

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.