

This document provides a translation of correspondence received from Cymdeithas yr Iaith

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 06

Ymateb gan: Cymdeithas yr Iaith

Response from: Cymdeithas yr Iaith

Key points:

- The Welsh language belongs to everyone in Wales, from all walks of life, and everyone should be entitled to become confident Welsh speakers. The Bill in its current form will not achieve that, even in the long term.
- The Bill's processes for increasing Welsh language education depend on the whims of individuals, with no statutory aims to drive them forward. The Government's previous non-statutory targets for Welsh language education have been consistently missed.
- If the Bill is to ensure that pupils finish their time in education as confident Welsh speakers, a statutory aim needs to be placed on the face of the Bill that 100% of children will receive Welsh medium education by 2050.
- Rather than static categories, a language continuum needs to be established for schools on the face of the Bill with a timetable for all schools to move along over time in order to become Welsh medium schools.
- There is consensus that learning Welsh as a second language is completely ineffective as a pathway for young people to become confident speakers. The solution is to create a single Welsh language learning and assessment qualification for all and to remove Welsh second language qualifications.
- Significant investment and much more ambitious planning is needed for the development of a bilingual workforce to grow Welsh medium education, with clear duties set out on the face of the Bill.

Introduction

Cymdeithas yr Iaith is an association of people, acting peacefully for the Welsh language and Welsh communities as part of the international revolution for rights and freedoms.

As an organisation campaigning for the Welsh Language Education Act since 2015, we welcome the proposed legislation in this vital area. In May 2023, the Cymdeithas yr Iaith *Welsh Language Education Act* was published, which presents in legal language what we want to see in such an act.¹ In that Act, the main aim was clear: to turn the whole education system into Welsh medium by 2050. Among other things, that would mean that all young people leaving the statutory education sector would be confident Welsh speakers, removing the current divide between young people who leave the Welsh language education system and speak the language with confidence, and the rest, who are failed by the education system and who, almost without exception, leave the education system unable to speak Welsh.

Despite the Government's good intentions in introducing this Bill, we have great concerns that the Bill will actually maintain the *status quo* continuing to deprive a large percentage of Welsh children of the Welsh language, even in the long term, more than anything because of the lack of statutory education targets on the face of the Bill, and because of the lack of a mechanism to ensure that schools will move along the continuum towards becoming Welsh language schools.

Although the Bill is nowhere near to achieving the Society's goal in our *Welsh Language Education Act*, we think it can be a step in the right direction, but that is subject to important changes being made to it to ensure that it achieves what it sets out to achieve. Indeed, we believe that this Bill can be significantly strengthened by making amendments based on what is set out in this document.

The right of every child

We believe that the Welsh language belongs to everyone in Wales, whatever their background, and that the Government's education policy should reflect that by ensuring that every child in the country leaves school confident in their use of the Welsh language. Currently, around 80% of children and young people in Wales are deprived of the language due to the failure of our education system to grow and normalise Welsh-medium education. The disparity is worst among disadvantaged communities, migrants and ethnic minorities. Because they leave school without being confident Welsh speakers, it is likely that the majority of young people here will be excluded from cultural, social and economic opportunities for the rest of their lives.

As the Society has stated over the years, Welsh language education for all is the long-term aim and there is a growing consensus on that. As the draft stands, there is no clear goal on the face of the Bill, there is no clear timetable for schools to move along a continuum from one language category

¹ Cymdeithas yr Iaith, *Cymdeithas yr Iaith Welsh Language Education Act* (Aberystwyth: Cymdeithas yr Iaith, 2023) <https://cymdeithas.cymru/sites/default/files/Welsh%20Language%20Education%20Act%20-%20SAES%20-%20TERFYNOL.pdf>

to the next and the minimum 10% Welsh language provision in ‘Primarily English Language’ schools is terribly low, nothing but a reflection of the situation as it really is today. Without substantive changes, therefore, the Bill will validate the current situation, where the majority of our young people are deprived of their right to the Welsh language.

Calculating the Million

The 2021 Census showed a drop of 24,000 to 538,300 speakers, following the same trend since 2001.² This was contrary to the Welsh Government’s prediction in its main policy document for the language, *Cymraeg 2050: A Million Welsh Speakers*, that there would be an increase of 38,000 to reach a total of 600,000 in the 2021 Census.³

In setting the million speakers as a statutory goal in the Bill, the Government in section 3(1) are also seeking to change the definition of the million. Since the disappointing Census figures were published, the Government has been trying to redefine the target with reference to other surveys which show there are more speakers than the Census. The honest way to increase the number of Welsh speakers is not to change the method of measurement, but to implement and invest in policies that will lead to an increase in the number of Welsh speakers and everyday use of the language.

For the Cymdeithas, as stated, it is a matter of social justice to create an education system for the future that will ensure that all young people leave school as confident Welsh speakers. Giving the Welsh language to our young people is not a way of reaching the million, but a goal in itself that will enable them to play a full part in modern Wales as citizens of a bilingual country.

However, it is also fair to note the scale of the task of ensuring the revival of the Welsh language over the coming decades, and education is vital in that regard. The Commission for Welsh-speaking Communities’ final report on education says, “no other policy field has as much influence on the ability to acquire and use language.”⁴ Currently, only 14.9% of Welsh children receive Welsh at home, which is insufficient to maintain, let alone increase, the current numbers of Welsh speakers.⁵

² Welsh Government, *Welsh language in Wales (2021 Census)* (Cardiff: Welsh Government, 2022) <https://www.gov.wales/sites/default/files/pdf-versions/2022/12/3/1671609478/welsh-language-wales-census-2021.pdf>, p. 3.

³ Welsh Government, *Cymraeg 2050: A Million Welsh Speakers* (Cardiff: Welsh Government, 2017) <https://www.gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf>, p. 24.

⁴ The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 116.

⁵ Fiona O’Hanlon, ‘Choice of Scottish Gaelic-medium and Welsh-medium education at the primary and secondary school stages: parent and pupil perspectives’, *International Journal of Bilingual Education and Bilingualism*, 18.2 (2015), pp. 242-259.

Even provision in the Welsh-speaking communities “is not intensive enough to sustain Welsh as a community language in the future” according to the Commission for Welsh-speaking Communities.⁶

RECOMMENDATION: Make it clear on the face of the Bill that it is the “census conducted in accordance with the Census Act 1920” that will be used to calculate the number of Welsh speakers while such a census is being conducted.

Creating confident Welsh speakers

Section 11(3)(b)(ii) refers to ensuring that every single child leaves school with at least a B2 proficiency level “for oral interaction”. In other words, creating confident speakers throughout the statutory education system.

Unfortunately, this would not be the outcome of the Bill in its present form. Without putting schools on a clear path to progressive learning through the medium of Welsh, there is a risk of reliance on teaching Welsh as a second language as a pathway to creating confident speakers. For over a decade, there has been consensus that learning Welsh as a second language is completely ineffective as a pathway to creating confident speakers. A report *One Language for All* chaired by Professor Sioned Davies of Cardiff University for the Welsh Government concluded that learners taking the GCSE Second Language course were “not confident enough to use Welsh outside the classroom”, and that it was “the eleventh hour” for the “tedious” subject.⁷ According to research by Cymdeithas yr Iaith, since the report was published in 2013, 142,351 children have achieved a GCSE Welsh Second Language grade, and have consequently been deprived of the opportunity to become confident Welsh speakers.⁸

The Bill as it stands seeks to redefine Welsh language education, suggesting that it includes “teaching Welsh” as well as learning through the medium of Welsh. This is a move that unnecessarily muddies the waters, and risks undermining the objectives of the Bill. Welsh medium education is the only way to create confident Welsh speakers, and Welsh medium education for all is the only way to ensure the right of every child in Wales to be able to speak the language with confidence.

⁶The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 116.

⁷ Welsh Government, *One Language for All: Review of Welsh second language at Key Stages 3 and 4* (Cardiff: Welsh Government, 2013) <https://www.gov.wales/sites/default/files/publications/2022-07/review-of-welsh-second-language-at-key-stages-3-and-4.pdf>, p. 1.

⁸ BBC Cymru Fyw “Llusgo traed’ Cymraeg ail iaith yn ‘amddifadu plant’ (Welsh only), 27 September 2023. <https://www.bbc.co.uk/cymrufyw/66933933>

RECOMMENDATION: Establish a single learning and assessment continuum for Welsh, removing the second language Welsh course.

RECOMMENDATION: Modify the definition of Welsh language education in section 8(2)(a) to mean “education and training through the medium of Welsh” only, i.e. remove clause 8(2)(a)(i).

Statutory Targets for Welsh Language Education

One of the main failings of the Bill is the fact that it does not set statutory targets for increasing the provision of Welsh medium education across the sector. Instead, the draft Bill would place statutory responsibility on the Welsh Ministers to *set targets* (section 1 (C)). The growth of Welsh language education would therefore depend, as it now stands, on a vision or lack of political vision or a difference of opinion about the importance of giving all children the same language opportunities.

The Welsh Government’s *Cymraeg 2050: A Million Welsh Speakers* strategy currently sets a non-statutory goal that 40% of Welsh children will be in Welsh language education by 2050. This target would continue to deprive 60% of Welsh children of the language, even within a quarter of a century’s time.

Furthermore, historical evidence warns us of the weaknesses of setting non-statutory targets: some set by the Welsh Government for Welsh medium education have consistently been missed. For example, in the Welsh Government’s *Welsh-medium Education Strategy* in 2010, a target was set for 25% of seven year olds to be assessed in Welsh first language by 2015, and 30% by 2020.⁹ By 2021, the figure was actually only 22.8%.¹⁰ This also fell short of a revised, less ambitious, 24% target that the Welsh Government set for 2021 in the language strategy, *Cymraeg 2050: A Million Welsh Speakers*.¹¹

In the twenty years between 2003/04 and 2023/24, the percentage of children receiving Welsh medium education in primary schools has only increased from 19.06% to 22.47%.¹² The corresponding figure for secondary education over the same period has increased from 12.89% to

⁹ Welsh Government, *Welsh-medium Education Strategy* (Cardiff: Welsh Government, 2010) <https://dera.ioe.ac.uk/id/eprint/4248/1/100420welshmediumstrategyen.pdf>, p. 21.

¹⁰ Audit Wales, *A Picture of Schools: Report of the Auditor General for Wales* (Cardiff: Audit Wales, 2021) <https://archwilio.cymru/sites/default/files/publications/POPS-Schools-Eng.pdf>, p. 8.

¹¹ Welsh Government, *Cymraeg 2050: A Million Welsh Speakers* (2017) <https://www.gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf>, p. 24.

¹² Statistics Wales, *Number of pupils in primary, middle and secondary school classes by local authority and Welsh category* (Cardiff: Statistics Wales, 2024) <https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Level-Annual-School-Census/Welsh-Language/pupilswelshclasses-by-localauthority-welshcategory>

13.48%. We are not convinced that the Bill as it stands will change this: without a clear drive brought about by statutory, quantitative targets, the pattern could be expected to continue.

There is a precedent for setting quantitative targets in legislation. The Climate Change Act (2008), passed by the British Labour Government under Gordon Brown, sets carbon emissions reductions by 100% compared to 1990 emissions as a statutory goal.¹³ The Welsh Language and Education Bill itself (section 1(a)) sets a statutory goal of one million Welsh speakers by 2050. We therefore see no reason not to put statutory targets on the face of the Bill for the growth of Welsh medium education, which would tie the Government and local authorities to action.

We are deeply concerned about the wording of section 11(2)(b) of the Bill, which sets out a children's language attainment goal "by a date specified by the Welsh Ministers by regulations", rather than "by 2050" as set out in the White Paper. This would give ministers free rein to push the target forward through regulations if they are not on course to meet it, repeating the pattern of recent years of lowering targets rather than acting firmly to meet them.

The Bill's mechanism (section 3(2)) for calculating the number of Welsh speakers is also of concern. There are consistent assessments of pupils throughout their education, and an end of Key Stage or GCSE assessment would be a more reliable measure without requiring additional assessments.

RECOMMENDATION: Set a statutory target for Welsh language education provision and the percentage of children in Welsh medium education by 2050 on the face of the Bill (new section 1(b)), alongside the target of a million Welsh speakers. We recommend that the target should be 100%.

RECOMMENDATION: Use an end of Key Stage assessment or GCSE instead of a self-assessment for section 3, (2a) and (2b).

Establishing a Language Continuum for Schools

We have real concerns about the categories that are being set up in section 9. Over the decades, we have seen that as a consequence of categorizing schools schools are placed in a static position without a stimulus to make progress. The Bill as it stands provides no assurance that schools will move up the categories, let alone make progress within the categories, which raises fundamental questions about the effectiveness of the Bill.

What is needed is for schools to move along a language continuum towards becoming Welsh language schools. We therefore propose that a Continuum for schools be established on the face of

¹³ Government of the United Kingdom, *Climate Change Act (2008)*
<https://www.legislation.gov.uk/cy/ukpga/2008/27/part/1/crossheading/the-target-for-2050>

the Bill, which would set every school on a journey to becoming a Welsh medium school. Clear Progression Steps along the Continuum should be defined on the face of the Bill, replacing the current categories in section 9.

In order to ensure transparency and progress along the Continuum, the Progression Steps should be more specific than the three current broad categories contained in the Bill, providing clarity on where the school is currently on the Continuum, and the steps and timescale for moving to the next Progression Step.

It is also crucial that there is a specific Progression Step for ‘Welsh medium schools’ (the current 3P category), which is the final Progression Step on the Continuum, and the destination for every school.

The Bill should outline deadlines for schools to move up to the next Progression Step so that schools cannot stand still. Schools will also need significant incentives and support to move along the Continuum.

The Commission for Welsh-speaking Communities recommended immediate action to move schools in areas of higher density linguistic significance along the language continuum so that inclusive Welsh language education is the destination.¹⁴ This can happen very quickly in those areas. The pathway for all local authorities to ensure that 100% of their children receive Welsh medium education is outlined in our document *Welsh Education for All: Reaching the Objective*.¹⁵

Another reason for not continuing with a categorisation system is the lack of definitions for school categories in the Bill itself. Instead, the Bill refers to the responsibility of Welsh Ministers to set an amount of Welsh language education provided “as a range for each language category” (section 10(2)(b)). It is essential in order to maintain and develop the provision of Welsh language schools that specific percentages are included in the Bill itself. As stated, we think the categories should be removed. However, it is vital that ‘Primarily Welsh Language’ schools are defined in the Bill as schools where Welsh is the medium of all school education – except for English lessons.

We are concerned about the impact of creating the new category of schools ‘Primarily English Language, Partly Welsh’, which sets 10% of Welsh language education as a minimum (only half a day a week), and especially so as this includes teaching Welsh. Teaching Welsh has been compulsory since the Education Reform Act 1988, and subsequent laws (now the Curriculum Act 2021). According to the Welsh Government itself, almost every single child already received this

¹⁴The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 118.

¹⁵ Cymdeithas yr Iaith, *Welsh Education for All: Reaching the Objective* (Aberystwyth: Cymdeithas yr Iaith, 2024) <https://cymdeithas.cymru/dogfen/welsh-education-reaching-objective>

minimum 20 years ago.¹⁶ Experience has shown that this does not create confident Welsh speakers.

We believe that a minimum of 30% (which constitutes a day and a half of the week) should be imposed in the first instance, which is a meaningful increase on the current situation. All schools should start working towards this immediately, with significant Government support to do so, and there should be a goal for all schools to comply with the requirement within five years at the latest (that is, by September 2030).

Currently, with the exception of 'Primarily English Language', the categories do not specify a minimum Welsh language provision in the Bill itself. We believe that such minimums are at the heart of the Bill and should therefore be placed on the face of the Bill rather than in secondary legislation or policy.

Establishing any new English medium provision would undermine the aim of increasing the percentage of Welsh language education provision. We believe that a new section is needed in the Bill dealing with new schools and the reorganisation of existing schools. This should include ensuring that any new school established is Welsh medium, and that any school resulting from the reorganisation of existing provision moves up the school continuum.

RECOMMENDATION: Replace the Categories contained in section 9 with a continuum with clear Progression Steps towards Welsh language education for all.

RECOMMENDATION: Establish a minimum of 30% Welsh language education provision in every single school, effective by September 2030.

RECOMMENDATION: Establish that Welsh shall be the medium of all Welsh school education, except for English lessons.

RECOMMENDATION: Establish as a percentage on the face of the Bill what is the minimum provision of education through the medium of Welsh at each of the Progression Steps.

RECOMMENDATION: Establish on the face of the Bill that any new school established in the future will be Welsh medium, and that any school resulting from the reorganisation of existing provision shall be higher in the school continuum than the provision replaced.

Exemptions

¹⁶ Welsh Assembly Government, *Iaith Pawb: A National Action Plan for a Bilingual Wales* (Cardiff: Welsh Assembly Government, 2003) [https://busnes.senedd.cymru/Data/WelshCommittee582/20021219/Agenda/ELL%2019-02\(p.1\)%20Atodiad%20B%20Adroddiad%20y%20Gweinidog.pdf](https://busnes.senedd.cymru/Data/WelshCommittee582/20021219/Agenda/ELL%2019-02(p.1)%20Atodiad%20B%20Adroddiad%20y%20Gweinidog.pdf), p. 39.

We are very concerned about the exceptions to achieving the minimum in Welsh medium education contained in the Bill. Because of these, it will be possible for schools to be excepted from the Bill's requirements for a total of six years, which constitutes almost a quarter (24%) of the period to 2050. Would it not also mean that when (and if) the minimum Welsh provision is increased in the future, schools will be able to be excepted once again for further periods? Either way, such exceptions would mean that more children will miss out on the opportunity to be confident Welsh speakers.

RECOMMENDATION: Remove sections 18 and 19 of the Bill which provide for exemptions to the minimum amount of Welsh language education.

The Education Workforce

The Bill currently fails to address one of the fundamental challenges of growing Welsh medium education provision, namely the lack of statutory targets to grow an education workforce able to work in the Welsh language. It neither deals in a meaningful way with the workforce, or incentives to train to learn through the medium of Welsh. This risks undermining the objectives of the Bill altogether.

According to the Education Workforce Council, in 2024, 26.5% of school teachers have registered their ability to teach through the medium of Welsh; however, 33.0% have registered their ability to speak Welsh.¹⁷ There is therefore a 6.5% gap, namely those who can speak Welsh but do not teach through the medium of Welsh, and who may not have the confidence to do so; with little investment and support, this is an opportunity for very rapid growth of the Welsh medium education workforce in the coming years, as an urgent starting point for the further growth required.

According to Statistics Wales, teachers' ability in terms of the Welsh language in the 2023/24 school year is as follows: 24.7% have a proficiency level (C1); 6.7% with a higher level (B2); 7.7% with intermediate level (B1); 18.7% with basic level (A2); 24.3% have entry level (A1); 17.8% have no Welsh skills.¹⁸ According to these figures, 31.4% already have the ability to learn through the medium of Welsh and a further 7.7% have very strong skills, according to the National Centre for Learning Welsh's work ability definitions.¹⁹

¹⁷ Education Workforce Council, *Annual Education Workforce Statistics for Wales 2024* (Cardiff: Education Workforce Council, 2024) <https://www.ewc.wales/site/index.php/en/documents-eng/about/workforce-statistics/annual-statistics-digest/current/1245-annual-education-workforce-statistics-report-2024/file>, p. 13.

¹⁸ Statistics Wales, *Teachers Welsh language ability by local authority* (Cardiff: Statistics Wales, 2024) <https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/school-workforce-annual-census/welsh-language/welshability-by-localauthority>

¹⁹ National Centre for Learning Welsh, *Work Welsh: Employers' Information* (Carmarthen: National Centre for Learning Welsh, 2017) https://dysgucymraeg.cymru/media/1658/pecyngwybodaeth_s_arlein_fesul-tudalen.pdf pp. 12-15.

Catalonia managed to increase the proportion of Catalan medium schools from 3% to almost 100% in 15 years between 1978 and 1993, despite an almost complete ban on Catalan education during Franco's time and a shortage of language literate teachers, by investing in learning courses for the workforce, namely 'reciclatge' courses for teachers who were in work.²⁰

Even for the present requirements, the Government's current *Welsh in education workforce plan* is completely inadequate for the purpose of achieving a Welsh in education workforce, and totally underestimates the scale of the task of achieving an adequate workforce for the future. Much more significant investment needs to be made in workforce training, to include those training from scratch to become teachers as well as those already working. Cymdeithas yr Iaith believes that at least £20m of annual investment is needed in this area to start making a real difference.²¹

While the teachers already in the system are the number one priority, there is also a need to transform the teacher training system for those training from scratch to be teachers, so that everyone who goes through that system is able to teach through Welsh by the time they qualify. This can be done by adding periods of intensive Welsh learning to the course, extending the current year course to up to two years depending on the language skills of the trainees involved.

It is also necessary to consider the workload of the education workforce in general in order to recruit and maintain the workforce, including a Welsh language proficient workforce. The expectations placed on the education workforce have increased in recent years and are unsustainable; it threatens the future of the profession and the training of a bilingual workforce.

The Bill should include percentage targets for increasing the capacity of all the workforce to learn through the Welsh language over time. A strategy for achieving this has been proposed by Cymdeithas yr Iaith in *Cynllunio'r Gweithlu Addysg – Cyrraedd Miliwn o Siaradwyr Cymraeg* [Welsh only].²²

Furthermore, there is no body named in the Bill to be responsible for carrying out the training work, something that is essential if we are to see any kind of growth.

If a workforce that can learn through the medium of Welsh is to be trained on a significant scale, a strong mechanism will be required at national level. At the moment, local authorities, which often have capacity shortfalls, have a responsibility. For this reason, a central body needs to be

²⁰ Joanna McPake, Wilson McLeod, Fiona O'Hanlon, Giovanna Fassetta and Mona Wilson, 'Professional development programmes for teachers moving from majority to minoritized language medium education: lessons from a comparative study', *Lang Policy*, 16.1, (2016), pp. 85-86.

²¹ Cymdeithas yr Iaith, *Strategaeth datblygu gallu'r gweithlu addysg* (Aberystwyth: Cymdeithas yr Iaith, 2017), https://cymdeithas.cymru/datblygu_gweithlu?page=7

²² Cymdeithas yr Iaith, *Cynllunio'r Gweithlu Addysg – Cyrraedd Miliwn o Siaradwyr Cymraeg* (Aberystwyth: Cymdeithas yr Iaith, 2016) <https://cymdeithas.cymru/dogfen/cynllunior-gweithlu-addysg-cyrraedd-miliwn-o-siaradwyr-cymraeg>

responsible for producing a strategy and promoting training, in partnership with Coleg Cymraeg Cenedlaethol and other bodies, an idea that has potential but would need to be adequately funded.

The Institute that would replace the National Centre for Learning Welsh could take that responsibility, but the re-establishment of the Welsh Learning Centre should not be an administrative exercise with very marginal impact. Therefore, the duty of the Welsh Ministers should be included on the face of the Bill, to adequately fund this work. It is also important that the whole education system has a clear duty to undertake the provision.

RECOMMENDATION: Set statutory percentage targets for teachers training to be able to learn through the medium of Welsh on the face of the Bill.

RECOMMENDATION: To place a duty on the Welsh Ministers on the face of the Bill to ensure that the Institute is adequately resourced to deliver intensive courses for increasing the Welsh language capacity of the existing workforce in order to achieve the objectives of the Bill, and a duty, support and incentives for the education system to undertake that provision.

Early years

Welsh medium early years provision is vital in paving the way for the significant growth required in statutory age Welsh language provision. We therefore believe that the Bill should include targets around pre-statutory education provision, ensuring that the early years sector moves rapidly towards Welsh language provision for all.

The Government is of course currently providing significant funding to the early years sector through Flying Start and the Childcare Offer. Currently, the bulk of this provision is English medium, and there are concerns that much of the provision also undermines the Government's aim for growth in Welsh language education.

RECOMMENDATION: Include a duty on the face of the Bill for Welsh Ministers to fund Welsh language early years provision, and to fund the existing early years sector to move towards Welsh language provision for all.

Regional Growth

Local authorities are directly responsible for maintaining schools, and therefore increasing the provision of Welsh language education. It is therefore a glaring weakness that the Bill does not replace nor significantly strengthen the organisation of the Welsh in Education Strategic Plans, which have proven ineffective. Under the current system, many local authorities are failing to

increase the provision of Welsh medium education according to their responsibility, and the Bill, if passed as it stands, will not change that.

We are concerned about a lack of criteria and ways of monitoring the achievement of local authorities. The only force the Bill gives to a Minister is to force local authorities to ‘reconsider’ their Strategic Plans and justify them, rather than to force new plans that would meet national requirements to ensure growth.

Cymdeithas yr Iaith has previously suggested that Estyn adopts a scrutiny and reporting role on local authority performance and practical steps for growing Welsh medium education provision. This was suggested as a possible option in the White Paper, and its omission from the Bill itself is a further weakness that could be rectified by amendment.

RECOMMENDATION: Reshape the National Framework and local strategic plans so that they incorporate a duty to willfully and continuously increase Welsh medium provision. The Welsh Government should provide targets, resources and motivation to ensure that local authorities contribute to achieving Welsh language education for all by 2050.

RECOMMENDATION: Stipulate Estyn in the Bill as the body responsible for scrutinising local authorities’ progress on Welsh language education.

Rural Schools and the School Organisation Code

One of the objectives of Cymdeithas yr Iaith’s *Welsh Language Education Act*, which is not reflected in the Government’s corresponding Bill, is to maintain and develop Welsh language rural schools. It is widely accepted that they are absolutely key to the survival of our communities, but the proposed Bill would not improve the current situation. The current School Organisation Code (2018) sets an assumption in favour of rural schools, but there are concerns over the implementation of that assumption.

According to the Commission for Welsh-speaking Communities, the importance of such schools is unquestionable:

*"Schools are a core part of the social network of their communities. Their contribution at the community level should be seen as a public good. This should be kept in mind as policy is developed. For example, it would be better in some instances to federate schools and share resources between them (in the use of technology for example), rather than close them."*²³

²³The Commission for Welsh-speaking Communities, *Empowering communities, strengthening the Welsh language: The report of the Commission for Welsh-speaking Communities on communities with a higher density of Welsh speakers* (Cardiff: Welsh Government, 2024), p. 117.

RECOMMENDATION: The importance of rural, Welsh schools to their communities should be established in statute in this Bill.

Transport

We are concerned that no coverage of free school travel provision is included in the Bill to strengthen existing provision through the Learner Travel (Wales) Measure 2008. As stated, the ultimate aim is for all schools to deliver through Welsh, but in the meantime we believe that the current provision of learner travel must be strengthened to ensure fairness.

RECOMMENDATION: Legislation is needed to ensure free transport for Welsh language schools, including sixth form, and for Welsh language early years provision.

Immersion

We welcome the fact that there is a reference to immersion in the Bill, which is a recognition of the need for late immersion provision throughout Wales. However, we do not agree that this provision should be available on a demand basis but rather that authorities should have a responsibility to actively increase uptake of late immersion provision, in order to increase in the short term the number of children who can benefit from Welsh medium education provision.

RECOMMENDATION: Modify section 22(2)(a) and 22(2)(c) to state that local authorities have a responsibility to encourage increased uptake of late immersion education provision and to proactively increase provision over time.

Subordinate legislation

As we have suggested above, leaving so much of the substance of the Bill to secondary legislation is a matter of considerable concern. While there is scope for secondary legislation in exceptional circumstances, issues such as what progress will be made nationally in Welsh language education provision, the proportion of Welsh language provision in different school categories, and by which time all Welsh pupils leave school as “independent Welsh language users” are core issues to this Bill and it is utterly inappropriate to leave them to secondary legislation. It is undemocratic, will lead to ineffective law-making, and will ultimately undermine the objectives of the Bill.

RECOMMENDATION: Put substantive issues, including issues relating to Welsh language education targets, implementation timescales, and Welsh learning goals, on the face of the Bill rather than leaving them to secondary legislation.

Unintended outcomes

The most obvious unintended outcomes are the risk that all of the Bill's intentions will come to a standstill from gaps on the face of the Bill in terms of statutory targets, timescales, and moving schools along the continuum. As we state above, so much has been left to the subordinate regulations and discretion of the Welsh Ministers, that there is really no guarantee that the majority of our young people will not leave school in 2050 without being confident Welsh speakers.

Further information

For any further information, or to discuss the issues set out in this response, please contact cyfathrebu@cymdeithas.cymru.

Education Group
Cymdeithas yr Iaith
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