



Cyfieithiad I'r Saesneg gan Gomisiwn y Senedd
English Translation by Senedd Commission

Comments on the Welsh Parliament Consultation into Welsh in Education
Strategic Plans - the legislative framework that supports Welsh-medium
education provision

Background of RhAG

Rhieni dros Addysg Gymraeg (Parents for Welsh-medium Education) is an organisation representing parents that have children in Welsh-medium schools. The aim of RhAG as an organisation is to support the development of Welsh-medium education throughout Wales.

RhAG appreciates the opportunity to submit these initial comments to the Culture, Communications, Welsh Language, Sport and International Relations Committee and the Children, Young People and Education Committee as they carry out an inquiry into Welsh-medium education, focusing specifically on Welsh in Education Strategic Plans.

It must be noted at the outset that RhAG has not seen the revised plans since they went to the Minister, and therefore we are unable to submit comments on the latest plans since they were introduced. We understand that there have been extensive feedback sessions between the counties and Welsh Government officials, and this document will provide comments based on the draft plans, in the hope that our comments will be addressed by September when we see the final plans. When contributing to some of the Welsh-medium Education Forums over the past few months, there was little opportunity to contribute to reforming these plans, although in some counties the process was an effective and collaborative.

But of course, we must have faith in our local authorities so as to ensure that there will be flexibility in the work of implementing, monitoring and refining the plans as they start work from September 2022 by the Welsh-medium education forums of the 22 counties.

These plans are operational plans, to be modified and strengthened as we move forward.

Core principles

RhAG responded to the 22 draft plans that were published for consultation between August 2021 and January 2022.

RhAG noted at the start of each response that the plans offer an important opportunity to set the direction of the work of strategic planning for the growth of Welsh-medium education in the county over the next decade. It was necessary to ensure that the plan responded in a coherent, proactive and ambitious manner as part of local authorities' important contribution towards realising the Welsh Government's Cymraeg 2050 target and the aim of one million Welsh speakers.

The education system is the main mechanism for producing Welsh speakers, and there is an expectation that counties will now adopt an approach of **stimulating and promoting growth in the sector**, which must be at the heart of the plans, with the aim of not limiting the language to the classroom, and making it a living language in every sense of the word.

The importance of each county consulting on their Welsh Language Strategy between 2021 and 2026 was also noted and a close and continuous relationship between the two plans was encouraged in their formulation, implementation and monitoring. This has not been evident in all counties across Wales but there are examples of close and sensible collaboration between the two strategies in a number of counties.

There was a golden opportunity with these plans to ensure an emphasis on the contribution of Welsh-medium education from perspective of the tackling poverty agenda, and it would have been good to see what specific strategies the counties would adopt to implement this. I was expecting to see details about Flying Start schemes, for example in the early years and the Childcare Offer.

It was suggested that the following considerations should be the core principles in drawing up and refining these plans:

1. The unique nature of Welsh-medium education needs to be recognised and noted - fewer schools in some counties, larger catchment areas, greater distances and travel times to school. There is much more of a challenge (geographically and practically) for pupils to access Welsh-medium provision, so it's essential that the council's policies and strategies reflect this.

2. Adopting the principle of looking at developing provision locally, and for this to be a guiding principle at the heart of the plan, would be an important step forward in order to ensure easy access to Welsh-medium education for families within a reasonable distance of their homes.
3. From the perspective of Welsh-medium education, and indeed any type of education, ensuring that there are enough local schools, within a reasonable distance and of good quality is the best way of avoiding situation where parents and pupils travel out of their natural or 'official' catchment area, from the early years until post-16.
4. Putting the development of Welsh-medium education at the heart of the work and function of the local authority, using LDPs to offer direction to the planning, identifying opportunities for growth within the areas of strategic importance across the county and seeing this plan as a key part of the county's long-term economic investment.

Response to your questions

1. **In December 2015, the Children, Young People and Education Committee of the Fourth Senedd published recommendations in its report on the 'Inquiry into Welsh in Education Strategic Plans'. Has the legislative framework for Welsh in Education Strategic Plans improved since then?**
 - 1.1 Without a doubt, the 7 outcomes presented as a planning framework for Welsh in Education Strategic Plans cover an age range and key areas that need to be developed and, as a result, have significantly strengthened the planning system. The big difference between the counties is capacity, resource and financial capabilities, and in some counties the political desire of the different local authorities to respond positively to the new framework.
 - 1.2 We very much welcome the inclusion of outcome 1 as the early years area has been deprived of purposeful strategic planning in the past as it was not part of an area of statutory education. While the content of the outcome itself is to be welcomed, there is still a great deal of work to be done by local authorities to align the aspects of local childcare and play provision - especially the 30 hour offer and Flying Start provision - within this outcome so that the provision from the early years to education up to the age of three and to reception offers good progression for pupils and parents when accessing the different systems. When there are obvious differences between Welsh-medium and English-medium provision, especially in terms of geographical convenience, the local, most accessible provision usually wins, which is usually English. It must be ensured

that the offer is equally accessible in areas, and that the local facilitation work, until that happens, is owned by the local authority under the guise of the Welsh-medium Education Forum.

1.3 Moving to 10-year plans also strengthens them in our opinion, but sometimes local authorities are reluctant to be able to act so far into the future in terms of concrete plans. Often giving the reason that they are only funded annually or as a scheme, such as the 21st Century Schools scheme. It has been a struggle to get some local authorities to set a timeline for these plans and even share a vision for the decade. Is this a lack of vision or a lack of capacity or real political desire? And so, despite the stronger, more detailed framework, the difference in ambition across Wales remains a concern.

1.4 Perhaps more significantly, dividing the outcomes into 7 has highlighted the obvious weaknesses of the current system, which has given us a more detailed and therefore clearer picture of the areas to which we must respond urgently with purposeful and rapid planning. We note outcomes 6 and 7, which are of great concern to us, and significant improvement must happen in these outcomes across Wales.

Outcome 6: An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) (in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018

Outcome 7: Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh

1.5 Outcome 6: We must have an urgent review of Welsh-medium ALN support provision

separately from the WESPs, comparing the provision available in English with the provision available in Welsh in order to set a baseline at the start of the period of these schemes. The support across Wales was extremely fragmented, with some local authorities without basic support in Welsh, such as basic intervention provision, education psychologists or alternative education provisions to name just a few. There is a promise of specific needs centres in the current plans, which is of course to be welcomed, but along with this there is real concern about how these centres will be staffed and funded, with a lower percentage of learners in Welsh education. In our experience, parents are too often forced to choose English-medium provision.

1.6 Outcome 7: We of course very much welcome the [Welsh in education workforce plan](#). It is a vital first step. But there must be a mechanism to be implemented

under the supervision of a new body that will be able to advise on a day-to-day basis and ensure the accountability of all of the stakeholders responsible for ensuring rapid and sound development within the key area.

The workforce must be looked at from the early years through to further education, also considering related areas such as care and play, which are key to ensuring the wider provisions for this area.

After all, if we don't have a qualified workforce to educate our young people, how are we going to achieve one million Welsh speakers?

2. To what extent do Welsh in Education Strategic Plans contribute to the outcomes and targets set out in the Welsh Government's Welsh Language Strategy – Cymraeg 2050?

- 2.1 It is good to see that not one local authority has rejected the targets set by the Welsh Government and that some have insisted on strengthening the target before even starting the work. But there are also some local authorities who are barely reaching the target, and following several years of a lack of development of Welsh-medium education.
- 2.2 New Welsh-medium provision, accessible to all families across Wales, will increase the number of Welsh speakers. The narrative of education provision in Wales must change to indicate that we want to see Welsh-medium education available locally to all children in Wales. The promotion of Welsh-medium education must be innovative and consistent and there must be confidence and strength in our message at all times.
- 2.3 Any proposals to strengthen Welsh within English-medium education must change the way in which the language is taught, used, recognised and promoted. As an organisation, we are convinced that the Welsh-medium education and school model is the only one that currently offers full access to both languages. This model must be accessible to all families in Wales and the Welsh-medium provision from one phase to the next must be consistent and broad up to post-compulsory education.
- 2.4 It is too early at the moment to give a definite opinion on the contribution of these plans. They haven't started yet. It may be good to review this question when local authorities have completed the first

annual reports in spring 2024. The Welsh-medium education forums will have important work to continuously monitor the work and regularly contribute to the work.

3. How are local authorities responding to changes to guidance on school categories according to Welsh-medium provision, and are they meeting the Welsh Government's ambition to increase Welsh-medium provision in English-medium and dual-stream schools?

- 3.1 Currently, only the details given in the draft plans give us an idea of how it is intended to tackle the change in category. While a number of local authorities have included details of their intentions, we are very concerned about their ability to realise these proposed plans without further support. Intensive and specialist help and support is needed to be able to navigate this process with schools, parents and carers and with governing bodies.

4. What challenges lie ahead in the planning and development of Welsh-medium provision, ahead of a proposed Welsh Language Education Bill?

It is a very challenging time financially for all Welsh local authorities and we are concerned that, without plans and a significant financial commitment, we will not see the targets in the current plans being achieved, let alone being ambitious and smashing targets.

- 4.1 **Lack of a bilingual workforce** - as already stated, urgent action must be taken to ensure that a sufficient and good quality bilingual workforce is coming through the education system in order to fulfill all our schools' functions and the support mechanism around our schools.

4.2 Funding

Capital funding: any central education capital plan in the future must clearly state that expenditure on Welsh-medium education must correspond to the growth target of local authorities' WESPs. Offering an additional pot to Welsh-medium education seems like a good idea. But it has given some local authorities a reason not to earmark capital expenditure from the central education pot. In order for local authorities to understand and embrace that developing Welsh-medium education is a core function for them, this must also be reflected in the funding system. This should be put in place for the band C funding round. It should be ensured that additional funding is available to continue with the immersion centres.

Section 106 funding contributions

When planning new housing estates, there is a need for clarity and guidance on how the funding that comes from the developer's contribution intends to contribute to the development of Welsh-medium education. Ideally, the local authority should require a statement from developers locally to reflect local ambition. In the absence of this, the Welsh Government should set clear guidance.

4.3 Consultation on developments in English-medium education

If we want our learners to be confident Welsh speakers, then is this the opportunity to put an end to plans to open new English-medium schools? The consultation process for any new proposal must identify the impact on the Welsh language of any further plan to develop English-medium education. (clause 3.4 [School organisation code](#))

The clause also clearly states that it must be stated

- to what extent the proposal would support the targets in the approved Welsh in Education Strategic Plan.
- how the proposal would expand or reduce the Welsh-medium provision. If this reduces the provision, state why the provision will be reduced (page 32).

4.4 **ALN** - it has already been identified that there is a need to carry out an assessment of Welsh-medium ALN provision to match these plans but also to meet the need within the [Additional Learning Needs and Education Tribunal \(Wales\) Act](#) where it is stated in the guidance for parents

"children and young people with ALN get help in Welsh wherever possible if they need it"

4.5 Transportation

Learner Travel (Wales) Measure 2008 - Clause 10: Promoting access to education and training through the medium of the Welsh language

No specific definition has ever been proposed to indicate what is expected for this clause, and as a result the response of local authorities is usually vague and means offering the minimum service. Annually, learners are refused transport to reach Welsh-medium provision as there is another school that is closer but

doesn't offer Welsh-medium provision. It is frustrating for parents to have to face such unnecessary challenges year after year.

Fuel costs are on the rise and a number of local authorities intend to review their transport policies. This can have a detrimental effect on Welsh-medium education. On average, Welsh-medium schools are further from families' homes and fewer of them are accessible.

There are significant differences across Wales in terms of access to post-16 education and the cost of transport is a key factor that makes Welsh-medium education less accessible to learners across Wales and prevents them from continuing their Welsh-medium education. These differences need to be scrutinised in the short term and ensure measures that ensure fairness across counties and regions. In the medium and long term, far-reaching changes are needed to this measure if we want Welsh-medium education to be accessible to all families in Wales. We have had promises of reviews from ministers over the years but continue to see no change. This is detrimental to any further development and takes the wind out of the sails of schools that are making real efforts to respond to the needs of learners that want to continue in post-compulsory education. This is where our bilingual workforce comes from.

4.5 **Existing measures, codes and policies**

Over recent years, when responding to calls from parents and responding to consultations, we have become more aware of aspects in current measures, codes and policies that have hindered the growth of Welsh-medium education in some parts of Wales, and therefore when considering the period before the bill and moving forward, we must carefully consider the impact that the following will have on the growth of Welsh-medium education and how the Welsh Government and local government can mitigate negative impacts on the development of Welsh-medium education in the short term.

Codes and policies preventing the School organisation code - as noted, plans to open new schools must consult on the impact on the Welsh language.

Implementation of clause 3.5 of [The schools admission code](#) by local authorities

The clause states as follows

3.5 The admission number reflects the school's ability to accommodate pupils and it should not be exceeded. However, it may be reasonable for the admission authority to consider exercising discretion, in exceptional circumstances, to

admit more pupils than the admission number indicates. Such instances might include:

- Where there are a significant number of surplus places across the year groups in the school, so that the pupil can be accommodated without prejudicing future intakes if the increased uptake of places continues.
- If there is a temporary shortage of a particular type of provision in an area, for example Welsh medium education, while additional provision is being established.

Recently some local authorities have failed to use a clause available to them when provision is not sufficient in a school and when more children have applied to that school and plans to extend the provision are pending.

4.6 Overreliance on measuring or responding to the demand:

It has already been noted that the spirit of these plans is very clearly in favour of stimulating the demand for Welsh-medium education. When this happens, local authorities have seen growth, some significant. Those counties where this is not normal must be supported, giving them confidence in their planning.