

Agenda – Children, Young People and Education Committee

Meeting Venue:

Hybrid – Committee room 2 Senedd
and video conference via Zoom

Meeting date: 26 September 2024

Meeting time: 09.15

For further information contact:

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Hybrid

Private pre-meeting

(09.10 – 09.15)

Public meeting

(09.15)

1 Introductions, apologies, substitutions and declarations of interest

(09.15)

2 Motion under Standing Order 17.42(ix) to resolve to exclude the public from items 3 and 9 of today's meeting

(09.15)

Private meeting

(09.15)



3 Welsh Government Draft Budget 2025–26 – consideration of the scope and approach

(09.15 – 09.30)

(Pages 1 – 6)

Attached Documents:

Private papers – Scope and approach

Public meeting

(09.30)

4 Welsh Language and Education (Wales) Bill – evidence session 2

(09.30 – 10.30)

(Pages 7 – 40)

Efa Gruffudd Jones, Welsh Language Commissioner

Attached Documents:

Research Brief

Paper 1 Welsh Language Commissioner

Break

(10.30 – 10.45)

5 Welsh Language and Education (Wales) Bill – evidence session 3

(10.45 – 11.45)

(Pages 41 – 46)

Professor Enlli Thomas, Pro Vice–Chancellor and Head of College of Arts, Humanities and Social Sciences, Bangor University [Via Zoom]

Professor Gwenno Ffrancon, Deputy Pro Vice Chancellor Welsh Language, Heritage and Culture and Director Academi Hywel Teifi, Swansea University [Via zoom]

Attached Documents:

Paper 2 Professor Enlli Thomas FHEA, FLSW, Bangor University (Translation)

6 Welsh Language and Education (Wales) Bill – evidence session 4

(11.50 – 12.50)

(Pages 47 – 70)

Dr Gwenllian Lansdown Davies, Chief Executive, Mudiad Meithrin

Angharad Morgan, Policy Manager, Mudiad Meithrin

Dr Gwennan Schiavone, Chief Executive Officer, CYDAG

Attached Documents:

Paper 3 Mudiad Meithrin (Translation)

Lunch Break

(12.50 – 13.30)

7 Welsh Language and Education (Wales) Bill – evidence session 5

(13.30 – 14.30)

(Pages 71 – 96)

Toni Schiavone, Chair, Cymdeithas yr Iaith Education Group

Osian Rhys, Member, Cymdeithas yr Iaith Education Group

Heini Gruffudd, Chair, Dyfodol i'r Iaith

Myfanwy Jones, Director, Mentrau Iaith Cymru

Attached Documents:

Paper 4 WLE 6 Cymdeithas yr Iaith (Translation)

Paper 5 Dyfodol i'r Iaith (Translation)

Paper 6 Mentrau Iaith Cymru (Translation)

8 Papers to note

(14.30)

8.1 Implementation of education reforms

(Pages 97 – 109)

Attached Documents:

Welsh Government response to the Committee's interim report on the Implementation of Education Reforms

8.2 Welsh Language and Education (Wales) Bill

(Page 110)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee
from the Llywydd

Private meeting

(14.30)

9 Welsh Language and Education (Wales) Bill – consideration of the evidence

(14.30 – 14.45)

Document is Restricted

Document is Restricted

This response was submitted to the [Children, Young People and Education Committee](#) on the [Welsh Language and Education \(Wales\) Bill](#)

WLE 07

Ymateb gan: Comisiynydd y Gymraeg

Response from: Welsh Language Commissioner

Thank you for the opportunity to present this written evidence, and for the invitation to give oral evidence on the Welsh Language and Education (Wales) Bill.

My main aim as Commissioner is to promote and facilitate the use of the Welsh language. The Welsh Language (Wales) Measure 2011 states that I can provide advice and/or comments to any person. In that context, and in line with my role as an independent advocate for the Welsh language and its speakers, I provide the comments below.

1. General principles of the Welsh Language and Education (Wales) Bill and the need for legislation to achieve the stated policy intention

- 1.1. I support the general principles of the Welsh Language and Education (Wales) Bill ("the Bill") and consider that legislation is necessary to achieve the stated policy intention. I very much welcome the Bill which, in my opinion, reflects the scale of the Welsh Government's ambition for the Welsh language. The legislation has the potential to make a substantial contribution towards achieving the vision and objectives of Cymraeg 2050.
- 1.2. Since devolution, we have seen the efforts of a number of policies and strategies aimed at strengthening planning processes in relation to Welsh language education. Nevertheless, a clear gap remains between the trajectory based on the data and empirical evidence of the past twenty years and the theoretical trajectory which is central to the objectives and targets of Cymraeg 2050. Delivering the objectives and vision of the Cymraeg 2050 strategy is reliant on increasing the numbers leaving the education system as confident and independent Welsh speakers. There is clear evidence, therefore, that bolder policies and legislation are needed for the Welsh language in education, and I therefore very much welcome the fact that the Government is responding firmly to the challenge by introducing this Bill.
- 1.3. I set out above a rationale for legislating, that is to say, it is a necessary step to achieve the Welsh Government's policy objectives. But it also needs to be stressed that there is an important ethical and principled basis for the policy in itself. As the Explanatory Memorandum emphasises, the Welsh language belongs to us all, and it is vital that all children have a real opportunity to develop into confident Welsh speakers. It is a matter of social justice that the education system in Wales affords everyone this opportunity. Not only is this Bill an opportunity for Wales to again lead the way in terms of language policy, but it sets out a clear and exciting vision for the future of education in a modern bilingual country. This is very timely in the context of the other significant developments afoot, including the implementation of the new Curriculum for Wales and the reform of the Additional Learning Needs system in Wales.
- 1.4. What is being proposed in the Bill is substantial and responds to many of the shortcomings of the current planning regime. It is fair to say that the Bill represents a historic turning point in the development of the Government's education and Welsh language policy. For the first time, some of the most important targets and commitments in the Government's Welsh language strategy will be set out in legislation. This includes a crucial focus on increasing the use of the Welsh language, which of course is also central to my work as Commissioner.
- 1.5. I also welcome the fact that the Bill contains powerful legislative mechanisms that will enable much more direct influence on the delivery of some of these targets. The proposed development

of a framework to describe Welsh language ability as the centrepiece of language planning policy is innovative, and underpins important provisions in the Bill, for example, the language categories and planning frameworks at national, local authority and school level.

- 1.6. One of the main regulatory aims of the Welsh language standards is to increase the opportunities available for people to use the Welsh language, whether by receiving public services, in the workplace or in our wider communities. With that in mind, I welcome the duty placed on Welsh Ministers in Part 1 of the Bill to review the Welsh language standards.
- 1.7. I believe that the relevant standards specified in the Bill have the potential to make a difference. They have a role to play in terms of language progression and the relationship between developing the Welsh language skills of children and young people through the education system and increasing individuals' use of these skills as they enter the world of work. In addition, there is further potential for the Welsh language promotion standards to be used as a tool for interweaving planning in education and skills with the wider strategies that exist for the promotion of the Welsh language and facilitating its use. I therefore very much welcome the fact that this Bill makes a clear link between educational policy and the Welsh language standards regime.
- 1.8. The Commission for Welsh-speaking Communities' report on communities with a higher density of Welsh speakers also recognises the need to strengthen the Welsh language standards. For example, it recommends imposing a new duty on relevant bodies to formulate a community language planning strategy. It also recommends taking steps to move organisations along a linguistic continuum by increasing their use of the Welsh language internally over a specified period.
- 1.9. These standards are currently fairly limited in their impact, but with amendments and increased support from us as an office, I believe that they could play a key role in the increasing use of the Welsh language in workplaces, and in promoting and maintaining the Welsh language more widely. With our increased focus on the outcomes of our regulatory work, these areas of the standards are ones we have already identified as a priority, and we are keen to play an increasingly proactive role in supporting organisations with this vital work. With that in mind, I welcome the opportunity to contribute to the Welsh Ministers' review of the standards, and to discuss how the Commissioner can best contribute further towards achieving some of the Bill's objectives.

2. Are there any potential barriers to the implementation of the Bill's provisions and does the Bill take these into account?

- 2.1. The obvious obstacle to implementing the provisions of the Bill is ensuring an increasingly bilingual education workforce. If we want schools and pupils to move along a linguistic continuum, it is inevitable that the education workforce will have to move along the continuum in the first place. Schemes for pupils and schools can go no further than the capacity of the workforce to offer and develop their Welsh language provision. Substantial intervention is needed here, and this is one area where Welsh Ministers have the ability to intervene in a direct and significant way in order to achieve the objectives of the Bill and the Cymraeg 2050 strategy.
- 2.2. The Welsh Government already has a *Welsh in education workforce plan* which includes a number of actions and interventions to increase the capacity of the education workforce to teach through the medium of Welsh. However, the content and scope of this plan will clearly need to be

revisited with the introduction of the Bill. Interventions will need to be developed and delivered on a much larger scale. The establishment of the Institute is an essential part of the solution, but I believe that this needs to be combined with a comprehensive national education workforce strategy that reflects the ambition of the Bill, and that would give clear context and direction to the work of the Institute and other key partners.

- 2.3. The establishment of the Institute addresses the key issue of planning language support and training for the education workforce. What is needed alongside this is the integration of the proposed provision as an integral part of training for teaching in Wales, and as part of the professional development of the education workforce. In other words, it must be ensured that sufficient numbers within the education workforce undertake the training on offer, and that this takes place in a strategic way and on a scale consistent with the objectives of the Bill. The Welsh Government needs to lead on this in partnership with the Institute and a number of other organisations, for example, the Education Workforce Council, Medr, the Coleg Cymraeg Cenedlaethol and universities.
- 2.4. For example, the current *Welsh in education workforce plan* could be built upon by developing a five-year language training framework for teachers who will train and teach in Wales in the future. I am confident that the Institute will be able to lead on curriculum and provision planning, but it is the Government which has the capacity to make it a requirement for new teachers to undertake this training. In collaboration with the partners identified above, the Government should ensure that a Welsh language training programme is put in place as a core part of all Initial Teacher Education courses, and then continues as a required part of the induction and professional development phase of new teachers for the first four years of their career.
- 2.5. Another key issue that should be considered is creating much stronger links between the Welsh language training that will be offered by the Institute and the targets of the National Framework for Welsh Language Education and Learning Welsh, the commitments in Welsh in Education local strategic plans, and school delivery plans. Schools committed to moving along the language continuum should have access to a specific package of resources and support, with language training for the workforce as a core part of this. The resources and training need to be prioritised strategically and in alignment with planning at a national, local and school level.
- 2.6. I am certain that the Government will agree with the need to develop such a strategy following the passing of the Bill. However, I believe that this priority could be expressed more clearly by placing a duty in the Bill on Welsh Ministers to produce and publish a Welsh in Education Workforce Plan as part of the National Framework for Welsh Language Education and Learning Welsh. Section 23(3)(d) already refers to training, professional development and support for education practitioners, but this provision does not reflect the importance of education workforce planning to achieve the Bill's aims. An education workforce strategy ought to be central to the National Framework, and I believe an additional section is required in Part 4 of the Bill focusing on education workforce planning. This section would place a duty on Welsh Ministers to set out the steps they intend to take to ensure that the education workforce has sufficient Welsh language skills to achieve the objectives of the National Framework for Welsh Language Education and Learning Welsh.
- 2.7. Such a duty would provide a statutory basis to set targets, to develop and introduce necessary interventions in education workforce planning (see 2.4 above), and to set clear responsibilities for key partners regarding the implementation and ownership of elements of the plan. Such a duty

would also be consistent with other requirements in the Bill, for example, the planning and reporting cycles of the National Framework and the Welsh in education local strategic plans. This would be one obvious way to strengthen the Bill and to address one of the main challenges of its implementation.

3. The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation

- 3.1. Overall, I believe that the Bill strikes the right balance in this context. Although many of the important issues will be introduced in subordinate legislation, the Bill contains sufficient detail regarding the substance of the provisions that will be in subordinate legislation. One matter of concern, however, is a lack of detail on the nature of language categories.
- 3.2. I accept the benefits of defining and explaining the categories in more detail in subordinate legislation. However, more detail and certainty are needed on the face of the Bill regarding the fundamental nature of these categories. This is too important and fundamental an issue to be included in regulations alone; it is central to the meaning and implications of the rest of the Bill.
- 3.3. As I elaborate below, it is essential that the Bill protects and provides for the expansion of Welsh-medium education – and language categories are integral to securing this. I wish further clarity that the ‘Primarily Welsh Language’ category will reflect the nature of Welsh-medium provision as currently understood. One way of providing such clarity would be to include an additional clause in Section 10 of the Bill that specifies a minimum for the range that can be provided for the ‘Primarily Welsh Language’ category. For example, it could be stated that in specifying the range for the ‘Primarily Welsh Language’ category, Welsh Ministers may not specify a minimum for the range that is less than 80% of Welsh language education.
- 3.4. I welcome the fact that Section 17(2)(a) prohibits changing a school’s language category from a ‘Dual Language’ category to a ‘Primarily English Language, partly Welsh’ category, and that Section 17(2)(b) prohibits changing a school’s language category from a ‘Primarily Welsh Language’ category to a ‘Dual Language’ category or a ‘Primarily English Language, Partly Welsh’ category. As the Explanatory Memorandum states, the principle that schools ought not to offer less Welsh language education than they have previously offered is very important. Even though Section 17 of the Bill ensures that schools will not be able to move down a language category, I am not convinced that there is a robust mechanism for ensuring schools do not slip backwards within the range of a language category. That is, it is possible that the range of the categories will be very broad, and that schools could offer less Welsh language provision without changing the language category of the school. I believe it would be possible to strengthen Section 14(1)(e) of the Bill in order to make it clear that the expectation is that schools’ Welsh language education delivery plans set out proposals to maintain or increase their Welsh language provision. The Explanatory Memorandum (paragraph 3.145) is clear on this policy objective. This would provide further certainty regarding the future of Welsh-medium education as currently understood.

4. Are there unintended consequences arising from the Bill?

- 4.1. I welcome the fact that this Bill has the objective of raising standards within English-medium schools, and also of encouraging more schools to move along the linguistic continuum. However, care must be taken to ensure that the aspiration to raise standards in the English-medium and bilingual sector does not inadvertently involve slipping from the other end of the continuum. I

want the Bill to be as robust as possible in protecting and ensuring the future of immersion education and Welsh-medium education.

- 4.2. The evidence clearly shows that immersion education and Welsh-medium education are most likely to create proficient Welsh speakers. Expanding Welsh-medium education and increasing the numbers of pupils reaching the higher levels of the linguistic continuum are essential in the context of the vision of Cymraeg 2050. This is particularly true in the context of increasing the use of Welsh, which is not only central to the aims of this Bill but also to my work as Commissioner.
- 4.3. The Welsh Government's Cymraeg 2050 strategy (p.21) states that '*Welsh-medium immersion education is our principal method for ensuring that children can develop their Welsh language skills, and for creating new speakers*'. The strategy is explicitly clear that there are two interconnected objectives in terms of the contribution of the education sector to achieving the aim of reaching a million Welsh speakers and doubling the daily use of the language by 2050. The first is increasing the number of pupils attending Welsh-medium schools. The second is improving and increasing the Welsh language provision in English-medium and bilingual schools so that an increasing number of pupils leave school able to speak Welsh. The trajectory to a million speakers is based on achieving two sets of targets concerning both interconnected strategies above. This is important because there is recognition here of the significance of immersion education and Welsh-medium education in the context of ensuring as many proficient Welsh speakers as possible, speakers who are more likely to use and transmit the language.
- 4.4. In several places the Bill makes it clear that the above policy intention remains. For example, Section 23(5)(b) distinguishes between targets to:
- (i) Increase the number of pupils of compulsory school age receiving education in 'Primarily Welsh Language' category schools in their areas
 - (ii) Increase the number of schools that are 'Dual Language' category or 'Primarily Welsh Language' category schools in their areas
 - (iii) Increase the provision of Welsh language education in 'Dual Language' category schools and 'Primarily English language, partly Welsh' language category schools in their areas

Section 23(3)(c) also refers to promoting education in 'Primarily Welsh Language' or 'Dual Language' category schools, and increasing the number of pupils attending those schools.

- 4.5. In other parts of the Bill however, the same clarity is lacking. Instead, the Bill refers to the more general concept of '*increasing the provision of Welsh language education*'. The Bill explains that the meaning of '*Welsh language education*' in the Bill is:
- (i) Teaching Welsh, and
 - (ii) Education and training through the medium of Welsh

'Increasing the provision of Welsh language education' could therefore mean increasing 'Primarily Welsh Language' education or increasing Welsh language provision in 'Dual Language' or 'Primarily English Language, partly Welsh' schools. The concept of '*increasing the provision of Welsh language education*' does not differentiate between the two. For example, Section 1 (Welsh language strategy targets) places a duty on Welsh Ministers to set targets to '*increase the provision of Welsh language education*'. Similarly, Section 28 (Local Welsh in education strategic

plans) requires local authorities to ‘*promote and facilitate Welsh language education*’, ‘*improve provision of Welsh language education*’, and ‘*improve the process of planning the provision of Welsh language education*’. These sections of the Bill would benefit from further clarity in terms of the Welsh Government’s policy objectives, that is, that a specific focus is needed on increasing ‘Primarily Welsh Language’ education.

4.6. I believe the Bill would be clearer and more robust if it were to distinguish consistently throughout between the two key interconnected aims of the Bill, namely 1) to increase the number of pupils of compulsory school age receiving education in ‘Primarily Welsh Language’ category schools, and 2) to increase the Welsh language provision in ‘Dual Language’ and ‘Primarily English language, partly Welsh’ category schools. I believe this should be looked at again to ensure clarity and consistency between the requirements of the Welsh language strategy (Section 1), the National Framework for Welsh Language Education and Learning Welsh (Section 23) and the Local Welsh in education strategic plans (Section 28). With the exception of Part 3 where reference is made to the concept of Welsh language education provision for the purpose of defining school language categories, I believe reference to the vague and imprecise concept of ‘*increasing the provision of Welsh language education*’ should be avoided. This will help avoid any ambiguity regarding the interpretation and implementation of the Bill.

5. What are the financial implications of the Bill (part 2)?

5.1. Although the Explanatory Memorandum discusses the budget of the National Institute for Learning Welsh, there is little clarity regarding the exact expectations that will be placed on the Institute in this context, or how much funding will be available to achieve this. The Explanatory Memorandum (p. 151) states that the assumption is that ‘*the resource for providing support and training to the education workforce in the National Institute for Learning Welsh will come from elsewhere in the system*’... but that ‘*it will not be possible to identify from where the resource will be moved from or provide accurate BAU or Option 2 costs until the Review of School Improvement - the roles and responsibilities of education partners in Wales has concluded*’. Neither does the Explanatory Memorandum cover the current programme costs of the National Centre for Learning Welsh, which include the crucial funding allocations to providers of Welsh language training courses for adults.

5.2. If the objectives of this Bill are to be realised, it will be necessary to secure adequate funding to design and deliver language training to the education workforce on a much larger scale than currently exists (see point 2.3 above). Shifting resources from other parts of the system may enable the Institute and other key partners to do more than is currently being done. But additional investment may be needed to offer language training to a substantially larger number within the education workforce in the future. As I have already made clear in my response to the second question above, I believe that further developments will be needed in terms of a national and comprehensive strategy for ensuring language training for the education workforce of the future. It therefore follows that I am also keen to ensure that sufficient resources and funding are available to achieve this.

5.3. As noted in the Explanatory Memorandum, most the Bill’s financial implications fall on existing recurring budgets and operational costs. One obvious implication of passing this Bill will be the need for these budgets to facilitate the achievement of the Bill’s objectives. One of the most important areas where this needs to be done is capital expenditure on the schools of the future. It

is essential that the capital plans agreed between the Government and local authorities as part of the *Sustainable Communities for Learning Programme* facilitate the achievement of the national and local targets that will have been set through the provisions of this Bill.

Agenda Item 5

This document provides a translation of correspondence received from Professor Enlli Thomas FHEA, FLSW, Bangor University

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar [Bil y Gymraeg ac Addysg \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) on the [Welsh Language and Education \(Wales\) Bill](#)

WLE 02

Ymateb gan: Yr Athro Enlli Thomas FHEA, FLSW, Prifysgol Bangor

Response from: Professor Enlli Thomas FHEA, FLSW, Bangor University

Below, I present my observations around three of the headings that were set out for consideration as part of the consultation:

- the general principles of the Welsh Language and Education (Wales) Bill and the need for legislation;
- any potential barriers to the implementation of the Bill's provisions; and
- whether there are any unintended consequences arising from the Bill.

The general principles of the Welsh Language and Education (Wales) Bill and the need for legislation

The Act outlines five sets of key aims and objectives for promoting and facilitating the use of the Welsh language in Wales.

It (i) lays down a sound legislative infrastructure to ensure that the Government sets, reviews, monitors and measures the success of any specific targets for increasing the number of Welsh speakers in Wales, reports on the level of progress, and proposes action plans to address any underachievement and/or ensure continued progress.

It (ii) sets an **innovative** plan to create a code to describe Welsh language ability, which is based on the Common European Framework of Reference for Languages (CEFRL) but which enables tailored modifications of the code to reflect the way that the Welsh language is used by bilingual speakers here in Wales.

It imposes an obligation on all schools¹ and local authorities to (iii) designate a school's language category and implement the statutory requirements to report, monitor, and assess performance in accordance with the expectations for that category. In addition, it gives the Welsh Ministers the power to determine the amount - including the minimum level - of Welsh language education provided for each school language category and the ability levels (the CEFRL code) expected of pupils according to the linguistic experience they have received at school. The requirement for governing bodies to draw up an implementation plan in relation to the Welsh language imposes an obligation on schools to regularly review their own educational practice in order to consciously plan to produce speakers able to reach B2 level by the end of the statutory school term or shortly thereafter. The aim of

¹ Apart from community special schools.

producing C1/C2 level speakers in “Primarily Welsh Language” schools is ambitious considering the type of Welsh language usage amongst children and young people, and the aim of enabling pupils in “Primarily English Language, partly Welsh” schools to reach B2 in due course is extremely challenging. However, it is necessary to set a high target if we want to see change. But both are possible, if the appropriate actions (which are proposed in the Bill) are in place and effective.

To assist the linguistic progress of individuals through the statutory school period and beyond, the Bill legislates for a (iv) *National Framework for Welsh Language Education and Learning Welsh* which will identify the steps that the Government will need to implement in order to promote and facilitate the use of the Welsh language **throughout life**. This is an ambitious framework, covering the childcare, nursery education, statutory education,² tertiary education sectors as well as paths outside of education in the workplace and in the community. It sets targets for local authorities to implement the Framework by increasing and improving provision in terms of learning Welsh and consciously planning to promote and facilitate Welsh education and the use of the Welsh language within schools in their areas – plans that will be approved, or rejected, by the Minister ensuring that the plans are prioritised and fully considered by each school.

The expectations for local authorities include the need to ensure training, professional development and support for education practitioners in Wales ‘for the purpose of improving ability in Welsh.’³ The Bill therefore gives Ministers the authority to (v) establish a National Institute for Learning Welsh as a corporate body to provide direction and strategic guidance to Welsh language learning providers. This is an exciting, unprecedented step, which will help to realise the Bill’s objectives.

Overall, the five aspects weave together to offer a means of realising the Bill’s aims and objectives, and the sound legislative precedent provided by the Bill should ensure that this vision is taken seriously and jointly adopted by the Welsh Government, local government, the education system, families, individuals and the community. The moves to adopt a clear framework for identifying individuals’ Welsh language ability levels (CEFRL) and map expectations according to the language categories of schools are a considerable step forward.

Any potential barriers to the implementation of the Bill’s provisions

The education workforce and Welsh speakers are integral to the Bill’s aims and objectives. The plans proposed within the Bill set out the infrastructure to ensure the best conditions so

² There is no specific reference to the statutory education sector under point 23(4), but there are references to that sector in 23(5). Note also that there is no specific reference to the Higher Education Sector in 23(4). However, the statement ‘including (but not limited to)’ suggests that the whole sector is part of the Framework.

³ It is assumed that this refers to improving pupils’ Welsh language ability, but it can also mean improving teachers’ Welsh language ability. What is missing from this statement is the need for training to improve Welsh-medium and bilingual education in “Primarily Welsh Language” category schools in order to ensure language development at C1/C2 level for pupils who speak Welsh at home and pupils who are new speakers through the education system.

that all speakers have access to the Welsh language and the ability to continue on their linguistic journey without interruption, but the majority of these are strategic plans with a legislative focus on setting targets and monitoring progress. There is room in the Bill to strengthen the potential impact of these quantitative plans by offering support to develop practical plans concerned with more qualitative elements to enrich experiences and successes of speakers themselves, specifically under Parts 2, 3, 4 and 5 of the Bill. These are discussed in turn below.

Part 2

- The CEFRL will be familiar to some teachers who teach Welsh as a second language but not to the whole sector, and certainly not to parents, pupils or employers. It will be necessary to ensure that the education workforce has a solid understanding of the logic behind the code, the logic behind the simplicity of the school language category system, the logic behind the connection between the code and the language category, an understanding of the importance of the code for employability, and a sufficient understanding of language pedagogy strategies, strategies for teaching through the medium of a minority language, and bilingual strategies which allow pupils to make the most of their skills in Welsh and English where necessary, in order to ensure robust bilingual skills. There is an opportunity to ensure that this is an integral part of what is discussed in Parts 4 and 5 of the Bill and that it is made more visible within the Bill.

Part 3

- The narrative within the Bill highlights the fact that there are fundamental differences between (i) “Primarily Welsh Language” and “Dual Language” schools on the one hand and (ii) “Primarily English Language, partly Welsh” schools on the other hand, specifically in terms of the main medium of teaching and whether pupils are considered first language/new speaker or second language due to the medium through which pupils are taught. The targets in terms of language codes are differentiated across the three school categories to reflect these differences. In order to realise the aims of the Bill, however, it is necessary to be realistic about how (i.e., what support is needed) and to what extent the current education system is going to succeed in achieving this. For example, our research has repeatedly shown that differences continue to exist among children within schools that were denoted (in the past) as Welsh-medium schools, depending on the language of the home. That is to say, there are differences between the language characteristics of children who only speak Welsh at home compared to children who speak Welsh and English or who only speak English at home,ⁱ and this is a natural pattern and one that can be seen internationally, sometimes throughout life.ⁱⁱ It is therefore important to recognise that reaching C1 or C2 level is not guaranteed or necessarily achievable for many pupils, even in the Welsh medium sector, *unless there is appropriate support and training for teachers to understand how, when and why they should differentiate*. At the moment, there is no clear support for the Welsh-medium sector (“Primarily Welsh Language;” “Dual Languages”) in terms of educating teachers on educational methods and strategies to support appropriate progress for different types of speakers in Parts 4 or 5 of the Bill. It would be useful if this

could be woven more clearly into the National Framework for Welsh Language Education and Learning (Part 4) and, therefore, into the work of the National Institute for Learning Welsh (Part 5) in order to ensure that the Welsh medium sector is given its proper place, and the necessary support, at a statutory level, to appropriately support the various speakers in their institutions.

- The Bill does not set a statutory minimum for Welsh teachers/educators to engage in Welsh language education training/training through the medium of Welsh. Is there room to include targets for teachers/tutors to attend training/access appropriate resources, and also targets for the Institute/Resource to ensure that there are sufficient supporting resources available to ensure that teachers/tutors are able to keep up to date in terms of practice?
- The targets to increase contact hours with the language are a step towards ensuring better conditions for learning, using and seeing the value of the language. There are different ways to achieve this. In the past, the secondary sector has practiced 'Welsh every day' but research shows that a lack of ownership and leadership at national level challenges the development and success of the scheme.ⁱⁱⁱ The suggestion that a minimum of 10% of education provided by the "Primarily English Language, partly Welsh" sector should be Welsh is vague and requires further consideration.

Part 4

- Part of the challenge with increasing contact hours is identifying how, when, why and to what extent having a minimum of 10% Welsh language contact hours is going to make any difference in the end. One of the main challenges for the "Primarily English Language, partly Welsh" sector is ensuring that the tone and ethos of the school allows the language to flourish. This means ensuring that seeing and hearing more of the Welsh language is an integral part of the organisation, which includes ensuring that there are more teachers with sufficient Welsh language skills to model the choice of using Welsh amongst each other as a starting point.
- According to recent research, only 77% of pupils from non-Welsh-speaking backgrounds and those attending English-medium secondary schools in Wales considered themselves bilingual, compared to 92% of pupils from non-Welsh-speaking backgrounds attending bilingual secondary schools and 90% of pupils from non-Welsh speaking backgrounds attending Welsh-medium secondary schools. Without considering yourself a Welsh speaker, there is no ownership of the language, and reaching B2, if not B1, is challenging if the individual does not consider speaking the language to be part of their identity.^{iv} In a minority language setting, any attempt to increase use of a language and levels of ability by focusing on quantitative measures (% exposure; % speakers etc) without developing key considerations such as raising awareness of the language, building confidence, and ensuring a positive ethos/environment for the language, is going to be a challenge.

Part 5

- There is only one formal reference to the statutory education sector in Part 5, namely 41(b): “*collaboration between Welsh language learning providers and schools in Wales (that are not Welsh language learning providers).*” Is there room to strengthen the supportive role of the Institute for the statutory education sector in order to ensure that the Institute is not seen as an entity solely for Learning Welsh ?
- There is considerable focus in Part 5 on teaching and learning Welsh (e.g., 37[3a-d]; 40[2a-c]; 42[a&b]). This is a key step forward and one to be commended. But teaching and learning Welsh is an integral part of the teacher's work, regardless of the language category of the school or the linguistic ability of the children where they teach. As described in the Bill, only "Primarily English Language, partly Welsh" schools will likely turn to/benefit from the Institute's work, and that in terms of the support available for sharing good practice/teaching materials etc in the context of learning Welsh. There is little reference to developing teaching strategies *through the medium of a minority language* – whether for native speakers or not. This leaves a gap in the support provided for teachers and could affect schools' ability to fulfil the requirements in terms of Part 2 of the Bill (as mentioned above).

Whether there are any unintended consequences arising from the Bill

- Will setting the same linguistic attainment for pupils in "Dual Language" Schools and those in "Primarily English Language, partly Welsh" schools - i.e., being independent Welsh users (B1 or B2) - raise questions among parents and pupils with English as the main language at home about the advantages of a Dual Language school over a “Primarily Welsh Language” school? If so, are more families likely to send their children to "Primarily English Language, partly Welsh" schools in order to receive 90% of the education through the medium of Welsh while also managing to reach B2 in due course? Of course, anyone from any background can reach B2 later on after their school years, but perhaps the narrative will push some to consider the advantages and disadvantages of attending schools where the majority of the education is studied through Welsh or through the medium of English.
- If the focus is on increasing the number of speakers, efforts to protect and develop the language among first language children might be challenged.
- Considerable changes are underway in terms of the Continuing Professional Development (CPD) Programme for teachers following the report's suggestions about the current support for school improvement.^v One major development in the field of CPD for teachers is the establishment of a company called *Adnodd* to commission standard resources to support the Welsh Curriculum. There is concern that support for teaching through the medium of Welsh, bilingual education and for teaching Welsh as a language subject (in a predominantly Welsh-medium, bilingual or English-medium context) may fall between two stools if there is no conscious attempt to combine Continuing Professional Development and the work of the Institute. This means that there is a need to take

ownership of the support/training/resources for teaching through the medium of Welsh and language pedagogy within the compulsory education sector in one space (the CPD Programme or the Institute), and then feed into the activities of the other space.

- The report refers to language immersion units, but there is no guidance regarding ALN children. Is the plan to include resources and training for developing ALN children's skills within whatever language model they attend as part of the Institute's output or Adnodd's output? This bridges the field of health and well-being, but is key if we want to ensure the best support for all pupils to embrace the language to the best of their ability.

ⁱ Binks, H. L., & Thomas, E. M. (2023). Welsh-English bilingual adolescents' performance on verbal analogy and verbal classification tasks: the role of language exposure and use on vocabulary knowledge. *International Journal of Bilingual Education and Bilingualism*, 1-16.

Binks, H. L. & Thomas, E. M. (2019). Long-term outcomes for bilinguals in minority language contexts: Welsh-English teenagers' performance on measures of grammatical gender and plural morphology in Welsh. *Applied Psycholinguistics* 40 (4), 1019-1049.

Thomas, E. M., Williams, N., Jones, Ll. A., Davies, S., & Binks, H. (2014). Acquiring complex structures under minority language conditions: bilingual acquisition of plural morphology in Welsh. *Bilingualism: Language and Cognition*, 17 (3), 478-494.

Rhys, M. & Thomas, E. M. (2013). Bilingual Welsh-English children's acquisition of vocabulary and reading: implications for bilingual education. *International Journal of Bilingual Education and Bilingualism*, 16 (6), 633-656.

Gathercole, V. C. Mueller, Thomas, E. M., & Hughes, E. (2008). Designing a normed receptive vocabulary test for bilingual populations: A model from Welsh. *International Journal of Bilingual Education and Bilingualism*, 11 (6), 678-720.

Gathercole, V. C. Mueller, & Thomas, E. M. (2009). Bilingual first language development: Dominant language takeover, threatened minority language take-up. *Bilingualism: Language and Cognition*, 12 (2), 213-237.

ⁱⁱ Bialystok, E. & Luk, G. (2012). Receptive vocabulary differences in monolingual and bilingual adults. *Bilingualism: Language and Cognition*, 15(2):397-401.

ⁱⁱⁱ Parry, N, & Thomas, E. M. (2021). The psychological experience if integrating language and content: Teacher and learner perspectives. Yn K. Talbot, S. Mercer, M-T Gruber, & R. Nishida, (ed.) *The psychological experience of integrating language and content*. Multilingual Matters.

^{iv} Parry, N. M. & Thomas, E. M. (2024). Legitimising the 'bilingual': Identity issues among L2 Welsh-speaking teenagers in English-medium schools in Wales. To appear in J. Cenoz & D. Goeter (Eds.), *Acquiring a minority language as a second language*. London: Routledge.

^v <https://www.gov.wales/sites/default/files/pdf-versions/2024/1/3/1706713541/review-roles-and-responsibilities-education-partners-wales-and-delivery-school-improvement.pdf>

Agenda Item 6

This document provides a translation of correspondence received from Mudiad Meithrin

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar [Bil y Gymraeg ac Addysg \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) on the [Welsh Language and Education \(Wales\) Bill](#)

WLE 04

Ymateb gan: Mudiad Meithrin

Response from: Mudiad Meithrin

The background of Mudiad Meithrin

Mudiad Meithrin is a national voluntary association of Cylchoedd Meithrin, cylchoedd Ti a Fi, wraparound care and Welsh day nurseries. Our aim is to create new Welsh speakers, campaign for care and Welsh language education for all children, support our members and plan strategically to develop new services.

We have grown a great deal since 1971. Today, there are around 1,000 Meithrin groups, Ti a Fi groups, 'Cymraeg for Kids' groups, 'Clwb Cwtsh' sessions and nurseries under the Mudiad Meithrin banner providing early years experiences for around 22,000 children every week. Our aim overall and through the 'Set Up and Succeed' scheme is to increase the number of settings that provide childcare services, nursery education and wraparound care for young children and to expand services in existing settings (to avoid replacing historical and long-standing Welsh provision).

We have seen over 3,480 individuals qualify directly into our Welsh-medium workforce with childcare qualifications, through our National Training Scheme and the 'Cam wrth Gam' Schools Scheme. The Mudiad is a centre with Agored Cymru, WJEC and City and Guilds accreditation and recognition, as well as CACHE, for the provision of the full range of post-14 and post-16 qualifications.

We also work very closely with parents to provide help and advice to enable them to develop and support the work of the groups in the home, to pass on the Welsh language to their children or to start learning Welsh. We are a registered charity employing over 200 people nationally, with an additional 2,000 working in the Cylchoedd and nurseries, and around 150 volunteering as part of management committees. The groups are supported by a national network of professional staff who advise on a range of issues, such as business support,

qualifications and staff recruitment, promoting good practice, staff training and working with local authorities.

Mudiad Meithrin's response

Part 1: Promoting and facilitating use of Welsh.

Increase in use

- 1.1. We believe that every child in Wales has the right to be a Welsh speaker, by taking advantage of Welsh language education. We therefore welcome that the Welsh Language and Education (Wales) Bill (the Bill) refers specifically to setting targets for increasing Welsh education provisions and increasing the number of people learning Welsh, also proposing a statutory definition of Welsh education for the first time.
- 1.2. We note that the results of the 2021 Census have highlighted the need to act with purpose in order to increase the numbers that can speak Welsh across Wales, and that the education system and the early years care and education sector have an integral role to play in moving towards this goal. We believe - with some exceptions - that the status quo is not effective in terms of producing independent Welsh speakers within the English education sector.
- 1.3. Education is one of the policy areas that has the ability not only to protect and promote the existing Welsh networks of communities but also to create new Welsh speakers, work which is vitally important in order to maintain and strengthen the Welsh speaking communities of the future.
- 1.4. The recent report of the Commission for Welsh-speaking Communities¹ (July 2024) notes that children from households where Welsh is not spoken would be only be able to pick up Welsh without the support of the education system in a handful of communities.
- 1.5. The Commission for Welsh-speaking Communities' analysis of the 2021 Census raises concerns that this subconscious bias is no longer completely common, even in the areas with the highest density of Welsh speakers.

¹ Empowering communities, strengthening the Welsh Language The Commission for Welsh-speaking Communities' report on communities with a higher density of Welsh speakers Available here: [45614 Interim report by The Independent Commission on the Constitutional Future of Wales \(gov.cymru\)](#)

- 1.6. In the 2021 census, a fall was seen in the transmission rate of the Welsh language among couple households where one adult could speak Welsh, from 45.4% in 2011 to 40.4% in 2021. Rates of transmission of the Welsh language in the home in couple households where only one partner speaks Welsh were higher when the woman was the Welsh speaker. However, the percentage of these families passing on the Welsh language in the household was less than 50%. The transmission rates for single parent households (male or female) are the same (53%).
- 1.7. We welcome the emphasis in the Bill on the importance of working with parents. We must therefore work to strengthen language transmission between generations as a priority. Families, and also wider communities, need to be supported to pass on the Welsh language.
- 1.8. It must be emphasised that parents and carers don't start thinking about the language of their children's education when they fill in the school choice form. Considering and choosing a school is the result of a journey that starts during the child's early life, with informal discussions with other parents and carers, and professionals such as health visitors, Cymraeg for Kids officers, Ti a Fi leaders and various other community children and family workers.
- 1.9. It must be acknowledged that Welsh language education isn't a 'choice' for some families, and that some will never have considered not sending their children to Welsh-medium education.
- 1.10. Parents' decision to introduce the Welsh language to their children early in their lives can bear fruit in a relatively short time. As an organisation, our aim is to encourage parents to take the first steps towards introducing the Welsh language to their children through the various services and settings that we support: the *Cymraeg for Kids* scheme, *Clwb Cwtsh* sessions, Ti a Fi groups, Meithrin groups and day nurseries.
- 1.11. The benefits of language transmission in the home must be emphasised, but it must also be recognised that language is a wider social phenomenon. Therefore, the role of the community, extended family and others in language transmission to a child should be considered.
- 1.12. The pre-school age group is essential from the point of view of socialising use of the Welsh language. There is potential to provide more Welsh social activities to nurture, develop and maintain the habit of speaking Welsh with the youngest

children, and to support the use of Welsh within the social networks of parents, grandparents and carers.

- 1.13. One of the challenges facing us as a Welsh early years community is supporting new Welsh speakers as they nurture and develop Welsh language skills relevant to the early years. A large number of practitioners across the sector are new Welsh speakers, and need further support to nurture and develop the confidence for presenting specific activities to children and families who choose Welsh-medium education and are specifically looking for opportunities to bring the Welsh language into the home.
- 1.14. Quality early years care and education improve children's educational, vocational, and social outcomes. As the benefits improve education levels, socio-economic status, income and health, as well as reducing crime rates, early years care and education is an effective means of reducing and alleviating poverty - as well as introducing Welsh.
- 1.15. Almost half of the respondents to a Bevan Institute survey in February 2023 indicated that they were unable to take part in hobbies and exercise, with 1 in 3 stating that an inability to meet family and friends negatively affected their physical and mental health.
- 1.16. Mudiad Meithrin supports a network of Ti a Fi groups, with some led by volunteer leaders, and others by employed Ti a Fi Officers. These groups offer a weekly opportunity for families to come together in their local community to share experiences, build relationships and develop emotional and practical support networks.
- 1.17. They offer safe places to meet, strengthen community links and reduce the feeling of isolation that is so often felt by families with young children. All of this while also introducing and encouraging use of Welsh in the community.
- 1.18. Ti a Fi groups promote early education opportunities for children that in turn will promote the ethos of the Curriculum for Wales. They also support literacy and communication skills by introducing the Welsh language through songs, basic vocabulary and activities that promote interaction between the parent / carer and the child.
- 1.19. Financial cuts affect us all, and we see local authorities having to prioritise statutory services within their current budgets. This has led to a reduction in the funding available to employ specialist officers to work with Ti a Fi groups. In order

to continue offering these valuable local experiences, long-term investment is needed to secure a paid organiser for Ti a Fi groups.

- 1.20. The main aim of the Cymraeg for Kids programme is to increase the number of children in Welsh-medium education and care. The programme's objectives are supporting parents, parents-to-be and other family members to introduce and use the Welsh language in the home, passing Welsh on to their children, and supporting children's linguistic development, both socially and educationally. This is done through a diverse programme of baby groups, including baby massage, baby yoga, story sessions, signing and song, and Me and My Baby sessions, which are specifically for parents in the pre-natal period.
- 1.21. Cymraeg for Kids groups play a key role by supporting parents to speak Welsh and choose Welsh language education, and also support the health and well-being of new parents. The groups are suitable for families from the pre-natal period up to when the child is around 18 months old. Afterwards, families are encouraged to attend the local Ti a Fi group, then on to the Meithrin group and then Welsh language education. So the language journey is clear to the parents from the very beginning.
- 1.22. In addition, the programme has established a collaborative partnership with several key early years partners such as Booktrust Cymru and Children in Wales, as well as local midwives and health visitors. The programme also provides (through the Government) a maternity folder and scan card across Wales.
- 1.23. As the costs of maintaining such a service rise, the impact of this is a reduction in what can be offered on the ground and cuts in the number of officers employed. Further investment is needed in the programme so that parents and families across Wales can benefit from the support.
- 1.24. Looking at the results of the 2021 Census, we can see that the demographics of the Welsh language are changing, especially the significant increase in the number of Welsh-speaking Black, Asian and Ethnic Minority children. In their recent paper, *The Changing Demography of Ethnicity and the Welsh Language*, Dafydd Trystan and Yasmin Begum said:
'This changing demography is reflected in the fact that while fewer than 1 in 50 Welsh speakers were Black, Asian, and Other in 2011, the figure had increased markedly to 1 in 33 by 2021. This figure is likely to change further by 2031, with large implications for Welsh language speaking society and institutions.'

- 1.25. Over half of Black, Asian or Minority Ethnic Welsh speakers are in the 3-15 age range. The Bill offers a real opportunity to make Welsh a language for all, as the education system plays a leading role in teaching Welsh to children across Wales, whatever their race and ethnicity.
- 1.26. We are collaborating with researchers from Swansea University on a scheme to try to tackle the growing awareness that we need to reach out to communities that are underrepresented in Welsh medium provision and encourage honest and open discussions with those communities about their choices in terms of language of education.
- 1.27. The intention of the research is to start the work of expanding impact capacity locally for migrant communities from a range of minority ethnic backgrounds (Global Majority parents) and their rationale for engaging (or not) with Welsh medium and bilingual early years education. It will also contribute to an understanding among providers of early years settings of the barriers to Welsh medium / bilingual education for members of Global Majority communities. It will increase multilingual and multicultural awareness of settings and assist in welcoming families from various backgrounds to provisions.

Reporting on the targets in the Welsh language strategy

- 1.28. We note that Welsh in Education Strategic Plans offer a significant contribution to the analysis of the situation of the Welsh language in Wales that need to be published every 5 years under section 78(8) of the Government of Wales Act 2006, but that plans must be delivered within a tight timeframe.
- 1.29. We also refer to the opinion of the Commission for Welsh-speaking Communities, which states that it is unanimous that the Welsh medium provision in many Welsh areas is not intensive enough to maintain Welsh as a community language for the future in communities with a higher density of Welsh speakers.
- 1.30. We agree with the opinion of the Commission for Welsh-speaking Communities, which states that ensuring that inclusive Welsh language education is available to all is the best way to improve children's language skills in the long term.
- 1.31. We recognise that this cannot be achieved immediately, and that the current priority is to move schools along a clear language continuum. Nevertheless, there should be consensus that inclusive Welsh language education for all children in Wales is the ultimate aim.

1.32. A clear and firm time limit must also be set on the number of years a school is allowed to remain in that category for any schools that indicate that they are moving up the linguistic categories, or increasing their percentage of Welsh language provision within a category. Ideally, if a school starts the journey of increasing its Welsh provision with a nursery/reception class, the school should have changed category by the time those children come to the end of their primary education.

1.33. We hope that dual stream schools and transitional schools will be expected to commit to advertising any new posts, stating that Welsh is essential for all posts in order to achieve the aim of increasing the school's Welsh medium provision.

Calculating the number of Welsh speakers

1.34. When considering calculating the number of Welsh speakers, we note that there is still no guarantee that a National Census will be held in either 2041 or 2051. This highlights the need to ensure a thorough and objective monitoring system in order to measure progress and performance, and where more specific attention needs to be given to this target over time.

Reviewing the Welsh language standards

1.35. How local authorities promote and support the Welsh language and its use is one of the language standards. Specific consideration will therefore need to be given to the role of the Welsh Language Commissioner in the area of education in the future. Setting a clear expectation that the promotion and support of Welsh language education is part of these standards would be a way of giving the Welsh Language Commissioner's office a function in this area.

Part 2: Describing ability in terms of the Welsh language

Types of Welsh user and common reference levels

2.1. The Bill establishes the concept that there are three types of Welsh user and that the definitions for the different types of Welsh speakers (Proficient User, Independent User, Basic User) are in line with the definitions of the six common reference levels of the *Common European Framework of Reference for Languages (CEFR)*. Harmonising the measurements of Welsh proficiency would be an important step forward, would facilitate recruitment processes, and would help in planning for improving individuals' language skills.

- 2.2. Although we acknowledge that there is no guarantee that the *CEFR* level descriptions will continue as they are in the long term, they offer a recognised system of benchmarking linguistic skill levels. Any change in the descriptions by the Council of Europe would therefore lead to the need to review and amend the Welsh skills continuum in the future.
- 2.3. We understand that Welsh GCSE / AS / A level qualifications for school pupils have not yet been linked with the *CEFR*. Although Qualifications Wales is currently undertaking a number of small projects linked to this, school qualifications have not been through the process of linking them to the *CEFR* in the same way as has already been completed (in 2014) for Welsh for Adults examinations. This seems to be a fundamental element that will need to be dealt with in order to ensure consistency between the standard descriptions of ability in Welsh and the grades that individuals receive when completing educational qualifications.

A code for describing Welsh language ability

- 2.4. It must be ensured that the code that will be developed to describe ability in Welsh by Welsh Ministers includes examples of the specific characteristics that are expected to be seen in a way that is easy to understand for individuals that are not used to using it.
- 2.5. It must also be ensured that there is a strong and obvious link between the descriptions of the types of Welsh users described as part of the Bill and the expected linguistic outcomes that are already part of the Curriculum for Wales. When publishing and revising the Code, it must be ensured that it facilitates mutual understanding between various stakeholders, including learners, teachers, parents and employers about individuals' linguistic abilities at each stage of the journey.

Part 3: Welsh-medium education

School language categories

- 3.1. The Bill establishes, for the first time, a statutory procedure for categorising schools according to Welsh language education provision. The list of linguistic categories for each school in its area (and each new school in its area) that each local authority will be required to maintain will ensure consistency in the definitions used across Wales. We welcome the fact that the emphasis is on categorising schools according to

percentage of Welsh language education. The findings and content of the Commission for Welsh-speaking Communities should be considered in this context to ensure transition.

- 3.2. We note that there are few official documents or reports that specify data about the number and percentage of children studying over half of their education through the medium of Welsh. The Pupil Level Annual School Census (PLASC) data does not currently measure this.
- 3.3. Placing an expectation on local authorities, whether through their WESPs or through other official reports, to publish how many children are studying a range of different percentages of their education through the medium of Welsh, and specifically at thresholds of 50% and 70% (as stated in the report by the Commission for Welsh-speaking Communities) would mean that performance in this area is much more transparent, and could be the basis for better public policy.
- 3.4. Thinking about the harmonisation of language categories within the non-maintained sector (on a non-statutory basis in the non-maintained sector) would be a means of establishing the principles of the Bill. The Welsh Government – through CIW – and others should work closely with Cwlwm and the local authorities to establish these language categories to embed these descriptions early on.
- 3.5. Clarity regarding language medium and school curriculum provision is an important part of introducing the new curriculum in Wales in order to enable the implementation of the language continuum and clear expectations of progression and expectations in terms of Welsh language acquisition for pupils and their parents / carers.
- 3.6. We agree with the statement by the Commission for Welsh-speaking Communities that “[e]nsuring that inclusive Welsh-medium education is available to all is the best way to improve children’s language skills in the long term. The Commission accepts that this cannot be achieved immediately, and that the current priority is to move schools along a language continuum. Nevertheless, there should be consensus that inclusive Welsh-medium education is the ultimate aim.”
- 3.7. We, as Mudiad Meithrin, are of the opinion that every new school established should be a designated Welsh-medium school. This would normalise Welsh-medium education in all communities and contribute significantly towards creating and increasing the demand for Welsh-medium education across Wales. It must be ensured that there will be no developments in the English education sector that can

damage or undermine the development of the Welsh language education sector. Developments in the field of education should not hinder a local authority's contribution towards the targets of *Cymraeg 2050*.

- 3.8. We note disappointment that the expected minimum (10%) for Welsh language education provision in the language category "Main Language – English, partly Welsh" is lower than what is stated for Category 1 (English medium) schools in the current non-statutory categorisation guidance² – which state that at least 15% of learners' school activities, both curricular and extracurricular, will be in Welsh. It must be queried how reducing the minimum contact hours will contribute to developing learners' Welsh language skills.
- 3.9. It must be ensured that an expected minimum of Welsh language education provision is also included for the other two categories "Main Language - Welsh" and "Dual Language" for the sake of clarity and consistency across the linguistic categories. The percentages should be ambitious enough to increase the Welsh language provision, and not below the percentages set out in the current non-statutory categorisation guidance. (From 2021 in primary schools, it is expected that 50% of learners' school activities (both curricular and extracurricular) in a Dual Language school will be in Welsh and at least 80% of learners' school activities (both curricular and extracurricular) will be in Welsh in a Welsh-medium school from the age of 7 onwards).
- 3.10. In *Cymraeg 2050*, the Government emphasizes that Welsh-medium immersion education is the main method of ensuring that children can develop their Welsh skills, and the main method of creating new Welsh speakers. We must therefore note concern about what is noted in Part 3 of the Bill³.
- 3.11. It must be ensured that "teaching Welsh" isn't prioritised over "Welsh-medium education". The definition of "Welsh language education" in Part 3 brings an element of ambiguity to the traditional interpretation of the term. In order not to undermine the development and expansion of Welsh-medium education, a distinction must be made between expectations to increase expectation to teach Welsh and to

² Guidance on school categories according to Welsh-medium provision (2021). Available here: [WG43283 \(gov.cymru\)](#)

³ Part 3, Lines 17 – 21: (2) For the purposes of this Part— (a) “Welsh language education” means—(i) teaching Welsh, and (ii) education and training through the medium of Welsh, in a school, to pupils of compulsory school age;

provide education and training through the medium of Welsh across the text of the Bill.

- 3.12. Details about the *CEFR* skill levels will need to be included in an easy to understand way for individuals that are not used to using it.
- 3.13. We agree that there should be a definite role for local authorities (and specifically education authorities) in working towards ensuring that all learners finish their statutory period of education with Welsh language skills that are (at least) at level B1 / B2 (Independent user) on the Common European Framework of Reference (*CEFR*) by 2050, and at level C1 / C2 (Proficient user) for those in schools of Main Language - Welsh. We would hope that the majority of learners would reach B2 and C2 levels (as appropriate) in order to develop Welsh skills to the highest possible levels.
- 3.14. Making it a requirement to provide Welsh language education provision in accordance with the range of their language category is a firm step in ensuring that current Welsh education provision levels are maintained.
- 3.15. Although the emphasis is on creating confident speakers, one measure of that is the number of children that sit exams through the medium of Welsh. In several counties, there is a reduction in the number of children sitting their exams through the medium of Welsh compared to the number of pupils that received Welsh language education earlier in their education journey.
- 3.16. Collaboration between local authorities and the Welsh Government will be central to the success of placing schools in fair and suitable language categories. Clarity regarding language medium and school curriculum provision is an important part of introducing the new curriculum in Wales in order to enable the implementation of the language continuum and clear expectations of progression and expectations in terms of Welsh language acquisition. It is important that the categories used are a fair and consistent reflection of what is provided in order to be able to measure the progress of local authorities over time.
- 3.17. Estyn's role must also be considered in the process of monitoring that a school provides education in accordance with the category set. This role will need to be collaborative and encouraging, rather than threatening, in order to encourage schools to make progress – within a category or when moving to a higher language category in order to realise the Bill's aim of increasing Welsh language education opportunities across Wales.

3.18. A clear and firm time limit must also be set on the exemption period of having to adhere to the linguistic minimums for any schools given permission from a local authority to be exempt from the requirements for a specific reason. I would hope that local authorities would be expected to set clear and firm targets for any school that is given an exception to work towards reaching the relevant linguistic minimum over a certain period. It shouldn't be acceptable for a school to be given a permanent exemption under 'exemption' and 'further exemption' regulations.

Late immersion education

3.19. The Bill places a duty on local authorities to promote late immersion provision for parents, carers and learners. It is important that parents or carers, together with learners, are aware of the option, and the different linguistic outcomes that belong to the new linguistic categories.

3.20. It must be ensured that there is an understanding among parents and carers about how children acquire language and the efficiency of the immersion method, and that young people understand the opportunities that come with speaking Welsh. Good practice must also be shared between local authorities in order to build on and learn from successful experiences across Wales.

3.21. Ensuring effective linguistic immersion for non-Welsh speaking newcomers should be a priority, and the most effective way of doing this is through immersion centres. They are essential for maintaining and supporting Welsh-medium education infrastructure, especially in areas of significance with higher linguistic density. Without a national network of centres, there is potential for latecomers to change the formal and informal language of schools, and therefore undermine efforts to ensure that Welsh is the formal and informal language of the school.

3.22. It would be useful to consider developing these centres to be family immersion centres, placing the learning experiences of the child and the parent / carer in the same setting. The Mudiad Meithrin Cwtsh Club scheme provides informal opportunities for families to learn the language together in a fun atmosphere.

3.23. The Bill includes a duty for local authorities to provide late immersion for learners. Lessons could be learned from successful schemes in other sectors in providing immersion opportunities. The Mudiad Meithrin Croesi'r Bont scheme already offers an immersion framework for early years settings across Wales, bridging with the schools that feed the Meithrin group, and further development of

this scheme could be considered with financial support. Croesi'r Bont also provides *Camfa Croesi'r Bont* support for settings that are starting their Welsh language journey with staff who are new Welsh speakers.

3.24. It must be ensured that late immersion opportunities are available for all learners, and not only *'if there is a place in the local Welsh school'*. The Welsh language belongs to everyone and it must be ensured that every child has the opportunity to acquire the language, so in order to succeed, the offer must be available to every pupil at every stage of the pupil's educational journey.

3.25. It must also be ensured that plans for 'late' immersion are available for pupils who choose to change the medium of education at any time, not only pupils who are new to the area. These plans must of course be age appropriate and therefore should be specifically designed for a full age range.

Part 4: Planning Welsh language education and learning

A national framework

- 4.1. The results of the 2021 Census highlighted the need to take purposeful action in order to increase the numbers of Welsh speakers across Wales. The education system and the early years care and education sector have an integral role to play in moving towards this goal.
- 4.2. The report of the Commission for Welsh-speaking Communities (July 2024) states that it is of the opinion that the current Welsh-medium provision in many Welsh-speaking areas is not intensive enough to maintain Welsh as a community language for the future. It notes that this is particularly true of the secondary sector and that great strides need to be made in this area.
- 4.3. We would like to emphasise the importance of the early years at the beginning of the linguistic continuum, especially in terms of communication and supporting parents and carers at the beginning of their Welsh language education journey. The results of the 2021 Census highlighted that there is a possible lack of understanding among parents and carers about their children's linguistic ability. We believe that parents and carers, as well as society in general in Wales, need a better understanding of the process of language acquisition, and the importance of early immersion at the start of the continuum.

- 4.4. There is a strong relationship between the availability of Welsh early years care and education in the non-maintained sector and starting the child's statutory education journey in the statutory sector. We cannot overstate the importance of collaboration with Mudiad Meithrin and Cwlwm in order to plan to ensure provision of early years care and education in the Welsh medium, within easy reach of all communities in Wales, to realise the aim of creating and increasing demand for statutory Welsh-medium education in our communities. In the year 2022-2023, 87% of the children leaving Meithrin groups for school transferred to the local Welsh school.
- 4.5. We therefore welcome that the Bill identifies the need for the *National Framework for Welsh Language Education and Learning Welsh* to set out the steps that the Welsh Ministers will take to provide opportunities to learn Welsh through childcare for those under compulsory school age as well as through nursery education (Part 4: 23 (4)(a) (b)). This could lead to the stabilisation of the funding for the 'Cam wrth Gam' national training scheme and our 'Croesi'r Bont' immersion scheme, which are core elements in delivering the above.
- 4.6. Currently, a minority of children in Wales are cared for and educated in Welsh and finish their education (at whatever point) as proficient Welsh speakers. The Welsh Government's current trajectory, set in 2017, sets a goal for 40% of all our learners to be in Welsh-medium education by 2050.
- 4.7. We cannot overstate the importance of collaboration with Mudiad Meithrin and Cwlwm in order to plan to ensure provision of early years care and education in the Welsh medium, within easy reach of all communities in Wales, to realise the aim of creating and increasing demand for statutory Welsh-medium education in our communities.
- 4.8. Where there is confidence in the early years – there is natural confidence in the language as they move forward on their linguistic journey through the school.

Workforce

- 4.9. If we want all children in Wales to receive at least some of their education through the medium of Welsh (beyond studying Welsh as a subject), we will need a clear commitment from the Welsh Government to grow an education workforce and early years workforce with the language skills necessary to expand Welsh-medium provision and improve our children's linguistic outcomes.

- 4.10. A recent report by *Alma Economics* for the Equality, Poverty and Children's Evidence and Support Division⁴ highlights the challenge of recruiting and retaining Welsh-speaking staff in the childcare and play workforce.
- "Nevertheless, setting managers frequently discussed significant difficulties in recruiting and retaining Welsh-speaking staff members. Regarding retention, it was often explained that salaries were insufficient to motivate staff to stay in their posts, given alternative positions in which they could benefit from their language skills (examples mentioned included work in schools or local authorities). When discussing recruitment, managers explained that they often received an insufficient number of qualified applications for Welsh-speaking posts and were thus unable to provide sufficient Welsh-medium provision for children. Managers highlighted the lack of incentives stemming from insufficient pay and no benefits resulting from additional qualifications obtained, including improved Welsh skills or training in Welsh."*
- 4.11. We believe that Mudiad Meithrin has expertise to share in this context, as highlighted by 'Camfa' and 'Clebran' (that are part of our 'Croesi'r Bont' immersion scheme).
- 4.12. A number of respondents to the *Alma Economics* report across childcare, playwork and childcare also voiced concerns about not being able to compete with schools when recruiting staff. We are aware that childcare staff and play workers report that they are paid the minimum wage or slightly above the minimum hourly wage, which is not a fair reflection of their accountability and responsibility for young children, or the physical and emotional demands of the job, let alone the long working hours, which are often unpaid.
- 4.13. Using the report's data, expanding the childcare element of the Flying Start programme to all two year-olds will require an expansion in the number of staff of approximately 24% on current levels. This means recruiting around 4,000 additional staff in childcare by 2027/28.
- 4.14. Assuming that the Welsh-medium sector represents around 20% of the whole sector, this means that 800 more Welsh-speaking qualified staff Welsh are needed by 2027/28, or 266 every year. Considering the rate of retirement / departure from the

⁴ Alma Economics (2024). Mapping the childcare and play workforce in Wales: phase 2 report Cardiff: Welsh Government, GSR report no. 56/2024. Available here: [Mapping the childcare and play workforce in Wales: phase 2 report \(gov.wales\)](#)

sector that is similar to that for teachers (around 13%), the number of new practitioners who need to qualify annually rises to 370.

ALN

- 4.15. We support the statutory basis within the current WESP (*Outcome 6: An increase in the provision of Welsh-medium education for pupils with additional needs (ALN) in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018*).
- 4.16. We support the calls in this committee's recent report (*Do disabled children and young people have equal access to education and childcare? – July 2024*) to improve and harmonise the provision of learning needs through the medium of Welsh.
- 4.17. This is an area that requires national planning in order to support the increase in pupils that will receive their education through the medium of Welsh in the future, so it will be necessary to ensure that Welsh medium ALN provision is strengthened and harmonised across Wales. Although the Additional Needs and Education Tribunal (Wales) Act 2018 states that provision should be ensured in the language most suitable for the child, there is no guarantee that provision is available through the medium of Welsh and it remains postcode lottery if the child can continue their education through the medium of Welsh.
- 4.18. It must be ensured therefore that the *Community special schools: plans and language category designation* section does not undermine current efforts to ensure fair access to Welsh-medium provision for all children in Wales – regardless of their needs.

Local Welsh in education strategic plans

- 4.19. In order to ensure the quality of Welsh language provision, it must be ensured that increasing the provision of Welsh in schools and early years settings is carefully planned alongside identifying the language skills of the workforce, and informed planning for fostering and developing Welsh language skills across the care and education sectors in Wales.
- 4.20. We see the benefits of changing the current system of local authorities' Welsh in Education Strategic Plans to Local Welsh in Education Strategic Plans. Shifting the focus towards the steps that the local authority intends to take to achieve the

targets set by the Welsh Ministers for increasing Welsh language provision in schools will be a way of measuring progress towards the goal of increasing education opportunities in the Main Language - Welsh category.

- 4.21. As an organisation that works with settings and services for families and the youngest children, we feel the need to emphasise the role of early years care and education settings when planning for the future. Consistency must be ensured between Local Welsh in Education Strategic Plans and the availability of early years care and education in local authorities. This would ensure recognition of the fact that the language development of a child and their family is a journey, and that it is important to lay the strongest possible foundations in the early years in order to be able to build on them during a child's time in statutory education.
- 4.22. *Outcome 1: more nursery age / three-year olds receive their education through the medium of Welsh* is an important target within current WESPs. It must be borne in mind that the majority of families make decisions about the language medium of their children's formal education in the period before starting statutory education. The targets of Outcome 1 therefore directly affect the targets of *Outcome 2: More reception class children/ five-year-olds receive their education through the medium of Welsh*, as local authorities ask parents to make the choice of school for a child's primary education for the start of full-time education (age 4 / reception class).
- 4.23. Innovative work is taking place among CWLWM partners to identify English-medium childcare settings that can convert to being Welsh-medium childcare providers. This will happen over a period of time, with support on charitable, constitutional and language issues, recognising that discussion on the implications of this needs to continue with regulators such as CIW, the Charity Commission and Estyn. We are ready to discuss how we can build on this expertise to support teachers and other practitioners in the nursery and reception classes in English and Dual Language schools to move up the Welsh language categories (see point 4.5 above).
- 4.24. Mudiad Meithrin has extensive experience in promoting, encouraging and supporting the growth of Welsh-medium care and education across Wales through various schemes such as Cymraeg for Kids, Clwb Cwtsh, Camau and Croesi'r Bont (a scheme which aims to facilitate language transition between early immersion settings (eg Cylchoedd Meithrin) and local Welsh schools). Additional investment in these schemes to promote and encourage use of Welsh in the early years, with an emphasis on the importance of transitioning from provisions for children under

compulsory school age to the statutory education sector, would lay a consistent, national foundation for local campaigns.

- 4.25. The long-term vision of the Bill sets out a clear ambition in terms of growing the Welsh language education provided in Welsh schools. If we want all children in Wales to receive at least some of their education through the medium of Welsh beyond studying Welsh as a subject, we will need a clear commitment from the Welsh Government to grow an education workforce and early years workforce with the language skills necessary to expand Welsh-medium provision and improve our children's linguistic outcomes.
- 4.26. Significant investment - in terms of time and funding - will be required over the next few years to re-skill the qualified workforce to develop Welsh skills to support the development of learners in schools to reach the outputs in terms of ability in the Welsh, as specified in Part 2 of the Bill, by 2050. Clear guidance from the Welsh Government for local authorities must be ensured, which ensures deliberate and purposeful planning across the areas that are part of developing and increasing use of Welsh across the education sector.
- 4.27. We trust that, as Mudiad Meithrin, we can share our expertise in this area with partners across the education sector (if we receive the necessary investment).
- 4.28. Schemes such as the National Centre for Learning Welsh's *Camau* scheme are vital to the development of an early years workforce that is either beginning the language journey or confident in use of Welsh. However, the importance of securing training and qualification opportunities through the medium of Welsh for those who want to start a career in the field, and ensuring consistent opportunities to become proficient bilingual / multilingual, must be noted. The Welsh Government already acknowledges this.

Part 5: The National Welsh Language Learning Institute

- 5.1. We agree that stable and appropriate support must be secured for Welsh language education and for learning Welsh beyond the education sector in order to ensure the long term success of the Bill. We understand that the current remit of the National Centre for Learning Welsh couldn't be expanded without holding a new tender process that included the additional requirements.

- 5.2. The vision of establishing one national body to carry out strategic oversight is an encouraging way of furthering collaboration opportunities between the different education sectors.
- 5.3. We agree in principle with the concept of establishing a body responsible for providing strategic guidance for lifelong Welsh learning. Discussion must be held with the variety of organisations and partners that currently support individuals on their language journey when establishing the National Welsh Language Learning Institute.
- 5.4. The Bill's Explanatory Memorandum states that it is anticipated that the Institute will be able to commission a network of providers to offer Welsh learning services. Although we can see the need to ensure value for money, and reduce the duplication of grassroots provision, we also wish to note the importance of not losing the specific expertise of organisations and providers when converting from the current system to the Institute.
- 5.5. We note that we, as Mudiad Meithrin, have significant expertise and experience in supporting linguistic development in Welsh among early years practitioners (eg the *Camau Working Welsh* scheme, the *Croesi'r Bont* scheme, *Clwb Cwtsh*) and from developing resources and training that support practitioners to introduce and develop children's Welsh skills (eg training on the language immersion approach, resources to support the development of children's communication skills).
- 5.6. Since its establishment in 2016, the National Centre for Learning Welsh has reduced from twenty seven to eleven providers in the Welsh learning sector across Wales, and the majority now provide in and for specific geographical areas of Wales. This enables the Centre to provide specialist support for learning Welsh to those over compulsory school age through the network of providers that already work with them.
- 5.7. We are already working closely with the Centre to deliver the innovative *Clwb Cwtsh* programme, that gives parents the opportunity to start their journey to learn Welsh, ultimately leading to a higher number of adults attending the Centre's mainstream courses. During 2023/2024, 1,027 adults registered for *Clwb Cwtsh* sessions, with 597 children joining the sessions. Placing *Clwb Cwtsh* within Mudiad enables the scheme to operate strategically, as Mudiad Meithrin is in an ideal position to identify adults that are keen to learn Welsh, as an average 80% of the children who attend Cylchoedd Meithrin are from households where English is spoken as the main

language. Therefore it can benefit from the expertise of staff that work closely with Meithrin and Ti a Fi groups, as well as the staff from Mudiad's other schemes, such as Set Up and Succeed. Mudiad Meithrin can identify where and how a *Clwb Cwtsh* programme should be provided for specific groups of parents/carers.

- 5.8. Similarly, Mudiad Meithrin operate the *Camau* Working Welsh scheme, in collaboration with Cwlwm's other partners, which can benefit from expertise within the Mudiad, as well as having direct access to the scheme's target audience.
- 5.9. We hope to continue and build on the effective collaborative relationship that we have already developed with the National Centre for Learning Welsh as specialist support for lifelong Welsh learning, including school education, is moved to the Institute.
- 5.10. We hope that the Institute will facilitate building on the partnerships we already have with higher education institutions, further education colleges, the Coleg Cymraeg Cenedlaethol and the National Centre for Learning Welsh. This would enable us (with an additional financial contribution) to expand into areas such as training the education workforce, sharing resources and good practice across the sector in schools and fostering language skills for further education subjects, building on the Centre's current specialisms.
- 5.11. This would be a way of growing communities of professional practice, by holding conferences on teaching Welsh that are open to all (at all levels and in all contexts), publishing papers on innovative developments in the field of pedagogy, learner case studies, theory-led practice, and empirical studies further strengthening the Welsh learning infrastructure.

Part 6: General

6.

- 6.1. We have no comments to make on this section.

Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them (including commencement and the United Kingdom Internal Market Act)

- 7.1. It must be considered that not everyone that provides services or supports the work of schools and early years care and education settings is employed by the education

authority, and joint planning will be required with various other agencies and organisations (eg health boards) to ensure that all of the workforce involved in education are developing their workforces in the same way.

The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)

8.1. We agree that the powers in the Bill for Welsh Ministers to make subordinate legislation are appropriate.

Whether there are any unintended consequences arising from the Bill

- 9.1. Targets cannot be set for the education workforce without simultaneous consideration of the needs (and therefore targets) for the care and early years education workforce. It must be ensured that setting national targets for the statutory education workforce does not lead to unexpected impacts regarding the workforces for the pre and post statutory education sectors (eg early years practitioners and further education college staff).
- 9.2. It must be ensured that the sectors work together to ensure that increasing workforce numbers in one sector does not have a detrimental effect on the workforce of a related sector (such as early years practitioners moving to work as classroom assistants in schools, without there being a corresponding plan to also increase the number of early years practitioners).
- 9.3. From 1 August 2024, Medr is responsible for funding and regulating the tertiary education and research sector in Wales. It must be ensured that Medr's priorities align with the Bill's aim and objectives in order to ensure consistency across schools, further education, higher education, apprenticeships and adult community-based learning.

The financial implications of the Bill (as set out in Part 2 of the Explanatory Memorandum).

10.1. We note that the majority of the proposals in the Bill build on existing structures and practices within the Welsh Government and local authorities. The Cymraeg 2050 targets are already being addressed by various departments across

central and local government, and the current WESP system is already being administered.

10.2. However, we acknowledge that significant financial investment will be required over the next few years in order to achieve the long-term ambition. Investment in training and re-skilling the early years workforce and current education will be required to move settings and schools along the linguistic continuum, as well as the need to invest in language training for individuals starting new careers in the field.

10.3. Workforce planning and ensuring a sufficient supply of staff to maintain Welsh-medium provision in the childcare and play sector, as well as the school workforce, is key in achieving the goals of the Welsh Government's Welsh Language Strategy. In order to reach the goal of expanding Welsh language provision over the next decade, we must invest today in qualifying the workforce of tomorrow. Without this investment, there is a risk that we will imitate the response of the childcare sector in England to the extension of free childcare there – where the sector is supportive of the idea but is unable to provide a sufficient number of places to meet the additional demand.

General comments

11.1. The Welsh language belongs to all of us and it must be ensured that our education and care organisations enable all children to benefit from it. Mudiad Meithrin therefore gives cautious welcome to what is included in the Bill.

11.2. However, it must be noted that we would like to see the Welsh Government set an ambitious long-term goal of ensuring that all schools in Wales provide Welsh-medium education in the future, committing to the financial investment that will be required for the building blocks, the education and care workforce and awareness raising campaigns that will be essential to realise that vision.

11.3. We acknowledge that the Bill's remit deals with the statutory education sector. However, we emphasize that the statutory education sector cannot be separated from the early years care and education sector. We agree with the comments of the Commission for Welsh-speaking Communities, which states the importance of the early years to the future of the Welsh language. The close relationship between the sectors means that reforms to the statutory education sector directly affect the early

years care and education sector – and that is more prominent in the Welsh language sector.

- 11.4. We note the importance of planning for adequate education, care and play provisions in town and country developments across Wales. S106 conditions must be imposed when considering the growth needs of urban areas, and specifically the need to ensure the provision of settings and services that offer dedicated Welsh medium provision for the care and education of our children.
- 11.5. We note the need to harmonise active language policies that are different for two year olds (for example) and for children in statutory education that are only a few years older. We see that primary education in areas of significance with higher linguistic density often upholds a firm Welsh medium policy. Often, local authorities do not put the same expectation in place for the non-maintained nursery sector, even though it mostly caters for the same children. The majority of non-maintained nursery settings (for example, day nurseries, playgroups, nursery groups) receive grants (and therefore public funding), which pay for childcare services such as Flying Start, the Childcare Offer and education for three year olds. It is therefore difficult to justify such inconsistency, even though local authorities cannot set a language policy for the non-maintained sector in the same way.
- 11.6. In its recommendations, the report of the Senedd’s Culture, Communications, Welsh Language, Sport and International Relations Committee on the legislative framework that supports the provision of Welsh-medium education states that the Welsh Government should urgently commission a rapid review of the transport policies of all local authorities in Wales to identify the areas that prevent access to Welsh-medium education provision.
- 11.7. It must be ensured that Welsh education, and therefore Welsh-medium schools, is not at a disadvantage due to the distance between school and home. Legislation must be considered to ensure that transport to the nearest Welsh-medium education setting is offered, free of charge, to all children where it is not within reasonable walking distance from home, throughout the child's time in education (from 3 to 18 years to be practical for families).
- 11.8. Often, there is no free transport to school for nursery age children, only when they start reception class. If there is no Welsh medium school close to home, families will therefore choose English-medium nursery education provision for reasons of convenience, and once they have settled in a school's nursery class, it is

very unlikely that a parent will then move the child to reception class in a Welsh school.

- 11.9. See also an increasing number of families stating that education authorities do not offer free transport to 6th form pupils that continue to receive their education in Welsh schools, but that the same individuals are eligible for free bus fares if they were to choose studying at the further education college and not continuing to study solely through the medium of Welsh.

Agenda Item 7

This document provides a translation of correspondence received from Cymdeithas yr Iaith

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar [Bil y Gymraeg ac Addysg \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) on the [Welsh Language and Education \(Wales\) Bill](#)

WLE 06

Ymateb gan: Cymdeithas yr Iaith

Response from: Cymdeithas yr Iaith

Key points:

- The Welsh language belongs to everyone in Wales, from all walks of life, and everyone should be entitled to become confident Welsh speakers. The Bill in its current form will not achieve that, even in the long term.
- The Bill's processes for increasing Welsh language education depend on the whims of individuals, with no statutory aims to drive them forward. The Government's previous non-statutory targets for Welsh language education have been consistently missed.
- If the Bill is to ensure that pupils finish their time in education as confident Welsh speakers, a statutory aim needs to be placed on the face of the Bill that 100% of children will receive Welsh medium education by 2050.
- Rather than static categories, a language continuum needs to be established for schools on the face of the Bill with a timetable for all schools to move along over time in order to become Welsh medium schools.
- There is consensus that learning Welsh as a second language is completely ineffective as a pathway for young people to become confident speakers. The solution is to create a single Welsh language learning and assessment qualification for all and to remove Welsh second language qualifications.
- Significant investment and much more ambitious planning is needed for the development of a bilingual workforce to grow Welsh medium education, with clear duties set out on the face of the Bill.

Introduction

Cymdeithas yr Iaith is an association of people, acting peacefully for the Welsh language and Welsh communities as part of the international revolution for rights and freedoms.

As an organisation campaigning for the Welsh Language Education Act since 2015, we welcome the proposed legislation in this vital area. In May 2023, the Cymdeithas yr Iaith *Welsh Language Education Act* was published, which presents in legal language what we want to see in such an act.¹ In that Act, the main aim was clear: to turn the whole education system into Welsh medium by 2050. Among other things, that would mean that all young people leaving the statutory education sector would be confident Welsh speakers, removing the current divide between young people who leave the Welsh language education system and speak the language with confidence, and the rest, who are failed by the education system and who, almost without exception, leave the education system unable to speak Welsh.

Despite the Government's good intentions in introducing this Bill, we have great concerns that the Bill will actually maintain the *status quo* continuing to deprive a large percentage of Welsh children of the Welsh language, even in the long term, more than anything because of the lack of statutory education targets on the face of the Bill, and because of the lack of a mechanism to ensure that schools will move along the continuum towards becoming Welsh language schools.

Although the Bill is nowhere near to achieving the Society's goal in our *Welsh Language Education Act*, we think it can be a step in the right direction, but that is subject to important changes being made to it to ensure that it achieves what it sets out to achieve. Indeed, we believe that this Bill can be significantly strengthened by making amendments based on what is set out in this document.

The right of every child

We believe that the Welsh language belongs to everyone in Wales, whatever their background, and that the Government's education policy should reflect that by ensuring that every child in the country leaves school confident in their use of the Welsh language. Currently, around 80% of children and young people in Wales are deprived of the language due to the failure of our education system to grow and normalise Welsh-medium education. The disparity is worst among disadvantaged communities, migrants and ethnic minorities. Because they leave school without being confident Welsh speakers, it is likely that the majority of young people here will be excluded from cultural, social and economic opportunities for the rest of their lives.

As the Society has stated over the years, Welsh language education for all is the long-term aim and there is a growing consensus on that. As the draft stands, there is no clear goal on the face of the Bill, there is no clear timetable for schools to move along a continuum from one language category

¹ Cymdeithas yr Iaith, *Cymdeithas yr Iaith Welsh Language Education Act* (Aberystwyth: Cymdeithas yr Iaith, 2023) <https://cymdeithas.cymru/sites/default/files/Welsh%20Language%20Education%20Act%20-%20SAES%20-%20TERFYNOL.pdf>

to the next and the minimum 10% Welsh language provision in 'Primarily English Language' schools is terribly low, nothing but a reflection of the situation as it really is today. Without substantive changes, therefore, the Bill will validate the current situation, where the majority of our young people are deprived of their right to the Welsh language.

Calculating the Million

The 2021 Census showed a drop of 24,000 to 538,300 speakers, following the same trend since 2001.² This was contrary to the Welsh Government's prediction in its main policy document for the language, *Cymraeg 2050: A Million Welsh Speakers*, that there would be an increase of 38,000 to reach a total of 600,000 in the 2021 Census.³

In setting the million speakers as a statutory goal in the Bill, the Government in section 3(1) are also seeking to change the definition of the million. Since the disappointing Census figures were published, the Government has been trying to redefine the target with reference to other surveys which show there are more speakers than the Census. The honest way to increase the number of Welsh speakers is not to change the method of measurement, but to implement and invest in policies that will lead to an increase in the number of Welsh speakers and everyday use of the language.

For the Cymdeithas, as stated, it is a matter of social justice to create an education system for the future that will ensure that all young people leave school as confident Welsh speakers. Giving the Welsh language to our young people is not a way of reaching the million, but a goal in itself that will enable them to play a full part in modern Wales as citizens of a bilingual country.

However, it is also fair to note the scale of the task of ensuring the revival of the Welsh language over the coming decades, and education is vital in that regard. The Commission for Welsh-speaking Communities' final report on education says, "no other policy field has as much influence on the ability to acquire and use language."⁴ Currently, only 14.9% of Welsh children receive Welsh at home, which is insufficient to maintain, let alone increase, the current numbers of Welsh speakers.⁵

² Welsh Government, *Welsh language in Wales (2021 Census)* (Cardiff: Welsh Government, 2022) <https://www.gov.wales/sites/default/files/pdf-versions/2022/12/3/1671609478/welsh-language-wales-census-2021.pdf>, p. 3.

³ Welsh Government, *Cymraeg 2050: A Million Welsh Speakers* (Cardiff: Welsh Government, 2017) <https://www.gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf>, p. 24.

⁴ The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 116.

⁵ Fiona O'Hanlon, 'Choice of Scottish Gaelic-medium and Welsh-medium education at the primary and secondary school stages: parent and pupil perspectives', *International Journal of Bilingual Education and Bilingualism*, 18.2 (2015), pp. 242-259.

Even provision in the Welsh-speaking communities “is not intensive enough to sustain Welsh as a community language in the future” according to the Commission for Welsh-speaking Communities.⁶

RECOMMENDATION: Make it clear on the face of the Bill that it is the “census conducted in accordance with the Census Act 1920” that will be used to calculate the number of Welsh speakers while such a census is being conducted.

Creating confident Welsh speakers

Section 11(3)(b)(ii) refers to ensuring that every single child leaves school with at least a B2 proficiency level “for oral interaction”. In other words, creating confident speakers throughout the statutory education system.

Unfortunately, this would not be the outcome of the Bill in its present form. Without putting schools on a clear path to progressive learning through the medium of Welsh, there is a risk of reliance on teaching Welsh as a second language as a pathway to creating confident speakers. For over a decade, there has been consensus that learning Welsh as a second language is completely ineffective as a pathway to creating confident speakers. A report *One Language for All* chaired by Professor Sioned Davies of Cardiff University for the Welsh Government concluded that learners taking the GCSE Second Language course were “not confident enough to use Welsh outside the classroom”, and that it was “the eleventh hour” for the “tedious” subject.⁷ According to research by Cymdeithas yr Iaith, since the report was published in 2013, 142,351 children have achieved a GCSE Welsh Second Language grade, and have consequently been deprived of the opportunity to become confident Welsh speakers.⁸

The Bill as it stands seeks to redefine Welsh language education, suggesting that it includes “teaching Welsh” as well as learning through the medium of Welsh. This is a move that unnecessarily muddies the waters, and risks undermining the objectives of the Bill. Welsh medium education is the only way to create confident Welsh speakers, and Welsh medium education for all is the only way to ensure the right of every child in Wales to be able to speak the language with confidence.

⁶The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 116.

⁷ Welsh Government, *One Language for All: Review of Welsh second language at Key Stages 3 and 4* (Cardiff: Welsh Government, 2013) <https://www.gov.wales/sites/default/files/publications/2022-07/review-of-welsh-second-language-at-key-stages-3-and-4.pdf>, p. 1.

⁸ BBC Cymru Fyw “Llusgo traed’ Cymraeg ail iaith yn ‘amddifadu plant’ (Welsh only), 27 September 2023. <https://www.bbc.co.uk/cymrufyw/66933933>

RECOMMENDATION: Establish a single learning and assessment continuum for Welsh, removing the second language Welsh course.

RECOMMENDATION: Modify the definition of Welsh language education in section 8(2)(a) to mean “education and training through the medium of Welsh” only, i.e. remove clause 8(2)(a)(i).

Statutory Targets for Welsh Language Education

One of the main failings of the Bill is the fact that it does not set statutory targets for increasing the provision of Welsh medium education across the sector. Instead, the draft Bill would place statutory responsibility on the Welsh Ministers to *set targets* (section 1 (C)). The growth of Welsh language education would therefore depend, as it now stands, on a vision or lack of political vision or a difference of opinion about the importance of giving all children the same language opportunities.

The Welsh Government’s *Cymraeg 2050: A Million Welsh Speakers* strategy currently sets a non-statutory goal that 40% of Welsh children will be in Welsh language education by 2050. This target would continue to deprive 60% of Welsh children of the language, even within a quarter of a century’s time.

Furthermore, historical evidence warns us of the weaknesses of setting non-statutory targets: some set by the Welsh Government for Welsh medium education have consistently been missed. For example, in the Welsh Government’s *Welsh-medium Education Strategy* in 2010, a target was set for 25% of seven year olds to be assessed in Welsh first language by 2015, and 30% by 2020.⁹ By 2021, the figure was actually only 22.8%.¹⁰ This also fell short of a revised, less ambitious, 24% target that the Welsh Government set for 2021 in the language strategy, *Cymraeg 2050: A Million Welsh Speakers*.¹¹

In the twenty years between 2003/04 and 2023/24, the percentage of children receiving Welsh medium education in primary schools has only increased from 19.06% to 22.47%.¹² The corresponding figure for secondary education over the same period has increased from 12.89% to

⁹ Welsh Government, *Welsh-medium Education Strategy* (Cardiff: Welsh Government, 2010) <https://dera.ioe.ac.uk/id/eprint/4248/1/100420welshmediumstrategyen.pdf>, p. 21.

¹⁰ Audit Wales, *A Picture of Schools: Report of the Auditor General for Wales* (Cardiff: Audit Wales, 2021) <https://archwilio.cymru/sites/default/files/publications/POPS-Schools-Eng.pdf>, p. 8.

¹¹ Welsh Government, *Cymraeg 2050: A Million Welsh Speakers* (2017) <https://www.gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf>, p. 24.

¹² Statistics Wales, *Number of pupils in primary, middle and secondary school classes by local authority and Welsh category* (Cardiff: Statistics Wales, 2024) <https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Level-Annual-School-Census/Welsh-Language/pupilswelshclasses-by-localauthority-welshcategory>

13.48%. We are not convinced that the Bill as it stands will change this: without a clear drive brought about by statutory, quantitative targets, the pattern could be expected to continue.

There is a precedent for setting quantitative targets in legislation. The Climate Change Act (2008), passed by the British Labour Government under Gordon Brown, sets carbon emissions reductions by 100% compared to 1990 emissions as a statutory goal.¹³ The Welsh Language and Education Bill itself (section 1(a)) sets a statutory goal of one million Welsh speakers by 2050. We therefore see no reason not to put statutory targets on the face of the Bill for the growth of Welsh medium education, which would tie the Government and local authorities to action.

We are deeply concerned about the wording of section 11(2)(b) of the Bill, which sets out a children's language attainment goal "by a date specified by the Welsh Ministers by regulations", rather than "by 2050" as set out in the White Paper. This would give ministers free rein to push the target forward through regulations if they are not on course to meet it, repeating the pattern of recent years of lowering targets rather than acting firmly to meet them.

The Bill's mechanism (section 3(2)) for calculating the number of Welsh speakers is also of concern. There are consistent assessments of pupils throughout their education, and an end of Key Stage or GCSE assessment would be a more reliable measure without requiring additional assessments.

RECOMMENDATION: Set a statutory target for Welsh language education provision and the percentage of children in Welsh medium education by 2050 on the face of the Bill (new section 1(b)), alongside the target of a million Welsh speakers. We recommend that the target should be 100%.

RECOMMENDATION: Use an end of Key Stage assessment or GCSE instead of a self-assessment for section 3, (2a) and (2b).

Establishing a Language Continuum for Schools

We have real concerns about the categories that are being set up in section 9. Over the decades, we have seen that as a consequence of categorizing schools schools are placed in a static position without a stimulus to make progress. The Bill as it stands provides no assurance that schools will move up the categories, let alone make progress within the categories, which raises fundamental questions about the effectiveness of the Bill.

What is needed is for schools to move along a language continuum towards becoming Welsh language schools. We therefore propose that a Continuum for schools be established on the face of

¹³ Government of the United Kingdom, *Climate Change Act* (2008)
<https://www.legislation.gov.uk/cy/ukpga/2008/27/part/1/crossheading/the-target-for-2050>

the Bill, which would set every school on a journey to becoming a Welsh medium school. Clear Progression Steps along the Continuum should be defined on the face of the Bill, replacing the current categories in section 9.

In order to ensure transparency and progress along the Continuum, the Progression Steps should be more specific than the three current broad categories contained in the Bill, providing clarity on where the school is currently on the Continuum, and the steps and timescale for moving to the next Progression Step.

It is also crucial that there is a specific Progression Step for ‘Welsh medium schools’ (the current 3P category), which is the final Progression Step on the Continuum, and the destination for every school.

The Bill should outline deadlines for schools to move up to the next Progression Step so that schools cannot stand still. Schools will also need significant incentives and support to move along the Continuum.

The Commission for Welsh-speaking Communities recommended immediate action to move schools in areas of higher density linguistic significance along the language continuum so that inclusive Welsh language education is the destination.¹⁴ This can happen very quickly in those areas. The pathway for all local authorities to ensure that 100% of their children receive Welsh medium education is outlined in our document *Welsh Education for All: Reaching the Objective*.¹⁵

Another reason for not continuing with a categorisation system is the lack of definitions for school categories in the Bill itself. Instead, the Bill refers to the responsibility of Welsh Ministers to set an amount of Welsh language education provided “as a range for each language category” (section 10(2)(b)). It is essential in order to maintain and develop the provision of Welsh language schools that specific percentages are included in the Bill itself. As stated, we think the categories should be removed. However, it is vital that ‘Primarily Welsh Language’ schools are defined in the Bill as schools where Welsh is the medium of all school education – except for English lessons.

We are concerned about the impact of creating the new category of schools ‘Primarily English Language, Partly Welsh’, which sets 10% of Welsh language education as a minimum (only half a day a week), and especially so as this includes teaching Welsh. Teaching Welsh has been compulsory since the Education Reform Act 1988, and subsequent laws (now the Curriculum Act 2021). According to the Welsh Government itself, almost every single child already received this

¹⁴The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 118.

¹⁵ Cymdeithas yr Iaith, *Welsh Education for All: Reaching the Objective* (Aberystwyth: Cymdeithas yr Iaith, 2024) <https://cymdeithas.cymru/dogfen/welsh-education-reaching-objective>

minimum 20 years ago.¹⁶ Experience has shown that this does not create confident Welsh speakers.

We believe that a minimum of 30% (which constitutes a day and a half of the week) should be imposed in the first instance, which is a meaningful increase on the current situation. All schools should start working towards this immediately, with significant Government support to do so, and there should be a goal for all schools to comply with the requirement within five years at the latest (that is, by September 2030).

Currently, with the exception of 'Primarily English Language', the categories do not specify a minimum Welsh language provision in the Bill itself. We believe that such minimums are at the heart of the Bill and should therefore be placed on the face of the Bill rather than in secondary legislation or policy.

Establishing any new English medium provision would undermine the aim of increasing the percentage of Welsh language education provision. We believe that a new section is needed in the Bill dealing with new schools and the reorganisation of existing schools. This should include ensuring that any new school established is Welsh medium, and that any school resulting from the reorganisation of existing provision moves up the school continuum.

RECOMMENDATION: Replace the Categories contained in section 9 with a continuum with clear Progression Steps towards Welsh language education for all.

RECOMMENDATION: Establish a minimum of 30% Welsh language education provision in every single school, effective by September 2030.

RECOMMENDATION: Establish that Welsh shall be the medium of all Welsh school education, except for English lessons.

RECOMMENDATION: Establish as a percentage on the face of the Bill what is the minimum provision of education through the medium of Welsh at each of the Progression Steps.

RECOMMENDATION: Establish on the face of the Bill that any new school established in the future will be Welsh medium, and that any school resulting from the reorganisation of existing provision shall be higher in the school continuum than the provision replaced.

Exemptions

¹⁶ Welsh Assembly Government, *Iaith Pawb: A National Action Plan for a Bilingual Wales* (Cardiff: Welsh Assembly Government, 2003) [https://busnes.senedd.cymru/Data/WelshCommittee582/20021219/Agenda/ELL%2019-02\(p.1\)%20Atodiad%20B%20Adroddiad%20y%20Gweinidog.pdf](https://busnes.senedd.cymru/Data/WelshCommittee582/20021219/Agenda/ELL%2019-02(p.1)%20Atodiad%20B%20Adroddiad%20y%20Gweinidog.pdf), p. 39.

We are very concerned about the exceptions to achieving the minimum in Welsh medium education contained in the Bill. Because of these, it will be possible for schools to be excepted from the Bill's requirements for a total of six years, which constitutes almost a quarter (24%) of the period to 2050. Would it not also mean that when (and if) the minimum Welsh provision is increased in the future, schools will be able to be excepted once again for further periods? Either way, such exceptions would mean that more children will miss out on the opportunity to be confident Welsh speakers.

RECOMMENDATION: Remove sections 18 and 19 of the Bill which provide for exemptions to the minimum amount of Welsh language education.

The Education Workforce

The Bill currently fails to address one of the fundamental challenges of growing Welsh medium education provision, namely the lack of statutory targets to grow an education workforce able to work in the Welsh language. It neither deals in a meaningful way with the workforce, or incentives to train to learn through the medium of Welsh. This risks undermining the objectives of the Bill altogether.

According to the Education Workforce Council, in 2024, 26.5% of school teachers have registered their ability to teach through the medium of Welsh; however, 33.0% have registered their ability to speak Welsh.¹⁷ There is therefore a 6.5% gap, namely those who can speak Welsh but do not teach through the medium of Welsh, and who may not have the confidence to do so; with little investment and support, this is an opportunity for very rapid growth of the Welsh medium education workforce in the coming years, as an urgent starting point for the further growth required.

According to Statistics Wales, teachers' ability in terms of the Welsh language in the 2023/24 school year is as follows: 24.7% have a proficiency level (C1); 6.7% with a higher level (B2); 7.7% with intermediate level (B1); 18.7% with basic level (A2); 24.3% have entry level (A1); 17.8% have no Welsh skills.¹⁸ According to these figures, 31.4% already have the ability to learn through the medium of Welsh and a further 7.7% have very strong skills, according to the National Centre for Learning Welsh's work ability definitions.¹⁹

¹⁷ Education Workforce Council, *Annual Education Workforce Statistics for Wales 2024* (Cardiff: Education Workforce Council, 2024) <https://www.ewc.wales/site/index.php/en/documents-eng/about/workforce-statistics/annual-statistics-digest/current/1245-annual-education-workforce-statistics-report-2024/file>, p. 13.

¹⁸ Statistics Wales, *Teachers Welsh language ability by local authority* (Cardiff: Statistics Wales, 2024) <https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/school-workforce-annual-census/welsh-language/welshability-by-localauthority>

¹⁹ National Centre for Learning Welsh, *Work Welsh: Employers' Information* (Carmarthen: National Centre for Learning Welsh, 2017) https://dysgucymraeg.cymru/media/1658/pecyngwybodaeth_s_arlein_fesul-tudalen.pdf pp. 12-15.

Catalonia managed to increase the proportion of Catalan medium schools from 3% to almost 100% in 15 years between 1978 and 1993, despite an almost complete ban on Catalan education during Franco's time and a shortage of language literate teachers, by investing in learning courses for the workforce, namely 'reciclatge' courses for teachers who were in work.²⁰

Even for the present requirements, the Government's current *Welsh in education workforce plan* is completely inadequate for the purpose of achieving a Welsh in education workforce, and totally underestimates the scale of the task of achieving an adequate workforce for the future. Much more significant investment needs to be made in workforce training, to include those training from scratch to become teachers as well as those already working. Cymdeithas yr Iaith believes that at least £20m of annual investment is needed in this area to start making a real difference.²¹

While the teachers already in the system are the number one priority, there is also a need to transform the teacher training system for those training from scratch to be teachers, so that everyone who goes through that system is able to teach through Welsh by the time they qualify. This can be done by adding periods of intensive Welsh learning to the course, extending the current year course to up to two years depending on the language skills of the trainees involved.

It is also necessary to consider the workload of the education workforce in general in order to recruit and maintain the workforce, including a Welsh language proficient workforce. The expectations placed on the education workforce have increased in recent years and are unsustainable; it threatens the future of the profession and the training of a bilingual workforce.

The Bill should include percentage targets for increasing the capacity of all the workforce to learn through the Welsh language over time. A strategy for achieving this has been proposed by Cymdeithas yr Iaith in *Cynllunio'r Gweithlu Addysg – Cyrraedd Miliwn o Siaradwyr Cymraeg* [Welsh only].²²

Furthermore, there is no body named in the Bill to be responsible for carrying out the training work, something that is essential if we are to see any kind of growth.

If a workforce that can learn through the medium of Welsh is to be trained on a significant scale, a strong mechanism will be required at national level. At the moment, local authorities, which often have capacity shortfalls, have a responsibility. For this reason, a central body needs to be

²⁰ Joanna McPake, Wilson McLeod, Fiona O'Hanlon, Giovanna Fassetta and Mona Wilson, 'Professional development programmes for teachers moving from majority to minoritized language medium education: lessons from a comparative study', *Lang Policy*, 16.1, (2016), pp. 85-86.

²¹ Cymdeithas yr Iaith, *Strategaeth datblygu gallu'r gweithlu addysg* (Aberystwyth: Cymdeithas yr Iaith, 2017), https://cymdeithas.cymru/datblygu_gweithlu?page=7

²² Cymdeithas yr Iaith, *Cynllunio'r Gweithlu Addysg – Cyrraedd Miliwn o Siaradwyr Cymraeg* (Aberystwyth: Cymdeithas yr Iaith, 2016) <https://cymdeithas.cymru/dogfen/cynllunior-gweithlu-addysg-cyrraedd-miliwn-o-siaradwyr-cymraeg>

responsible for producing a strategy and promoting training, in partnership with Coleg Cymraeg Cenedlaethol and other bodies, an idea that has potential but would need to be adequately funded.

The Institute that would replace the National Centre for Learning Welsh could take that responsibility, but the re-establishment of the Welsh Learning Centre should not be an administrative exercise with very marginal impact. Therefore, the duty of the Welsh Ministers should be included on the face of the Bill, to adequately fund this work. It is also important that the whole education system has a clear duty to undertake the provision.

RECOMMENDATION: Set statutory percentage targets for teachers training to be able to learn through the medium of Welsh on the face of the Bill.

RECOMMENDATION: To place a duty on the Welsh Ministers on the face of the Bill to ensure that the Institute is adequately resourced to deliver intensive courses for increasing the Welsh language capacity of the existing workforce in order to achieve the objectives of the Bill, and a duty, support and incentives for the education system to undertake that provision.

Early years

Welsh medium early years provision is vital in paving the way for the significant growth required in statutory age Welsh language provision. We therefore believe that the Bill should include targets around pre-statutory education provision, ensuring that the early years sector moves rapidly towards Welsh language provision for all.

The Government is of course currently providing significant funding to the early years sector through Flying Start and the Childcare Offer. Currently, the bulk of this provision is English medium, and there are concerns that much of the provision also undermines the Government's aim for growth in Welsh language education.

RECOMMENDATION: Include a duty on the face of the Bill for Welsh Ministers to fund Welsh language early years provision, and to fund the existing early years sector to move towards Welsh language provision for all.

Regional Growth

Local authorities are directly responsible for maintaining schools, and therefore increasing the provision of Welsh language education. It is therefore a glaring weakness that the Bill does not replace nor significantly strengthen the organisation of the Welsh in Education Strategic Plans, which have proven ineffective. Under the current system, many local authorities are failing to

increase the provision of Welsh medium education according to their responsibility, and the Bill, if passed as it stands, will not change that.

We are concerned about a lack of criteria and ways of monitoring the achievement of local authorities. The only force the Bill gives to a Minister is to force local authorities to ‘reconsider’ their Strategic Plans and justify them, rather than to force new plans that would meet national requirements to ensure growth.

Cymdeithas yr Iaith has previously suggested that Estyn adopts a scrutiny and reporting role on local authority performance and practical steps for growing Welsh medium education provision. This was suggested as a possible option in the White Paper, and its omission from the Bill itself is a further weakness that could be rectified by amendment.

RECOMMENDATION: Reshape the National Framework and local strategic plans so that they incorporate a duty to willfully and continuously increase Welsh medium provision. The Welsh Government should provide targets, resources and motivation to ensure that local authorities contribute to achieving Welsh language education for all by 2050.

RECOMMENDATION: Stipulate Estyn in the Bill as the body responsible for scrutinising local authorities’ progress on Welsh language education.

Rural Schools and the School Organisation Code

One of the objectives of Cymdeithas yr Iaith’s *Welsh Language Education Act*, which is not reflected in the Government’s corresponding Bill, is to maintain and develop Welsh language rural schools. It is widely accepted that they are absolutely key to the survival of our communities, but the proposed Bill would not improve the current situation. The current School Organisation Code (2018) sets an assumption in favour of rural schools, but there are concerns over the implementation of that assumption.

According to the Commission for Welsh-speaking Communities, the importance of such schools is unquestionable:

*"Schools are a core part of the social network of their communities. Their contribution at the community level should be seen as a public good. This should be kept in mind as policy is developed. For example, it would be better in some instances to federate schools and share resources between them (in the use of technology for example), rather than close them."*²³

²³The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 117.

RECOMMENDATION: The importance of rural, Welsh schools to their communities should be established in statute in this Bill.

Transport

We are concerned that no coverage of free school travel provision is included in the Bill to strengthen existing provision through the Learner Travel (Wales) Measure 2008. As stated, the ultimate aim is for all schools to deliver through Welsh, but in the meantime we believe that the current provision of learner travel must be strengthened to ensure fairness.

RECOMMENDATION: Legislation is needed to ensure free transport for Welsh language schools, including sixth form, and for Welsh language early years provision.

Immersion

We welcome the fact that there is a reference to immersion in the Bill, which is a recognition of the need for late immersion provision throughout Wales. However, we do not agree that this provision should be available on a demand basis but rather that authorities should have a responsibility to actively increase uptake of late immersion provision, in order to increase in the short term the number of children who can benefit from Welsh medium education provision.

RECOMMENDATION: Modify section 22(2)(a) and 22(2)(c) to state that local authorities have a responsibility to encourage increased uptake of late immersion education provision and to proactively increase provision over time.

Subordinate legislation

As we have suggested above, leaving so much of the substance of the Bill to secondary legislation is a matter of considerable concern. While there is scope for secondary legislation in exceptional circumstances, issues such as what progress will be made nationally in Welsh language education provision, the proportion of Welsh language provision in different school categories, and by which time all Welsh pupils leave school as “independent Welsh language users” are core issues to this Bill and it is utterly inappropriate to leave them to secondary legislation. It is undemocratic, will lead to ineffective law-making, and will ultimately undermine the objectives of the Bill.

RECOMMENDATION: Put substantive issues, including issues relating to Welsh language education targets, implementation timescales, and Welsh learning goals, on the face of the Bill rather than leaving them to secondary legislation.

Unintended outcomes

The most obvious unintended outcomes are the risk that all of the Bill's intentions will come to a standstill from gaps on the face of the Bill in terms of statutory targets, timescales, and moving schools along the continuum. As we state above, so much has been left to the subordinate regulations and discretion of the Welsh Ministers, that there is really no guarantee that the majority of our young people will not leave school in 2050 without being confident Welsh speakers.

Further information

For any further information, or to discuss the issues set out in this response, please contact cyfathrebu@cymdeithas.cymru.

Education Group
Cymdeithas yr Iaith
September 2024

This document provides a translation of correspondence received from Dyfodol i'r Iaith

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar [Bil y Gymraeg ac Addysg \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee on the Welsh Language and Education \(Wales\) Bill](#)

WLE 01

Ymateb gan: Dyfodol i'r Iaith

Response from: Dyfodol i'r Iaith

Part One Promotion and facilitation of use of the Welsh language

1. Dyfodol i'r Iaith welcomes the purpose of Part 1 of the Bill, promotion and facilitation of use of the Welsh language.

We welcome the setting of targets to increase Welsh Language use in the workplace, socially, in education, at home, between generations and in the community. These targets involve the foundations of minority language revival, and we look forward to further action taken by the Welsh Ministers in this respect. We also welcome the Welsh Language Commissioner having a consultancy role.

2. We welcome the intention to set linguistic targets in all local authority areas, and to act on the basis of this.

3. While the Census figures can be misleading in terms of counting the number of Welsh speakers (these figures are on the basis of self-assessment, and without distinction between fluent speakers and those who can speak a few words) we welcome the aim of calculating the number of Welsh speakers. We are concerned that the Census figures for under 16 year old children are much higher than those for children over 16. The figures for under 16 year olds do not differentiate between those in Welsh schools and those in English schools, e.g. there is likely to be a very large difference in language skills between these groups.

To coincide with the Welsh speaker figures, we would like to see statistics about the use of spoken Welsh, e.g. regularly, occasionally. Such statistics may be more important than numbers of those who are able to speak Welsh.

4. We welcome the review of the Welsh language standards. We want to see public bodies offering jobs through the medium of Welsh at least according to the percentage of their county population who speak Welsh. These jobs may vary according to the Welsh language skills required for the positions.

In this first part of the Bill it is necessary to refer to the need for an adequate workforce to implement the expected requirements of the Bill.

We need a much higher supply than the current workforce of teachers who will be able to teach through the medium of Welsh. The Government's estimate was an additional 1,000 primary teachers to teach through the medium of Welsh by 2031 and a further 1,300 by 2050. In the secondary sector the Government's estimate was that an additional 400 Welsh teachers were needed by 2031 and a further 300 by 2050. In addition to these the Government says an additional 1,400 Welsh-medium teachers are needed in the secondary sector by 2031 and a further 1,000 by 2050.¹

This increase in teachers is absolutely central to increasing Welsh-medium school and the Welsh language in schools. In light of this, the Bill needs to set targets:

- (a) Numbers of Welsh subject teachers in the secondary sector
- (b) Numbers of teachers who teach through the medium of Welsh in the primary and secondary sectors
- (c) Other relevant workforce numbers in the primary and secondary sectors

These targets should be linked to

- (a) Methods to encourage students to study at Welsh Universities
- (b) Language learning and refreshing as an integral part of all PGCE courses in Wales
- (c) Expanding Sabbatical Schemes for teachers to learn the language and/or refresh it

Part 2 Describing Welsh language ability

¹ *Cymraeg 2050*, Welsh Government, 2017, p. 12.

5. We are concerned that the Common European Framework of Reference for Languages does not fully apply to the learning and use of the Welsh language in schools. The Framework is primarily concerned with offering professional targets to foreign / second language learners.² While the Framework can be useful, and provide a means for employers to appoint according to language skills, it can be less beneficial in school situations, and particularly for first language Welsh speakers. It would be more relevant, in the context of schools, to produce a skills code according to the different skills aimed at by age, learning media and enriched experiences.
6. Based on this, it would be good for any code involving schools to clearly define what is expected of children of different ages

Part 3 Welsh language education : This needs to be changed to 'Welsh language provision'

8. The heading of this section, 'Welsh Language Education' is completely misleading. The Bill, as a whole, misuses the term 'Welsh language education' to mean any use of the Welsh language in schools, rather than using the term to mean education through the medium of Welsh, as is the case in Welsh schools.

The definition of 'Welsh language education' in the Bill [teaching Welsh and education and training through the medium of Welsh] combines two different concepts, and in using the term 'Welsh language education' for both concepts, the meaning of 'Welsh language education' is lost.

Learning a language as a subject has never been considered 'education'. If it is, it is possible to say that a school that teaches French as a subject offers 'French education'. While 'French education' is offered in French lessons, it is not factually correct to say that the school offers 'French

² 'It is a tool for reflection for all professionals in the field of foreign/second languages with a view to promoting quality, coherence and transparency through a common meta-language and common scales of language

proficiency.- , <https://www.coe.int/en/web/common-european-framework-reference-languages/introduction-and-context>

education'. The school is likely to offer Welsh / English / bilingual education.

We definitely think it is necessary to distinguish between 'Welsh language education', which is schools that offer most of their education to all pupils through the medium of Welsh, and other schools.

Claiming that all schools in Wales can offer 'Welsh language education' is a mis-perception, and is likely to confuse education planning and cloud parental expectations and lead to unsuitable long-term decisions for pupils.

The use of the term 'Welsh language education' in the bill is therefore particularly misleading, as there are no other terms in the bill to describe Welsh-medium schools. The term 'Welsh language school', 'Welsh language schools' nor 'Welsh-medium education' is used in the bill. There is also no reference to early age 'immersion education'. Early age immersion education, and the continuation of education in Welsh language schools, has been the foundation of language recovery in Wales since the second world war, and the standard to aspire to.

The use of this term in the bill is contrary to all discussions that the Welsh Government has had and that have occurred in Wales in general since the second world war.³ Here are some examples:

- 2002, *Ein Hiaith: ei dyfodol*, Y Pwyllgor Diwylliant a'r Pwyllgor Addysg a Dysgu Gydol Oes, t. 80:

³ Mae'r term 'addysg Gymraeg' wedi ei ddefnyddio ers tro byd i olygu 'addysg cyfrwng Cymraeg', e.e. *Cyflwyniad i Ddwyeithrwydd*, Delyth Jones, CAA, 1977, t, 117:

“Gwelir bod y rhieni hyn felly, yn sylweddoli mai addysg Gymraeg, (neu addysg drochi i'r plant di-Gymraeg), a rydd y cyfle gorau iddynt ddod yn ddwyieithog” Mae trafodaethau ar ysgolion Cymraeg yn barhaus yn sôn am 'addysg Gymraeg', e.e. *Gorau Arf*, gol. Iolo Wyn Williams, 2002, t. 14 “A ydyw Addysg Gymraeg yn llwyddiant? Mae'r ffaith fod y galw am addysg Gymraeg yn parhau i gynyddu ynddi ei hun yn fesur o lwyddiant.”

“Cydnabyddir rôl hollbwysig ysgolion cyfrwng Cymraeg dynodedig... wrth gyflwyno dwyieithrwydd yn y pedair sgil ieithyddol i bob disgybl”

Gelwir am “strategaeth er mwyn hwyluso’r gwaith o ehangu’r model hwn”

- 2002, *Cynllun Iaith Gymraeg ar gyfer Llywodraeth Cynulliad Cymru*, t. 14: “Yr ydym eisiau cynyddu’r ystod o gyfleoedd i bobl fedru derbyn addysg drwy gyfrwng y Gymraeg”

- 2003, *Iaith Pawb, Cynllun Gweithredu Cenedlaethol ar gyfer Cymru Ddwyieithog*, Llywodraeth Cymru, t. 39:

“Mae Llywodraeth y Cynulliad yn rhoi pwys mawr ar ddatblygu darpariaeth yn Gymraeg ar gyfer y blynyddoedd cynnar... “

t. 40: “ Mae addysg trwy gyfrwng y Gymraeg wedi ehangu’n gyson a dymuna Llywodraeth y Cynulliad annog y duedd hon. Cydnabyddir rôl hollbwysig addysg trwy gyfrwng y Gymraeg a dulliau trochi ieithyddol yn y broses o ddatblygu sgiliau dwyieithog cadarn ymhlith disgyblion.”

“Mae diffinio darpariaeth cyfrwng Cymraeg mewn ysgolion yn flaenoriaeth i Lywodraeth y Cynulliad.”

- 2017, *Cymraeg 2050*, Welsh Government, p. 12: “Increase the proportion of each school year group receiving Welsh-medium education from 22 per cent... to 30 per cent... by 2031.. and then 40 per cent.. by 2050”

p. 21: “Welsh-medium immersion education is our principal method for ensuring that children can develop their Welsh language skills, and for creating new speakers”

- 2017, *Cymraeg 2050: A million Welsh speakers*, Welsh Government, p. 7: “Ensuring the availability of Welsh-medium education, from those initial early years through to primary and secondary education then progressing through to higher and further education, is fundamental to achieving the target of a million Welsh speakers.”

- 2021, *Canllawiau ar Gynlluniau Strategol Cymraeg mewn Addysg*, Llywodraeth Cymru:

“Cymraeg 2050 is clear that Welsh-medium immersion – which is where the medium of teaching and learning is delivered wholly or

predominantly through the medium of Welsh – is the most reliable model for creating Welsh speakers with the skills and confidence to use the Language comfortably in their everyday lives.”

It is astonishing that, in light of these reports, and all the targets regarding Welsh language education in Welsh Language in Education Strategic Plans, the term 'Welsh language school' or 'Welsh language schools' or 'Welsh medium education' does not occur at all in the Bill, and that the term 'Welsh language education' is being utilised to mean something quite different. The Bill cuts across the development of Welsh language education which has been central in the revival of the Welsh language.

Our proposal is that the definition in Part 3, 8 (2) changes to this:

(a) “Welsh language education” means

- (i) immersion education in the period under 7 years old
- (ii) education in Welsh-medium schools where 100% of the pupils receive at least 80% of their education through the medium of Welsh

(b) “Welsh language provision” means –

- (i) the teaching of Welsh in non Welsh-medium schools
- (ii) education and training through the medium of Welsh in non Welsh-medium schools

The letters of the subsequent paragraphs will need to be changed as a result. Due attention will then need to be paid to distinguishing between 'Welsh language education' and 'Welsh language provision' throughout the document.

Interestingly the Secretary's explanatory notes state 'Set the minimum amount of Welsh provision in 'Primarily English – partly Welsh' schools at 10%', in contrast to the wording of the Bill. It would be good for the Bill to adopt the term 'provision'.

Following this, all other references to 'Welsh language education' in the bill will need to be changed to 'Welsh language provision'.

One of the main shortcomings of the Bill, following this, is the failure to mention Welsh language schools, how to develop them, what pathways are available to transfer to. There needs to be a whole section in the Bill to discuss this. I would be happy to comment when the opportunity arises.

9. Given the lack of attention to Welsh-medium education in the Bill, there is a corresponding failure in the definitions of school language categories in section 9 (2) (a).

The 'Primarily Welsh language' category does not come close to defining how Welsh schools operate. 'Primarily Welsh language' can be suitable for any school where 51% of the pupils learn through the medium of Welsh. One of the qualities of Welsh schools is that they offer pupils from English or bilingual homes a complete immersive education. For most Welsh school pupils, school is the only place in their life where Welsh is the only or main language. This gives them the essential environment to become natural Welsh speakers. No other category of school gives this to pupils.

There needs to be a separate category, therefore, for Welsh schools. We propose this as the essential category:

(d) the 'Welsh-medium school - schools where 100% of the pupils receive at least 80% of their education in Welsh' category

This category is the golden standard, being the only model (a) that enables the school to be a Welsh-speaking community and (b) its ability to produce fluent Welsh speakers, regardless of their linguistic background, has been proven. This model is the only way to provide inclusive Welsh language education.

We have mixed feelings about the 'Primarily Welsh Language' and 'Dual Language' categories, as these are open to vague definitions. The Government can yet determine how these definitions are suitable for bringing more pupils to Welsh. What is essential at this stage is that the validity of category (d) is recognised in legislation, namely in this bill.

While there is talk of a linguistic continuum, and a way for schools to move along a linguistic continuum, we therefore need category (d) at the top end of the continuum, the model to access.

Given the linguistic arrangement of the categories in the Bill, it would be advisable for this new category, (d), to be at the top, namely (a), and the other three categories to follow it.

10. Further to the above discussion, I find this clause odd: "Amount of provision of Welsh language education for each language category". 'Education' needs to be eliminated from this heading.

Then there needs to be a specific discussion on 'Welsh-medium education', starting in the under 7 sector. There is no adequate discussion in the Bill of the possibilities for this sector, and how important this sector is as the basis of pupils' educational linguistic career.

11. We have a very mixed view of the learning goals for the schools. As we have previously noted, we do not feel that the use of suitable categories for adults learning a second language is fully relevant to the statutory education system. There is not enough differentiation in the aims, between 'dual language' schools and 'primarily English language' schools, for the aims to be appropriate.
12. 'Welsh language education' needs to be changed to 'Welsh language provision'.
13. The term 'provision of Welsh language education' is unsuitable in 'Primarily English Language, partly Welsh' schools. 'Education' needs to be eliminated from the term. It goes on to mention the 'Welsh learning goal', which is more appropriate in this context.
14. It is difficult to believe that every school governing body in Wales has sufficient expertise to produce a 'Welsh language education delivery plan'. To begin, the term 'Welsh language education' is inappropriate in this context. Again, please change to 'Welsh language provision'.

In (2) the governing body will be asked to consult with the head of the school and pupils in setting out their 'Welsh language education delivery plan'. This is irrelevant to Welsh schools, whose language policy has already been set. This is indicative of the Bill's lack of consideration for Welsh-medium education.

15 and 16, 17 and 18: Again, 'Welsh language education' needs to be changed to 'Welsh language provision'.

20 and 21: **There is a discussion here about the designation of school language categories. Without a category specific to Welsh-medium schools, the discussion is useless. We would argue that asking local authorities to**

designate language categories to schools, without Welsh schools having a category, is a huge step backwards, being hugely damaging to the prospect of ensuring the prosperity of the language.

22 Late immersion education

It is good to see a discussion here of late immersion education, but early immersion education policies, under the age of 7, which is the most important age of language acquisition, needs great attention.

Part 4 Planning Welsh language education and learning

23 We welcome the need for a National Framework for Welsh Language Education and Learning Welsh.

However, the main weakness here again is the constant talk of 'Welsh language education' which ignores Welsh-medium schools. The title of the Framework will need to be changed to 'National Framework for Welsh Language Education, Learning Welsh and Welsh Language Provision'.

This section needs to note that increasing Welsh schools is a primary goal, and pathways for other schools to convert to become Welsh schools can be shown here. This should be a core element of the Bill.

There is no mention here of transport to Welsh schools. Convenient transport to Welsh schools is essential as most Welsh schools are further from pupils' homes than English schools in most local authorities.

A national framework needs to deal with the unfairness of the inconvenience of transport to Welsh schools which is contrary to the spirit and wording of the Welsh Language Bill 2011.

28 Local Welsh in education strategic plans

One of the main aims of the Welsh in Education Strategic Plans that have been in place to date is that local authorities are to:

"Improve the planning of the provision of education through the medium of Welsh ("Welsh medium education") in its area"⁴

⁴ *Guidance on Welsh in Education Strategic Plans*, Welsh Government, 2021, p.

It is again remarkable that the Bill does not, therefore, distinguish between Welsh schools, or Welsh medium education, and the rest of the school system. This section needs to recognise the importance of these Schemes for the development of Welsh-medium schools, and rephrase the section to mention 'Welsh language provision'.

Among the consultation groups in (4) (b) it is necessary to add Parents for Welsh Language Education.

Part 5 National Institute for Learning Welsh

37 We welcome the duties entrusted to the National Institute for Learning Welsh. Nevertheless, we are not convinced that these duties are going to compensate for the serious loss of students who are under the encouragement of various Government procedures and schemes studying at universities outside Wales. These students do not have the opportunity to improve their Welsh language skills in studying their subjects, and the PGCE programmes of universities outside Wales do not give Wales a proper linguistic and cultural background.

The Government's current schemes, e.g. the Welsh in Education Teacher Retention Bursary, the *Cynllun Pontio*, and the Welsh-medium Capacity Grant seek to compensate for the deficiencies in the workforce recruitment and retention regime, without being able to address a fundamentally flawed element, namely the unsustainable and increasingly large percentage of students studying outside Wales.

This document provides a translation of correspondence received from Mentran Iaith Cymru

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar [Bil y Gymraeg ac Addysg \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) on the [Welsh Language and Education \(Wales\) Bill](#)

WLE 05

Ymateb gan: Mentrau Iaith Cymru

Response from: Mentrau Iaith Cymru

Written evidence from Mentrau Iaith Cymru to the Children, Young People and Education Committee (CYPE) regarding scrutiny of the Welsh Language and Education Bill: Comments on the general principles of the Welsh Language and Education (Wales) Bill and the need for legislation to achieve the stated policy intent.

Part 1: Promotion and facilitation of use of the Welsh Language

1. Welsh language strategy targets: a million Welsh speakers and increase in use

1.1 Mentrau Iaith Cymru welcomes the statutory basis that this Bill will provide for targets to achieve a million speakers. We particularly welcome the statutory basis for targets relating to the use of the Welsh language. We know how important it is in the field of linguistic planning just to ensure use, let alone proficiency, and the Mentrau Iaith face a permanent battle to maintain community use of the Welsh language in order to ensure a living language for future generations. We hope that having a statutory basis to increase the use of Welsh will facilitate work on the ground and attract more resources and investment in our work.

1.2 Mentrau Iaith Cymru welcomes the provision in the Bill that would place a duty on Welsh Ministers to set, measure and report on the Welsh Language Strategy. We believe that this guidance needs to be accompanied by a clear narrative that emphasises the point that suitable levels of attainment in the Welsh language give the young people of Wales an equal opportunity to become bilingual. The Bill would not deprive young people of the choice of an English-medium education; instead, it would give all young people the opportunity to make choices regarding their future language use. The intention of the Bill is to enable young people to choose to use Welsh and English in the future, rather than deprive some of them of that choice. This narrative needs to permeate all Government dealings with local authorities and education practitioners, and it needs to form the basis of teacher education training, so that the entire workforce can take pride in the intention of this Bill. It also needs to be woven into the language of the Commissioner for Future Generations, as it aims to redress where young people's Welsh skills are inconsistent or have been denied and ensure the continuation of the language for future generations.

2. Reporting on targets in the Welsh language strategy

1.3 We welcome the direction in the Bill to set targets and measure progress in

the 'provision of Welsh language education', but we would emphasise the importance of measuring attainment rather than provision alone and measuring performance as well as process. We hope that the assessment arrangements referred to in Part 3, section 12 ensure that pupils' linguistic attainment is measured to ascertain whether schools are meeting their Welsh learning goals.

3. Calculating the number of Welsh speakers

1.4 While we welcome the provision in the Bill regarding calculating the number of Welsh speakers for the purpose of reporting on the Promotion and Facilitation Strategy targets, we are a little concerned about the lack of emphasis on measuring use, as the Bill elaborates on 'calculating the number of Welsh speakers', but not on calculating use.

4. Reviewing the Welsh language standards

4.1 We welcome the direction in the Bill to review the Standards with the aim of increasing their impact and contribution to achieving Strategy targets to promote the Welsh language. The Standards relating to the development of the workforce's Welsh language skills allow for a situation in which a public body would fulfil the requirements of the Standards by reporting on the Welsh language skills of the workforce without ensuring any progress from year to year. Often, our public workplaces fail to offer continuity or development to the Welsh language skills of the workforce as they miss an opportunity to employ their skills in their work, and they miss an opportunity to encourage informal use of Welsh in the workplace. This frequently undoes the good work of Welsh language education under the WESPs. In addition, with regard to local authorities, the Standard relating to Welsh Language Promotion Strategies in general in the county is inadequate. The bar needs to be raised in terms of increasing residents' use of the Welsh language. As well as practical projects, the Mentrau Iaith wish to offer language planning expertise to local authorities to fulfil the Promotion Standards requirements, but the Standards do not place sufficiently firm expectations on authorities to create positive activity on the ground that has been planned and endowed with suitable investment.

Part 2: Describing Welsh language ability

2.1 We welcome the intention to standardise the ability to use the Welsh language and the intention to draw up a code that includes specific characteristics. We trust that identifying types of users, and adopting common reference levels to describe those types, will be an effective means of harmonising the measurement of attainment for new speakers of all ages. Public bodies currently using different language levels will likely need help to secure a smooth transition to the new framework without too much delay. It will also be necessary to integrate the levels into recruitment processes and harmonise them with the requirements of the Standards on public bodies from the point of view of developing the workforce.

2.2 It would be good if the code contained a comment to help assessors recognise confidence in using Welsh within the skills framework, rather than just ability. We have experience of dealing with an independent speaker who has a relatively high level of understanding and speaking skills and is confident enough to use his skills. We also come

across extremely skilled speakers who doubt their ability and therefore miss opportunities to use Welsh regularly. Naturally, the first example would be much more useful to the workforce than the second and would also be more likely to pass the language on to the next generation.

Part 3: Welsh Language Education

9. School language categories, 10. Amount of provision and 11. The learning goals

3.1 We welcome the setting of clear categories in accordance with the amount of Welsh education provided and are especially pleased to see a learning goal for each category. This ensures clear accountability between the amount of provision and the quality and nature of the provision and is bound to trigger an increase in pupils' outcomes. We are confident that this will ensure progress and are extremely glad to see it specified that changing a school's category to provide less Welsh language education is not permitted. We agree with the learning goals for the categories and are confident that this arrangement will give parents and guardians a clear picture in terms of the expectation of a child's Welsh language ability from attending various schools.

We express our concern, however, that 'Main language - Welsh' is the highest category in the range. We know from the experience of recent years that the type of education that produces young people who are confident in their use of Welsh is Welsh-medium education in which the ethos of the school, including how it operates and is administered, is Welsh. These schools, which give pupils a holistic Welsh experience, provide spaces in which pupils can be immersed in the Welsh language. Our concern is that without a category higher than 'Main language – Welsh' in this Bill, there will be no incentive for schools to provide this type of education any longer. The danger is that a school that provides the specified percentage of Welsh-language learning for the highest category but does not provide a holistic experience of Welsh for the pupil would fall into the same category as a school that provides a space in which pupils are immersed in the Welsh language, with nothing to distinguish between the two types of school.

12. Assessing progress

3.4 We are extremely pleased that the Bill states that assessment arrangements made through the Curriculum and Assessment (Wales) Act will be interwoven with the types of Welsh users and set as outcomes for the education system through the Bill. Ensuring that pupils' linguistic outcomes can be measured in a way that matches the learning goal of various categories is essential to the successful implementation of the aims of this Bill, and the aims of the Ministers' Welsh language promotion strategy.

14. School Welsh language education delivery plans and 15. Approval of the plans

3.5 We welcome the direction to governing bodies to draw up plans that state their intentions regarding their schools' Welsh language provision, and we welcome the requirement for the Local Authority to approve it, and that plans need to have regard to a local Welsh strategic plan in education. The correlation between the school plan and the

county plan regarding the Welsh language ensures a clear line of accountability which is likely to trigger improvements.

3.6 We are particularly pleased that there is a direction in the Bill for the plans to deliver on how schools will promote their Welsh ethos and culture and promote the use of Welsh within the school. The Mentrau Iaith can attest that this aspect of Welsh language experience is just as important for the pupil as the medium of education, and absolutely essential to the learning success to produce confident speakers.

17 Amending a plan to change school language category

3.7 We welcome the way in which the Bill makes it simpler for a school to change category through the school plans and are happy with the direction that would make it impossible to change to a lower category to reduce the pupils' Welsh learning attainment.

Part 4: Planning Welsh language education and learning

23. National Framework

4.1 We welcome the direction in the Bill for Welsh Ministers to draw up a National Framework that explains how education will contribute to the Welsh Language Strategy. Setting a National Framework will give local authorities and school governors alike a clear direction of the education system's contribution towards reaching the goal of a million speakers by 2050. We regret, however, that the proposed Bill does not specify the relationship between the National Framework and the target for increasing the definition of the Welsh language. Given that use of the Welsh language is important if it is to be passed down to future generations as a living language, Mentrau Iaith Cymru is of the opinion that the framework should include **(d) the use of Welsh** in addition to (a) Welsh education, (b) (lifelong) Welsh language learning, and (c) acquiring the Welsh language. The inclusion of a duty to have regard to the use of Welsh would recognise the correlation between learning the language and using it. In our opinion, this would increase the likelihood of this Bill successfully giving rise to a contribution to the Welsh Language Strategy. Given that the school plans and the county plans refer to the need to promote the use of Welsh, logic dictates that the National Framework should mirror the requirement in the other two plans.

4.2 We would assume that the Framework should also refer to the recommendations in the Commission Welsh-speaking Communities report, 'Empowering communities, strengthening the Welsh language', indicating the steps to be taken to ensure that Welsh language education in Wales contributes to the strengthening the language in those communities that are considered significant as they have a higher density of Welsh speakers.

4.3 We also believe that the Framework should specify an expectation on local authorities to explain how their plans to reorganise schools or establish new schools will contribute to the aim of the Welsh Language Strategy.

28 Local Welsh in education strategic plans

4.4 We enthusiastically welcome the direction in the local strategic plans to clarify how the local authority will promote and facilitate the use of Welsh in schools, but we strongly believe that the duty needs to extend beyond the school walls. A duty should be included for local authorities to create opportunities to use the Welsh language in school and in the community. People cannot be expected to learn Welsh without the linguistic spaces in which they can practice and sustain their skills – there is no point in the education system ensuring that young people have Welsh language skills if they cannot use them in the community.

4.5 To this end, a direction should be included for local authorities to intertwine their local strategies with their promotion strategies, as required under the Welsh Language Wales Measure. This would be the most effective way of ensuring enough opportunities for children and young people to use their Welsh outside of school and to continue using those skills after leaving school.

4.6 This particularly applies to areas with a higher density of Welsh speakers. As noted in the Commission for Welsh-speaking Communities report, 'Empowering communities, strengthening the Welsh language', 'The Commission recognises that there is an interrelationship between Welsh as a school language and Welsh as a language of the community. In communities where the school and the community reinforce each other linguistically, a positive environment is created for Welsh and for intergenerational language transmission.'

4.7 Mentrau Iaith Cymru is of the opinion that a local authority should be directed to consult on the local strategic plan with the local Menter Iaith in order to benefit from its expertise in community linguistic planning.

Part 5: National Institute for Learning Welsh

5.1 We welcome the intention to create such an institute and urge that it be instructed to forge an active relationship with community organisations that provide extra-curricular opportunities to use Welsh, to ensure that formal learning is reinforced with informal use and that learners can develop their Welsh language skills outside the classroom. Consideration should be given to having the organisation contribute financially to the activity of those bodies that provide Welsh community opportunities, so that they can reinforce the Institute's efforts to create proficient Welsh speakers who enjoy using their Welsh in their everyday lives.

Part 6: General

The financial implications of the Bill

6.1 It should be recognised that investing more extensively in organisations that provide informal opportunities to use Welsh would be central to the Bill's success. If the use of Welsh is not maintained, the outcome of creating proficient speakers who are confident in

their use of Welsh will not reach fruition. The budget should recognise the role played by Mentrau Iaith in:

- Promoting Welsh language education and its benefits,
- Offering linguistic expertise to ensure that LA promotion strategies intertwine with and reinforce the WESPs
- Providing a Welsh community context for Welsh education
- Extending school boundaries so that children and young people's *use* of Welsh strengthens their education
- Supporting schools in the provision of in-school opportunities to use Welsh (lunchtime clubs etc) in order to achieve their Welsh learning goals
- Supporting schools to ensure a Welsh language ethos and culture in which the language is used.



The Implementation of education reforms

Response to the CYPE Committee interim report (July 2024)

11/09/2024

The Children, Young People and Education Committee is monitoring the implementation of two key education reforms as they are being rolled out throughout the Sixth Senedd.

In July 2024 following the third check-in the Committee decided to publish an interim report on the findings to date. The report includes 8 recommendations.

This is the Welsh Government's response to those recommendations.

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1. Introduction

In Wales, Education is Our National Mission. The implementation of our education reforms will achieve high standards and aspirations for all. Together the reforms to the Curriculum for Wales (CfW) and the Additional Learning Needs (ALN) system are acting as a catalyst for change.

There remains broad support for the new curriculum and new ALN system in Wales, for the new way of working, and commitment across the sector to get it right. This is set against a backdrop of wider reforms including the whole school approach to mental health and wellbeing, the new approach to school evaluation, improvement and accountability, and supported by the approach to national Professional Learning. These reforms are also happening in the context of ongoing challenges, including the continued legacy of the impact of the pandemic on learning and wellbeing, challenges with attendance, an increase in children and young people with complex needs, as well as workforce, and budgetary pressures.

The Implementation of the new ALN system is now in the third year, and by September 2025 we will complete the initial phase to move learners from the SEN to the ALN system. It is still early days in implementation of our ALN reforms which is a systemic and cultural change to improve practice to identify and support learners with additional learning needs.

2. Response to the 8 recommendations

Recommendation 1

The Committee recommends that:

As part of its review into the ALN Act and Code, the Welsh Government should review the clarity and accessibility of the legislation and statutory guidance. A focus of that work should be what constitutes, or at least is commonly understood as, so-called 'universal provision' by exploring the extent to which routine teaching across mainstream schools should meet the learning needs of children with low to moderate additional needs, and the point at which routine differentiation should tip into Additional Learning Provision.

Response: Accept

The Cabinet Secretary communicated her commitment to review the ALN legislative framework to ensure it is clear and understood at the Children, Young People and Education (CYPE) Committee's scrutiny session on 8 May. This includes considering the clarity and accessibility of the Act and statutory guidance to identify next steps to increase consistency of implementation across Wales.

The scoping of this work will be completed by November 2024 and informed by existing evidence, including the report by the CYPE Committee and initial findings from our four-year evaluation. An update to the Senedd on the progress and findings of the review is expected by Summer 2025.

In addition, work is underway to acquire further knowledge on what provision is 'generally available' to learners of the same age in Wales. Whilst 'universal provision' is not a term referenced in the ALN Act or Code, the term is widely used in the sector to describe the day-to-day practice which happens in every classroom to respond to educational needs, secure individual progress and ensure that all children and young people can thrive in their setting.

Financial implications: Accommodated in existing budgets

Recommendation 2

The Committee recommends that:

As part of its review into the ALN Act and Code, the Welsh Government should review how ALN provision is funded in mainstream schools. This work should include consideration of local authorities' funding formulae, sets of principles, and other funding arrangements to:

- ensure that local authorities are passing on appropriate levels of funding to schools to support pupils with ALN;
- ensure that the balance between provision funded by schools and by local authorities is as intended in the ALN Act and Code;
- investigate whether local authorities have changed how they fund ALN compared to how they funded SEN under the old system, and whether this is appropriate;
- promote transparency about how ALN is funded for the benefit of schools and families; and, most importantly
- ensure that a lack of funding or resources is not a reason for children being wrongfully denied an IDP.

Response: Accept in part

The Cabinet Secretary for Education continues to prioritise investment in ALN in Wales and it is the statutory responsibility of local authorities to pass on appropriate levels of funding to schools to support pupils with ALN.

The Welsh Government provides funding to local authorities to support their funding of pre-16 provision in schools in Wales mainly through the local government revenue settlement. The settlement is not ring-fenced; the funding allocated to each authority is available to the authority to spend as it sees fit across the range of services for which it is responsible, including schools.

As part of the duty on local authorities to ensure there is suitable education provision for children, they must make sure their arrangements for learners with ALN are sufficient to meet the needs of children and young people in their area. This is in line with the Welsh Government's policy that local authorities are best placed to judge local needs and circumstances and to fund schools accordingly. Annual statistics on budgeted expenditure on Special Educational Needs (SEN) and Additional Learning Needs (ALN) provision are published [here](#).

We are currently conducting a review of local authority mainstream school funding formulae across Wales. The review will identify the total funding that each local authority delegates to schools to meet the needs of pupils with ALN and the different distribution methods used.

The review will enable us to consider how the system can be improved to make a fairer funding system, to enable more transparent, comparable and consistent funding across Welsh schools.

Phase 1 of the funding review is due to be completed in September 2024. A report on the analysis and recommendations for improvement is due to be published in the Autumn term. Following this, phase 2 of the funding review includes consultation and redrafting of the school funding regulations, alongside a programme of work aimed at supporting and improving the school funding system, including the funding of ALN provision within mainstream schools. This work is subject to legislative process and timetabling.

Financial implications: None

Recommendation 3

The Committee recommends that:

The Welsh Government should ensure that every health board appoints its own dedicated DECLO as soon as is practicable to do so.

Response: Accept

The recommendation is accepted as every Health Board has a designated DECLO, in accordance with the ALN Act.

The ALN Act places a duty on all Health Boards to designate an officer to have responsibility for co-ordinating the Health Board's functions in relation to children and young people with ALN.

The role of the DECLO is to operate strategically to coordinate the Health Board's functions in relation to children and young people with ALN. The role has been positively received by both education and health sector and is driving forward standardisation and improvements at a national level.

The DECLOs have brought about improvements in communication, collaboration and joint working between authorities and the Health Boards and examples of this are cited in the CYPE Committee findings. In particular working regionally across local authorities and Health Boards to reduce variation, sharing of effective practice and lessons learnt, as well as establishing ALN champions within each service to create a sustainable structure for managing and responding to education requests.

The concerns raised by the committee are known to both education and health sectors. These operational capacity issues include longer than expected waiting times, lack of Allied Health Professional capacity to support assessments and attend review meetings, as well as inefficiencies and bottlenecks within the multi-agency ALN process.

The ALN Multi-agency Group are working together to resolve the operational challenges by agreeing shared expectations and national key performance indicators to monitor performance and compliance to statutory timelines. The Welsh Government will be considering schools' rights under the Act to make section 65 and section 20 requests as part of the legislative review, and responding to evidence and data from our four-year evaluation.

Financial implications: None

Recommendation 4

The Committee recommends that:

As part of its review into the ALN Act and Code, the Welsh Government should explore the impact of the Act and Code specifically on collaboration between health and education. That review should include consideration of: Implementation of education reforms:

- whether health bodies are consistently responding to referrals and requests for information from local authorities in a timely manner (and if not why not);
- whether the timescales for health board responses to local authorities provided for in the Act and subordinate legislation are appropriate;
- whether the requirement for referrals/requests for information to be made to health boards from local authorities – rather than from schools - is appropriate, and whether any changes could be made to make that collaboration more efficient; and
- whether there are any other bottlenecks in the ALN Act and Code that are hampering collaboration between health and education.

Response: Accept

The ALN Multi-Agency Collaboration Working Group is already exploring the impact of implementation of the Act and Code on collaboration, particularly between health and education. Key Performance Indicators are being developed for Health which will report on statutory performance data.

The Welsh Government has already committed to a review of the ALN legislation, and the scope of the review will be completed by November. This will consider areas within the Act and the Code that may have an impact on creating barriers to the operational processes between education and health.

Financial implications: Accommodated in existing budgets

Recommendation 5

The Committee recommends that:

The Welsh Government should remit the ALNCo task and finish group to undertake further work examining the pay and terms and conditions of teaching staff working wholly or partially as deputy/assistant ALNcos. The task and finish group should consider the training that individuals holding such posts should receive, the key tasks and responsibilities that they could expect to have, and considerations governing bodies should take into account when setting their pay.

Response: Reject

The Welsh Government ALNCo task and finish group was a time-limited group to consider the remuneration and non-contact time of Additional Learning Needs Coordinators (ALNcos). It has completed its work and a report was published and shared with the Independent Welsh Pay Review Body (IWPRB) for their consideration.

Further insights into the workload of ALNcos and that of the team around them are being gained from a variety of additional sources. This includes the four-year evaluation of the implementation of the ALN system which will survey the workforce, a doctoral thesis, a Ministerial ALNCo roundtable, and on-going discussions with delivery partners.

Following the publication of the Fifth Report of the IWPRB, Welsh Government will respond to any recommendations and consider any further actions.

Financial implications: None

Recommendation 6

The Committee recommends that:

The Welsh Government should publish the findings and recommendations of the teaching assistant task and finish group first established in February 2022.

Response: Accept in principle

The teaching assistant task and finish group is a sub-group to the Schools Social Partnership Forum (SSPF), which is made up of representatives from unions, employers and Welsh Government.

The task and finish group has been tasked by the SSPF with securing evidence to contribute to a wider agenda in reaching a position where there is parity across Wales for teaching assistants (TAs).

The task and finish group submitted the Teaching Assistant Job Description Review to the SSPF in January 2024 and it has subsequently been shared with ADEW (1 March 2024) and the WLGA Human Resource Development (HRD) Network Group (which constitutes the human resource directors of all local authorities) (18 July 2024).

Once all relevant groups and stakeholders have had the opportunity to comment on the Review, the SSPF will then need to agree a final report and at this stage, as the current chair of the SSPF, I will ask members for their agreement to publish.

Financial implications: None

Recommendation 7

The Committee recommends that:

The Welsh Government should remit the teaching assistant task and finish group to undertake further work examining the pay and terms and conditions of teaching assistants working wholly or partially alongside the ALNCo as part of a central ALN team. The task and finish group should consider the training that individuals holding such posts should receive, the key tasks and responsibilities that they could expect to have, and considerations that governing bodies and local authorities should take into account about their pay.

Response: Accept in principle

As outlined in response to recommendation 6, the teaching assistant task and finish group is a sub-group to the Schools Social Partnership Forum (SSPF). It is therefore a matter for the SSPF to discuss and agree collectively on how this recommendation is taken forward.

Pay and terms and conditions of teaching assistants remains the responsibility of local authorities and / or schools, with individual authorities having different approaches within their local pay frameworks to reflect local considerations. Therefore, it is important that local authorities, as the employers, are happy for the task and finish group to take forward this recommendation.

I will ask the WLGA as secretariat to the SSPF to include this recommendation for discussion on the agenda of the next meeting in order to agree a way forward.

Financial implications: None

Recommendation 8

The Committee recommends that:

The Welsh Government should set out its views on the following in relation to the Made for Wales GCSEs:

Does publishing the new GCSEs just one year before secondary schools are required to teach them provide enough time for effective preparation?

How will the Welsh Government mitigate the risk that, despite having a new flexible curriculum, a fixed set of qualifications will encourage secondary schools in particular to 'teach to the test', thereby undermining this flexibility and autonomy afforded to them under the Curriculum for Wales?

To what extent, if at all, does the Welsh Government consider having one single qualifications provider is a barrier to school flexibility under the Curriculum for Wales?

Response: Accept

Does publishing the new GCSEs just one year before secondary schools are required to teach them provide enough time for effective preparation?

Our new Made-for-Wales qualifications have been built from the ground up to align with the Curriculum for Wales, published in 2020. The Welsh Government has been clear in its communications to secondary schools that preparing for and implementing the curriculum itself is preparation for the new suite of qualifications, as these build upon

and seek to assess the learning provided under the new curriculum. In addition, we have been clear that curriculum experiences of learners beyond age 14 should not solely be based on qualifications. In February 2024, the Welsh Government published draft guidance on 14-16 learning in the Curriculum for Wales to help set out for schools both the legal requirements and the Welsh Government's policy expectations for a school's curriculum for 14 to 16-year-old learners under the Curriculum for Wales. The final guidance will be published in September 2024 and accompanied by a package of professional learning and resources to support schools in designing, implementing, and reviewing their curriculum for years 10 and 11.

The overall timeline for the roll-out of reformed made-for-Wales 14-16 qualifications strikes a balance between the time needed to design and develop high quality qualifications and the time needed by the workforce to prepare for teaching. Work started on the design of these qualifications once the Curriculum for Wales was finalised so that the first cohort of learners under Curriculum for Wales will be able to undertake the first wave of reformed GCSEs as part of their curriculum offer. Qualifications Wales worked closely with practitioners during the development period of Curriculum for Wales and have continued to do so in the development of the new suite of qualifications.

It is now standard practice for qualification specifications to be made available a year before first teaching, not just for GCSE qualifications in Wales, but for other reformed qualifications in Wales and across the UK. New qualification specifications were not always published this far in advance, and this is a lesson learned from previous reforms. In line with this practice, full specifications for those reformed GCSEs that will be taught from September 2025 will be published in September this year.

Learning from past experiences, the introduction of these new qualifications is being supported by more information, more frequently, and sooner than before. The publication of the final specifications does not, therefore, represent the first opportunity for teachers to have sight of what is coming. For example, Qualifications Wales consulted on design proposals for the GCSE qualifications in autumn 2022 and published Approval Criteria in June 2023. WJEC subsequently consulted on qualification outline documents in the autumn term in 2023, and published draft GCSE specifications in July 2024.

WJEC have also published a schedule of professional learning events to introduce schools and others to the new qualifications. For the first wave of GCSEs these include specification walk-throughs in September/October, live qualification online briefings and Q&A sessions in November/December and an unprecedented Pan-Wales series of in-person events in the spring of 2025.

How will Welsh Government mitigate the risk that, despite having a new flexible curriculum, a fixed set of qualifications will encourage secondary schools in particular to 'teach to the test'. Thereby undermining this flexibility and autonomy afforded to them under the Curriculum for Wales?

The Curriculum and Assessment (Wales) Act, 2021 and accompanying Framework Guidance, clearly outlines the agency of schools and settings to design learning that best meets the needs of learners within their context, within the mandatory and statutory obligations of the Curriculum for Wales Framework.

Educational research is clear that 'teaching to the test' results in the narrowing of a learner's curriculum, often negatively influencing classroom practice by focusing only on the assessment. The range of reforms since 2015 have been designed to respond to this risk and mitigate this problem, outlined in Successful Futures as a feature of the previous National Curriculum.

We have reiterated the need to consider a wide range of information about how well a school is serving its learners – it is clear that a sole focus on assessment outcomes creates unhelpful incentives and does not provide a true reflection of a school's overall performance. Our new approach to school evaluation, improvement and accountability makes this clear, underpinned by guidance and supporting materials to support school self-evaluation and improvement, and working with our partners to identify emerging issues, align priorities and effectively support our schools to improve. The Welsh Government's commitment to a broader information ecosystem – ensuring that at all levels of the system we use a range of information in obtaining a holistic understanding of the education system and the progression and outcomes of our learners – is intended to provide greater clarity on system performance, while mitigating the risk to classroom practice and maintaining the principle of subsidiarity within the Curriculum for Wales.

All qualifications have been designed to support the Curriculum for Wales and to enable schools to deliver them in a way that suits the needs of learners within their context and as part of, not wholly, their curriculum offer after age-14. The aim of a school's curriculum should be to support learner progression towards the four purposes, mitigating the risk to focus solely on qualifications outcomes. Whilst the qualifications have been developed to reflect these aspects of the Curriculum for Wales, curriculum design within secondary schools is intended to be wider in scope than just qualifications, ensuring that the flexibility and agency afforded to schools and settings within the national Curriculum for Wales framework is secured.

Assessment guidance within the Curriculum for Wales Framework is clear on the purpose of assessment within Curriculum for Wales. Assessment plays a fundamental role in ensuring each individual learner is supported and challenged accordingly. It should contribute to developing a holistic picture of the learner, their strengths, the ways in which they learn, and their areas for development, in order to inform next steps in learning and teaching. This should be achieved by embedding assessment into day-to-day practice in a way that engages the learner and makes it indistinguishable from learning. This allows the practitioner to respond to the individual needs of the full range of learners within their classroom on an ongoing basis. This cannot be achieved through simply 'teaching to the test'.

In addition, the qualifications are not 'fixed' in many respects. For example, centres can focus on different topics or areas within the History specification over time. In English, they may change which texts they teach and their approaches to teaching them, to best reflect the changing nature of their cohorts. In other subjects, there are opportunities to contextualise learning, building on the understanding and experiences of learners, enabling practitioners to design learning that effectively responds to the strengths and developmental needs of their learners.

Nevertheless, in order that learners are fairly and consistently assessed both over time and across Wales, it is important that there is commonality between the knowledge, skills and understanding that are expected of them to achieve their qualifications.

Supporting practitioners to understand this within the new specifications is a crucial element of the professional learning that will be provided to schools from autumn 2024. As qualifications continue to evolve, we will explore the scope for them to consistently assess understanding of concepts and abilities while giving more choice over the content used to develop and demonstrate these, as can be seen in systems elsewhere.

The role of the mandatory Progression Code to support learners to become increasingly effective, to deepen their understanding of a range of disciplines within the Areas, to increasingly make connections and transfer their learning to new contexts, will broaden the expectations of assessment within the new qualifications. 'Teaching to the test' is not just down to how flexible a qualification is. It also relates to how predictable the assessments are, and the stakes associated with the assessment. Adopting a broader range of assessment methods across the Made-for-Wales GCSE suite and the other National 14-16 Qualifications should mean that, on balance, the assessments will be less narrow and act as a safeguard to reduce teaching to the test, enabling schools to devise locally relevant experiences and assessment opportunities for learners to demonstrate their understanding and strengths. The Welsh Government and its education partners will continue to support schools to realise this ambition.

To what extent, if at all, does Welsh Government consider having one single qualifications provider is a barrier to school flexibility under the Curriculum for Wales?

The Curriculum for Wales guidance is clear that a learner's curriculum is wider than the qualifications they choose. Headteachers and Governing Bodies/Management Committees have a responsibility to secure learning that is broad and balanced, meeting the needs of learners within their context.

WJEC is the current provider of approved GCSEs (and A Levels) in Wales and will continue to be the provider of the new Made-for-Wales GCSEs. Prior to the start of Qualifications Wales's co-construction work to develop new Made-for-Wales GCSEs to support the Curriculum for Wales, they wrote to all four awarding bodies that are recognised in Wales to offer GCSE qualifications. Only WJEC expressed an interest in committing to offering the full suite of new GCSEs. The main reasons for other awarding bodies not wanting to offer the GCSEs in Wales were the small market size and the need to offer qualifications bilingually: a key principle of reformed, Made-for-Wales qualifications.

We do not, however, consider that having a single qualifications provider is necessarily a barrier to school flexibility. Having one provider can help deliver qualifications that are based upon a shared understanding of the ethos of the Curriculum for Wales. For example, in developing all of the new GCSEs, WJEC have considered where there are opportunities to embed the cross-cutting themes and to develop the integral and cross-curricular skills of the curriculum. Working with one provider can also help monitoring and consideration of standards, when the GCSEs have gone live.

A wider range of awarding bodies will be involved in the development of the other qualifications that make up the National 14-16 Qualifications, alongside the new Made-for-Wales GCSEs.

Financial implications: None.

Agenda Item 8.2

Eluned Morgan AS/MS
Prif Weinidog Cymru/First Minister of Wales



Llywodraeth Cymru
Welsh Government

Elin Jones MS
Llywydd
Senedd Cymru
Cardiff Bay
CF99 1NA

17 September 2024

Dear Elin,

Member in Charge, Government Bill

I am writing to notify you of my authorisation, under Standing Order 24.4(ii), of the following member of the Government as Member in Charge of a Government Bill:

- Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language as the Member in Charge of the Welsh Language Education (Wales) Bill.



Eluned Morgan

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.