

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 12

Ymateb gan: Cymdeithas Cyfarwyddwyr Addysg Cymru (CCAC) a Cymdeithas Llywodraeth Leol Cymru (CLILC)

Response from: Association of Directors of Education (ADEW) and Welsh Local Government Association (WLGA)

---

## Background

The Welsh Language and Education (Wales) Bill is allocated to the Children, Young People and Education Committee for stage 1 scrutiny.

Representatives from the Association of Directors of Education (ADEW) and the Welsh Local Government Association (WLGA) will be providing evidence on the morning of October 9<sup>th</sup>. Marc Hughes, Director of Education, Skills and Young People at the Isle of Anglesey County Council is representing ADEW and Cllr Sue Edmunds Cabinet Member for People and Education at Blaenau Gwent CBC will be representing the WLGA.

## Response to general principles

WLGA and ADEW support the general principles of the Bill and agree that the legislation will support the aims of Cymraeg 2050.

However, there are concerns over successful implementation of the Bill due to the amount of educational reform that the sector is currently grappling with as the Bill will increase the education workforce's workload. There are also significant concerns based on the school funding challenges LAs are already facing, and concerns that LA staff and schools will not be able to deliver all the proposals without additional funding.

## Part 1: Promotion and facilitation of use of the Welsh Language

- The WLGA and ADEW are supportive of establishing a Code describing Welsh ability as part of the secondary legislation, providing there is clear guidance for use so that this is applied consistently.



- LAs would welcome greater clarity over how different targets and objectives will be set and how the number of Welsh speakers will be calculated and recorded, particularly given the challenges of accurately assessing the amount of Welsh used outside of statutory education.
- Targets need to be realistic, considering local contexts and different linguistic profiles. Targets will also need to be flexible enough to take into account local demographic changes and birth rate changes over time.
- Furthermore, if there is an expectation that Welsh speaker numbers should be analysed every 5 years then this is challenging within the 10-year cycle of Census data collection. Targets set in relation to the number of Welsh speakers will need to consider several specific circumstances and will need a flexible margin which accommodates variations in population numbers.

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

- Common reference levels are welcomed to define Welsh proficiency to eliminate the subjective nature of self-assessment and inaccuracies in terms of expectations.
- The skills continuum will support all stakeholders to monitor progression of Welsh language skills and to strategically plan which interventions are needed.
- Having a shared skills continuum should also support workforce recruitment and employer expectations in determining which levels are required for which roles.
- Clarity for parents, teachers and learners of the progress towards reference levels is welcomed. However, the goal of B2 by the end of compulsory education may be unachievable for some learners.

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

- Local government generally support the plans to make language categorisation statutory, providing there is sufficient funding to support schools to move along the Welsh language continuum. The move to making categories statutory will ensure that there is a consistent and transparent national approach which is welcomed.
- Councillors and officers have raised concerns over the lack of funding to support this transition, particularly in light of current financial pressures. There are examples where councils are having to close smaller English medium schools, while increasing Welsh medium provision elsewhere, which is causing many tensions at a local level. If existing funding is diverted in an inequitable way, then this will only increase the opposition and challenges to



Welsh language provision. To meet the Welsh language education aims, these schools will therefore need appropriate additional funding.

- Linked to the above point, there is also some work to be done in some communities to ensure that all stakeholders share the aims of an LA's WESP, especially as Governing Bodies will now be tasked with providing Welsh in education delivery plans. This is another reason for ensuring funding is not a barrier and that there is a degree of flexibility in the timing of the changes.
- LAs have always been supportive of the opportunity to plan over a decade in relation to the WESP timeframes as this provides a valuable opportunity to anticipate and overcome long-term challenges and plan strategically. It also reduces the planning burden and bureaucracy. Some of the proposals for additional plans within the Bill have a far shorter timeline, for example the three years for the Welsh education delivery plans is relatively short given WESPs operate over ten years.
- The WLGA and ADEW are concerned about the additional burden the regular preparation and reviewing of documents will place on school staff. Any delivery plan should be integrated into school improvement plans to reduce workload and provide a cohesive approach to school improvement.
- Similarly, the acceptance and approval of education delivery plans will place a significant workload on local authorities, even if templates and guidance are available. According to the plans, school Governing Bodies will need to submit draft Welsh language education delivery plans to LAs (including the consultation the school has done) 9 months ahead of the start period. The impact of this on the school staff and LA staff has been underestimated. Governors may also need additional training to support them with this area of work. We would welcome further guidance in ensuring that delivery plans and School Development Plans are aligned and duplication limited.
- Dual language schools need clarity in terms of the nature of the provision as the expectations may not be as clearly defined as Welsh medium (3) or English medium (1). Dual language is being linked to and confused with the previous category of dual stream.
- As previously reported, there are significant challenges in relation to the recruitment and retention of enough staff to deliver more Welsh language provision. This is across the spectrum of schools, but particularly in English medium secondary schools.
- In relation to Special Schools, it is welcomed that there is no duty on them to provide a specific amount of Welsh language provision but rather demonstrate their promotion of the Welsh language with pupils or provide a language category on a voluntary basis.
- LAs welcome the facility for temporary exemption where required.



- The WLGA and ADEW welcome the duty that will be placed on LAs to promote and encourage late immersion education in their areas. We know from experience that the demand for such education is increasing, and it is key that older learners also have the opportunity to access this provision. However, for this to succeed more funding will be needed to cover the capital and revenue costs, as well as national messaging to promote and reassure non-Welsh speaking parents of the advantages of this provision to increase demand.
- Different areas across Wales are at different stages of Welsh language immersion provision. Where the provision is at its earlier stages, LAs would welcome more evidence on the long-term impact on immersion education on numbers of pupils in Welsh-medium education. In larger LAs with more geographic challenges, running the provision is costly and more information is needed on the return on the investment before being statutorily obligated to run the provision.

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

- The introduction of a National Framework for Welsh Education and Learning Welsh is welcome as this will set a clear direction for the sector and will help with consistency. To ensure that the framework is implemented section 23(3)(d) is critical, the requirement that Welsh Government is “*ensuring that training, professional development and support is available for education practitioners in Wales for the purpose of improving ability in Welsh (by reference to the Code prepared by the Welsh Ministers under section 6)*”. The National Centre for Learning Welsh (or Institute as it will be renamed) has a key role to play in this regard.
- Within this National Framework, realistic adjustments in terms of timescales need to be factored into any accountability of realising objectives. This flexibility would help reflect changes beyond the Local Authority’s control, for example changes in funding for capital build projects.
- Targets for increasing the numbers of people over school age learning Welsh poses an additional challenge and views of FE and HE institutions will need to be taken into account as they have a role to play in achieving these targets.
- To support this entire area of work, more time and resource will need to be spent on analysing and collating data on education practitioners’ Welsh language skills, and avoiding over reliance on self-reporting. This will need to be factored into any targets arising from the National Framework. We would welcome more clarity on any arrangements to improve the assessment of workforce skills and some consultation before decisions are made.



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

- The role of the Learning Centre as centralised support for Welsh language learning is welcomed. As one organisation that specialises in learning Welsh at all stages, this will ensure continuity in terms of provision and a clear pathway of support that will provide guidance in all aspects of learning Welsh.
- Given the current financial climate, some authorities would also welcome more information on the role and responsibilities of the new Institute and its relationship with other public bodies already operating in the field. Some aspects, such as the ability of the Institute to commission research or give advice seem to overlap with that of the Welsh Language Commissioner so understanding the delineation between these would be useful. Likewise, how will the Institute's responsibility to drive continued improvement sit with Estyn's work?

### **Barriers to the implementation of the Bill's provisions**

The three greatest barriers to implementation are;

- i) workload pressures in the context of delivering these changes in addition to other educational reforms,
- ii) school funding pressures,
- iii) and the recruitment, retention and training of a workforce with the Welsh language skills needed for successful delivery.

The barriers listed above are interrelated. The amount of national reform, compounded by the new challenges school are facing in this post pandemic era, are overwhelming staff which is a risk to the retention and recruitment of the education workforce. LA core budgets and school budgets are also completely stretched, and the sector is already having to make difficult decisions to cope with these financial pressures. Therefore, although the WLGA and ADEW are supportive of many of the general principles of this Bill, it is important to recognise that introducing the changes outlined could create additional tension if this isn't done gradually and if there isn't sufficient additional funding to cover the costs.

### **Subordinate legislation**

- Detailed plans related to legislation are welcomed.
- The Code describing Welsh ability as part of the secondary legislation and any other guidance documents and templates are welcomed.

### **Unintended consequences arising from the Bill**



- There is more work to be done with parents to frame and local communities to share the benefits of moving along the language continuum and the benefits of a bilingual education. There is a risk of some parent groups taking against these proposals and this shift without more engagement work, especially if it is perceived that funding is being redirected without consultation.
- The additional workload could also be an issue for education workforce unions.
- Tensions could also arise if Welsh medium provision expands but English medium provision reduces, especially if teachers do not have the linguistic skills to apply for posts that require higher level Welsh language skills.

### **Financial implications**

- Any financial pressures related to changes to schools and settings resulting from the Bill should not be borne by individual schools or LA budgets.
- Any reform which involves statutory changes will take up a vast amount of LA officer time to produce the appropriate documentation, publish, collate responses, produce reports for Cabinet approval and manage engagement with the schools involved. LA officer teams are very small due to impact of financial austerity in local government and there is insufficient capacity to take on extra work. Welsh Government must provide funding for the time LA officers and schools will need to develop and implement plans for these statutory changes.
- The WLGA and ADEW anticipate there will be additional costs in the following areas:
  - Cost of training and recruitment to upskill Welsh language skills at all levels of the education workforce.
  - Cost of adapting policies, development of guidance and training in relation to the change in legislation.
  - Increase in LA staffing needed to monitor and challenge individual school plans.
  - Increased LA engagement with Governing Bodies to support with development, monitoring and implementation of delivery plans but also to support decisions related to shifting language categories.
  - Additional funding for engagement work with parents and communities to promote the benefits of Welsh language education and to promote increased late immersion places.