

This document provides a translation of correspondence received from Undeb Cenedlaethol Athrawon Cymru (UCAC)

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 09

Ymateb gan: Undeb Cenedlaethol Athrawon Cymru (UCAC)

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1. The general principles of the Welsh Language and Education (Wales) Bill and the need for legislation to deliver the stated policy intention

- 1.1 We welcome any strategy to promote and encourage and ensure progress in the use of Welsh. We are of the opinion, therefore, that setting a specific, quantitative progress target in legislation is to be commended. (Part 1:1) We also agree that education has an important part to play in the aim for one million Welsh speakers. As such, we feel strongly that it significant investment is needed in education, in order to be able to realise the aspirations. The stated ambition of having every pupil as an independent user of Welsh by the end of compulsory school age is commendable and ambitious. However, it must be borne in mind that sufficient funding, time and resources are needed in order to realise the aspiration.
- 1.2 We believe that developing a Common European Framework of Reference, and setting the framework in legislation, is an important step towards ensuring consistency. This consistency which will result from the legislation will be an opportunity to couple and align the Framework with qualifications (eg GCSE) and with the requirements of various jobs. The framework will be a foundation for individuals, schools, examination boards, local authorities and workplaces.
- 1.3 Putting schools on a linguistic journey according to category also seems to be a step in the right direction. We welcome the fact that the Bill's aspiration is to increase the use of Welsh in our schools, but we are concerned about the nature and definition of the categories, as we will explain later.
- 1.4 The overall content of the Bill is a very positive step and a key development in terms of the Welsh language, and there is potential to make a big difference to the state and status of the language in Wales today. We are very happy with the general principles of the Bill and welcome legislation that should empower and confirm the status of the language.

2. Any potential barriers to the implementation of the provisions and whether the Bill takes account of them

a) workforce shortage

- 2.1 If education is going to contribute to realising the Bill's aspirations, then it cannot be overemphasised how crucial it will be to ensure a sufficient workforce within Welsh and English medium schools to achieve these aspirations. There will undoubtedly be implications for the profession in

terms of recruiting staff and ensuring appropriate training for them and, in addition, resources and time will need to be provided to support schools. Strategic planning is needed for the new requirements. Schools are currently facing financial challenges and as a result many teachers have lost their jobs. Such a situation is not conducive to realising the Bill's aspirations and targets. However, this Bill's ambitions are so vital it is important that appropriate support is given in order to ensure its success.

- 2.2 Some work has already been done in the *Welsh in education workforce plan*, but this work needs to be developed further and ensure that the plans set out in it are realised.
- 2.3 In order to recruit and retain teaching staff, it must be ensured that the teaching profession is appealing, with the best possible working terms and conditions. Flexibility must be ensured within the profession, along with fair working conditions, giving immediate attention to teachers' workload. It is quite clear that teachers are currently facing an excessive workload. Not only do more teachers need to be recruited, but adequate support must be secured for them once they have started their career. If incentives are offered, the career paths of those that receive them should be tracked and a condition placed on bursaries, eg a commitment to teach in Wales for a certain period.

ch) training opportunities

- 2.4 Together with a workforce shortage, consideration must also be given to the language support and training available to teachers and prospective teachers. It must be ensured that initial teacher training offers the appropriate training, paying attention to the requirements of the Welsh Language and Education Bill within the context of schools of all categories. It must be ensured that similar training is available for teachers as part of their ongoing professional development. This needs to be planned strategically, as soon as possible.

b) ambiguity of terminology

- 2.5 It is vital that the language and terminology of the Bill is absolutely clear. It is felt that there is ambiguity in terms of who is considered a 'Welsh speaker' (Part 1:3 (1)). Will an adult's 'self-assessment' or 'parent or carer assessments' (2:3(2)) be strong enough evidence? There was concern following the 2021 census, with many questioning the data. Without seeing what the guidance is for the assessments mentioned in 3:3 (4), it is difficult to know if the data this time will be more robust and that it is completely clear what is meant by 'Welsh speaker'.
- 2.6 We are also of the opinion that more clarity is needed regarding the schools' language categories. It must be ensured that the categorisation will confirm the status of the Welsh language rather than water down its status. It is a matter of concern that the linguistic aim for 'Dual Language' schools is that pupils reach a common reference level of B2 or B1. A vast number of pupils in such schools should be expected to reach C1 or C2. There is a real danger here that expectations for pupils in some of our schools will fall and that the expectations will not be challenging enough. There must be absolute clarity as to which category a school belongs and it must be ensured that expectations regarding the Welsh language are compatible with the context of the school.

c) exemptions

2.7 There is concern that some schools will seek an exemption (3:18) because there are no teachers available to teach through the medium of Welsh, or for other reasons. The length of any possible exemption is also worrying (three years and an opportunity for further extension). Thorough preparations and detailed provisions must be made in order to ensure the Bill's success and that no school needs an exemption. Strategic planning is essential. The danger of seeking an exemption is particularly relevant to schools on the border and those in very English areas.

d) inconsistency that could threaten equality of opportunity

- late immersion education

2.8 We welcome the references to late immersion education and agree that information about an immersion scheme should be part of every information pack given to latecomers. We are concerned, however, that the opportunities will not be the same for all pupils in Wales. Late immersion provision should be available for all children wherever their home is, whatever their ability, so there must be a network of immersion centres throughout Wales.

- contact hours

2.9 It is also important that 'English medium' schools must provide enough contact hours to ensure that learners develop into confident speakers. English-medium schools should not be in a situation where they would be able to offer a more varied range of subjects than Welsh-medium schools, as they would not be required to offer as many contact hours in terms of the Welsh language. The number of Welsh lessons should be the same in both English and Welsh medium schools. The minimum stated should be monitored by local authorities and Government Ministers.

- The Institute (ensuring clarity)

2.10 Establishing the Institute in order to meet various needs as listed in the Bill is to be welcomed. However, it is important that there is integrated collaboration between the Institute and other organisations. There will need to be a thorough examination of what has already been achieved, while being ready to evaluate critically and honestly, in order to move forward in the most effective and most appropriate way for the future. It is important that the Institute receives appropriate support and funding, so that it can ensure that the most effective methods, including the latest technological developments, are used in order to ensure the best possible progress in developing the workforce's Welsh skills.

3. The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation

3.1 It is important to note that more details are needed regarding school categories. This is a key issue and it is vital that we get this right – it could lead to the success or failure of the Bill.

3.2 Similarly, it is felt that it must be completely clarity is needed as what is the role of the Institute, ensuring that it is completely clear what the exact expectations are and how the different organisations will work together.

4. Whether there are any unintended consequences arising from the Bill

4.1 We welcome all efforts to increase Welsh provision in schools, but we are concerned that an increase in provision could create a false impression in some cases. We should not lose sight of the fact that Welsh-medium education is the best way to ensure confident, natural speakers.

- a) We fear that some parents might assume (wrongly in our opinion) that their children would become fluent speakers in English-medium schools.
- b) We are concerned that this situation could lead to limiting the development of Welsh-medium schools.

Both a) and b) would go completely against the principles and ambitions of the Bill. We believe that it is necessary to ensure that all pupils in Wales have the right to a Welsh-medium education, and if no provision is available locally, that arrangements are in place for free transport for pupils to the nearest Welsh-medium school within a reasonable distance .

5. What are the financial implications of the Bill (part 2)?

5.1 It is vital that local authorities, schools and organisations that provide initial teacher training receive the funding needed to ensure an adequate workforce and resources. It must be considered that schools will face increasing costs as they have to increase/improve their provision in terms of the Welsh language. This is referred to in the document, but in the current challenging financial climate, assurance is needed that enough funding will be set aside for this purpose. It is also important to ensure that a significant amount of funding is set aside for the recruitment and upskilling of the workforce. The importance of having the necessary number of qualified staff cannot be overemphasised.

5.2 There will be an additional cost (in terms of time) to deal with questions, queries etc. that will be tied in with the proposed changes. It's also important to consider the additional cost for ensuring support for prospective teachers as they follow training courses, funding language refresher courses and language courses, ensuring specific training for learning through the medium of Welsh, providing sufficient funding for providing extracurricular activities in schools.

5.3 As stated in the Explanatory Memorandum (page 112), the Bill 'the Bill creates a clear link between the target of one million Welsh speakers and the infrastructure and planning processes involved in growing Welsh-medium education'. It is important, therefore, that there is significant investment in Welsh language education.

5.4 It appears that the National Institute will be an organisation with wider duties than the current Centre for Learning Welsh. More clarity is needed than is currently given in terms of the Institute's budget. In order to ensure that the Institute develops in the most effective way, it must be ensured that its role is clear and that sufficient funding is allocated for developments in the field of language learning eg technological developments.

