

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 23

Ymateb gan: Cyngor y Gweithlu Addysg

Response from: Education Workforce Council

11 October 2024

Dear colleagues

Welsh Language and Education (Wales) Bill – EWC consultation response

The EWC is the independent, professional regulator for the education workforce in Wales. We regulate education practitioners across schools, further education, youth work, and adult/work-based learning. The Education (Wales) Act 2014 formally sets out our aims and functions. We are focusing this response on matters specific to our remit, notably the workforce.

In order to regulate the workforce, we are required to maintain a Register of Education Practitioners (the Register). As a result, the Register provides a rich source of data about the composition of the education workforce in Wales, across 13 different groups of registered practitioners. Our data includes workforce information such as:

- Ability to speak Welsh, teach through the medium of Welsh, teach Welsh as a second language
- Recruitment and retention
- Employment (including phase, subject, Welsh medium, bilingual or English medium)
- Numbers of teachers who trained through the medium of Welsh
- Supply workforce and their Welsh language ability

We would welcome the opportunity to brief Welsh Government and/or the CYPE committee on the data. We have provided similar data briefings (and other updates) to Welsh Government's Welsh in Education Workforce – External Implementation Group, upon which we sit as a member.

Our comments on the Bill

Providing a statutory basis to the one million Welsh speakers target

The EWC welcomes the provision within the Bill to provide a statutory basis for the target of one million Welsh speakers by 2050 (alongside other targets relating to the use of the language). In order to meet such an ambitious goal, a concerted and sustained national effort will be required, involving a wide range of stakeholders. Placing a duty on Welsh

Ministers and local authorities to give due regard to the target when exercising their education functions (specifically in relation to increasing the provision of Welsh language education and the number of people who are learning Welsh), will help to ensure that the necessary leadership is provided and sustained over time.

Nevertheless, the size of the challenge and the extent of the resources that will be required to achieve the 2050 target should not be underestimated. This is underlined by the results of the 2021 census which showed a decrease in the number of Welsh speakers between 2011 and 2021, as well as the EWC register data, relating to the school workforce which indicates that the school workforce able to teach through the medium of Welsh has not increased in the last five years. Neither has the Welsh Government achieved its requirement that 30% of recruitment to all Initial Teacher Education programmes be students learning to teach through the medium of Welsh.

We would encourage Welsh Government to review the Welsh in education workforce plan to ensure that the strategy and interventions outlined within it are sufficiently ambitious to fully meet the objectives of the Bill. A comprehensive workforce strategy will also give clear context and direction to the work of the new National Institute for Learning Welsh and other key partners.

It will also be essential to ensure that the workforce strategy reflects the roles of teachers at all levels in supporting Welsh language acquisition. This should include those within early years provision which has a critical role to play in laying the foundations for lifelong learning, through giving younger children early exposure to the Welsh language at an age when they have a unique capacity to acquire new languages. The success of second language acquisition in later years is often contingent on the quality and availability of provision in the early stages of learning.

Placing a duty on the Welsh Ministers to review Welsh language standards

The EWC notes the provision within Part One of the Bill placing a duty on the Welsh Ministers to review the Welsh language standards in relation to improving or assessing the Welsh language skills of the workforce. Amending the standards could help facilitate the achievement of specific targets and we therefore cautiously welcome this duty. However, in exercising the duty, Welsh Ministers should give full consideration to the impact of any changes to the standards upon the education workforce, including implications relating to workload, recruitment and retention and professional learning. It is also clear that significant additional resources will need to be allocated to support schools in ensuring that the workforce meets the required standards.

A standard method for describing Welsh language ability

The EWC welcomes the proposed establishment of a standard method for describing Welsh language ability, based on the common reference levels of the European Common Reference Framework for Languages (CEFR). We believe that this will help facilitate the development of clear national standards and ensure that language proficiency is assessed consistently and with transparency. The existence of a clear framework could also be helpful in relation to the design and development of Welsh language courses that are tailored to the specific needs of learners at each proficiency level.

The proposed standardised method for describing Welsh language ability could also help to clarify the level of language proficiency required within different educational settings. This could assist in guiding staff recruitment and professional development for teachers and learning support workers, ensuring that the Welsh language skills expected for specific roles are clearly defined.

EWC registrants are currently asked if they are able to speak Welsh and whether they are able to work through the medium of Welsh. As the professional regulator for the education workforce we could potentially collect additional data that would allow the Welsh language competency of the workforce (and how it changes over time) to be monitored at a more granular level, in line with the framework, to assist with workforce planning.

Designation of school language categories

We recognise the rationale behind the categorisation of schools according to the amount of Welsh language education they provide, with specific Welsh language learning goals for those in each category. This will provide learners and their parents/guardians with greater clarity in relation to the nature (linguistically) of the education on offer in different schools. It will also help ensure that every school is able to play a part in supporting Welsh language acquisition (including those in the “Primarily English Language, partly Welsh” category, which will be required to provide at least 10% of teaching through the medium of Welsh).

However, there is a danger that the expansion of Welsh language provision within (primarily) English medium schools could have detrimental consequences for Welsh medium schools, particularly if parents and learners were to develop unrealistic expectations of the level of Welsh language proficiency that could realistically be gained by pupils studying within an English medium setting. It will therefore be important to ensure that all schools provide parents and learners with clarity regarding the extent to which Welsh is used in lessons and how fluent learners are likely to be in the language upon completing school.

The EWC welcomes the Bill's ambitious targets, with respect to the goal of learners achieving proficiency (C1/C2) in Primarily Welsh Language schools and independence (B1/B2) in other categories. However, we are concerned that meeting them could present challenges for some schools on two levels. Firstly, the availability of a workforce qualified beyond independence (B1/B2), which is equivalent to A level standard, would be required to support learners in achieving this goal. Secondly some schools, particularly those with fewer resources or where there are a larger proportion of learners with limited exposure to Welsh at home or within their local community. In some such communities there may also be a high proportion of learners who come from households with English as an additional language. It will be important to ensure that the educational needs of such communities are given careful consideration.

The specific circumstances of special schools, particularly those in which significant numbers of pupils possess limited vocabulary, experience challenges in understanding language or are non-verbal must also be considered. Clarity is required in relation to the level of Welsh language proficiency these learners should be expected to attain and the additional support (including tailored training for practitioners working with ALN pupils) that may be required to support this.

The workforce challenges of implementing this policy should also not be underestimated. We would therefore encourage the Welsh Ministers to ensure that schools receive adequate resources and support to meet these requirements, particularly in areas where Welsh is not as widely spoken. The current financial constraints in the system will not provide the favourable conditions required to support the delivery of these ambitious targets.

School Welsh language education delivery plans

We support the proposal for each school's governing body to be involved in the development of a Welsh language education delivery plan. We also welcome the fact that consultation on the delivery plans will involve other key stakeholders including parents, staff, and learners. However, we believe that the preparation of the plans should be practitioner lead, with governors performing a supporting role in line with their designated role (which is strategic and not operational).

Provided that schools are given appropriate support to develop clear, realistic pathways, in order to meet their targets, the EWC is hopeful that the delivery plans could help to ensure that schools develop detailed strategies, tailored to their specific circumstances. We also believe that the consultative approach outlined within the Bill should help to foster a more consensual environment for implementing (and, where there is demand,

expanding) Welsh medium and bilingual education. Nevertheless, it will be important to ensure that processes for producing, renewing and amending Welsh language education delivery plans does not become overly bureaucratic or time-consuming for school leadership teams and governing bodies. Local authorities will therefore need to play a strong role in supporting schools and sufficient time will need to be allocated for meaningful consultation and planning.

Temporary exemptions and transition periods

The EWC believes that the provision within the Bill allowing for temporary exemptions for schools that cannot immediately meet minimum Welsh language education requirements is prudent. However, it would be useful to understand more about the range of circumstances in which such an exemption may be deemed appropriate. We would particularly welcome further guidance for schools regarding the circumstances in which workload considerations may be a factor in the granting of exceptions for schools. It will also be important to ensure that the exemption process is accompanied by targeted support for schools and a plan (including clear timelines) for progression towards compliance.

National Framework for Welsh Language Education and Learning Welsh

The EWC notes the requirement placed upon the Welsh Ministers, within the Bill, to produce a framework setting out how they will implement the Welsh language strategy's proposals in relation to Welsh language education, (lifelong) Welsh language learning, and acquiring the Welsh language. It will be important to ensure that this framework is aligned with broader workforce planning initiatives, to ensure the education workforce has the necessary skills and support.

The EWC welcomes the proposal to develop a framework focussed on promoting and facilitating Welsh language learning across educational and professional sectors and we are pleased to note that this will specifically cover professional learning for education practitioners (as set out within section 5(3)(d)). We also welcome the focus on increasing Welsh language education at all levels (section 5(4)(d)). However, we would once again emphasise the importance of ensuring that appropriate additional resources are allocated to facilitate any additional Welsh language requirements for educators. Introducing such requirements without sufficient support may place additional pressure on schools (and their budgets) and could negatively affect the current workforce, which could struggle to balance existing duties with the new expectations. Schools may wish to consider the most efficient and effective approach within their setting to ensure that all teachers and

learning support workers are provided with equitable access to Welsh language professional learning opportunities.

Section 5(6)(c) states that the National Framework for Welsh Language Education and Learning Welsh must include an assessment of the number of education practitioners that will be required to meet the targets. Greater clarity regarding workforce requirements will be helpful and these figures should also be used to help identify any requirements for additional resources to support recruitment, in order to minimise workforce shortages and additional strain being placed upon the existing workforce. However, without proper funding and a clear recruitment strategy, these targets may be difficult to achieve.

Whilst the EWC is not included in the list of organisations that WG will consult with on this matter as set out within paragraph 5(26)(1), as the workforce regulator and holder of unique data regarding the composition of the education workforce we would welcome the opportunity to support such consultations, in line with our function (set out within section 4(1)(a) of the Education (Wales) Act 2014) to provide advice to Welsh Government and other stakeholders on matters related to the education workforce.

Local Welsh in education strategic plans

The EWC supports the requirement outlined within the Bill for local authorities to prepare and implement Welsh in education strategic plans outlining how they will promote and facilitate Welsh language education and use of Welsh in schools within their areas. We also note that, within these plans, local authorities are required to set out the steps that they will take to ensure they have sufficient education practitioners working in its area. However, as outlined above, significant additional resources will be required to ensure that local authorities are able to recruit and retain staff with the necessary Welsh language skills that will be required to meet these targets, as well as ensuring that existing staff have access to professional learning opportunities. It should be noted that smaller Local Authorities may experience particular challenges in preparing and implementing Welsh in education strategic plans, due to the more limited capacity within their education teams, which may also be stretched as a result of the reorganisation of the middle tier.

We would also encourage Welsh Government to reflect upon the significant role that might be played by youth work in helping to create more active Welsh speakers, with these settings often being uniquely placed to encourage use of Welsh within and outside formal education settings (including within diverse contexts). We therefore believe that youth work conducted by local authorities (either themselves or through agreements with

other bodies) should be included as a key element within Local Welsh in education strategic plans.

National Institute for Learning Welsh (NILW)

The establishment of the National Institute for Learning Welsh (NILW), is another element of the Bill that will have important implications for the education workforce in Wales. The EWC notes that the NILW will be responsible for planning “the development of the education workforce for the purpose of improving Welsh language teaching” (detailed in section 37(2)(c)), as well as for making arrangements to provide opportunities for the education workforce to learn Welsh (37(2)(d)) and improving the wider Welsh language ability of the workforce (37(2)(e)). However, establishing such a body and ensuring that it is adequately resourced will require substantial investment and it is crucial that this does not come at the expense of direct support for schools.

Many of the functions listed for NILW in the Bill are already undertaken by The National Centre for Learning Welsh with whom the EWC has an established working relationship. The EWC welcomes the statutory basis for the proposed new body and sees it as an opportunity to build upon existing areas of provision and develop new professional learning opportunities, based on high quality resources that promote Welsh language proficiency within the workforce. Such provision should be scaffolded to align with the Professional Standards for Teacher and Leadership in Wales (which we would note are owned by Welsh Government and not by the EWC, as the workforce regulator, as would normally be expected in most professions) to ensure that professional development is targeted, coherent and fully aligned with the broader national vision for education in Wales. The goal should be to provide practitioners with continuous support to enhance their Welsh language skills throughout their careers, with flexible learning opportunities tailored to fit in the demands of working within a school. This could play a key role in equipping teachers and support staff with the knowledge and skills to meet increasing demand for Welsh medium and bilingual education.

The NILW could work alongside ITE providers to create focussed provision that will help to enhance the Welsh language skills of new teachers entering the workforce. The NILW will also be able to work in partnership with local authorities, to assist them in delivering on the objectives set out within their Welsh in Education Strategic Plans (WESPS). However, in line with our previous comments, upskilling the workforce will also require appropriate funding. We would also, once again, emphasise the importance of ensuring that teachers and learning support workers are provided with sufficient time to engage with these professional learning activities, especially during a period of significant change within the system such as the new curriculum and ALN Bill, require the workforce to participate in

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ongoing professional learning. The interrelationship of these other ongoing changes taking place within the Welsh education system with the Welsh language and Education Bill should be clearly communicated and articulated to the sector.

Conclusion

The EWC is hopeful that the Bill will advance bilingualism in Wales. Whilst we support the Bill's objectives, we would ask that Welsh Government undertakes further work to identify the possible impacts of the Bill (including workload) and ensures the system receives adequate financial and practical support in order to support recruitment and professional learning. Without these the introduction of the Bill risks overburdening the system without achieving the desired outcomes. It will be therefore by crucial for Welsh Government to maintain a strong focus on the practical measures needed to drive change and meet the ambitious targets that it has set. The EWC remains committed to supporting Welsh Government's efforts through our statutory role and remit including in collecting and analysing data on the Register, accrediting and monitoring ITE provision, promoting careers in education and providing advice to Welsh Government and other stakeholders.

If I can be of further assistance, please do not hesitate to contact me.