

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

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

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

WLE 01

Ymateb gan: Dyfodol i'r Iaith

Response from: Dyfodol i'r Iaith

Part One Promotion and facilitation of use of the Welsh language

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

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

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

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

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

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

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

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

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

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

These targets should be linked to

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

Part 2 Describing Welsh language ability

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) “Welsh language education” means

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

(b) “Welsh language provision” means –

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

22 Late immersion education

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

Part 4 Planning Welsh language education and learning

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

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

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

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

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

28 Local Welsh in education strategic plans

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

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

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

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

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

Part 5 National Institute for Learning Welsh

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

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