

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 10**

**Ymateb gan: Cymdeithas Arweinwyr Ysgolion a Cholegau Cymru**

**Response from: Association of School and College Leaders (ASCL) Cymru**

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## **Introduction**

1. The Association of School and College Leaders (ASCL) is a professional association and trade union for all school and college leaders. In Wales, ASCL Cymru represents over 93% of secondary school leaders.
2. We work to shape national education policy, provide advice and support to our members. We are proud to speak on behalf of members and act on behalf of children and young people.
3. ASCL Cymru fully supports the promotion and facilitation of Welsh language provision across schools and settings in Wales but does not support the introduction of this Bill at this time. ASCL has significant concerns about the statutory nature of the Bill's content and the educational system's capacity to deliver its expectations, within the current climate of:
  - pressures on school funding
  - the workforce recruitment and retention crisis
  - ongoing workload demands arising out of major policy reforms and their implementation
4. ASCL Cymru 's members have made it clear that they consider the education system to be in crisis due to the pressures that these issues present on a daily basis within their schools and settings. As a result, we feel strongly that the time is not right to introduce this Bill and risk the unintended consequences that it may bring upon the workforce and, consequently, the wellbeing and educational outcomes of the young people of Wales.

### **Part 1: Promotion and facilitation of use of the Welsh language**

5. ASCL Cymru does not oppose the setting of a target to aspire to an increase in the number of Welsh speakers by 2050. However, it does not support the proposed target being introduced into statute as described in the Bill.

6. The most recent census data showed that the percentage of people aged three years or older able to speak Welsh in 2021 was the lowest ever recorded. <sup>1</sup> ASCL Cymru acknowledges that action is required in order to facilitate an increase in the number of Welsh speakers amongst young people but feels strongly that the current target is unrealistic and would place school leaders under significant pressure to channel resources into the achievement of this target, to the detriment of other educational priorities such as:
- the development of a broad and balanced curriculum aspiring towards creating young people who display the attributes of the four purposes as set out within the Curriculum for Wales
  - closing the gap between those most disadvantaged compared to those least disadvantaged – in particular, by raising standards of literacy and numeracy, alongside transferrable skills that will increase future life chances
  - embedding the new Additional Learning Code within schools and being able to offer appropriate support within a landscape of insufficient funding
  - preparing for the introduction of the suite of new Made-For-Wales Qualifications to support curriculum for Wales as it continues to roll out
  - recruiting and retaining a skilled workforce within a climate of ongoing school workforce shortages
  - managing insufficient school budgets, often accompanied by resources and school buildings that are unfit for purpose
7. ASCL Cymru believes that whatever target is set to guide the education system should be realistic and subject to regular review. In addition, any target set should be non-statutory and used to guide strategic planning around promotion and facilitation of Welsh language within the curriculum and the linguistic demands of the population of Wales.

## **Part 2: Describing Welsh Language Ability**

8. The Curriculum for Wales guidance for the Languages, Literacy and Communication Area of the Curriculum for Wales clearly sets out the expectations for language acquisition through the Progression Code and accompanying descriptions of learning in order to... *'enable learners to communicate effectively using Welsh, English and international languages'*. <sup>2</sup> It states that the ...*'descriptions of learning provide guidance on how learners should progress*

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<sup>1</sup> [Welsh language in Wales \(Census 2021\) \[HTML\] | GOV.WALES](#)

<sup>2</sup> [Languages, Literacy and Communication: Introduction - Hwb \(gov.wales\)](#)

*within each statement of what matters as they journey through the continuum of learning*'. It is ASCL Cymru's understanding, through dialogue with those responsible for developing the new curriculum, that the Common European Framework of Reference for Languages (CEFR) was reflected in the development of the descriptions of learning and progression within the Area.

9. It is ASCL Cymru's belief that the introduction of an additional lingual continuum or framework, such as the CEFR framework, would present additional workload amongst the profession and confusion for those already familiar with working within the guidance of the existing descriptions of learning and Progression Code.

### **Part 3: Welsh Language Education**

10. To achieve the target of a million Welsh speakers by 2050, a significant increase in the Welsh language capacity of the school workforce would be necessary. Recruitment and retention is an ongoing issue for education in Wales. This is particularly the case in a number of shortage areas which includes Welsh medium education. To achieve Welsh Government's target for the number of Welsh speakers, through a broadening of Welsh medium education, there would need to be a significant increase in the number of teachers able to work through the medium of Welsh.
11. The Education Workforce Council's annual statistics<sup>3</sup> indicate that in 2024 the total number of registered teachers with the ability to work through the medium of Welsh formed 26.5% of the workforce. This demonstrates a gradual decline since 2020 when the figure was 27.2%. This is mirrored in the number of teachers able to speak Welsh which has shown a declining trend from 33.6% in 2020 to 33% in 2024.
12. In order to meet the increased demand for Welsh medium education, there would need to be an uplift in recruitment into the workforce. However, recruitment into initial teacher education (ITE) remains an issue, particularly at secondary level and does not currently meet its targets. Low recruitment numbers have been observed in general across all ITE partnerships in Wales and, after a slight uplift, have returned to pre-pandemic levels. However, even during this period, shortage subjects including Welsh medium and Welsh language in English medium secondary remains undersubscribed.<sup>4</sup>

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<sup>3</sup> [Annual Education Workforce Statistics \(ewc.wales\)](https://www.ewc.wales/)

<sup>4</sup> [What is the education workforce's role in meeting the Welsh Government Cymraeg 2050 targets? \(senedd.wales\)](https://www.senedd.wales/)

13. An additional concern lies with those teachers who are increasingly required to teach Welsh language but are trained to teach other subjects within the curriculum. The qualities and skills of a linguist are specialist. Since 2021, the workforce statistics have shown that the number of Welsh teachers in secondary schools teaching but not trained to teach Welsh has risen from 25.7 to 27.7%.
14. Learning support workers play a vital role within schools, particularly for those children with additional learning needs. The demand for learning support workers who are able to speak Welsh (currently 20.3%) would inevitably need to increase significantly as would those able to work through the medium of Welsh (currently 17.5%) as increased capacity for Welsh medium education progressed. Whilst this figure has increased slightly over the 5-year trend (16.7%), it will be necessary to recruit significantly more learning support workers with capacity to work in Welsh if the Welsh Government target is to be supported adequately.
15. To support the recruitment and retention of teachers who are able to teach through the medium of Welsh, the range of necessary resources alongside leadership support and guidance will need to be enhanced. This will inevitably have demands upon the already significantly underfunded education system in Wales. This focus on addressing additional statutory provision beyond the current curriculum reform risks negatively impacting upon outcomes and wellbeing of young people in schools through further erosion of sufficient resourcing and quality of support. This would be a significant concern should the Bill be introduced without a significant uplift in education funding.
16. ASCL Cymru considers that increasing both Welsh-medium provision and the Welsh language contact hours in all schools in Wales will be extremely challenging, when considering the staffing and recruitment crisis discussed above.

#### **Part 4: Planning Welsh Language Education and Learning**

17. ASCL Cymru believes that there are a number of essential factors to be addressed prior to implementation of the Bill being considered. This includes an urgent assessment of the impact implementation would have on the workload of those working within the profession. This was not carried out prior to the publication of the Bill and is now to be carried out retrospectively.

18. ASCL Cymru has concerns regarding the capacity within the existing education system and how this would need to change to accommodate the breadth of demands of the Bill.

19. Prior to implementation of the Bill it would be necessary to carry out an assessment of needs to meet the requirements of the Bill across the system. This would include exploration of:

- The interventions required to improve Welsh language skills amongst the existing workforce so that they have the level of confidence and skill required for high quality Welsh medium provision
- The nature and level of intervention required
- The time allocation required to deliver interventions
- Appropriate funding for provision

As the provision outlined above does not exist within the current workload, directed hours or finances of school, it would be necessary for it to be funded in addition to the current level of schools' allocated financial and time budgets.

20. In order to upskill the education workforce, as outlined above, a comprehensive national professional learning programme would need to be put in place. There are already considerable demands on the workforce to embrace expectations brought by the current reforms within Welsh education. Teachers and school leaders in Wales are already struggling with the increased workload that has been placed on them over recent years and have no capacity to take on more. As Professor Dylan Williams noted in his review of roles and responsibilities of education partners in Wales...*'School leaders said they feel overwhelmed by the amount of change in the system and felt that there was a lack of clarity about national reforms in some key areas like curriculum, progression and ALN.'* This is further supported by the Welsh Government's establishment of workload stakeholder groups who are exploring ways of reducing the current workload demands.

21. ASCL Cymru also believes that the proposals for the introduction of the Welsh in Education Implementation Plan (WEIP) for local authorities is heavily bureaucratic and will require the allocation of many man hours for their administration and monitoring. This is a further pressure on already inadequate finances and should be considered as an aspect within the evaluation, improvement and accountability framework currently in its implementation phase within the education system in Wales.

## **Part 5: National Institute for Learning Welsh**

22. ASCL Cymru agrees in principle with the proposal to establish a national body to support the promotion and facilitation of the Welsh language. However, it considers that this should work in partnership with local authorities, schools and settings. As such its focus should be on supporting learners that fall outside the 3-16 setting and compulsory education. This would enable school leaders to maintain autonomy and agency in embracing Welsh education within their strategic planning. ASCL Cymru believes that the 3-16 education workforce, supported by local authorities and led by a clear Welsh Government vision for education is the best way to raise standards in our schools to the desired level.

### **Part 6: General**

23. The recruitment of Welsh-speaking individuals is highly competitive, not just in education, but across other sectors and professions. ASCL Cymru, therefore, has concerns regarding a sufficient supply of Welsh speaking recruits with the appropriate knowledge, skills and attributes for a career in teaching. We feel that the demands placed on local authorities to meet recruitment targets published through their Welsh in Education Implementation Plans (WEIP) places an additional unnecessary burden and will channel resources disproportionately. The focus now, and in the coming years, must be on improving educational outcomes across a breadth of curriculum experiences. This must happen through the development of a strong and capable workforce with the appropriate expertise to equip our increasingly diverse population of young people with the attributes described within the four purposes of Curriculum for Wales

24. The Welsh Government budget settlement for 2024-25 is still up to £700m lower in real terms than expected at the time of the 2021 Spending Review and our Budget in 2024-25 is £3bn lower than if it had grown in line with GDP since 2010.<sup>5</sup> Furthermore, a Senedd report<sup>6</sup> indicates that local authorities face a £432m funding gap which will, inevitably, put front line services at risk. The introduction of the Bill would undoubtedly bring about further significant funding challenges through the associated resource implications including the development of new teaching materials, professional learning, and infrastructure adjustments to support more bilingual and Welsh medium settings.

25. ASCL Cymru believes that equitable access to Welsh-medium education must be given across all regions of Wales but should take into consideration the level of demand. This

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<sup>5</sup> [Written Statement: Welsh Government response to the UK Budget 2024 \(6 March 2024\) | GOV.WALES](#)

<sup>6</sup> [How is the Welsh Government spending its budget in 2024-25? \(senedd.wales\)](#)

would require substantial investment in expanding Welsh-medium schools and resources at considerable expense in a climate of financial crisis in education.

26. Maintaining the quality of education while developing learners' proficiency along the language continuum would demand ongoing financial support for curriculum development, assessment tools, and language support services. Balancing these funding needs against existing budget constraints that are challenging the maintenance of front-line services would add to the present an impossible challenge
  
27. Our education landscape in Wales is in a period of significant reform which includes Curriculum for Wales and the new Additional Learning Needs Code, our profession also faces a workload, recruitment, and retention crisis. School leaders have found the challenge this poses overwhelming at times, this was highlighted by Professor Dylan Jones in his recent review.<sup>7</sup> The workforce requires a period of time to implement and embed fully the current reforms as well as the capacity to address the other pressing challenges such as behaviour and attendance alongside the need to improve standards in literacy and numeracy. The additional pressures on workload that implementation of the Bill would demand is currently unsustainable and may, ultimately, impact upon its success if it proceeds within the current environment.

Claire Armitstead  
ASCL Cymru Director  
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<sup>7</sup> [Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements: letter to the minister \[HTML\] | GOV.WALES](#)