Ymateb gan Mudiad Meithrin / Evidence from Mudiad Meithrin

Mudiad Meithin is a voluntary organisation offering provisions of *Cylchoedd Meithrin* (Welsh-medium playgroups), *cylchoedd Ti a Fi* (parent and toddler groups), wraparound care and Welsh-medium day nurseries.

The Mudiad is the largest provider of Welsh-medium early years care and education in the voluntary sector in Wales. Mudiad Meithrin was established in 1971 with 50 *cylchoedd meithrin* to its name. Today there are 1000 *cylchoedd meithrin, cylchoedd Ti a Fi*, 'Cymraeg for Kids' groups and day nurseries working under the Mudiad's banner.

Each week these provide early years' experiences to approximately 22,000 children. In addition, the Mudiad works closely with parents to provide advice and support, enabling them to continue the *cylch*'s work within the home, and also opportunities to begin learning Welsh through the 'Clwb Cwtsh' scheme.

To this end, Mudiad Meithrin employs 200 people nationally and has a further 2000 working within the *cylchoedd* themselves. The *cylchoedd* are supported by a national network of professional staff, who advise on a wide range of matters, from encouraging good practice, staff training and linguistic matters to Local Authority contact.

The Mudiad works with children and families from a wide range of socio-economic backgrounds. We work in collaboration with the *Flying Start* agency to provide opportunities in the least affluent areas, and with local education authorities to offer part time education to 3 year olds within their local community.

In addition, we have a subsidiary company which provides training to enable people to gain early years qualifications through the medium of Welsh. This is done in cooperation with secondary schools, providing courses to school pupils, and through our national training scheme. Workplace-based training courses are offered via a national network of tutors, assessors and validators.

- Post legislative scrutiny of the Welsh Language (Wales) Measure 2011 to assess the perceived successes and limitations of the legislation, and the impact and effectiveness of Welsh Language standards in improving and increasing access to Welsh language services.
- To assess whether the legislative framework supports or limits Welsh language promotion and its use.

 An international perspective - gathering evidence on legislation to protect and promote minority language planning in other countries.

Mudiad Meithrin welcomes the opportunity to offer evidence in response to a request from the Culture, Welsh Language and Communications Committee. Our chief aim, our underlying principle, and that which drives our mission is a passionate adherence to the principal of creating future citizens of Wales who are both bilingual and multilingual.

To ensure that each and every child in Wales has actual, practical access to Welshmedium care and education, we must:

- Create a robustly regulated legislative framework
- Ensure statutory duties are in place to bring about the effective growth of Welsh-medium education
- Provide substantial investment in order to create a climate and environment which lends itself to persuading parents and families to choose Welshmedium care and education

### Hitting the nail - Realizing Cymraeg 2050

The vision behind Cymraeg 2050 is commendable and affirmative. In spite of this, the emphasis of the Welsh Language Measure 2011 has been on the provision of services through the medium of Welsh, which to a great extent ignores how children learn and acquire language. Whilst Cymraeg 2050 does address this issue, there is a gap in the legislative framework creating substantial weaknesses in the linguistic planning processes, especially within the education sector.

As an organisation with its focus on grass roots provision, our response derives chiefly from the perspective of children and their families.

As this is beyond the committee's terms of reference we lose a valuable opportunity to legislate in the most effective way possible.

The Mudiad suggests that any considerations of legislative reform must address education (and therefore childcare), as this is one of the primary services that will ensure we can realize the targets of Cymraeg 2050.

The proposals made so far in the 'White Paper – proposals on the Welsh Language Bill 2017' only deal with superficial matters. They are unlikely to have a substantive impact on the growth in the number of Welsh speakers in future years. Without a new effort to expand the Welsh-medium education sector, the Cymraeg 2050 strategy is doomed to failure. In future we will have an insufficient number of Welsh speakers to satisfy the needs of a Welsh-speaking workforce across the public and private sectors.

Following the Rapid review of the Welsh in Education Strategic Plans 2017-2020 by Aled Roberts, it becomes apparent that the current education system has not led to effective linguistic planning within the education sector. The Welsh-medium Education Strategy 2010 has also been evaluated in some detail, and is showing us its weaknesses and also, the way ahead. There is evidence galore in existence to demonstrate that a lack of cohesion between strategies and legislation within the education and language sector has led to situation where satisfying the legal requirements of the Learner Measure 2008 has undermined children's right to access to Welsh-medium education, which stems from the Welsh-medium Education Strategy.

Our feeling at Mudiad Meithrin is that any legislation drawn up without due consideration of the education sector would be insufficient.

# Reconsidering the legislative relationship with WESP

In order to hit the nail on the head we need to create or reform the new Welsh language legislation, so that expectations and responsibilities are placed onto the shoulders of local authorities. They should offer access to Welsh-medium education to every child in Wales, and plan for this by following specific quantitative targets set by the government. Mudiad Meithrin has prepared a paper in response to the Rapid Review of the WESP, and these matters are discussed in greater detail therein<sup>1</sup>. The landscape of current early years provision, with the offer of 30 hours' free childcare, underpins the success of the plans to successfully implement Cymraeg 2050. Roughly, we support:

- The need to strengthen the strategic relationship between local government and Mudiad Meithrin, in order to ensure growth on every level contributing to the Welsh Government's national targets for the 2050 strategy.<sup>2</sup>
- To use legislation or subordinate legislation to formalise the relationship already in existence between Mudiad Meithrin and local government.
- Ensure that the Care, Early Years and Play work sector is included in its
  entirety in any future conversations regarding the use of statutory linguistic
  planning to develop local provisions. This will ensure that local service
  development plans (especially those responding to the 30 hours offer and
  education for 3 year olds) will correspond to both the local and national longterm vision.
- Supplant the principle of 'measuring demand' with new primary legislation (or subordinate legislation) which will provide a basis for educational linguistic planning from ages 0-18. The Welsh Language Standards have brought about a dramatic change of attitude, and this new trend towards planning growth without the need to measure demand must be sustained and further

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<sup>&</sup>lt;sup>1</sup> See Appendix 1

<sup>&</sup>lt;sup>2</sup> Adolygiad brys o Gynlluniau Strategol y Gymraeg mewn Addysg – 2017–20

implemented. If we are to achieve the Government's national targets for 2050 we need to increase the capacity of the Welsh-medium early years provisions in order to feed Welsh-medium schools and increase the bilingual population.

We suggested that the route to achieving this (with new and appropriate legislative support) would be to implement a programme which would establish a system providing Welsh-medium education for every child from the Foundation Phase age upwards. Obviously this will take years to implement in full, but with careful planning (especially with regards to the workforce), and with the weight of legislation behind it, this system is a real possibility.

### **Promotion**

Although we have questioned the committee's terms of reference on this matter, we wish to make the following observation regarding the question

• To assess whether the legislative framework supports or limits Welsh language promotion and its use.

Mudiad Meithrin would like to see an intensive direct marketing campaign which would market Welsh-medium childcare and education to every parent in Wales, using a similar technique to the one used in the 'PLANT' tree planting campaign, which is now in its tenth year.

The current promotional activities are indirect and dependant on the cooperation of a range of organisations and establishments which are already busy promoting their own specific services. Governmental marketing campaigns carry their own unique status.

The Welsh Government should continue with and develop this work. Were new legislation in place to give each child in Wales the right to a Welsh-medium education, then there would be a means of promoting this message, and the advantages of bilingualism, to families. Unfortunately, as this was not included in the Welsh Language Measure 2011, this is not the case at present.

## **Welsh Language Standards and the Workforce**

Whilst the Welsh language standards are of value as they have improved access (in some areas) to services through the medium of Welsh, the development of a bilingual workforce continues to prove challenging. The childcare sector (which plays an essential part in helping children to begin their bilingual journey) requires an injection of ideas and originality in order to persuade people to work in the sector. It would be good to see students rewarded for choosing to work in the sector- possibly through a 'golden handshake' upon entering their first paid role (as is becoming increasingly usual within certain areas of the education sector), or perhaps paid a

living allowance while they study. Similar techniques are already in use within the education sector.

Current legislation allows us to pilot all sorts of new, original schemes, for example:

- attracting Welsh speaking students from Patagonia, beginning with a pilot project (a technique frequently used by the NHS, whose planning reflects that they draw doctors and nurses from around the world)
- training boys and girls through schemes such as the Forest Schools in order to entice them into the childcare sector
- invest in the creation of an intense training programme (to coincide with the 30 hours' provision) which would target the bilingual workforce and offer the prospect of a professional career in Welsh-medium childcare
- create more opportunities for childcare practitioners to study abroad in firstrate provisions, or provisions run through the medium of a minority language

No legislative change would be needed to accomplish some of these ideas, and other similarly original schemes. All that would be needed is the commitment and innovation of the Welsh Government.

In a time of financial pressure and cuts to local services it is vitally important that any investment leads to a real change in people's experiences at a grass-roots level. It is our firm belief that creating opportunities for children to learn the language, creating Welsh-medium training opportunities for them once they have left school, and the chance to work through the medium of Welsh in their chosen field, should be the central considerations of any legislative change.

#### **APPENDIX 1**

# Mudiad Meithrin's Response to the Recommendations of the WESP Rapid Review by the Welsh Government's WESP Advisory Board

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Recommendation 1: Establish an open and unreserved relationship between the Welsh Government and all the stakeholders when developing the WESPs, especially with regards to setting targets and agreeing outcomes.

- 1.1 We agree that there is a need to establish an unreserved relationship between the Welsh Government and its stakeholders in order to develop WESPs that reflect the strategy's ambitious aspiration of creating a million Welsh speakers by 2050. We note the need to ensure that there is room to discuss, suggest, agree upon and challenge targets within the county Welsh language fora, where those opportunities exist. However, it must be acknowledged that it will not always be easy for representatives from each sector, and from organisations and service providers dependant on Local Authority funding to fulfil this role.
- 1.2 In order to achieve this there must be an effective medium which enables progress to be measured against outcomes and targets, and which also enables open and transparent discussion.
- 1.3 The targets referred to in 1.2 must be clear, quantitative and measurable.

Recommendation 2: Revise the WESP timetables to coincide with Welsh Government Capital Programmes, especially 21st Century Schools. Target capital investment to ensure a connection between school and preschool programmes.

- 2.1 We agree with the suggestion of revising the WESP timetables to coincide with Welsh Government Capital Programmes. This would make it easier to plan and work in collaboration, and to ensure a link between school and preschools programmes.
- 2.2 We also suggest the need to facilitate the committees which decide on how the various capital programmes are spent, so that they may diversify and unite projects when appropriate, and so that projects bridging several areas can be collaboratively funded.

- 2.3 It should also be ensured that any programmes attached to the (future) Child Care Offer should be made available for the purposes of promoting Welshmedium care and education.
- 2.4 We suggest that neither Welsh-medium primary nor secondary schools should be built without early years provisions being a part of the plans, and that consideration should be given to relocating any provisions already within the proposed catchment.
- 2.5 In addition, we note that extending WESP timetables to be 5 years in length would allow for more considered planning, and would enable various stakeholders to implement and measure effects on the ground.

Recommendation 3: Review current outcomes and also agree on the most purposeful and appropriate outcomes for the next WESP cycle in order to effectively contribute to the Government's ambitions for 2050.

- 3.1 We agree that current outcomes should be reviewed in order to ensure inclusion of the most purposeful and appropriate outcomes for the next WESP cycle, ensuring an effective contribution to the Government's Cymraeg 2050 strategy.
- 3.2We agree that a specific outcome pertaining to 'pre-school' provision is essential. The availability of Welsh-medium provisions across the country is an important part of the wider provision of Welsh-medium education.
- 3.3 The Welsh Government has set specific targets to ensure that Mudiad Meithrin contributes to growth in its sector. Including a sector-specific outcome within the WESPs would be a way of ensuring that this planning and development is acknowledged at a local level, and would ensure a consistent means of measuring and analysing developments at a nationwide level.

Recommendation 4: Act quickly and purposefully to introduce the new legislation. A panel or group should be set up to discuss and evaluate the necessary legislative changes and regulations, prior to them being presented to the Assembly.

- 4.1 We agree that any changes or additions to the current legislation need to be implemented quickly.
- 4.2We note that the placement of the WESPs within the Welsh Language Bill must be explicit, in order to avoid confusion and maintain ongoing momentum.
- 4.3 We also note that a national body's input will be required to monitor and inspect work carried out at a local level.

Recommendation 5: A national level agreement should be sought between local government and the Welsh Government, in order to ensure consistency in terms of membership, expected contributions of the language fora and to discuss changes based on best practice.

- 5.1 We agree that an agreement should be sought, at national level, between local government and the Welsh Government, in order to ensure consistency in terms of membership and expected contributions of the language fora.
- 5.2 Ideally we would wish to see local Education Forums contribute to the Local Welsh Language Fora, in order to ensure that the county's Welsh Language Strategy reflects the full scope of activity and encourages Local Government departments and their other partners to take ownership of their Language Strategy.
- 5.3 Partners and stakeholders' existing targets could be taken into account when implementing the Welsh Language Strategy, in order to facilitate strategic planning and raise awareness of ongoing work across other departments.
- 5.4 We refer also to that already noted in in 4.3.

# Recommendation 6: Strengthen the strategic relationship between local government and Mudiad Meithrin in order to ensure a multi-level growth that will contribute to the Welsh Government's overall targets for 2050.

- 6.1 We agree in principle with the need to strengthen the existing relationship between Mudiad Meithrin and Local Government.
- 6.2 We agree that establishing and developing a strong working relationship with Local Authorities across Wales is the best way to enable local strategic planning and develop Welsh-medium pre-school provision; and that this, in turn, will contribute to the Welsh Government's Cymraeg 2050 Strategy.
- 6.3 In addition, we note the need to include the Care, Early Years and Play Work sector in any discussions regarding the development of local provision, in order to ensure that individual groups' development plans complement both the local vision as well as the national long-term one.
- 6.4 Currently we refer to 'measuring the demand' and responding to that demand when providing pre-school and education through the medium of Welsh. We should consider whether there is a need to generate demand for Welsh-medium pre-school provision. In order to realize the targets set by the Welsh Government for 2050, we need to increase the capacity of Welsh-medium provision, so that a greater number of families across Wales will be able to take advantage of the opportunities afforded them.

# Recommendation 7: Welsh Government to plan for plentiful Welsh-medium provision in response to the 30 hours' free childcare offer, and to consider its effect on local provisions.

- 7.1 We agree with the need to plan for the provision of Welsh-medium care as part of the 30 hours Offer.
- 7.2 One way of achieving this would be to set a minimum number of Welshmedium settings within each county.
- 7.3 We note a lack of consistency on a national level in the way that Local Authorities offer 30 hours free childcare. This may affect the options available

- to parents, and their choices regarding the care element which is also included as part of the 30 hours.
- 7.4 Although the payment of 'care' hours which are part of the 30 hours Offer have been agreed and are consistent across Wales, we note that there is a lack of consistency in the payment non-maintained settings receive for the education element, that is, the Foundation Phase. We refer to the table in Appendix 1, which includes details collected by the Cwlwm partnership, which has already been submitted to members of the Children, Young People and Education committees.
- 7.5 In addition, we note the need to ensure that county-level planning ensures opportunities for staff who wish to work in the pre-school sector, or for those who are already working in the sector, to develop appropriate Welsh language skills. In order to realize this there needs to be opportunities for individuals to follow relevant vocational courses through the medium of Welsh, and also opportunities for existing staff members to develop and strengthen their Welsh skills. It should be a requirement that the oral element of these vocational courses is done in Welsh.
- 7.6 Underpinning our ability to ensure an adequate supply of Welsh-medium preschool provisions across Wales is our ability to supply enough workers possessing both the necessary professional skills and sufficient Welsh language skills of the highest standard.

Recommendation 8: Simplify the process of categorizing schools according to language. In the meantime, the consortia to draw up reports for the local authority, confirming the current state of affairs in each individual schools.

- 8.1 We strongly agree with the need to simplify and standardise the process of categorising schools according to language.
- 8.2 Although the *Defining schools according to their Welsh-medium provision* document was published in 2007, we note the need to update and to simplify it, making it is easier for parents and others to understand.
- 8.3We note the need to create a strong definition of Welsh-medium provision and 'bilingual' provision as new definitions and classifications are developed, as bilingualism is a result as opposed to a medium.
- 8.4We also note the need to ensure consistency of usage across education consortia when reporting on the situation in schools nationwide.

Recommendation 9: Ensure the nature and validity of data presented to the Welsh Government. This should lead to early and effective identification of any data patterns which might suggest areas for concern within projects/programmes concerning the Welsh language.

- 9.1 We agree with the need to ensure the nature and validity of data presented to the Welsh Government.
- 9.2 Data is collected from Cylchoedd Meithrin and Cylchoedd Ti a Fi which are members of Mudiad Meithrin. We do not collect data to the same extent from

- the independent day nurseries which are members of the Mudiad. (See appendix 2).
- 9.3To resolve this, we are assessing our processes and systems on a regular basis, to ensure the validity of the data already submitted to the Welsh Government.

Recommendation 10: The Welsh Government to publish definitive guidelines on the allocation of capital investment within the Welsh-medium education system. Some stakeholders have suggested a separate fund, and others believe that plans responding to the Government's priorities to increase Welsh-medium education should receive an increased level of financial support from the Government. Capital proses for pre-school provision should also be reviewed to ensure an effective transition between pre-school provisions and Welsh-medium primary schools.

- 10.1 We agree that clear guidelines regarding the allocation of capital investment within the Welsh-medium education system would ensure that consideration will be given to expanding the capacity of the sector which would further increase opportunities for Welsh-medium education.
- 10.2 We note the need to ensure strategic planning to ensure that Welshmedium pre-school provisions of the highest standard are established and developed locally.
- 10.3 We agree with the need to review capital processes for pre-school provisions in order to plan the transition from pre-school to Welsh-medium primary school effectively.
- 10.4 To this end, we note the need for long-term security for pre-school provisions included as part of Governmental plans and capital investments for the development of new Welsh-medium schools. In order to achieve this we need to ensure that within the funding agreements a specific location is reserved for pre-school provision, and this should not be considered as part of the school when considering its capacity.
- 10.5 The linguistic definitions used for categorising schools, as referred to in Recommendation 8, would also need to be used when deciding on the classification of capital grants for Welsh-medium provision.

Recommendation 11: An agreement should be sought at national level, or an agreement between the Government and local authorities, regarding the process deciding the linguistic medium of any school built under the requirements and ramifications of the Local Development Scheme, or as part of an agreement between developers and the local council in accordance with the conditions of Clause 106.

11.1 We suggest the need for national guidelines to unlock the potential of Clause 106 for the benefit of Welsh-medium care and education.

11.2 We note the need to ensure that the building of new schools contributes to the targets set to increase the % of pupils receiving their education through the medium of Welsh or those who are studying for qualifications through the medium of Welsh, as noted in the Cymraeg 2050 Strategy.

Recommendation 12: A revised focus on post-16 provision when considering any changes to the data collected, in order to ensure an accurate reflection of Welsh-medium provision in further education colleges. Once the data is solid and provides a clear image, we can consider the way future Welsh-medium further education provision is funded.

- 12.1 We welcome the Welsh Government's confirmation that Welsh further education colleges will come under the remit of the Coleg Cymraeg Cenedlaethol.
- 12.2 As already noted in our response to Recommendation 7, the Childcare, Early Years and Play work sector requires an ample supply of workers who possess both the necessary professional skills and Welsh language skills of the highest order. This workforce will be key in ensuring a sufficient number of Welsh-medium pre-school provisions across Wales.
- 12.3 We note the need to create opportunities for post-16 students who wish to work in the Child Care, Early Years and Play Work sector to develop appropriate Welsh language skills.
- 12.4 In order to realize this we need to ensure that there are opportunities for individuals to follow relevant vocational courses through the medium of Welsh, at a venue which is a reasonable distance from their home.
- 12.5 We note the need to ensure that these Welsh-medium courses are run, and also note that there may be a need for additional grants to enable educational establishments to justify running a course through the medium of Welsh with fewer students than would usually be required.
- 12.6 Opportunities must also be created for post-16 students to develop their Welsh language skills within the workplace, and these should be concurrent with their vocational courses.
- 12.7 In order that data collected will be clear and consistent and provide an accurate reflection of Welsh-medium provision within Welsh further education colleges, we note the need to set clear, national definitions regarding categorization.
- 12.8 We refer to the document 'Mudiad Meithrin's plan to qualify the workplace', which is included in Appendix 3.

Recommendation 13: Rapid planning and action needed in order to increase the number of teachers trained to teach through the medium of Welsh.

- We agree with the need for rapid planning and action in order to increase the number of teachers trained to teach through the medium of Welsh.
- 13.2 We also note the need to plan and ensure a sufficient number of Welsh speaking individuals who are able to undertake work such as classroom assistants and lunchroom assistants, and to ensure that they have the necessary skills to support teachers in their work.

Recommendation 14: Set targets and criteria within each scheme, in order to ensure that young people have opportunities to use Welsh outside of school hours. Work to ensure consistency at a nationwide level in the way that youth services are provided in Welsh.

- 14.1 We agree with the need to ensure opportunities for children, young people and their families to use Welsh within informal settings within their communities.
- 14.2 We note the need to ensure that these Welsh-medium provisions across Wales become part of the mainstream provision, as opposed to a 'niche' offering.

Recommendation 15: Councils to include detailed assessments of their additional learning needs services within their planning, and consortia to report on the situation regularly, leading the regional discussions (or subregional, when there is insufficient demand for services within individual counties.)

- 15.1 Mudiad Meithrin agrees with this recommendation and thinks that it will be a public means of validating information about the availability of specialist interventional services for children with ALN. We consider that this recommendation will strengthen and support effective implementation of the new legislation.
- This suggestion, in conjunction with the new legislative ramifications requiring Welsh ministers to collect national data, will address points 1.39 and 1.40 of this report.
- 15.3 The Welsh Government's programme for transforming the additional learning needs system, which imposes a timetable and guidance on how to adopt and implement the Additional Learning Needs and Education Tribunal (Wales) 2018, is already under way. This demands the attention and resources of Local Authorities across Wales.
- 15.4 We suggest that the recommendation to 'explain how the authority intends to bridge the gaps in present provision, the needs noted and the support available' could be strengthened or redeveloped.
- 15.5 This is entirely in accordance with the aims of the act. The Welsh Government Guidelines: Implementing the Additional Learning Needs and Welsh Tribunal Act (Wales) Welsh language impact assessment refers to the

- present duties outlined under the Welsh in Education Strategic Regulations and Measuring the Demand for Welsh-medium Education Act (Wales) 2013.
- 15.6 It is therefore vital that arrangements to verify, monitor and develop WESPs are effective, as this will decide how successful we will be in creating a workforce able to meet the requirements of the Additional Learning Needs and Welsh Tribunal Act (Wales).
- 15.7 The Referral Route. The expectation under the new act is that any person will be able to refer concerns about possible additional learning needs to the Local Authority. This will happen when children are under school age, or receiving education in a non-maintained setting. The new act creates jobs with the specific responsibility for coordinating and providing Individual Learning Plans to these children, as required. This will be the function of the Early years additional learning needs leading Officer.
- 15.8 It is essential that the persons undertaking these roles will possess a thorough understanding of the advantages of Welsh-medium education, in addition to possessing an additional learning needs specialism. These persons will have to discuss services and choices with families during the early years, possibly before the child reaches school age. Therefore they need to possess the confidence to discuss linguistic choice with parents, in an appropriate and sensitive way. Mudiad Meithrin Research (2) showed that parents were put under pressure by health visitors and others to send their children (who spoke Welsh and other languages) to English-medium provision. This is done to 'ensure linguistic consistency' due to shortages of Welsh-medium specialists.
- 15.9 We would wish to see a recommendation that the statutory duty to provide ILPs in Welsh (which is a part of the new act) will be done by people who are trained and qualified and who understand the ramifications of linguistic choice for children in Wales.
- 15.10 While we welcome the intent to improve the system, we are concerned about the implications for pre-school children in the period before the new system is adopted. The expected implementation period is 2020 2022, and this will run parallel to the present system, which as we know, is disadvantageous to those who wish to receive their education and early years care through the medium of Welsh.
- 15.11 Younger children are likely to come under new legislation from 2021, and it will be the responsibility of the Local Authority to prepare their Individual Learning Plans (ILP). The government's latest guidelines note:

The school or LA conducting the ILP must ensure additional learning needs provision (ALNP) as described in the ILP, and where the ILP notes that provision should be made through the medium of Welsh, the school or LA should take every reasonable step to ensure that provision is delivered in Welsh. (14)

(14) The exception to this is when the ILP notes that an NHS body is to provide the ALNP. In that circumstance, the NHS body's duty is to secure that ALNP and where the ILP notes that provision should be made through the medium of Welsh, the NHS

should take every reasonable step to ensure that provision is delivered in Welsh: articles 20 and 21 of the act.

15.12 It should be noted that 'take every reasonable step' is the objective for the local authority, and as such the legal expectation is vague and open to interpretation. We welcome that the Act has the flexibility to assess this and to strengthen the duties in the future. However, obviously Welsh ministers will only be required to inquire into this once every 5 years, and in the meantime a generation of children will have to accept 'every reasonable step', and this could well be insufficient and prejudicial against their rights to receive services and education through the medium of Welsh.

Recommendation 16: Increase the status of the Welsh language within Government departments so that it is given due consideration before any new strategies are adopted. A proses should also be created for the avoidance of, or resolution of situations which bring into conflict strategies which could affect the situation of the Welsh language.

- 16.1 We agree with the need to ensure the status of the Welsh language within Government and Local Government departments in order to ensure the success of the Cymraeg 2050 strategy, and in order to ensure departmental cooperation as they implement and realize this ambitious strategy on a local level.
- 16.2 Ensuring representation from local services on the Welsh Language Fora would be one way of raising awareness of the strategies and plans concerning the Welsh language.

Recommendation 17: The central Government and local governments to consider the size of their Welsh Language Units as they move to realize the Welsh Government's ambitions for 2050.

17.1 Although we agree that ensuring sufficient capacity to operate through the medium of Welsh is key within the Welsh Government and Local Governments, if we are to achieve the targets of 2050 we suggest that consideration of the resources allocated across all departments would enable the mainstreaming of Welsh-medium services.

Recommendation 18: A legislative framework should be created to provide support, advice and constructive criticism to bodies working to meet their legal duties regarding educational planning (be this via WESP or other format).

18.1 We agree on the need for a legislative framework to provide support, advice and constructive criticism for bodies working to meet their legal duties regarding the planning and provision of Welsh-medium pre-school education