportunities for Welsh speakers.
To foster good relations between different groups	✓			The Strategy is designed to benefit everyone, non-Welsh speakers, learners or fluent Welsh speakers. However, it is possible that the strategy could result in some resentment from non-Welsh speakers/supporters, although this should be minimal.

#### What action will be taken to improve positive or mitigate negative impacts?

Publicity of the strategy will be undertaken to raise its profile.  
Articles/press releases/social media publicity etc. will be produced to promote activities etc., when appropriate, throughout the life of the strategy.

#### 4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	There is potential for the strategy to help address socio-economic disadvantage within Neath Port Talbot. Greater opportunities and support to learn and use Welsh will help provide a greater awareness of the language itself while increasing individuals' skill levels. With complementary actions to support the outcomes in the WESP, children and young people and

	<p>their families' improvement in language skills, increased attainment and involvement in the education journey will be maximised. This will help ensure increased opportunities in further education and accessing employment.</p> <p>Greater opportunities to improve/use language skills with activities and events accessible for all skill levels. Participation by all communities in celebrating/learning/using the language will potentially help improve wellbeing and so impact positively on health in the short and in the longer term.</p> <p>Cultural and heritage activities/events will help increase participation by those members of our communities who struggle to do so currently, due to lack of confidence, ability, opportunity or financial constraints.</p>
Negative/Disadvantage	N/A
Neutral	N/A

#### What action will be taken to reduce inequality of outcome

This will be revisited following the consultation period.

### 5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	✓			The strategy aims to promote the Welsh language, culture and heritage and as a result it is anticipated that this would have a positive impact, especially in instilling (greater) pride in the area and Wales as a whole. The various actions would help



				<p>encourage participation and so bring about a new sense of belonging and community spirit.</p> <p>However, there is a danger that the proposal could trigger disharmony and resentment amongst those non Welsh speakers who do not support the aims of the strategy, etc.</p>
Social Exclusion			✓	<p>Little impact on either of these is anticipated however the implementation of the strategy and associated actions could lead to more involvement of those socially excluded due to lack of Welsh language activities/opportunities.</p>
Poverty				

#### What action will be taken to improve positive or mitigate negative impacts?

Ensure that the strategy and actions are as inclusive as possible. Use publicity judiciously to promote Welsh and dispel any potential negative perceptions.

## 6. Welsh

	+	-	+/-	Why will it have this effect?
<p>What effect does the initiative have on:</p> <ul style="list-style-type: none"> <li>people's opportunities to use the Welsh language</li> </ul>	✓			<p>The aims of the strategy and the action plan will help provide more opportunities to use Welsh, more activities and events held in Welsh thereby increasing the number of participants. The strategy will also help ensure that Welsh is a key element in policies/strategies as well as being more visible across the whole of the area.</p> <p>Implementation of the strategy will help all Welsh speakers within Neath Port Talbot regardless of their skills level, their location or community.</p>

- treating the Welsh and English languages equally	✓			By implementing the strategy it is likely that the profile of Welsh language will be raised and become more visible throughout the area. The fulfilment of the strategy will help raise the profile of the language, secure its place and promote its equal status within Neath Port Talbot. Treating both languages equally is a legislative requirement and the strategy and associated actions aim to help establish this.
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### What action will be taken to improve positive or mitigate negative impacts?

Publicity of the strategy and its action plan will be undertaken.  
Articles/press releases/social media publicity etc. will be produced to promote activities/events etc. as and when appropriate.  
Further consideration will be given to this during and following the consultation period.

## 7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			✓	There is no impact on biodiversity as a result of the strategy and potential actions at this time.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			✓	However, as time goes on there may be impacts, Welsh medium school extensions/new builds, etc., and these will be considered as part of the individual project.

### What action will be taken to improve positive or mitigate negative impacts?

No action at this time although this will be kept under review

## 8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead	The strategy is the Council's response to the Welsh Government's commitment to increase the number of Welsh speakers by 2050. This is a long term aim and the strategy is a step on the road to achieve this.
ii. <b>Prevention</b> – preventing problems occurring or getting worse	<p>The strategy and its actions have been developed with the aim to ultimately facilitate an increase in the number of Welsh speakers; increase the use of Welsh and ensure the language has greater visibility in the area.</p> <p>By supporting parents, particularly non-Welsh speakers, throughout the educational journey (preschool to college), providing increased opportunities to learn and use Welsh as well as increasing understanding and knowledge of the culture and heritage, the strategy and actions aim to 'change' attitudes as well as increase the number of Welsh speakers.</p>
iii. <b>Collaboration</b> – working with other services internal or external	<p>It is not in the Council's gift to singlehandedly influence the increase in the number of Welsh speakers nor be in a position to solely promote the language and the strategy has been developed accordingly.</p> <p>A number of council services as well as partners in the voluntary sector will help deliver the aims of the strategy. Menter Iaith Castell-nedd Port Talbot has supported the development of the strategy with the Language Forum also lending its support.</p>

iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population	The strategy and action plan were developed by a cross party elected Member Task and Finish Group with advice and support from officers of the Council and Menter Iaith CnPT. Members were able to use their personal and ward knowledge in developing the strategy.
v. <b>Integration</b> – making connections to maximise contribution to:	Links to other Council initiatives and strategies have been identified and applied wherever possible. In addition to those identified below there are particular links to the WESP and the draft Culture and Heritage Strategy.
<b>Council's well-being objectives</b>	<p>The strategy supports and complements the council's purpose, vision, values as stated in the Corporate Plan:</p> <p>Purpose:</p> <ul style="list-style-type: none"> <li>• To help Neath Port Talbot residents live good lives</li> </ul> <p>Vision:</p> <ul style="list-style-type: none"> <li>• All children get the best start in life</li> <li>• All communities are thriving and sustainable.</li> <li>• Our local environment, culture and heritage can be enjoyed by future generations.</li> <li>• Local people are skilled and access high quality, green jobs.</li> </ul> <p>Values:</p> <ul style="list-style-type: none"> <li>• Connected</li> <li>• Caring</li> <li>• Collaborative</li> <li>• Confident</li> </ul>
<b>Other public bodies objectives</b>	<p>The strategy supports and complements the Public Services Board's Wellbeing Objectives:</p> <ul style="list-style-type: none"> <li>• All children have the best start in life</li> <li>• All our communities will be thriving and sustainable</li> <li>• Our local environment, culture and heritage can be enjoyed by future generations</li> <li>• There are more green, secure and well-paid jobs and skills across the area are improved</li> </ul>

## 9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The Welsh Language Officer Group and Equality and Community Cohesion Group will have a key role in monitoring progress.

Progress will be monitored by Cabinet and scrutinised by the relevant Scrutiny Committee.

The impact of the strategy and progress against actions will be reported in an annual report presented to Cabinet/ Cabinet Scrutiny Committee.

## 10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
<b>Equalities</b>	
<b>Socio Economic Disadvantage</b>	
<b>Community Cohesion/ Social Exclusion/Poverty</b>	
<b>Welsh</b>	
<b>Biodiversity</b>	
<b>Well-being of Future Generations</b>	

## Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised ☐
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions ☐
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities ☐
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified ☐

Please provide details of the overall conclusion reached in relation to the initiative

## 11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Undertake consultation on the draft Welsh Language Promotion Strategy and Action Plan	Corporate Policy, Performance and Engagement Team	12 April - 10 May 2023	Consultation responses received

Publicise the Strategy and Action Plan during the consultation period and beyond	Corporate Policy, Performance and Engagement Team/ Communications & Digital Services	12 April - 10 May 2023 As and when required following adoption of the Strategy and Action Plan	Communication plan developed and actioned Press release issued and other media activities undertaken
Ensure that the Strategy and Action Plan are as inclusive as possible.	Corporate Policy, Performance and Engagement Team / Relevant Service Areas	Following consideration of responses received during the consultation	Strategy and Action Plan revised in light of responses received during the consultation
Articles/press releases/social media publicity etc. to be produced to promote activities	Relevant services / Corporate Policy, Performance and Engagement Team / Communications & Digital Services	When appropriate throughout the life of the Strategy	Articles, etc. are published in a timely manner
Measures to be developed to ensure progress is measured appropriately	Corporate Policy, Performance and Engagement Team / Relevant Service Areas	July 2023	Data is available for and reported in annual reports

## 12. Sign off

	Name	Position	Signature	Date
<b>Completed by</b>				
<b>Signed off by</b>				