

Cyflwynwyd yr ymateb hwn i ymchwiliad y [Pwyllgor Plant, Pobl Ifanc ac Addysg](#)  
i [weithredu diwygiadau addysg](#)

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IER 75

Ymateb gan: Comisiynydd y Gymraeg

Response from: Welsh Language Commissioner

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# Implementing education reforms: the Welsh Language Commissioner's evidence

## Introduction

As a modern bilingual country, an exciting vision has been presented for the future of education in Wales. One of the objectives of the Curriculum for Wales is to support all learners to be able to communicate effectively in Welsh and English. The ambitious intention of the Welsh Language and Education (Wales) Act 2025 is to ensure that every pupil leaves school as an independent Welsh language user. There is clear potential for transforming the linguistic future of our young people and our society for the better.

However, there are substantial obstacles to realizing this vision. The challenges that threaten the success of the Welsh Government's innovative Welsh language strategy exist throughout Wales. This paper outlines the issues that parents, pupils and teachers have contacted the Welsh Language Commissioner about. Among them are the place of the Welsh language in the curriculum, qualifications, and the specific challenges facing Welsh-medium education.

This paper is presented to the Children, Young People and Education Committee to highlight the challenges at issue in the context of its inquiry into the implementation of education reforms, and to convey the urgent need to overcome these obstacles. These are issues that the next Welsh Government will have to resolve urgently.

## 1) Planning the growth of Welsh-medium education

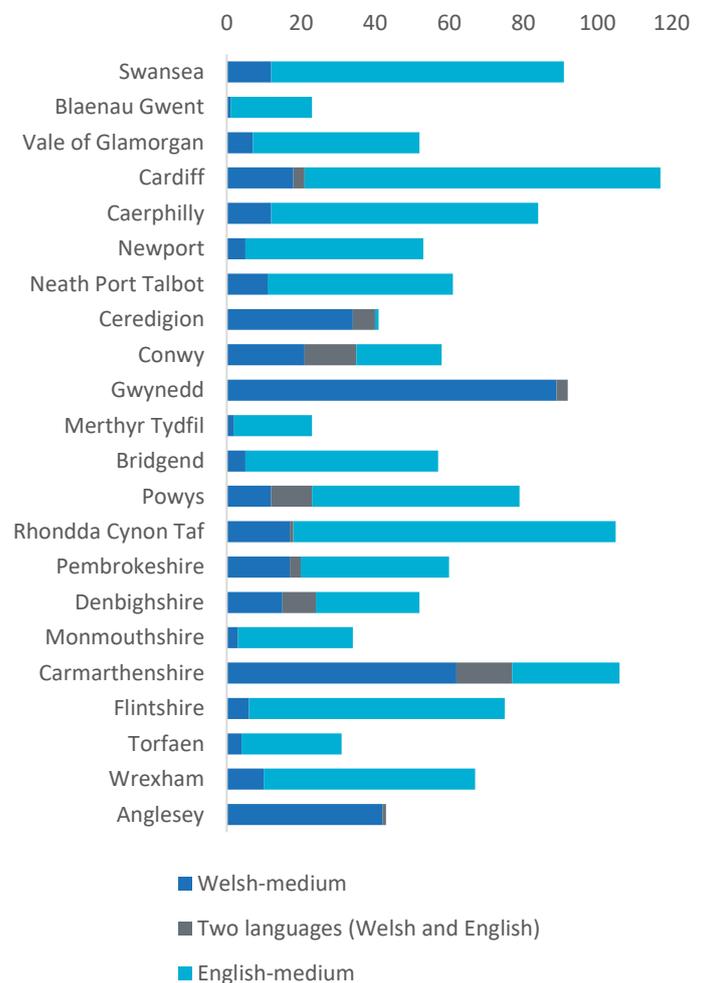
The Welsh Government emphasizes the need to encourage demand for Welsh-medium education. However, there is clear evidence

that the growth of Welsh-medium education is being hindered by several issues.

### 1.1 Local capacity for Welsh-medium education

One aspect that hinders growth is the lack of Welsh-medium education capacity and, linked to this, a lack of forward planning to expand that capacity. This includes cases of uncertainty that suitable buildings will be available in the long-term for new Welsh-medium schools.

**Figure 1:** The number of maintained schools by local authority and language medium ([Schools' Census Results: January 2025](#))



The Commissioner hears regularly from parents who have applied unsuccessfully for places in Welsh-medium education for their children. Figure 1 above shows that Welsh-medium schools are in the minority in almost every local authority area in Wales.

The Welsh in Education Strategic Plans (WESP) were intended to be a vehicle for local authorities to plan proactively to expand Welsh-medium education in their areas. However, Welsh-medium education is not a real choice in many areas. There is a definite risk that children will miss the opportunity to receive a Welsh-medium education while waiting for local authorities to expand that education. This, in turn, could have a long-term impact on the education of those children and undermine the objectives of *Cymraeg 2050* and the Welsh Language and Education Act.

As Figure 2 below shows, there has been very little increase in the percentage of year 2 learners who are assessed in Welsh as a first language, for over a decade. This does not bode well for achieving the targets of *Cymraeg 2050* to increase the proportion of learners in Welsh-medium education.

**Figure 2:** The percentage of learners in year 2 who are assessed in Welsh as a first language ([Pupil Level Annual School Census](#))

	Percentage of year 2 learners who are assessed in Welsh as a first language
2011/12	22.2%
2024/25	24.1%
2030 Target	30%

## 1.2 Transport and the accessibility of Welsh-medium education

Difficulties with transport and the accessibility of Welsh-medium education are a problem throughout Wales. At a general level, access to Welsh-medium education is more difficult and costly because there is less Welsh-medium provision and therefore learners, on average, live further from this provision. On the whole, people are more likely to live within walking distance of English-medium schools than Welsh-medium schools. Often this means that there is inequality between those who wish to attend Welsh-medium education and those who attend English-medium education.

The Learner Travel (Wales) Measure 2008 clearly states that local authorities must promote access to Welsh-medium education and training when considering how they will provide transport for learners. However, there are examples of local authorities changing travel arrangements in a way that makes access to Welsh-medium education more difficult or less affordable. The situation is particularly difficult in the context of post-16 education. While local authorities are duty-bound to provide transport to statutory education (conditional on certain distance thresholds), post-16 transport is provided on a discretionary basis. Transport policies vary from one local authority to another, but we know that a number of local authorities do not provide free transport to post-compulsory education.

Transport arrangements can have a substantial impact on learners who wish to study through the medium of Welsh. This is increasingly significant in the context of the cost of living crisis. Higher transport costs could mean that some families decide not to choose Welsh-medium education for their children. Instead, they could choose an English-medium school that is closer to their home, easier to attend and costs them less.

Regarding access to Welsh-medium education, transport to school is one of the most problematic issues that parents contact the Commissioner about. Constant challenges are identified, especially when local authorities revise their school transport policies in order to make savings. There is an obvious risk in such a situation of undermining the commitments and targets of the WESP. In order to achieve the Welsh Government's targets regarding Welsh-medium education, ensuring convenient transport to schools is key.

### 1.3 The education workforce

The most important issue for realizing the Government's vision is to ensure an education workforce with the necessary Welsh language skills for presenting the language as a subject and as a medium of education. One of the main obstacles to ambitious planning to expand Welsh-medium education capacity is the lack of a workforce with those language skills. The Commissioner has presented [evidence](#) to the Committee already about this matter in the context of its consultation on teacher recruitment and retention. A crucial recent development in the field of education is the Welsh Language and Education Act, which will need to be implemented in the next Senedd term. The role of Welsh-medium teachers is essential to its success.

## 2) The Welsh language in the new curriculum in English-medium schools

An essential element of the success of the new curriculum in the context of the Welsh language, and the Welsh Language and Education Act, will be the place of the language as a subject and as a medium of education in the schools that present Welsh as a second language. Currently, this means the majority of schools in Wales. We have received information that raises concerns about the way

in which the Welsh language is presented in some of these schools, and we believe that the situation should be scrutinised carefully.

We know that secondary schools offer different routes for studying Welsh as a second language in Years 10 and 11. Not all learners will apply for a GCSE qualification and schools can choose a different route for some pupils, for example, the Agored Cymru Certificate in Wales, Europe and the World.

We accept that schools have academic reasons for choosing different study routes for different learners. However, we have heard from Welsh language teachers in some schools who are concerned that not enough hours are allocated for their subject and that expectations are not set high enough for the learners. It is a source of concern for the Commissioner that substantial percentages of learners in some schools do not apply for a GCSE Welsh Second Language qualification. In one example that came to our attention, fewer than half the learners in Year 11 were going to undertake the qualification.

The *14 to 16 learning guidance* which forms part of the Curriculum for Wales Framework statutory guidance makes it clear that schools are expected '*to consider how they will ensure all learners are challenged and are making suitable progress in their Welsh language learning in line with their local authority's Welsh in Education Strategic Plan (WESP)*'.

Outcome 4 of the WESP is directly relevant in this regard: 'More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh'.

The Welsh Language and Education Act builds on the requirements of the Curriculum for Wales and the WESP framework by emphasizing the need for schools to offer an appropriate, challenging and ambitious qualification to learners, to demonstrate their attainment and to facilitate continuity. Under the Act, schools will be required to draw up a

Welsh language education delivery plan. The plan will show how the school will provide Welsh language education in accordance with the school's language category, and also increase the amount of that Welsh language education. These plans will be very important for promoting the Welsh language as a subject and as a teaching medium in schools.

However, the plans will not come into force for some time. The evidence we have received shows that not all schools are operating yet in accordance with the principles of the Government's Welsh language strategy. This means that there is a risk that today's learners will miss the opportunity to develop their Welsh language skills to their full potential. To avoid that, it must be ensured that all schools act proactively in the meantime to support the progress of their learners in the Welsh language. They will therefore prepare to comply with the requirements of the Act and also support the aims of the Curriculum for Wales and the *Cymraeg 2050* strategy.

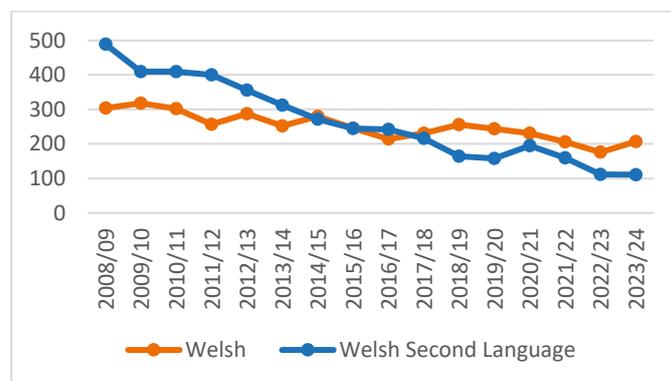
### 3) Welsh as an A Level subject

Following on from the discussion above about the Welsh language at GCSE level, attention must be drawn to the situation of the subject at A Level. In recent years, there has been a reduction in the number of learners who choose to study A Level Welsh and A Level Welsh Second Language, as shown in Figure 3 below.

In 2008/9 there were 304 learners studying A Level Welsh and 489 studying A Level Welsh Second Language. By 2023/24 the figures had fallen to 207 studying Welsh and 111 studying Welsh as a Second Language. According to WJEC data, between 2015/16 and 2023/24 the number of centres offering A Level Welsh fell from 48 to 45. During the same period, the

number of centres offering A Level Welsh Second Language fell from 71 to 55.<sup>1</sup>

**Figure 3:** The number of applications for A Level Welsh and A Level Welsh Second Language (pupils aged 17 only) ([StatsWales](#))



This is a matter of great concern, especially in the context of the objectives of the *Cymraeg 2050* strategy and the Welsh Language and Education Act, and the need to increase substantially the number of teachers who will be able to teach Welsh as a subject in the future. Without enough teachers with Welsh language skills, there will be a continuous obstacle to ensuring an increase in the number of individuals who leave school able to speak Welsh and use the language.

A number of heads of Welsh departments in English-medium schools have contacted the Commissioner expressing their concern regarding the situation of A Level Welsh Second Language. The teachers note that the position of Welsh as a subject after GCSE has been fragile for quite some time, but that the situation is getting worse.

The Coleg Cymraeg Cenedlaethol receives a grant from the Welsh Government to carry out specific activities to support the Welsh language as a subject. However, the important work that the Coleg does to market and promote the Welsh language as a subject is being undermined by strategic decisions that have much greater influence. Decisions such

<sup>1</sup> [Results Statistics Archive](#)

as the following undermine the efforts that are in place to promote and market the Welsh language as a subject:

- not offering the subject in schools
- offering the subject online only
- scheduling the subject in a way that makes it more difficult or less likely that learners will choose it.

In March 2024 the [\*Evaluation of Schemes to Promote Welsh as a Subject\*](#) was published. The recommendations of this evaluation should be considered urgently, including in particular recommendation 4: 'Local Authorities should be enforced to ensure that A level Welsh and Welsh Second Language provision is available to all learners within their post-16 centres.' As the evaluation highlights, it is necessary to consider a range of different interventions in order to support the Welsh language as a subject, but attention must be given in the first instance to ensuring that the Welsh language is an easy and accessible choice for all learners. The obstacles that prevent learners from studying the Welsh language must be removed, and Welsh courses must be funded without the need to rely on a minimum number of learners to justify running those courses.