

**WLE 08**

**Ymateb gan: Cymdeithas Genedlaethol y Prifathrawon Cymru**

**Response from: National Association of Headteachers (NAHT) Cymru**

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We agree with the laudable aim of the proposed Bill. We believe that including provision on the target for one million Welsh speakers on the face of the Bill will give a strong and clear signal of its importance to the people of Wales, now and in the future.

For this policy to be successful, there needs to be strong, joined-up thinking on how it is to be delivered effectively. Giving the target a formal, legal basis means that it then becomes essential to describe precisely the support and funding that the Welsh Government intends to put into place to ensure that target can be met. This is both in terms of making sure that there is a sufficient number of appropriately trained, rewarded and supported teachers and making sufficient school places and teachers available in the right areas to achieve the target.

We believe there would be no merit in having a legal basis for a target that is solely aspirational and without there being clarity on the funding and support which will make it achievable. Increasing the Welsh language offer across schools in Wales, takes time and funding.

However, we cannot ignore the elephant in the room. Funding for schools in Wales is at a crisis point, members of NAHT Cymru have told us this year that half expect to report a deficit in their end of year budget for 2024/25. A majority of our members are making significant cuts to resources, cutting support and teaching staff hours and in some cases, employees in order to balance their budgets.

With so many leaders unable to properly fund the ALN provision, meet the appropriate staffing levels, or make important repairs to school buildings, NAHT Cymru cannot support additional ringfenced funding for training teachers to teach in the Welsh Language without ensuring that funding levels are enough to even deliver the basics of frontline, statutory functions.

NAHT Cymru believe that growing the Welsh Language is laudable, ambitious a positive step forward for Wales, but the existing crisis issues must be addressed before we can begin steps towards increasing the Welsh language offering in schools.

In terms of their role place planning, teacher support and training and ensuring the effective delivery of the target and in taking appropriate remedial action if it looks in danger of not being met. To be able to achieve this, the local authorities themselves need to be sufficiently funded and supported by Welsh Government.

The consultation in June suggested that minimum targets could be effective provided

it is set appropriately and represents the right level of challenge and stretch. There is a danger that targets could have unintended consequences and drive negative behaviours. As with any language learning, young people will be motivated to learn to speak Welsh for themselves by being encouraged and enthused to do so, not by being overly assessed and examined.

There are clear implications in setting a target for what it means for the number of teachers required to be able to speak Welsh themselves, what amount and level of training is needed to reach that number, and how that training is to be fully funded, what pay and other financial incentives are needed, what support those teachers are to be given, whether the teachers needed are in the same geographical areas as the demand and the opportunity cost.

It is hard enough at present for schools to find suitable teachers, particularly in shortage subjects such as science and maths, without there being additional linguistic requirements on potential candidates. It is also the case, given the often highly limited number of potential candidates, that where one school is successful in recruiting a teacher who is fluent in Welsh, that teacher is then not available to meet another school's need.

NAHT Cymru are concerned that targets will not account for the existing problems in the system. The growth of Welsh language should be sustainable and realistic. The target proposed by Ministers is one that is to be written into legislation, so Ministers must show the necessary leadership and be visibly supportive to enable the target to be met.

There should also be a workload impact assessment to assess the likely effect on the existing workload of the proposals on Welsh language provision, with due consideration of what work would be ended to make room for this new workload pressure. That impact assessment should consider the pressures created by the need to cover regular staff absence for training, including availability of supply cover, not adding supply duties to leaders workload, impact on pupils and parental responses to teacher absence; an assessment of the cost of ensuring that all training is fully funded; the workload associated with any tracking and reporting of language progress against targets, both for staff and pupils; the impact on school management in encouraging and supporting staff and pupils; the interplay between this policy and other new initiatives for leadership capacity and overload; and questions about how schools will be held to account and by whom, including mitigation of any unintended consequences or perverse incentives flowing from this.

Initiatives such as the sabbatical to promote Welsh language learning, while welcomed and valued by the teachers involved, are having limited long-term impact in communities where the demand among local communities for the Welsh language

is low. For it to be successful and become embedded, Welsh language learning needs to have a community-wide focus, not just a school-based one.

NAHT Cymru agree in principle that all schools should increase their Welsh language provision over time, however as we have stated, this must be realistic and cannot be done successfully in isolation without considering the wider systemic funding issues. Increasing Welsh language provision needs to be done with care and targets need to be realistic and not aspirational or open-ended. However, there may be exceptional cases where it would not be appropriate, for example if there is for whatever reason little demand within a particular geographical area or local community for Welsh language learning. The proposal also needs to take careful consideration of the learning and emotional needs of children within a school, particularly those with learning disabilities and other special educational needs.

Finally, the appropriate level of financial support and training to ensure that there is a sufficient supply of teachers able to offer Welsh provision in schools; a means to ensure that delivery is taking place in the areas where demand and need are higher; and careful consideration of what action to take if it becomes clear that that target is in danger of not being met. It is also important to put an emphasis on ability in spoken Welsh as it is a living language, rather than on a more analytical approach to the written language. It is also important that teaching standards are not in any way reduced in the push to meet language targets, and that the standards required to be a teacher remain in place, with fluency an additional skill.