

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar [Bil y Gymraeg ac Addysg \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) on the [Welsh Language and Education \(Wales\) Bill](#)

WLE 03

Ymateb gan: Cymdeithas Genedlaethol yr Ysgolfeistri ac Undeb yr Athrawesau

Response from: National Association of Schoolmasters Union of Women Teachers (NASUWT)

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**CYPE Consultation on:**  
**Welsh Government Welsh Language and Education Bill 2024:**  
**‘A million Welsh speakers by 2050’**  
**October 2024**

1. The NASUWT welcomes the opportunity to comment on the proposals to introduce a Welsh Language and Education Bill to realise the Welsh Government’s ambition of having a million Welsh speakers by 2050.
2. The NASUWT is the largest teachers’ union in Wales representing teachers and school leaders.

‘By ‘putting teachers first’, the NASUWT works to enhance the status of the teaching profession to deliver real improvements to teachers’ working lives, seeking to ensure they are recognised and rewarded as highly skilled professionals with working conditions that enable them to focus on their core role of teaching’.

**GENERAL COMMENTS**

3. In noting the Welsh Government’s ambition to persuade the citizens of Wales to embrace the Welsh language and effectively double the number of Welsh speakers by 2050, which would see the percentage of the population able to speak Welsh rise to around 31.5% on current estimates, the NASUWT notes that this Bill introducing statutory duties and targets is moving away from the Welsh

Government previous pragmatic approach based on encouragement and on providing access to learning the Welsh language.

4. The NASUWT is, therefore, concerned about the potential implications and/or unintended consequences for the education workforce in realising some of the statutory objectives contained within the Welsh Language and Education Bill 2024. development areas referred to in the consultation document.
5. The concerns of the Union are heightened by the lack of detail in relation to the costs and funding streams, definitions of categories, lack of clarity in timescale and monitoring arrangements, as well consequences if schools do not achieve the desired status.
6. The Union therefore, seeks assurances from the Welsh Government that it will militate against the possibility of the proposals impacting adversely on the education workforce.
7. The NASUWT expects the Welsh Government to:
  - Identify additional and dedicated funding which will be provided for education establishments to assist in meeting the ambition through increased staffing and by providing the necessary resources and infrastructure changes. This would require sufficient additional capital and revenue funding;
  - Provide an assurance that the significant increase in the number of teachers and early years practitioners who are able to teach through the medium of Welsh would be realised through additional staffing and/or access to courses to enable existing post-holders to learn the Welsh language through paid release from their teaching or support duties;
  - Give a binding commitment that no members of staff would be under threat of losing their livelihood if they were not able to gain sufficient grasp of the language to enable them to teach through the medium of Welsh,

where they are currently employed in either English-medium or bilingual schools;

- Ensure that the ambition is taken forward on the basis of mutual respect and tolerance and that the legislation envisaged, which, as stated in the consultation document, will provide an unequivocal basis for organisations to act in support of the language and for Welsh speakers to use, has this at its heart.

8. The NASUWT has long argued that the key to reinvigorating the Welsh language is to concentrate on the early years of education so that the journey can be an adventure for the learners of Wales, rather than a crusade.

### **SPECIFIC COMMENTS**

9. The NASUWT offers the observations and comments:

- a) The proposal to establish a statutory regime to categorise the provision of Welsh language education.

The Bill states that there will be three categories: i) Primarily Welsh Language, ii) Dual Language, iii) Primarily English, Partly Welsh.

Ministers will be given the power to set the range of Welsh language provision for each category, and the bill sets out the Welsh language learning goals for schools in each category.

10% is the minimum provision for a Primarily English Partly Welsh school.

Ministers, in regulations, will have powers over time to increase the minimum provisions of Welsh language as factors such as workforce change.

Schools are required to prepare to delivery plans, giving outlines for plans to increase/improve Welsh language provision, and how to move to a higher category.

The Bill introduces changes that relate to planning, resourcing, and development of Welsh language education in schools. All education staff will have to adapt to new ways of working which will have an impact on workload. It is difficult at this stage to

estimate the impact, but worth noting that the impact will affect mostly those in the Primarily English, Partly Welsh category. The Bill notes that the demand for a 10% provision will not happen immediately, and notes further that there will be a period of time when regulations are developed which will give schools time to plan for the change.

NASUWT asserts that this lack of clarity on both the impact on workload, and in any timetable being put forward does not reassure education staff that their working conditions will be protected during these changes.

NASUWT further notes that education staff are overwhelmed by current workloads and change fatigue resulting from the implementation of the Curriculum for Wales, and the ALNet, and there is no slack in the system to accommodate further unpredictable change.

No assessment has been made of the impact of the changes on workload, nor of the extra funding required to support the proposals. The NASUWT stresses that the increased workload should not fall on the shoulders of the existing workforce. The funding for changes at school level would come from the Local Authority allocation to individual schools. The NASUWT calls for regular reviews on school spending, to ensure that financial impacts are acknowledged and recompensed by the Welsh Government. The costs to schools need to be fully mapped out as many are currently working to deficit budgets.

b) Staffing challenges.

There are currently severe shortages in teachers proficient in delivery through the Welsh medium. This would hinder the implementation of the proposals. NASUWT would ask the Welsh Government to concentrate on the huge staffing crisis existing already in recruiting those proficient in Welsh, at all levels in the education sector (early years to FE and HE). Success requires Welsh Government investment, in that this recruitment depends on appropriate resourcing. The NASUWT calls on the Welsh Government to ensure that the proposals contained in this ambition are securely funded. The NASUWT notes that building capacity in early years education is pivotal to success throughout the school career, as the levels of Welsh proficiency when joining primary or secondary school impacts on further pupil achievement. The

NASUWT asks that the Welsh Government gives the need of the Early Years sector particular attention.

c) Approval and Monitoring.

The NASUWT notes that the Bill proposes a role for the Local Authority in agreeing the Delivery Plans created at school level. The NASUWT notes that this role depends on the Welsh Government producing clear guidance on how the school targets should be set. Consideration also needs to be given to the additional resources needed, and the work pressures this planning would place on school staff. These guidelines also need to provide clarity on the role of other education institutions involved such as Estyn, Improvement Providers and the National Welsh Language Learning Institute (being proposed).

Introducing more monitoring in schools will only result in a higher workload for staff. Whilst understanding that monitoring arrangements would be needed to ensure consistency across schools in the placing of categories, the NASUWT is extremely concerned at yet another layer of monitoring is being placed on teachers work.

d) Non-achievement of Primary English, Partly Welsh.

The consequences of a school not achieving the desired category of Primary English, partly Welsh at 10% Welsh provision should be managed sensitively.

There is real fear amongst English monoglot teachers on possible pressures which may be placed on them, or on threats to their livelihood and job retention. Welsh Government and other stakeholders education training will need to ensure that there are adequate training opportunities for language development and funds to release staff to complete the training.

There is a lack of clarity on consequences of not-achieving the category. Schools can ask for an extension, but it is not clear for how long, or on what would be the ultimate sanction.

The use of Estyn in monitoring this progression would go against a collaborative, non threatening ethos of language development. This move from an encouraging collaborative approach could impact badly on the mental health of non Welsh speaking teachers.

It is clear from Estyn report on Welsh language in schools 2022/23 that English schools are the target of this proposed Bill. (Annual Report on the Welsh Language in Estyn 2022-2023

PDF ([www.estyn.gov.wales](http://www.estyn.gov.wales)) This report does not include an analysis of the impact on non-Welsh speaking pupils, who may feel targeted by this development in how the Welsh language is promoted. The NASUWT calls for the Welsh Government to conduct further research into this aspect of a possible unintended consequence of the proposed Bill.

There are particular needs for our ALN pupils which will also need specific support in terms of how to categorise, and extra training education staff in this sector which are not adequately explored.

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**NASUWT Cymru**

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