

Buffy Williams MS
Chair
Children, Young People and Education Committee
Welsh Parliament,
Cardiff Bay,
Cardiff
CF99 1SN

21 November 2024

Dear Chair,

Further to Medr's evidence session to the Children, Young People and Education Committee (the Committee) on 17 October, please find a note setting out:

- where amendments identified in our written evidence could provide opportunities to strengthen the Welsh Language and Education Bill (the Bill).
- further information on the likely resources needed to upskill the workforce to deliver the Bill's ambitions

We ask the Committee to note that we have been engaged in a positive dialogue with Welsh Government officials regarding our written evidence since our submission to the Committee.

Amendments to the Bill

Evidence

Section 14 of the Bill proposes that schools will be required to prepare a Welsh language education delivery plan. In our evidence to the Committee we set out (paragraph 3.4) that:

School based sixth forms are critical to the delivery of Welsh medium education and ensuring that the language thrives. However, those sixth forms cannot be separated from an overall school's function and there is a risk that in taking a school approach to Welsh language delivery, which is the correct approach, without recognising Medr's duties in relation to sixth-form provision risks increasing incoherence.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg, ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence in Welsh. Any correspondence in Welsh will be answered in Welsh, and corresponding in Welsh will not lead to a delay in responding.

2 Cwr y Ddinas
Stryd Tyndall
Caerdydd CF10 4BZ

2 Capital Quarter
Tyndall Street
Cardiff CF10 4BZ

Proposed amendment

The explanatory memorandum sets out in the context of the requirement in section 14 that when a school with a sixth form prepares a Welsh language delivery plan, it must take into account Medr's regulatory requirements. We propose that reference to sixth-form compliance with the requirements contained in any Learner Engagement Code published by Medr is added.

Evidence

Part 4 of the Bill introduces the concept of a National Framework (the Framework). It is not clear in the Bill how the Framework will take account of tertiary education, despite explicitly setting out that tertiary education will be within the scope of the Framework (section 23 (1)(4) refers). We note Welsh language education is defined in this part of the Bill in the context of compulsory education only; this suggests that the scope of tertiary education in the Framework is in the context of Welsh language learning (undefined) and acquiring the Welsh language.

Proposed amendments

Define Welsh Language Learning more clearly in Part 4 of the Bill.

In the relevant parts of the explanatory memorandum, set out the role of Medr in relation to Welsh as a subject and Welsh-medium provision in tertiary education. It would also be helpful to be explicit in the explanatory memorandum as to whether Medr's role fits within scope of the Framework or not. These additions will provide clarity of the context in which the Framework will be developed, and how it will be developed.

Evidence

The limited lack of references to Medr and the broad tertiary education sector in both the Bill and its associated documents is problematic in the context of section 28 of the Bill, which sets a requirement for local authorities to prepare a local Welsh in education strategic plan. Given local authority oversight of schools with sixth forms and the requirements in the plan to consider progression to tertiary education, local Welsh in education strategic plans will potentially overlap with Medr's responsibilities.

Proposed amendments

When a local authority prepares a local Welsh in education strategic plan, the Bill should set a requirement in section 28 (4) (b) that the local authority consults Medr and other tertiary education providers, including higher education institutions, not just further education institutions.

The local authority should also be placed under a duty in section 28 of the Bill to take account of any proposals for restructuring sixth-form provision in accordance with the School Standards and Organisation (Wales) Act 2013.

Evidence

The lack of reference to Medr's role in the context of references to tertiary education and how they fit within the proposals for the Institute for Learning Welsh in Part 5 of the Bill creates the potential for ambiguity of responsibilities in the tertiary education sector. This ambiguity is magnified with the absence of definitions for language learning and language learning providers in Part 5.

There will be requirements placed on the Institute (as per sections 39 and 40 of the Bill) in relation to equality of opportunity, continuous improvement, and setting quality frameworks in the context of their oversight of Welsh language learning providers (which are likely to be, or part of, tertiary education providers). This overlaps with Medr's role in relation to equality of opportunity, continuous improvement, and setting quality frameworks in the context of Medr's oversight of tertiary education providers more generally.

Proposed amendments

Define Welsh Language Learning and Welsh Language Learning Providers in Part 5 of the Bill.

Clarify the roles of Medr, the Institute and the Coleg Cymraeg Cenedlaethol (where it is appropriate) in the explanatory memorandum; this would provide helpful context to frame the new statutory duties for the Institute.

Set out an expectation on the Institute to take account of the requirements set by Medr for tertiary education providers when delivering their overlapping duties in sections 39 and 40 of the Bill.

There should also be a duty placed on the Institute to take account of the Learner Engagement Code that Medr will publish for tertiary education providers. This will be in line with the principle that learners are at the heart of the tertiary education system in Wales.

Workforce requirements

We raised workforce requirements in our evidence, recognising that if we want to have more learners who can speak Welsh and learn through the medium of Welsh, there will need to be more people who can deliver education through the medium of Welsh. Ultimately, these reforms can only be delivered by a sufficiently well-resourced workforce across the whole education system in Wales. The tertiary education sector will need to be able respond to the increased demand for Welsh-medium tertiary education, as well as support the skilling and training of the compulsory workforce. In our view, this key dependency is not strongly reflected in the Bill and accompanying documentation. If there is no recognition or clarity on how this will be addressed, either in the Bill or accompanying documents, there is a risk that the ambitions won't be realised. There is also a risk that the burden for delivering the reforms will fall to those within the workforce with the necessary skills, which could have a negative impact on the well-being and retention of those members of the workforce.

At present, however, we are unable to quantify the resources needed to train the tertiary education workforce in the context of the Bill's ambitions. There is some publicly available information that highlights the most recent data around Welsh language skills and the ability of members of the tertiary education workforce to deliver tertiary education through the medium of Welsh:

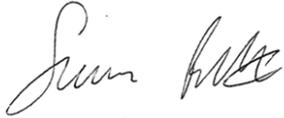
- [Annual Education Workforce Statistics](#)
- [Welsh Language in Higher Education, 2021/22](#) (section E)
- [Initial Teacher Education Wales, 2021/22](#) (section F)

We recognise that this information is patchy, and retrospective, and herein lies part of the challenge.

Medr is committed to looking at consistency of data across the tertiary education sector, where achievable. In our draft Strategic Plan, due to be submitted to Ministers by 15 December, we have made a commitment to establish baseline data, which will provide a strong evidence base for future planning and decision making. We will also ensure that the workforce is considered in our commitment to deliver on Ministers' strategic ambition that Medr "develops a plan to increase and improve the provision and promotion of Welsh-medium education and assessment in the whole of the tertiary system". This will need to align with the work we deliver to support the broad tertiary education workforce.

We will not be able to deliver these commitments on our own and we will need to work collaboratively with a range of different stakeholders to achieve them. Any plan for Welsh medium in tertiary education will also need to align with the National Framework proposed in the Bill, as well as the different delivery plans that will sit underneath that framework.

Yours sincerely,



Simon Pirotte
Prif Weithredwr | Chief Executive
Medr