

WELSH LANGUAGE IMPACT ASSESSMENT TOOL

This Welsh Language Impact Assessment (WLIS) tool enables RCT Council to consider the principles and requirements of the [Welsh Language Standards \(No.1\) Regulations 2015](#) to ensure compliance with the [Welsh Language \(Wales\) Measure 2011](#).

Stage 1 – Information Gathering

NOTE: As you complete this tool you will be asked for **evidence to support your views**. Please see [Welsh Language Impact Assessment Guidance](#) for more information on data sources.

Proposal Name:	Empty Homes Strategy
Department	Housing Strategy & Investment
Service Director	Derek James
Officer Completing the WLIA	Peter Lewis
Email	Peter.G.lewis@rctcbc.gov.uk
Phone	07745579506
Brief Description	<p>The Empty Homes Strategy 2022-2025 sets out the approach Rhondda Cynon Taf CBC will take to address the issues relating to empty private sector homes as defined in paragraph 2.1 of the Draft Empty Homes Strategy (attached). The strategy was developed to promote the holistic Council approach, which is needed to tackle empty homes and to rejuvenate our communities. The draft strategy replaces the previous Empty Homes Strategy, which run from 2018-2022, and hopes to build further on its achievements.</p> <p>The purpose of the strategy is to develop a strong strategic approach to the problem and the overarching aims of the strategy can be outlines as follows:</p> <ul style="list-style-type: none">• To develop partnerships and vehicles that will enable an increase in the scale of empty properties being brought back into use.

	<ul style="list-style-type: none"> • To maximise the use of current funding options and to identify future funding models to increase the number of empty homes that are brought back into use. • To continue to use a wide range of interventions to ensure that all types of empty homes are targeted and enabled to be brought back into use, and monitor the outcomes related to these closely. • To undertake further research in communities and evaluate existing approaches to understand why there are high numbers of empty properties, and then to identify possible approaches that could prevent homes from becoming empty. • To identify and develop interventions for different market areas and types of housing to further diversify choice for the residents of RCT.
Date	01/09/2022
Please outline who this proposal affects? (Service Users, Employees, Wider Community)	The Strategy will affect Service users, Employees and the Wider Community
What are the aims of the policy, and how do these relate to the Welsh Language?	<p>The Empty Homes Strategy forms a key element in the way that RCTCBC tackles the problem of empty properties within the Borough. Currently, there are 2894 empty private sector homes within RCT and a large number of which have been empty for 4 years or more. Empty homes represents a wasted resource in a time of increased housing need and a missed opportunity to provide much needed affordable housing.</p> <p>The Strategy acknowledges the need for good quality, energy efficient, affordable housing and that new build developments alone will not met this demand. Affordable housing is categorised as housing, which is provided for sale or rent at below open market prices and where there are mechanisms in place to ensure that it is accessible to those who cannot afford market housing. RCT Local Housing Market Assessment indicates that there will be a shortfall of affordable homes, which equates to 263 units of accommodation, per annum for the next 15 years.</p> <p>Contained within the Strategy are five key strategic priorities, which aims to allow the Council to develop a strong strategic approach to the problem. Strategic priority 1-5 aims to develop partnerships and vehicles that will enable an increase in the scale of empty properties brought back into use, whilst developing funding options</p>

	<p>for owners of empty properties and residents of RCT. A multi-agency approach to the problem will ensure that all services involved are working in accordance to Welsh Language Standards.</p> <p>The priorities reflect the need to proactively assist the housing market by focusing on the most problematic empty homes and offering advice, guidance and assistance to enable owners of empty properties to make the right choices. We will achieve this by drawing on best practice and identifying new funding models and opportunities. All literature, advice and guidance available for service users, staff or our partner groups is available and offered via a bilingual service in accordance with the Council's Welsh Language duties. Our newsletter, empty Homes Pack, Houses into Homes application and booklet, together with information and application forms for the Empty Property Grant, are all offered bilingually.</p> <p>Furthermore, the strategy supplements the Local Housing Market Assessment and the Local Development Plan in so much that it assists in the development of new affordable homes. The Local Development Plan includes planning policies and site allocations, which are used to determine planning applications. When determining planning applications, the local planning authority should take into account Technical Advice note 20: Planning and the Welsh Language.</p> <p>It is documented that second homes in Wales and the lack of affordable housing can have a negative impact on the Welsh Language and on Welsh speaking communities, especially with regards to Welsh Medium Education. Through the Welsh Language Community Housing Plan, from 2023 the Welsh Government has given Local Authorities additional powers to increase council tax on second homes and long term empty properties, by up to 300%. If this option was applied them this would assist in helping local Welsh speaking residents access housing in their preferred localities.</p>
<p>Welsh speaking communities, is something what also needs to be considered</p>	<p>Residents who are owners of empty properties, first time buyers and other residents hoping to obtain housing, local builders and building merchants/suppliers, home owners who benefit from Empty Property Grants. The wider community will also profit from the paybacks associated with bringing empty homes back into use. The various options available in RCT for grants and loans to assist homeowners bring empty properties back into use; will also aide residents who speak Welsh to access affordable housing by increasing the net housing supply.</p> <p>The Strategy can therefore benefit everyone because all residents could find themselves living in a street or a community that is blighted by large numbers of empty properties. The strategy should only have a positive impact on any Welsh Language groups as the development of the Strategy and its associated working practices, will all abide by the Council's Welsh Language policy and standards, in particular in exercising the Council's policy on the distribution of grants (Standard 94) Equally, any partner organisations will be expected to operate</p>

in a manner that should reflect the high standards set in Local Authorities vis a vis the Welsh Language Standards.

Current linguistic profile of the geographical area(s) concerned

Every ten years the nation sets aside one day for the Census, a count of all people and households. The Census is a key source of information about the number of people who can speak Welsh. The 2011 Census indicated that of the 225,555 residents living in the County Borough, 12.3% (27,779) were able to speak Welsh. This can be compared to the all-Wales showed of the 2,955,841 residents living in Wales, 19% (562,016) were able to speak Welsh.

The Annual Population Survey for the quarter ending December 2021 reported that 20.9% of respondents living in the County Borough said they could speak Welsh; this is compared to the all-Wales percentage of 29.5% of respondents. This can be further broken down to the data contained in the table below:

Welsh Language Skills of Residents – (%)		
	County Borough of Rhondda Cynon Taf	Wales
Can Read Welsh	18.9%	25.9%
Can Write Welsh	17.7%	23.7%
Can Understand Spoken Welsh	24.5%	33.4%

Other relevant data or research

Empty Homes Strategy 2022-2025, RCT Local Housing Market Assessment 2022.

Stage 2 – Impact Assessment

In this section you need to consider the impact, the evidence and any action you are taking for improvement. This is to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language (Wales) Measure 2011.

Please note there is a separate impact assessment for Equality and Socio-Economic duty that must also be completed for policy proposals.

Remember that effects that are positive for some groups could be detrimental to others - even among Welsh language groups. Consider the effects on different groups. For example, a proposal may be beneficial to Welsh learners, but not to Welsh speakers.

Previous Welsh Language Impact Assessments can be found on Inform by [clicking here.](#)

Will the proposed action affect any or all of the following?

	Does the proposal have any positive, negative or neutral impacts?	Describe why it will have a positive/negative or neutral impact on the Welsh language.	What evidence do you have to support this view?	What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
<p>Opportunities for persons to use the Welsh language</p> <p>e.g. staff, residents and visitors</p> <p>The rights of Welsh speakers and learners to use Welsh when dealing with the council and for staff to use Welsh at Work</p>	<p>Positive</p>	<p>During the pandemic we have embraced new methods of working and new technology in order to, initially sustain our service but subsequently to enhance it. This has afforded us opportunities to promote the Welsh Language as more service users access the Council's website, complete application forms, and obtain information online. All Council websites and key partners' websites have access to all services in the Welsh Language. The Council has responded to service users needs by using new technologies to unlock the ability to support people in new and innovative ways, therefore providing Welsh speakers and</p>	<p>Increase in the number of service users using online tools to access services through the medium of Welsh.</p> <p>Both staff and service users are able to engage digitally and have their service requirements meet through this method.</p> <p>An increase in the supply of good quality, affordable housing which has been developed in accordance with the Council's Local Development Plan. The LDP has been produced in accordance to TAN20 and Planning Policy Wales.</p>	<p>Review how we have embraced technology and provided services that are innovative during the Pandemic and further enhance delivery methods and information in the Welsh Language.</p> <p>Develop digital inclusion skills across services as well as the residents we are supporting. This will be linked into Digital Communities Wales. We will also work with local libraries, community groups, schools and colleges to deliver classes through the medium of Welsh.</p> <p>The Council will establish a healthy development programme for Social Housing Grant by assessing and</p>

		<p>learners with the opportunity to use the Welsh Language.</p> <p>The Empty Homes Strategy aims to ensure that homeowners who have an empty property can access all our services, including funding options and further advice and guidance. This includes ensuring that Welsh speakers and learners, not only have access to, but also are given a pro-active offer to all available information in Welsh.</p> <p>Through collaborative working with our partners, we will provide a holistic, person centred support with effective officer interventions where necessary. This will promote the Welsh Language and allow us access to a larger pool of staff in order to fully utilise their Welsh language skills. Where an individual requests to have a meeting in Welsh, we would adhere to standards 26/26A by utilising Welsh Language resources from our internal staff resources or alternatively arranging for a translator.</p>	<p>New multi agency approaches to the planning and commissioning of services to ensure that the Welsh Language is promoted.</p>	<p>prioritising schemes that are based on their accessibility to local facilities. This will include access to libraries, schools and colleges, which provided services in Welsh.</p> <p>Develop training, updates and briefings to staff and providers to keep abreast of service developments, good practice, innovation and new practices via joint training sessions, Empty Property Operational Group meetings and local, regional and national forums. Some of our partners are already subject to the Welsh Language Standards, for example, Cwm Taf Health Board and 6th form colleges. Equally, because the standards are strongest within RCT, then partner organisations would have to abide by these standards whilst working with us or if in receipt of social housing grants.</p> <p>The empty homes information pack is already available in a bilingual format, but going forward we will ensure that</p>
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Stage 2 – Impact Assessment

Will the proposed action affect any or all of the following?

	Does the proposal have any positive, negative or neutral impacts?	Describe why it will have a positive/negative or neutral impact on the Welsh language.	What evidence do you have to support this view?	What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
Numbers and / or percentages of Welsh	Positive	The Welsh Government’s prime objective is to see the number of	In line with the Council’s Welsh Language Promotional Strategy	RCTCBC will ensure its key partners will provide and

<p>speakers e.g Welsh Medium Education / Study Opportunities. Links with the Welsh Government's Cymraeg 2050 Strategy / RCTCBC Five Year Welsh Language Strategy</p>		<p>people able to enjoy speaking and using the Welsh Language, reach a million by the year 2050. RCTCBC hopes to contribute and encourage this ambition by providing the conditions to facilitate an increase in the use of the Welsh Language in line with our 5 year Welsh Language Strategy.</p> <p>This Strategy supports these goals, by ensuring, wherever possible, that Welsh speakers have access to warm, safe and affordable housing in a location that affords them the opportunities to continue to use or learn the Welsh language. For example, our Housing allocation scheme, which supplements this strategy, gives priority to applicants who need to move to be nearer a child's school. (Where the need to move to a school has been recommended by the Director of Education).</p> <p>All properties available for let are advertised via the Council's Choice Based Lettings scheme, which enables applicants to bid on properties which meets they needs. This means that</p>	<p>and our Welsh Language Standards, this strategy will ensure bilingual text (Welsh first) on all Council documentation.</p> <p>Increase in the number of staff and service users accessing Welsh language courses. RCTCBC will encourage staff and partners to enable staff to have access to Welsh Language courses and we will monitor this to ensure its effectiveness.</p>	<p>promote information through the medium of Welsh.</p> <p>RCTCBC will review the number of new housing developments, which are near Welsh Medium schools and will work with colleagues in Education who are leading on the Welsh in Education Strategic Plan.</p> <p>RCTCBC will work with our Registered Social Landlord partners to ensure that when property adverts provide details of local facilities and schools that they promote Welsh Medium schools first.</p> <p>Promote Welsh language courses to staff and service users; particularly promote free Welsh lessons for 16 – 25 year olds, which will be provided by Welsh Government.</p> <p>Work with the Welsh Language team to develop briefing notes to inform staff of the Welsh Language services that they need to offer customer/clients.</p>
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		<p>applicants are able to research the area and ensure that nearby schools offer Welsh language education.</p> <p>Developing the skills of staff and service users will help to increase the numbers of Welsh speakers by ensuring training is offered in Welsh and by ensuring Welsh language, courses are promoted.</p> <p>There is also a wider issue to consider when examining issues of affordability and access to housing. By restoring empty homes into use and therefore increasing the access of housing to local residents, this in turn would have a positive impact in terms of retaining Welsh speakers in their communities.</p>		
<p>Opportunities to promote the Welsh language e.g. status, use of Welsh language services, use of Welsh in everyday life in work and in the community</p> <p>Actively encourage and promote the use of our services in Welsh to see an increase in demand over time</p>	Positive	<p>All promotional material to access funding options for empty homes loans and grants and all promotional material relating to the advice and assistance offered to help owners bring their properties back into use, will be bilingual. An active offer will be made to clients to use these services in Welsh and to receive Welsh language materials.</p>	<p>Increase in empty homes brought back into use by encouraging and developing bilingual information and promotional material and information and advice around empty properties.</p>	<p>Ensuring that all material is bilingual with both Welsh and English published in line with the Welsh Language Standards.</p>

Stage 2 – Impact Assessment

Will the proposed action affect any or all of the following?

	Does the proposal have any positive, negative or neutral impacts?	Describe why it will have a positive/negative or neutral impact on the Welsh language.	What evidence do you have to support this view?	What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
<p>Compliance with the Council's Statutory Welsh Language Standards e.g increasing or reducing the Council's ability to deliver services through the Medium of Welsh.</p> <p>Consider the rights of Welsh speakers to use Welsh when dealing with the Council and for staff to use Welsh at Work</p>	<p>Positive</p>	<p>The development of this strategy will increase the Council's ability to deliver services through the medium of Welsh by:</p> <p>Considering the rights of Welsh speakers to use Welsh language when dealing with the Council and for staff members who wish to use Welsh at work. The development of bilingual services will allow staff members to utilise the Welsh language at work.</p> <p>The Council will procure services in line with the requirements of the Welsh Language Standards, specifically Standards 76-80 which will allow suppliers to tender for a contract in Welsh if</p>	<p>Increase in services through the medium of Welsh will be evidenced by the increase in the digitalisation of the service, which will be accessible bilingually.</p> <p>Increase in the number of service users accessing grants and loans for empty properties in Welsh. The Strategy will be made available to the public in Welsh.</p> <p>The Council has already developed a Contract Strategy Document that includes a section on the Welsh Language Standards that officers must complete before inviting supplier to tender for a contract. Officers are required to list all the relevant standards in this section to ensure</p>	<p>Ensure that all services relevant to this Strategy are promoted bilingually with Welsh first.</p> <p>Actively promote both Council services and services offered by key partners that are available in Welsh.</p> <p>There are currently active discussions taking place around how the empty property grant will be offered in the future, taking account of the requirements of standard 94 (and 70-75) and how this may be affected if RCT are to offer the grant on behalf of all Welsh Local Authorities.</p>

		<p>that is their wish. Additionally all relevant standards will be listed in the Invitation to Tender document so that our suppliers - when acting on our behalf or providing a service on our behalf - comply with our statutory responsibilities. Standard 94 requires the Council to publish a policy on awarding grants – all grants the Council awards must consider how the proposed use will influence the Welsh language. This will ensure that any identified negative or neutral impacts are mitigated, therefore having positive outcomes for the language.</p> <p>Back-office services, such as complaints handling and , any correspondence, publicity, websites and phone services – where these are procured or provided directly by the Council will be available in Welsh in line with the Welsh Language Standards</p>	that suppliers are made aware of the Welsh language requirements of the contract.	
Treating the Welsh language, no less favourably than the English language	Positive	See above for detail	See above for detail	See above for detail

<u>Stage 3 - Strengthening the proposal</u>				
Having listed actions in section 2 which may mitigate any negative impacts or better contribute to positive impacts – please record below which ones you will imbed into the policy proposal and who will be responsible for them.				
Also consider is the proposal necessary? Would it be possible to meet demand without any new developments? Could other existing provision be used? Where should the development be?				
What are you going to do?		When are you going to do it?	Who is responsible?	
Review the services we currently provide with particular emphasis on how we have embraced technology and provided services differently during the COVID-19 pandemic. We will further enhance best practice by ensuring that we deliver information in the Welsh language.		TBC	Housing Strategy Officers Housing Grants Officers Environmental Health Officers Members of Empty Property Operational Group	
Develop digital inclusion skills across services as well as for the residents we are supporting; this will be linked into Digital Communities Wales. We will work with local libraries, community groups, schools and colleges to deliver classes through the medium of the Welsh language.		TBC	TBC	
The Council will establish a vibrant development programme for Social Housing Grant by accessing and prioritising schemes based on their accessibility to local facilities. This will, include access to libraries, schools, and colleges (and other facilities) which provide Welsh language services.		Ongoing	RCT CBC Housing Strategy	
Develop training, updates and briefings for staff and providers to keep abreast of any service developments, good practice, innovation and new ventures via joint training sessions, Empty Property Operational Group meetings and local, regional and national forums.		Ongoing	RCT Empty Property Operational Group	
		Ongoing		

RCTCBC will ensure its key partners provide and promote information through the medium of Welsh.		RCT Empty Property Operational Group
RCTCBC will review the number of new housing developments which are near a Welsh Medium School	Ongoing	RCTCBC Housing Strategy & Investment Team
Promote Welsh language courses to staff and service users, particularly free Welsh lessons for 16-25 year olds provided by the Welsh Government.	Ongoing	RCTCBC Housing Strategy & Investment Team
Ensure that all material relating to empty homes loans, grants and advice or support are bilingual with the Welsh promoted before the English.	Ongoing	RCTCBC Housing Strategy & Investment Team
Ensure that all services relating to empty homes, including promotional literature, newsletters, application forms and information leaflets are promoted bilingually with Welsh first	Ongoing	RCTCBC Housing Strategy & Investment Team
Actively promote both Council services and services offered by key partners that are available in Welsh		RCTCBC Housing Strategy & Investment Team

If ways of reducing the impact have been identified but are not possible to implement, please explain why. Give sufficient detail of data or research that has led to your reasoning.

What was identified?	Why is it not possible?
Offering all services in accordance with the Welsh language standards	Not all of the Council's partners are required to comply with the Welsh language standards; however, we will encourage our partners who aren't subject to the standards to promote the Welsh language whenever practical to do so.
Offering housing that is in a location that affords people the opportunity to continue to use or learn Welsh.	Housing is a limited resource and there is not enough affordable housing to satisfy the needs to every applicant on our waiting lists or aspiring to buy or rent. For example, if affordable housing was not available near a

Welsh language school, then the Council would have difficulty affording people the opportunity to continue to use/learn Welsh. However, we will work with registered Social Landlords and our other partners, to ensure that when a property is available to let, then the advert includes information on the location of the nearest Welsh medium school and it is placed before information on English language schools. The home to school transport requirements are enhanced further within RCT, and Educational services assist all pupils to attend the school of their choice in their catchment area. RCTCBC go over and above the requirements of the school transport policy by helping to ensure that all pupils can attend the school of their choice in their catchment area, whether they choose a Welsh or English school.

Stage 4 – Review

For all policy proposals, whether it is a Significant Key Decision or not, you are required to forward this assessment to Welsh Language services – welshlanguageofficer@rctcbc.gov.uk and the Consultation and Engagement team – consultation@rctcbc.gov.uk in the first instance for some initial guidance and feedback.

As part of the Welsh Language, Equalities and Socio Economic Duty Impact Assessment Process all proposals that fall within the definition of Significant Key Decision should present at the Officer Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your report is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Strategic Decision please forward your completed (Stage 1>6) impact assessment, policy proposal/report and consultation report to CouncilBusiness@rctcbc.gov.uk for an Officer Review Panel to be organised to discuss your proposal. [See our guidance document](#) for more information on what a Significant Key Decision is.

It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable Welsh language considerations wherever possible. Please ensure you update the relevant sections below in collaboration with the relevant departments.

Welsh Language Services Comments	Date Considered	Brief description of any amendments made following Welsh Language Services feedback
<ol style="list-style-type: none">1. This Welsh language impact assessment carefully considers the various ways in which the Empty Homes Strategy will have an impact upon the Welsh language and the opportunities to use and promote in in RCTCBC. There is a clear understanding here of the relevant Welsh language standards, and the relationship between housing and ensuring a thriving Welsh-speaking community, and necessary actions are clearly set out. Welsh Language Services would encourage you to consider the following to further strengthen the assessment:2. Note that discussions have already taken place with staff in relation to the Empty Homes Grant to ensure these are administered in line with the standards.		

<p>3. Emphasise where there are opportunities for us to make and active offer of services/materials in Welsh, with the aim of maximising the use of the language amongst speakers and more confident/experiences learners.</p> <p>4. Acknowledge the link between housing and Welsh as a community language – perhaps this is not so pressing an issue in RCT but it would be good to note that there are wider concerns regarding this that we can help address even on a small scale.</p>		
Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
	23/09/2022	<p>Greater stress given on the positive outcomes achieved by bringing properties back into use and helping to ensure that Welsh speakers stay within the communities of their choice.</p> <p>Stage 3 – Relevant officers identified with specific responsibility for making sure that Welsh Language requirements and policies are not only adhered to but actively so.</p> <p>Emphasise the importance that any offer of help is given on a proactive basis for Welsh speakers/learners.</p>
Consultation Comments	Date Considered	Brief description of any amendments made following consultation

Stage 5 – Monitoring, Evaluating and Reviewing

How and who will you monitor the impact and effectiveness of the proposal?

The adoption of the Empty Homes Strategy will be supplemented by the Action Plan, which has been in place since 2018 at the implementation of the previous strategy. The Council will monitor, steer and review the progress of the Strategy via the Empty Property Operational Group, which meets every quarter or when necessary. Monitoring and outcomes in line with the action plan will be a standing item at these meetings.

Whilst a formal review of the Strategy will take place every two years as a minimum, the actions identified in this impact assessment will be reviewed more frequently because many of the actions outlined are ongoing.

A key commitment of the Empty Property Operational Group will be to improve the information that is collected across all strands of investment, using empty property loans and grants to support those who are looking to bring their properties back into use.

Stage 6 – Summary of Impacts for the Proposal

Provide below a summary of the impact assessment, to include some of the main positive and negative impacts along with an overview of actions taken since the impact assessment to better contribute to more positive impacts. This summary must be included in the Welsh Language Considerations section of the SLT/Cabinet report template. It is not suitable to only write 'please see full report at Appendix x' in the body of the report. The impact assessment must be published alongside the report.

A Welsh Language Impact Assessment has been completed and the main findings are as follows –

The Empty Homes Strategy and its aims and objectives will have a positive effect on the Welsh language, Welsh speakers and Welsh learners, and any plans or developments that stem from the Strategy will fully comply with the Welsh Language Measures and the Welsh Language Standards.

The vision for the Strategy is to enable owners of empty properties to bring them back into use for the benefit of residents of RCT and those who wish to live here; this will enable people to have access to good quality housing and to be able to stay within their local communities. This vision is facilitated by offering grants, loans, advice and guidance and where necessary enforcement action. We aim to provide high quality

support to people whether they aim to rent or sell their empty property and we further aim to utilise all available technology, ensuring effective delivery of our service and providing person centred support.

All of the Strategies aims will promote the service through the medium of the Welsh language and we will ensure that all information is produced bilingually and is accessible in Welsh. When offering our services vis a vis empty properties, we ensure that all specialist needs are taken into account, including how the service user requests to engage with us. We will further focus on training and developing the Welsh language skills of our staff by encouraging them to take up Welsh language courses or to utilise their existing skills.

Stage 7 – Sign Off			
Name of Officer completing the WLIA	Peter Lewis	Service Director Name:	Derek James
Position	Housing Strategy Officer	I recommend that the proposal: (Highlight decision)	Is implemented with no amendments
			Is implemented taking into account the mitigating actions outlined
			Is rejected due to disproportionate negative impacts on the Welsh language
Signature		Service Director Signature	
Date		Date	