

**Welsh Language Education Bill – General principles  
NEU Cymru response for Children, Young People and Education  
Committee Oral Evidence session.**

**Background**

NEU Cymru welcomes the opportunity to respond to the General Principles of the Welsh Language Education Bill.

**NEU Cymru position**

NEU Cymru supports the Cymraeg 2050 as a long-term strategy and national ambition, to increase the numbers of Welsh speakers in Wales.

Whilst there is much to welcome in this legislation, the Bill will need amending, and sufficient funds allocated to it, in order for this legislation to work in practice.

Too many times in Wales, we have seen aspiration not matched by implementation. Despite warnings from the trade unions during the legislative process, we have seen both Additional Learning Needs (ALN) and curriculum reform fail to meet expectations in our classrooms, as insufficient funding, training and time have been allocated to the education workforce, to meet the increasing demands.

**Key considerations**

Whilst NEU Cymru supports the Cymraeg 2050 as a long-term strategy and national ambition, we're not sure if this should be incorporated in the bill, especially without a commitment for significant funding, as this puts significant pressure on schools and local authorities.

It is important to note, the Bill aims to increase the amount of Welsh taught in schools, and will see schools encouraged to do this by changing their categories. Schools can move to a new category to increase their Welsh medium teaching, but cannot move back again. This will have a significant impact on the education workforce, and they must be consulted (via recognised trade unions) at every stage.

It is critical that this legislation does not have unintended consequences, including there should be no redundancies associated with implementation of this legislation.

Therefore, we request the Welsh Government to undertake an urgent Workload Impact Assessment, in partnership with the trade unions. We would also welcome a more comprehensive Equality Impact Assessment, which examines how this Bill will impact different groups within the workforce, including women and older workers.

We are concerned the expectation for learners to reach “B2” on the Common European Framework of Languages (CFER) – which appears to represent leaving school with an A level equivalent in Welsh. This seems ambitious, and given the level of need within the workforce to acquire Welsh Language skills, unrealistic. We believe outcomes should be for individual schools to decide, based on their learners.

We have set out a series of key concerns by theme below.

### **Recruitment**

At this time we do not have enough teachers able to teach through the medium of Welsh, let alone if we increase Welsh language requirements. We have repeatedly asked that the Welsh Government undertakes a comprehensive audit of education professionals’ Welsh Language ability, so that they know the recruitment and training needs of the workforce. Without this, it is impossible to develop a realistic costings for the Bill.

### **Training**

Training needs to be made available to everyone in the workforce who wants to increase their ability to teach through the medium of Welsh.

We believe that experienced teachers and support staff have vital skills, and should be given the opportunity to learn Welsh, and the associated training and time to do so. We cannot rely on the idea that people new to teaching will become the Welsh language teachers of the future.

We surveyed our members in Wales on the White Paper proposals in 2023, and asked respondents to place themselves in one of seven Welsh speaking categories, e.g. I am a confident, but not fluent, Welsh speaker, and would like more support to be confident enough to teach through the medium of Welsh. Fifty-five per cent (55%) of respondents who either speak a lot of Welsh, are confident, or fluent Welsh speakers said they’d like more support to be confident enough to teach through the medium of Welsh.

We understand that some sources<sup>1</sup> say that learners take approximately 200 guided learning hours for a language learner to progress from one level of the Common European Framework of Reference (CEFR) to the next. Therefore, to arrive at an outcome that's synonymous to level B2 from a starting point of level A1, will take between 500 and 600 guided learning hours in total.

It is clear extra non-contact time would need to be found for the education workforce, if they are expected to increase teaching through the medium of Welsh.

### **Additional Learning Needs (ALN)**

Whilst the Bill as drafted doesn't require special or ALN schools to teach a certain amount of Welsh language, it does not contain any differentiation in terms of expectations for children in mainstream school with an additional learning need – or for disabled children without ALN and associated individual Development Plan (IDP).

Indeed, we do not know how many children there are in mainstream school who would have previously been identified as having additional learning needs, as the numbers identified have dropped significantly since the introduction of the ALNET Act<sup>2</sup>. Our members tell us these children are still in school, it is that they are expected to support them without additional support, through “universal provision”.

Given this, we believe that this proposed Welsh language legislation is ambitious. We don't know how many children in Wales require additional support, so it would be unhelpful to expect them to carry out higher levels of Welsh Language learning, without support in place. All schools should decide each child's expected outcome by the end of Year 11, there should not be a universal expectation of B2.

### **Workload**

To that end, it is clear teachers are going to need an increased amount of PPA time to support children and young people in their learning, but also to improve their own levels of Welsh.

Those who are in the system, who have a wealth of pedagogical experience, are critical to education in Wales. We must ensure that this legislation does not cause any redundancies, but that we nurture the experience and expertise we have in every classroom.

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<sup>1</sup>

<sup>2</sup> <https://www.gov.wales/schools-census-results>

It is therefore vital that we ensure that the existing workforce has time outside of the classroom to learn, improve and practice their Welsh.

A specific language impact assessment should be carried out before specifying the language medium of a new school, together with a Workload Impact Assessment and an Equality Impact Assessment. These, along with a consideration of the targets that are to be achieved through their WESPs, would provide the local authority with evidence to consider in taking a decision.

### **Union representation**

The Bill lists consultees in several sections, for example Sections 26 and 28. These must include recognised trade unions, who represent the relevant workforce, on the face of the Bill – in line with social partnership principles in Wales.

### **Suggested amendment: Add to Section 26 (1) (f) Recognised trades unions of the education workforce.**

This amendment would mean that Welsh Ministers would have to consult with recognised trade unions when setting out the National Framework.

### **Suggested amendment: Add to Section 28 (1) (b) (viii) Recognised trade unions of the education workforce**

This amendment would mean that local authorities would have to consult with the recognised trade unions when completing local plans.

### **School categorisation**

School categories according to Welsh-medium provision were reviewed and amended back in 2021 to ensure local authorities, when creating local policies, consider the new structure as an asset to their planning processes and easy to adopt, and to set simple definitions that explain provision clearly using a limited number of categories and therefore gain commitment for the new structure.

The above changes have not had time to have a real effect on the Cymraeg 2050 strategy, therefore we are concerned that this legislation is a response to a situation which has not yet had time for full implementation, and therefore may contain some unintended consequences.

We believe that schools should be given the utmost support and appropriate funding to move between categories, ensuring all staff have access to training at the appropriate level to meet any additional language requirements.

In our response to the to the 'School categories according to Welsh-medium provision' consultation back in 2021 we highlighted some concerns with regards to the transitional categories as we felt the changes wouldn't encourage schools, especially those in Category 1 (English medium), to increase the amount of Welsh medium provision. For example, in a Primary setting, to move from Category 1 to Category 2 (Welsh / English), the school must increase its provision of Welsh medium education by at least 35%, which is a significant increase, especially in some areas, where there are already not enough teachers able to teach through the medium of Welsh.

Similarly, to move from Category 2 to Category 3 (Welsh medium), the school must increase its provision of Welsh medium education by at least 30%, which again is a big increase, and will need significant time and investment. The increases are similar for Secondary settings.

The ability of a Secondary school to transition to the next category is dependent upon the categories of its feeder Primary schools. Secondary schools who want to transition to the next category must be enabled to consult with their feeder schools to assess if this transition is possible within the period allowed.

There should be a clear role for Welsh Ministers, and that is to work with local authorities to achieve the desired linguistic outcome for learners, based on their WESPs.

It is recommended that schools should be in the transitional sub-category for at least 5 years and no more than 10 years to successfully oversee a seamless transition from one category to another. Whilst agree with this time period in principle, we believe that trade unions must be consulted at every stage.

### **Minimum contact hours**

We disagree with Welsh Ministers setting a minimum time in terms of Welsh language contact hours that learners are expected to receive, in accordance with the category. Care needs to be taken when imposing a minimum amount of Welsh language provision on an English-medium school, especially if those schools do not have the teaching staff to be

able to teach Welsh (as a subject) and teach through the medium of Welsh.

A minimum amount of Welsh language provision should be recommended but the delivery depends on the number of teaching staff that are enabled to teach through the medium of Welsh. This makes the mapping of school staff, to establish staff proficiency and confidence in teaching through the medium of Welsh, a matter of urgency and need to be undertaken immediately if it hasn't already started. NEU Cymru raised this issue as a matter of urgency in the 'School categories according to Welsh-medium provision' consultation back in 2021.

Imposing a minimum amount of provision could have an adverse effect on staff, especially if staff aren't confident in teaching through the medium of Welsh. We surveyed our members in Wales on the White Paper proposals in 2023, and asked respondents to place themselves in one of seven Welsh speaking categories, e.g. I am a confident, but not fluent, Welsh speaker, and would like more support to be confident enough to teach through the medium of Welsh. Fifty-five per cent (55%) of respondents who either speak a lot of Welsh, are confident, or fluent Welsh speakers said they'd like more support to be confident enough to teach through the medium of Welsh.

As we have said, learners could need between 320 and 400 guided learning hours to reach level B2, between 520 and 600 guided learning hours to reach level C2, and between 720 and 900 guided learning hours to reach level C1. This will have a significant impact on the timetable, and the Welsh Government need to set out what learners and the workforce can stop doing, in order to make this ambitious Bill a reality.