

This document provides a translation of correspondence received from Rhieni dros Addysg Gymraeg (RhAG)

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 14

Ymateb gan: Rhieni dros Addysg Gymraeg (RhAG)

Response from: Rhieni dros Addysg Gymraeg (RhAG)

Thank you for the opportunity to submit oral evidence in relation to the Bill in question. We wish to note a few comments in response.

1. The background of Rhieni dros Addysg Gymraeg

1.1 Rhieni dros Addysg Gymraeg (RhAG) represents the interests of parents and carers of pupils in Welsh schools and those who wish to see the growth of Welsh schools and Welsh education across Wales.

1.2 We represent and advocate for parents and carers that have children in Welsh-medium schools and also those that have not yet considered or started their journey through Welsh-medium education. We therefore consider that all parents and carers are eligible for our help and support as an organisation, from before birth and through their children's educational career, and that all parents deserve to be fully aware of the benefits, provision and linguistic outcomes of Welsh education in their area from the start.

1.3 To this end, RhAG works by promoting and campaigning to increase the accessibility of Welsh education throughout Wales through various means. We provide direct support to parents and carers and we work closely with partners in the third sector, as well as local authorities and the Welsh Government, to ensure that Welsh education becomes more accessible for families, and that the benefits of Welsh education are promoted in abundance all over Wales and in various ways. This is done by promoting externally on social media and websites but also by offering advice on how to improve the mechanism of the education system by sharing good practice from other areas across Wales. All central and local government systems must be easy and hassle-free for families to be able to have easy access to Welsh language education for their children. This means continuously increasing the provision of Welsh language education.

1.4 Since the start of the new cycle of the Welsh in Education Strategic Plans (WESPs) in September 2022, RhAG has taken an active role in contributing to the work of drawing up the plans from 2021, responding to the consultations between 2021 and 2022 and then assisting with the work of supporting, developing and implementing them in September 2023 by having a presence on the Welsh Education Forums of most counties across Wales.

1.5 RhAG a clear overview of the vast majority of plans across Wales – though not all. In some counties, it has been difficult to get the cooperation of the local authority to be able to contribute to the work of the Welsh Education Forums so that parents' perspective has its due voice. In the case of these counties, we have only been able to respond to situations reactively. Our hope therefore is to see each county acting proactively as this legislation is developed and implemented.

1.6 We are pleased to see the publication of long-awaited legislation that brings a real opportunity to make a significant difference to the education system in Wales and indeed to develop the Welsh language, and specifically Welsh education. Finally we see education and Welsh being linked in statute, with real opportunities to set in law the ability to deliberately plan for the further development of Welsh education. This legislation has the opportunity to transform education in Wales and indeed establish an innovative early and late immersion system in the field of world minority language acquisition.

1.7 When drawing up new legislation, it must be clearly shown that the new legislation is stronger than the last. While there has been clear progress in this legislation, we notice that there is backslide in places.

2. What did we want to see this bill achieving?

2.1 We noted in our response to the white paper that the core principle of this legislation should ensure that all learners in Wales, wherever they live, have default access to **Welsh-medium** education. The Welsh Government has repeatedly stated that its ambition is to increase opportunities for learners to acquire the Welsh language so that they can use it easily and confidently in order to reach a million speakers, and the Welsh Government's current guidance document Welsh in Education Strategic Plans states as follows

"The Cymraeg 2050 strategy is clear that full Welsh immersion education – that is, education within a Welsh-medium or predominantly Welsh-medium setting – is

the most reliable way to create individuals with the skills and confidence to use the language in their daily lives."¹

3. Comments on the Bill

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

Part 1: Promoting and facilitating use of the Welsh language.

3.1 We agree with the principles of Part 1 of the Bill. It sets a living context for the Welsh language in statute and confirms the ideal of ensuring that Welsh is a viable community language, which is used daily by all residents of Wales.

3.2 We agree that targets need to be set for Welsh education (1(c)) but we are concerned about how the Bill sets the definition of Welsh language education in Part 3. We elaborate on this in Part 3.

3.3 We would like to see more details regarding including using Welsh on a daily basis when counting the number of speakers. The Basque Country uses a social method of counting speakers by carrying out a street survey as part of the count, listening to the language of conversations heard over a certain period. This should be considered when developing the legislation further.

3.4 We agree with the principle of reviewing Welsh language standards, especially the promotion standards. It is essential to show the link between promotion and increase in use.

3.5 Parents/carers must clearly understand the extent of their children's language skills. This is extremely important when parents complete the census, for example. It is essential to ensure that the methods for counting the number of Welsh speakers are consistent and reliable and give a clear picture of the viability of the Welsh language within our communities. Honesty of provision is also important so that parents are not misled when making applications to schools.

3.6 The first part does not specify any details regarding the workforce. This needs to be looked at in more detail. Without a bilingual workforce, how is the population expected to be able to use Welsh more easily?

¹ Page 8: <https://www.gov.wales/sites/default/files/publications/2021-02/guidance-welsh-in-education-strategic-plan.pdf>

3.7 There is an opportunity in this part for the Welsh Government to set a clear vision when promoting and facilitating. The Bill's aspiration needs to be reconciled with the promotion messages that come from the centre. The linguistic outcomes of the current education system need to be clear to parents/carers. Too often, we see parents/carers assuming that English-medium education produces proficient speakers. There is also a need to tackle the prejudices that still exist about Welsh education.

Part 2: Describing ability in terms of the Welsh language

3.5 While we agree that it would be useful to have a standard framework for reconciling understanding of linguistic proficiency and to encourage linguistic progression along a continuum, it must be appreciated that Welsh schools have been using a literacy framework successfully to guide children along their journey to Welsh acquisition for decades. It is therefore important to ensure that the new framework is age appropriate from the early years to post-16 and beyond, and that the framework matches the needs of qualifications.

Part 3: Welsh medium education

3.6 It appears that this Committee's own guidance confuses the term Welsh-medium Education and Welsh language education. The terms of reference identifies Welsh-medium education as Part 3 but in fact the title of the section in the Bill is Welsh language education. This highlights our concern about the definition of Welsh language education in the Bill as it is in section 8 (2), which states

(2) For the purposes of this Part—

(a) “Welsh language education” means—

(i) teaching Welsh, and

(ii) education and training through the medium of Welsh,

in a school, to pupils of compulsory school age;

The most important word in this part is the word "and", as the Bill clearly wants to couple and combine the two types of "Welsh language education" within the same definition, probably in order to be concise when introducing the Act. But we note the risk here of being misleading, rather than making things clearer to the public. In fact, it complicates the meaning of the term Welsh language education and indeed causes problems later on in the Bill by using the term far

too loosely and generally without giving sufficient detail as to the two types of "Welsh education" when talking about "Welsh language education." The term Welsh language education is well established as the education system for complete language immersion. This new definition risks a term that is well-established amongst parents and carers. There is a risk that linguistic outcomes could be further complicated by this definition.

At no point does the Bill make any reference to Welsh schools or indeed to Welsh-medium education. It must be asked why? Why does the Bill ignore the very sector that has been growing over the past decades? Why does the wording of the Bill seem to be a backslide - a concept that is identified as one that should not happen according to the current language category guidance.

The term "set the minimum amount of Welsh provision" is used in the Explanatory Memorandum. We suggest that the difference must be highlighted more firmly when defining Welsh language education and Welsh language provision in this part.

3.7 Again, in section 9 (2) there is no category that recognises designated schools as they are currently known. Welsh-designated schools must be the ideal and the main category, as it is these schools, as recognised by the Welsh Government, that produce proficient speakers. This cohort offers the greatest opportunity to nurture a bilingual education workforce for the future. The Main Language - Welsh category only guarantees little over half of the provision in Welsh as currently identified. It is therefore essential that a category is added to recognise Welsh-medium schools, firmly defining the highest percentage on the face of the bill.

3.8 It must be acknowledged that it isn't only classroom teaching that creates proficient Welsh speakers. The whole ethos of the school, the conversations that are had and heard with the teaching staff and additional staff of the school, those that serve lunch, those that run clubs before and after school hours, school visitors, the wider community around the school - it is all of those holistic experiences that create a proficient and confident individual in Welsh.

3.9 A key element in order to ensure progression from primary to secondary and avoid losing pupils to Welsh secondary schools is to ensure that children do not slip into a secondary school of a lower category. Too often, we see this happen when English-medium schools are closer to children's homes or easier to reach as a result of a lack of suitable and accessible transport. Section 11 (4) provides an opportunity to clearly place the assumption that children move to a school in the same category or higher. This section will strengthen the ability of local

authorities and schools to bridge with schools in the same category. It will also align with the desire to provide pupils with late immersion opportunities in years 7 and 8. We suggest that this clause be further strengthened by noting instead using "it is assumed" but to change this to "there is a strong presumption" reading as follows:

*In relation to the Welsh language goals for a primary school, **there is a strong presumption** that the pupils of the school continue with education in schools of the same language category until they cease to be of compulsory school age.*

3.10 Obviously, the planning and promotion work needs to be mainly focused on early immersion from the early years, but sometimes children come to the education system that want to join Welsh-medium provision later. We welcome the recognition in the Bill to formalise late immersion education provision. It must be ensured that this provision is consistent and available in primary and secondary schools across the whole of Wales. The Bill must ensure this. It must also be ensured that the Welsh language is offered to newcomers to our communities as default rather than directing them to English-medium education, as is currently happening in some areas. The Welsh language belongs to everyone in Wales, which should be reflected in all aspects of welcoming people from all parts to our communities.

3.11 Placing responsibility on schools to plan Welsh provision in Welsh Medium schools already happens and therefore we see no difficulty with this. The school's development plan already does this. What would be good to see is for Estyn to adapt its review framework to reflect the change that will be schools' responsibility as a result of the changes in the Bill in order to recognise their linguistic outcomes and clearly identify how Welsh medium schools are laying strong linguistic foundations early on through complete immersion education.

Part 4: Planning Welsh language education and learning

3.12 It has already been noted that the definition of "Welsh language education" needs to be looked at again as part 4 is full of references to it and again, it is not clear which "Welsh language education" is being referred to. If both types are referred to, then the explanation for both types must be expanded or go back to redefine using the term provision. It is misleading to generalise with the same term.

3.13 We agree with promotion aspects for Welsh language education in the sense of Welsh-medium schools but we are concerned about the promotion element with dual language schools. As an organisation, our thrust is to promote

full immersion education so that pupils receive both languages up to proficiency as soon as possible. It must be ensured that promoting a system that does not give pupils Welsh fully does not interfere with the work of encouraging more children to receive complete immersion education.

3.14 The WESPs are now rooted in local authorities' education planning system and therefore we welcome the evolution to the local Welsh in education strategic plans. However, it must be realised that the new definition of "Welsh language education" once again here needs further clarification so that local authorities do not neglect their responsibilities to increase numbers in full immersion Welsh education.

3.15 We welcome the establishment of the framework in part 4, but there is a significant and obvious gap in this framework in terms of developing the number of the workforce in its current form. No part of the Bill shows how the Welsh language and education workforce will be strategically planned. It's important that strategic functions to increase the workforce are clearly on the face of the Bill so that the linguistic skills development planning is the responsibility of the Institute, but that the strategic planning is to meet the challenges of the currently obvious gaps is addressed in the framework. We therefore suggest that an additional function be included in section 23(3) such as the following wording, to be placed under (c) and before (d) so that it leads to the element of

"training, professional development and support available..."

(ch) Increasing and strengthening the Welsh education workforce in schools

This aspect could also be coupled by the development of further secondary legislation to the Education Workforce Council's responsibilities, as suggested by us in response to the white paper. However this is done, we cannot continue without a statutory plan to develop the workforce. It leaves the circle incomplete.

Part 5: The National Welsh Language Learning Institute

3.16 We welcome the establishment of the National Welsh Language Learning Institute. We note that the work of the National Centre since its establishment has evolved enormously in order to respond to the changing needs that have arisen in our communities - especially since the Welsh in Education Strategic Plans began to be implemented. Putting the establishment of the Institute on the face of the Bill is essential to ensure due status to the process of acquisition and development of language skills in the education sector and the community, which is essential to the effective implementation of this Bill. It must be emphasised that

the partnership work that the Centre is currently undertaking has to be transferred to the functions of the new Institute, and therefore it would be good to have further clarity on this. We see for example the commendable work that takes place to train staff in the early years, Camau and parents with the Clwb Cwtsh scheme in collaboration with Mudiad Meithrin, or the intensive learning work with parents in Ceredigion with the new transitional schools and Welsh in the Home schemes for new schools such as Ysgol Gymraeg Nant Gwenni in Newport and Ysgol Gymraeg Trefynwy in Monmouth.

Further clarity is also needed on the difference, if any, between the role of the Institute in providing lifelong education and post-16 education in schools. Reference is often made in the Bill to statutory education, which in Wales ends at the age of 16. What then? The responsibility for funding post-16 education in schools remains unclear.

3.17 The Institute must be a prominent and recognised authority on providing training and planning Welsh language acquisition needs across the span of the education and training sector - from the early years to lifelong education. There is a real opportunity here to create a body of authority with expertise in language acquisition and a place to nurture experts in the field for the future. These functions must be clear from the outset.

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

3.18 We have identified the need to include an additional clause in the Bill to reflect the need to plan to increase the workforce in a purposeful manner. Without this, it will be very difficult to implement the provisions of this Bill. This Bill does not consider it sufficiently in our opinion.

3.19 Details must be included on how data on the language ability of the education workforce specifically will be collected and in order to be a baseline for implementing proficiency pathways through the support of the Institute.

3.20 There is no reference in the Bill to the Learner Travel (Wales) Measure 2008, which is essential to ensure that learners reach their education. Consideration should be given to the effect that omitting this will have on implementing this Bill.

Whether there are any unintended consequences arising from the Bill

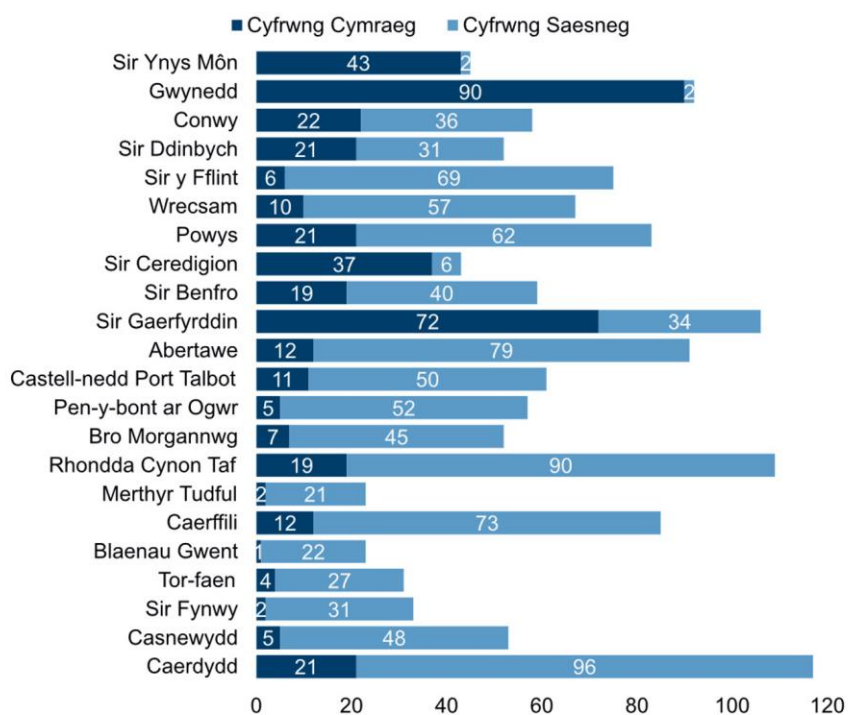
3.21 We are concerned that the new emphasis to increase provision within each school will draw attention and resources away from the development of Welsh-medium education. In Wales, we have an immersion system that creates proficient and confident users. The Bill should focus more on expanding this sector and making significant resource provision to support a structure to convert English-medium schools into Welsh schools.

The financial implications of the Bill

3.22 It must be ensured that not only existing budgets will be transferred to implement this legislation. There are high expectations in the Bill that can only be realised with relevant resources. We have noted the absence of reference to the workforce strategy and therefore a budget will need to be secured for this aspect. Investment in training will be needed to increase capacity. This should be seen at all levels from the Welsh Government, local authorities and schools as a significant investment in the Welsh language and in increasing the population's ability to be bilingual and multilingual citizens.

In conclusion, we would like to give you as a committee the context of the accessibility of Welsh-medium education. Below you will find the table of the latest school census showing the numbers of Welsh schools, which are in the minority in most of the counties of Wales. We emphasise the need to increase the number of Welsh-medium schools so that more children acquire the language as early and as fully as they can and follow the path of Welsh-medium education up to work so that they can participate fully in the bilingual economy of Wales.

Ffigur 1: Nifer yr ysgolion a gynhelir, yn ôl awdurdod lleol a chyfrwng, 2024 [Nodyn 1]



<https://www.gov.wales/schools-census-results-january-2023.html>