

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:	Continuation of free breakfast club provision in primary and special schools, with the introduction of a charge for the additional childcare element.
Department	Education & Inclusion Services
Service Director	Andrea Richards
Officer Completing the WLIA	Lisa Kidner
Email	Lisa.J.Kidner@rctcbc.gov.uk
Phone	07795 391750
Brief Description	<p>The Council is facing significant financial challenges into the medium term and is considering a range of options to contribute to addressing the shortfall in funding.</p> <p>The proposal is to initiate a consultation for the consideration of the introduction of termly charges for the childcare element of free breakfasts clubs in RCT from the start of the new financial year in April 2024. Consideration is to be given to four charging options per term, ranging from £50-£80. A full community consultation with service users and key stakeholders will be undertaken to furnish Cabinet with the outcome, for Members to best consider if charges should be introduced and if consideration should be given to any categories of exemption/concession (i.e. to pupils eligible for free school meals) or a cap applied to parents/carers with multiple children making use of the provision.</p>

	In the main, the Welsh language is not going to be treated less favourably than the English language as the proposals apply to all sectors. However, learners transported to schools may potentially be disadvantaged due to the tight timescales associated with the childcare element. In order to mitigate these risks, it is proposed that some flexibility in relation to accessing the additional childcare element is provided for those learners arriving by school transport. A charge will however apply for these non-eFSM learners for childcare irrespective of the arrival time prior to the commencement of free breakfast club provision.
Date	10 th November 2023 (Updated 18.01.24 following completion of the public consultation)
Please outline who this proposal affects? (Service Users, Employees, Wider Community)	The proposal will affect pupils, parents/carers, employees and the wider community.

<p>What are the aims of the policy, and how do these relate to the Welsh Language?</p>	<p>The aim of the policy is to consider the introduction of termly charges for the additional childcare element of free breakfast clubs in RCT. The Consultation will be undertaken in both Welsh and English, and the proposed changes apply to both English and Welsh medium settings.</p>
<p>Who will benefit / Could the policy affect Welsh language groups? If so, list them here.</p>	<p>The proposals will ensure continuity of service and as a consequence Welsh language groups such as pupils, parents/carers, employees, and the wider community will continue to be able to deal with the Council in the Welsh language, and access provision in Welsh medium settings, if they choose to do so.</p> <p>The Welsh in Education Strategic Plan is focused on developing a wide range of actions to promote access and growth in the Welsh language and provision, and access to childcare in Welsh medium settings will be potentially beneficial, whilst recognising that there will be some cost implications. However, the costed element of the additional childcare could be a barrier to some families, and children may lose out on opportunities to interact with others in Welsh as a consequence of this. A drop off in numbers accessing the additional childcare element, and potentially free breakfast clubs, may also potentially adversely impact on staffing. However, the need for Welsh medium staff in the County Borough remains high, with many available employment opportunities within the Welsh medium education sector.</p> <p>Nevertheless, access to free breakfast clubs will remain in place in all Welsh medium primary school settings.</p>
<p>Current linguistic profile of the geographical area(s) concerned</p>	<p>The 2021 Census figures regarding the Welsh language show a decrease in the percentage of Welsh speakers across Wales to 17.8%. There was, however, a small increase in RCT, where the percentage of the population in the county borough, who can speak Welsh, increasing from 12.3% to 12.4%. Numerically, RCT saw a 2.8% increase in the number of Welsh speakers in the county borough, from 27,779 speakers to 28,556 speakers. RCT was also one of only four Local Authorities in Wales to see an increase in the percentage of Welsh speakers. Others Local Authorities included Cardiff, the Vale of Glamorgan and Merthyr Tydfil. All of these are neighbouring county boroughs, which could demonstrate that our region is seeing some positive trends in terms of increases in the numbers of Welsh speakers, and that there may be a resulting increase in demand for services through the medium of Welsh. As further, more detailed, data from the Census becomes available for RCT (e.g., LSOA data), we will need to consider what impact this may potentially have on the services we provide.</p>

The Annual Population Survey collects information about respondents' Welsh speaking ability and includes a question on how often people speak Welsh. It is updated quarterly, so is a more up-to-date source than the Census. The most recent Annual Population Survey, for the quarter ending June 2023, reported that 20.2% of respondents living in the County Borough of Rhondda Cynon Taf said they could speak Welsh, compared to the All-Wales figure of 29.7% of respondents. This can be further broken down into the data contained in the table below:-

Welsh Language Skills of Residents – (%)		
	County Borough of Rhondda Cynon Taf	Wales
Can Read Welsh	18.89%	26%
Can Write Welsh	17.2%	23.9%
Can Understand Spoken Welsh	23.0%	33.5%

The data demonstrates that in each Welsh language skill area, the 'all Wales' percentages are notably higher than the County Borough percentages. However, the current data shows a significant increase in the number of residents that can read, write, and understand spoken Welsh since the last Census in 2011.

When asked about their frequency of speaking Welsh, the table below provides a breakdown of responses of respondents living in the County Borough of Rhondda Cynon Taf compared to the all Wales responses.

Frequency of Speaking Welsh by Residents – (%)		
	County Borough of Rhondda Cynon Taf	Wales
Speak Welsh Daily	7.4%	15.0%
Speak Welsh Weekly	5.1%	5.8%
Use it Less Often	5.2%	7.4%

The data demonstrates that the percentage of respondents that speak Welsh daily is far lower for the County Borough than the all Wales percentage.

Other relevant data or research

N/A

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 by [clicking here](#).

[Please note: the original Welsh Language Impact Assessment has been updated following completion of the public consultation.](#)

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>	Negative	If Cabinet approve the proposal to introduce charges for the additional childcare element of breakfast clubs, and learners access this provision, then this will potentially have a negative impact on pupils, parents/carers, staff and the wider community's	Pupils who attend breakfast clubs, parents/carers, employees and the wider community are currently able to deal with the Council through the medium of Welsh, if they choose, and our website and correspondence is fully	Stakeholders will be able to use the Welsh language when they are given the opportunity to express their views on the proposal during the consultation process. The full consultation process will comply with the requirements of The Welsh

		<p>ability to use the Welsh language.</p> <p>The above Groups will continue to have opportunities to use the Welsh Language and have dialogue with the Council through this medium if they choose as there will be continuity of service. Catering Services will also continue to promote the use and development of the Welsh Language in its operation.</p> <p>However, as some families that are not eFSM many may not be able to afford to pay for the additional childcare aspect there is a possible risk that there might be a reduction in the numbers of learners accessing this and the breakfast club provision. If this is the case, then there will potentially be reduced opportunities for some learners to use the Welsh language prior to the start of the school day.</p>	<p>compliant with the relevant Welsh Language Standards. Phone greetings are also bilingual and service users are encouraged to communicate with the provision in Welsh.</p> <p>Staff are actively encouraged to greet pupils and parents/carers in Welsh and use the Welsh Language in work.</p> <p>All new starters must complete Level 1 Welsh, if they are not already a Welsh speaker, and there are opportunities to learn Welsh in the Council. Staff who have completed Level 1 are actively encouraged to move onto Level 2 and to progress through the levels.</p> <p>33% of respondents to the public consultation thought that the proposal would have no impact on opportunities to use and promote the Welsh Language. Whilst 33% felt that the proposal would have a negative impact, 28% did not know and 6% felt it would impact positively.</p>	<p>Language Standards (No.1) Regulations 2015 Breakfast club staff will be encouraged to access Welsh lessons as part of our strategic actions as detailed in Outcome 7 of the new Welsh in Education Strategic Plan.</p> <p>A proactive marketing campaign will be undertaken to encourage engagement in both childcare and breakfast club provision.</p> <p>The Council acknowledges that a number of pupils attending Welsh medium primary and special schools do not access the breakfast club provision, as they travel on home to school transport, so they do not arrive in time. However, if a child requests a breakfast, as part of the</p>
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			<p>A comment from one respondent stated 'most childcare providers do not provide care through the medium of Welsh for school age children. Charging for childcare during breakfast club will make that less accessible for low-income families in deprived areas who have chosen to send their children to a Welsh medium school'.</p> <p>Considering the consultation feedback, the impact of the proposal has been changed from neutral to negative.</p>	<p>legislation, a breakfast will be accommodated.</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?
<p>Numbers and / or percentages of Welsh 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>Neutral</p>	<p>The proposal would have a neutral impact on the numbers and/or percentages of Welsh speakers with pupils, parents/carers, employees, and the wider community.</p> <p>Breakfast clubs will continue to actively promote and use the Welsh Language in line with statutory standards.</p> <p>Staff are actively encouraged to learn Welsh and speak Welsh in work by accessing the Councils free Welsh Courses.</p>	<p>Staff are encouraged to learn and speak Welsh and are provided with staff updates from the Translation unit on training opportunities.</p> <p>All new starters must complete a Level 1 Welsh course if they are not already a Welsh speaker, and there are opportunities to learn Welsh in the Council. Staff who have completed Level 1 are actively encouraged to move on to Level 2 and to progress through the levels.</p> <p>Breakfast clubs have a number of staff, who are Welsh speakers to varying degrees of fluency, who can assist with pupil, parent/carers, staff enquiries.</p>	<p>Catering Services are working with the Translation Unit to develop a tailored Level 1 Welsh course for breakfast club staff. They will be able to learn Welsh words and phrases that would be specific to their role.</p> <p>Catering Services will identify the number of staff and pupils who can speak Welsh and categorise their proficiency so that</p>

			The Service is currently unaware of the number of pupils, parents/carers who are Welsh speakers.	monitoring can be undertaken.
<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>	Negative	<p>The proposal would potentially have a negative impact on the opportunities to promote the Welsh language with pupils, parents/carers, employees and the wider community.</p> <p>Breakfast clubs are already promoted through the medium of Welsh on the Council's website and the continuation of the service, will allow opportunities to further encourage and promote the Welsh language.</p> <p>All communication is bi-lingual. Enquiries in Welsh are responded to in Welsh and language choice will be recorded for future reference. All consultation is undertaken bi-lingually.</p>	<p>Pupils and parents/carers have daily contact with breakfast club staff in person where the Welsh language can be promoted as all staff have to undertake Level 1 training. Staff are provided with opportunities to learn Welsh by accessing the Councils free Welsh Courses.</p> <p>33% of respondents to the public consultation thought that the proposal would have no impact on opportunities to use and promote the Welsh Language. Whilst 33% felt that the proposal would have a negative impact, 28% did not know and 6% felt it would impact positively.</p> <p>A comment from one respondent stated, 'pupils have a chance to engage with pupils of all ages in smaller groups, as well as staff members, promoting the use of the Welsh Language and confidence'.</p>	<p>Pupils and parents/carers will continue to receive a service from the Council so the Welsh language will continue to be promoted and all correspondence will be bi-lingual.</p> <p>The Council acknowledges that a number of pupils attending Welsh medium primary and special schools do not access the breakfast club provision, as they travel on home to school transport, so they do not arrive in time. However, if a child requests a breakfast, as part of the legislation, a breakfast will be accommodated.</p>

			Considering the consultation feedback, the impact of the proposal has been changed from neutral to negative.	
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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?
<p>Compliance with the <u>Council's Statutory Welsh Language Standards</u> 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>Neutral</p>	<p>The proposal will have a neutral impact on compliance with the Council's Statutory Welsh Language Standards as the proposal is not reducing the Council's ability to deliver service through the medium of Welsh. The review will provide an opportunity to strengthen the standards.</p> <p>All digital and offline communications are bi-lingual. All consultation with pupils and parents/carers is undertaken bi-lingually.</p> <p>We have a good working relationship with the Translation Unit, ensuring that all our documentation, letters, online</p>	<p>The consultation process will be undertaken in accordance with the requirements of the Welsh Language (Wales) Measure 2011, as will all correspondence with pupils and parents/carers.</p> <p>Staff will be enrolled on a proposed bespoke Level 1 Welsh course with the aim of further development.</p>	

		material is compliant with the Welsh standards.		
Treating the Welsh language, no less favourably than the English language	Negative	<p>We will continue to monitor and improve systems in place to ensure that the Welsh language is treated no less favourably than the English language.</p> <p>All consultation documents and correspondence will be produced in both Welsh and English and in accordance with the Welsh Language (Wales) Measure 2011.</p> <p>All digital and offline communications are bi-lingual and any enquires/complaints in Welsh will be replied to in Welsh.</p> <p>Staff are encouraged to learn Welsh and speak Welsh in work. All new starters must complete Level 1 Welsh, if they are not already a Welsh speaker.</p>	<p>All website content, correspondence with pupils and parents/carers, signage, greetings etc are bi-lingual.</p> <p>55% of respondents to the public consultation said that the proposal does not treat the Welsh Language less favourably than the English Language. Whilst 34% did not know and 10% felt that it did.</p> <p>Considering the consultation feedback, the impact of the proposal has been changed from neutral to negative.</p>	<p>The Council will continue to recruit Welsh Language speakers and support staff to undertaken additional training.</p>

Stage 3 - Strengthening the proposal

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?
We will require staff to complete the tailored Level 1 Welsh course and continue to actively encourage staff to complete the Council's free Welsh Courses.	On-going	Training Team, Catering Services
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?	
Some respondents to the consultation requested if payment for the termly charge for the childcare element could be made daily or weekly or if they could just pay on the day(s) they access the provision.	Accepting daily/weekly payments would create a substantial administrative burden on the Council and would also create problems forecasting appropriate staffing levels. Other issues include constraints of the digital administrative system, safeguarding/Health & Safety considerations, pupil's dietary requirements.	
N/A	N/A	

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
<p>Welsh Language Services welcome the points made in regard to this proposal. On the surface, the proposal is considered to have a neutral/positive effect on the Welsh Language as there will be a continuation of the service and, therefore, compliance will more than likely stay the same.</p> <p>As we consider the change in how the service is administered in more detail, however, there are some negative effects that need to be considered and mitigated where possible.</p> <p>First of all, the extra charges may cause the parents of non eFSM children to be more reluctant to send their children to breakfast club. Indirectly, therefore, opportunities for</p>	03.11.23	Comments received have been considered and included where appropriate.

<p>pupils to use the Welsh Language could potentially be reduced if they do not attend the clubs. Furthermore, if there is a reduction in attendance numbers, the number of staff required could also be impacted. Here, we need to ensure that Welsh Language skills are not lost from the Service.</p> <p>Another aspect that requires consideration in terms of mitigation is the issue of transport to Welsh Medium (WM) schools compared English Medium (EM) settings. Given that there are specific times included within the proposal and that WM settings require transport in terms of distance and time, this could potentially act as a barrier for some parents. We must ensure that the Welsh Language is not affected disproportionately if this were to be the case and, mitigations should be implemented in event of this occurring.</p> <p>Other comments made are relatively minor but together could really strengthen proposal further if applied.</p>		
Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
Consultation Comments	Date Considered	Brief description of any amendments made following consultation
<p>The consultation was conducted in-house and ran from the 27th November 2023 and ended on the 8th January 2024.</p>	<p>16.01.24</p>	<p>To decrease any negative effects of the proposal, all schools settings will continue to encourage the use of the Welsh Language and develop language skills through play and activities to increase pupils' familiarity with language patterns in Welsh.</p>

An email was sent to all schools who could be potentially impacted by the proposal to Headteachers, Chair of Governors and Breakfast Club Staff members, to be forwarded on to all parents and carers. An email was also sent to key stakeholders to promote the consultation and encourage participation in the online survey.

Respondents were also given the option to write in using a dedicated email address consultation@rctcbc.gov.uk, and a telephone option was also in place through the Council's contact centre.

The Council held 3 public engagement events, where officers were on hand to answer any questions on the proposal and encourage or assist people to take part in the survey.

The majority of respondents were service users, pupils, parents or carers (80.3%).

Respondents who stated that they were service users were asked how often they used the breakfast club provision. The majority said that on average they used the provision 5 times a week (54%).

Service users were also asked why they used the breakfast club provision, with the majority stating that they use it for the free healthy breakfast and free childcare (53%).

Of the 20% (218) who stated other uses for the breakfast club provision, responses can be grouped under the following;

- Work related reasons and commitments.
- The benefits of social interaction
- The help they provide to working Single Parents
- Managing multiple school attendance

The majority of respondents (73%) **disagreed** with the proposal to introduce a charge for the additional childcare element of breakfast club.

The 18.9% of respondents who agreed with the introduction of a charge were asked if they agreed with the charge being set at £1 per day (rounded down to £60 per term) and implemented from April 2024. 82% of those who agreed with the proposal agreed with a charge of £1 per day.

In addition, those who agreed with the overall proposal were asked what level of termly fee they would be willing to pay for the additional childcare element of breakfast club? 36% of respondents suggested a termly fee of £60, with 30% stating they would be willing to pay £50.

The majority of respondents (57%) agreed that there should be a cap on any charge for parents/carers.

52% of respondents said that they would continue to use the free breakfast club provision, if charging is introduced and they decided not to make use of the additional childcare element of the provision, with 22% stating they wouldn't and 26% stating they do not know what they would do.

The respondents were asked how the proposal would impact them or their families. A number of themes were identified, as follows;

- **Financial Strain:** Many parents express concerns about the additional financial burden, especially during a cost-of-living crisis.
- **Impact on Working Parents:** The proposed charge is seen as affecting working parents who rely on the breakfast club for childcare, allowing them to maintain full-time employment.
- **General Disagreement with Charge:** Several individuals express strong disagreement with the introduction of charges, emphasising the initial purpose of the breakfast club and its role in supporting families.
- **Concerns about Implementation:** Some express concerns about the practicalities of payment, potential refunds, and the impact on children if payments are missed.
- **Mixed Opinions on Service Use:** Opinions vary on whether the breakfast club is primarily used for childcare or for providing a nutritious start to the day.

A number of comments were received in relation to the potential impacts of the proposal on protected characteristics of residents, particularly for people with disabilities and the impact on women.

The majority of the respondents (55%) said that the proposal does not treat the Welsh Language less favourably than the English Language.

Overall, 1351 responses were received to the consultation survey and 10 emails were received.

Respondents were asked how they felt the proposal would impact on opportunities for pupils and staff to use and promote the Welsh Language. 33% of respondents thought that the proposal would have no impact on opportunities to promote the Welsh Language, with 33% feeling that the proposal would have a negative impact. 28% did not know and 6% thought it would have a positive impact.

Respondents were asked if the proposal, in any way, treats the Welsh Language any less favourably than the English Language. The majority of respondents (55%) said that the proposal does not treat the Welsh Language less favourably than the English Language, with 34% feeling they did not know and 10% thought that it did.

Stage 5 – Monitoring, Evaluating and Reviewing

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


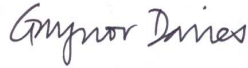
A further report summarising the outcome of the consultation will be presented to Cabinet on 24th January 2024.

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 -

Welsh language groups such as pupils, parents/carers, employees and the wider community will continue to be able to deal with the Council in the Welsh language, if they choose to do so, as there will be continuity of service. There are some neutral/negative Welsh Language implications associated with the proposal.

Stage 7 – Sign Off			
Name of Officer completing the WLIA	Lisa Kidner	Director Name:	Gaynor Davies
Position	Service Manager, Catering Services	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		Director Signature	
Date	09.11.23 (updated 18.01.24)	Date	09.11.23 (updated 18.01.24)