

WLE 24

Ymateb gan: Comisiynydd Plant Cymru

Response from: Children's Commissioner for Wales

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

The commitment of the target of a million Welsh speakers by 2050 is crucial for the language's future. Collaboration among schools, families, and communities will be key to ensuring that every learner can access and appreciate their linguistic rights and foster an environment where bilingualism is valued and promoted.

## Part 2: Describing Welsh Language Ability

I welcome the motion that by describing Welsh proficiency levels along the proposed 'continuum' that this will mean learners, teachers, parents and employers will have a common understanding of the journey towards becoming Welsh speakers, promoting unity across all regions and strong communication.

## Part 3: Welsh Language Education

To successfully introduce a minimum level of Welsh language provision, it is essential that this is developed collaboratively with stakeholders, including learners, to ensure it meets diverse needs effectively - particularly those for whom neither Welsh nor English is their first language, as well as learners with additional learning needs.

Additionally, providing adequate support and resources for teachers is crucial. This will need to include training and professional development opportunities that build their confidence in using Welsh, which in turn will benefit their learners. There must be robust transition planning for maintaining language continuity, especially as students move from primary to secondary education and into further education.

## Part 4: Planning Welsh Language Education and Learning

As evidenced in one piece of correspondence to my office, a parent wrote regarding their council's consultation process and proposal for introducing Welsh only education in the foundation phase to all schools in Ceredigion. They felt the consultation process had not been advertised fully and that the process would most likely later affect parents of nursery aged children who had not been consulted.

The correspondence continued to express concern that despite one of the explicit goals of the Welsh in Education Strategic Plan being to increase the number of Welsh speakers in the area, that communication from the consultation had not addressed lack of resourcing which would prevent this being achieved. The correspondent further felt that there was insufficient consideration for young children affected by stilted speech and language development due to the pandemic.

Increasing awareness of Welsh Education Strategic Plans (WESPs) for English-speaking families moving into Welsh-speaking areas is important. It's vital that these families understand the benefits of bilingual education and the resources available to them. As stated on page 117 of the explanatory memorandum, the preferred option is to reform the current system and to create a direct link with the targets in the National Framework. This would greatly benefit from a strong communications plan.

## Part 5: National Institute for Learning Welsh

I would need further details about the role and remit of the organisation to be able to comment properly. What will be the relationship between the National Centre and the Welsh Language Commissioner? Is there a risk here of duplicating work of the education consortia in supporting schools?

## Part 6: General

Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them (including commencement and the United Kingdom Internal Market Act)

### Additional Learning Needs

As a member of the ALN Reform National Steering Group my office has continued to be informed on discussions about learners with additional learning needs and the Bill.

An appointed Welsh Language Implementation Lead has conducted a review of Welsh Language provision in schools and LAs, visiting 22 clusters of schools.

This review identified risks to the Welsh Language within Additional Learning Needs and consideration of capacity to deliver. These included:

- Many of the resources available are not fit for purpose as they are outdated.
- Packages currently available for visually impaired learners and noted that accessibility of technology was a problem.
- A project being undertaken by Bangor University to carry out scoping work to provide recommendations for the review of Welsh Medium ALP due in 2026. It was noted the following had taken place:
  - o Reviewed literature that is already available;
  - o Met with WG policy makers;
  - o Reviewed available statistical data and Welsh in Education Strategic Plans from each LA
  - o Conducted interviews with key external stakeholders.

In June 2023 my office published a [joint paper](#) with the Welsh Language Commissioner on the Welsh language in the additional needs system.

In the paper we identified that there is a lack of specialised workforce who have the necessary linguistic skills.

All local authorities raised concerns about the size and capacity of the ALN workforce capable of delivering services in Welsh, particularly in areas like neurodiversity, as well as emotional, social, and behavioral challenges. Even those authorities that can provide comprehensive ALN support in Welsh still express concerns about having enough expertise in areas such as psychology and sensory impairments.

I would therefore ask the Welsh Government to create a timetable for developing national interventions and to publish its plans in areas including workforce planning, resources, and professional learning.

Given the above, I am concerned that the needs of learners with ALN may not have been adequately considered, and that this may affect their right to education in line with Article 28 UNCRC.

I concur that a thorough review of ALN services by local authorities is essential, especially to ensure that support is available through the medium of Welsh. This includes planning for a diverse workforce, adequate resources, and targeted professional training.

There will also need to be sufficient time for staff to feel confident in their own use of Cymraeg and to be able to teach others.

### Children and young people from ethnic minority backgrounds

The lack of diversity among Welsh-speaking teachers, particularly regarding representation for LGBTQ+, Black, Asian, and ethnic minority individuals, is a significant concern.

Ensuring a diverse teaching body is crucial for all students to see themselves reflected in their educators and for children with protected characteristics to feel included in the educational environment.

Page 72 of the Welsh Government's Anti-racist Action Plan states - *We are also committed to improving the levels of recruitment, retention and progression into leadership of teachers, lecturers and managers and leaders from ethnic minority communities. A lack of representation within practitioner and leadership roles, including on governing bodies, does nothing to promote ambition within our children and young people, who need to recognise themselves and their own experiences within their leaders.*

Regarding the Welsh language on page 77, the plan states - *In doing so we will listen to, learn from, and respond to the lived experiences of Welsh speakers and non-Welsh speakers from ethnic minority communities. We will use this intelligence to guide the way we engage with communities to promote the benefits of a Welsh language education and the use of the language every day. We will ensure our marketing and communications reflects the communities we serve and the Welsh terminology we use is appropriate and culturally sensitive to discuss anti-racism.*

It would be good to understand what plans are in place to create a fully inclusive recruitment drive and how the lived experience of Welsh and non-Welsh speakers from ethnic minority communities will inform that strategy.

### The Learner Travel Measure

I would again make clear that I am disappointed with the Welsh Government's review of the Learner Travel Measure as it fails to signal any meaningful change under current legislation.

The original terms of the review of the learner travel measure did not include access to Welsh medium education until my office and the Welsh Language Commissioner made calls for it to be included.

However, the final review of the measure did not cover Welsh language or post 16 travel access in any meaningful way. Therefore, it is difficult to understand how the current situation has been fully analysed and if any further steps have been taken to support learners in accessing Welsh medium education.

The categorisation of schools could in theory help with learner travel if more schools had more Welsh language provision, then this would mean not having to travel too far to access Welsh language education. However, it would need to be clear how the revisions to the learner travel guidance will take this into account and how it will support local authorities to continue to promote access to Welsh medium education.

My office continues to have cases brought to us in relation to learner travel and currently there are no assurances of equitable access to education for all learners, particularly when considering categorization of schools and learner ability.

The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum);

Whether there are any unintended consequences arising from the Bill;

My office has received correspondence from a parent concerned about their one-year-old child, whose mother is a foreign national living in Wales and who is being brought up bilingually through the medium of English and an additional language exclusive of Welsh.

The parent feels that being required to learn three languages fluently, and with neither parent a Welsh speaker, will negatively impact their development at a formative stage. This type of concern, may be more widespread. As the Welsh Government continues to implement the *Nation of Sanctuary Plan*, and deliver on its commitment to helping schools to support learners from refugee and asylum seeking backgrounds to access their right to education, it is important to recognise the potential additional resource required to support this cohort of learners, as well as ensure that communications plans address these concerns.

The financial implications of the Bill (as set out in Part 2 of the Explanatory Memorandum).

My office has received multiple pieces of correspondence from concerned parents and schools worried about shrinking school budgets, including cuts to ALN provision.

I have raised these concerns with the Cabinet Secretary for Education and my office continues to share casework with her officials.

Therefore, I am concerned that the plans outlined in this Bill could potentially be underfunded. It would be good to see clear reassurance that training needs and time away from the classroom to complete professional learning are funded sufficiently.