

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.

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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>