

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 30

Ymateb gan: Blynyddoedd Cynnar Cymru

Response from: Early Years Wales

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### **Overarching feedback**

Overall, we would like to see more of an emphasis on Early Years throughout the act, the phrases “Early Years” and “childcare” is only mentioned once throughout the text. The bill also makes no reference to the “first 1,000 days”. We feel that more of an emphasis on these three key aspects will be beneficial, because we know that Welsh language development in the early years is crucial for later development of fluency. Furthermore, providing parents with the means to speak Welsh in the home reinforces the importance of the cognitive developmental benefits of language interactions.

### **Comments and proposed amendments to specific sections:**

#### **Notes from Integrated impact Assessment document:**

#### **Pages 03 and 04:**

- The introduction of a Code to establish a standard method for describing Welsh language ability will enable learners, teachers, parents, and employers to have a shared understanding of an individual’s journey as they learn the Welsh language.
- Establishing a statutory system for categorising schools according to the Welsh language provision will give schools a framework to make progress, whether that is to improve or increase the Welsh language provision within a category or moving to a higher language category. Categorising schools will also offer clarity and consistency to learners and parents/guardians in relation to the Welsh language learning goals.
- A National Framework for Welsh Language Education and Learning Welsh will, amongst other things, provide strategic direction to local authorities regarding what is expected of them in terms of increasing and improving their Welsh language education provision in schools, guidance to those providing support to the education system with regard to acquiring and learning Welsh, and set out the steps the Welsh 4 ministers will take to provide opportunities for persons of all ages in Wales to learn Welsh.

Notes and Amendments: Code for the Early Years. There is an opportunity here to promote school membership of Camau, which we feel will help place further value on the Camau programme, increasing prevalence of Welsh speaking in children.

#### **Page 04:**

- The promotion of Welsh-medium education and the promotion and provision of late immersion education in Welsh will lay a strong foundation for a local authority to make ambitious decisions regarding Welsh-medium education and will widen access to the Welsh language for pupils in Wales, including pupils wishing to access Welsh medium education after the end of foundation learning.

Notes: The early Years should be recognised as the building of the foundations of language and cognitive abilities. A good chance to mention the importance of the first 1,000 days, and how the foundations of cognitive development are set.

#### **Page 06:**

- Interviews were conducted with representatives from Estyn, the National Centre for Learning Welsh, Mudiad Meithrin, the Education Workforce Council, and four Initial Teacher Education providers.

Notes: We would be grateful to be considered for consultation in the future.

#### **Page 16:**

- The Bill will establish a new statutory body, the National Institute for Learning Welsh, which will facilitate and support people of all ages to learn Welsh and develop their Welsh language skills. The Institute will be a one-stop-shop for supporting all aspects of Welsh language learning.

Notes: Will Early Years providers fall under this?

#### **Page 17:**

- As a result, it is possible these individuals will be able to apply for jobs where the Welsh language is desirable or essential, thereby enabling them to benefit from more opportunities within the labour market which might otherwise have been closed to them.

Notes: Will there be an implementation of standardised levels and certifications?

#### **Page 22:**

- Establish a statutory regime to categorise the provision of Welsh language education. The Bill states that there will be three categories: (i) “Primarily Welsh Language” (ii) “Dual Language” and (iii) “Primarily English Language, partly Welsh”.

Notes: Could Early Years providers be encouraged to follow suit with this programme? Aligning Early Years provision with the wider curriculum helps ease the transition between nursery and school

#### **Page 51:**

- We also have a statutory obligation to fully consider the effects of our work on the Welsh Language. This means that any Welsh Government policy should consider how our policies affect the language and those who speak it. The Cymraeg 2050 strategy has 3 interrelated themes: Theme 1: Increasing the number of Welsh speakers • Language transmission in the family • The early years • Statutory education • Post-compulsory education • The education workforce, resources and qualifications

Notes: If the Early Years has been identified as a key theme of the Cymraeg 2050 strategy, the lack of reference to it in the Bill is quite confusing. We feel that there needs more of a continuum of learning identified throughout the bill, referencing the first 1,000 days.

#### **Page 56:**

- Two online workshops were conducted with local authorities to explain the proposed changes outlined in the Bill and to gather feedback regarding the anticipated costs and benefits. All local authorities were invited to provide input by completing a series of questions on costs and benefits in a survey format. Feedback was received from 13 local authorities.

Notes: It is interesting to note that nine Local Authorities did not respond to the consultation.

### **Notes from statement of Policy Intent document:**

#### **Page 12:**

- In the primary sector we plan to amend PLASC so that primary schools will be able to identify themselves in more than one category. This is most relevant for schools currently categorised as dual stream primary schools with and English-medium and Welsh-medium stream.
- Primary schools wishing to increase their provision gradually can also categorise streams or classes within a school to reflect this.

Notes: What does this mean for settings based on school sites? Will people make the assumption that the setting is also adhering to the same principles and standards as the school?

### **Page 31:**

- This power is important to support the progress monitoring process of local Welsh in Education Strategic Plans, introducing a procedure for the Welsh Ministers to use if that progress is not considered adequate.

Notes: How will this monitor early years settings on school sites? Are they included in the strategic plans, or are they separate?

### **Page 32:**

- 33(2) presents further information about what the Welsh Ministers can do under the power in 33(1). It states that regulations under sub-section (1) may also make provision to enable two or more authorities to produce a joint local Welsh in education strategic plan, and any such regulations may make provision applying sections 28 to 32 with modifications for that purpose.

Notes: We welcome the promotion of partnership between Local Authorities, as this means that they can share best practice and work cumulatively to achieve their goals.

### **Page 33:**

- These powers could be used to ask local authorities to highlight in their plans how programmes, policies and their wider statutory duties have been considered in pursuit of the targets imposed on them, e.g. Childcare Sufficiency Assessments, early years programmes, school capital, learner travel arrangements, reviews of additional learning needs provisions, workforce plans, amongst others.

Notes: So they review early years programmes in line with Welsh language goals?

### **Page 35:**

- Given that the Cymraeg 2050 strategy, and its underlying wellbeing goal, is a long term aspiration, the need to facilitate and support Welsh language learning will continue. It therefore follows that we need to future-proof.

Notes: No mention of the early years allows us to put into question the point around future proofing? First 1,000 days talks about the importance of speech and language and cognitive development, so vital in the sense of future proofing.

## **Notes from the Bill as introduced document:**

### **Page 7:**

- (4) In relation to the Welsh language goals for a primary school, it is assumed 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.

Notes: For clarification purposes, we feel this needs to be more clearly defined as a safeguard, if it is designed to act as one?

### **Page 8:**

- (a) sets out a language category for the school (taking into account the amount of Welsh language education provided by the school at the time)
- (ii) promote use of the Welsh language within the school

Notes: What about the early years provider on sight? Is the teaching in line with the language category promoted to the early years setting by the school, or promoted by the early years setting?

### **Page 11:**

- (2) A school's language category may not be changed— (a) from a "Dual Language" category to a "Primarily English Language, partly Welsh" language category; (b) from a "Primarily Welsh Language" category to a "Dual Language" category or a "Primarily English Language, partly Welsh" language category.

Notes: Positive that a schools language categorisation cannot be changed but there needs to be more information about what support is provided to the school in order to allow it to be retained at that level.

### **Page 14:**

- (a) encourage demand in its area for late immersion education, and participation in it
- (3) Where a school's governing body has received information (by virtue of subsection (2)(b)(iv)) about the availability of late immersion education in the area of the local authority in which the school is located, it must take all reasonable steps to ensure that pupils of the school and their parents are aware of— (a) the availability of the education, and (b) how that education can be accessed

Notes: Is there enough speakers to help fit the demand for late immersion education? Is the cost of the education also affordable to people? Point (3) has caused an area of confusion – does this mean that schools will be promoting other schools in the nearby vicinity if they offer other Welsh language support services? Or will the services promoted only be in relation to late immersion education, classes etc.

### **Page 16:**

- (6) For the purpose of setting targets in accordance with subsection (5), the National Framework for Welsh Language Education and Learning Welsh must include— (a) an assessment of the Welsh language education provided at the time in schools in each local authority; (b) an analysis of the amount of Welsh language education needed in schools in each local authority in order to meet any target set; (c) an

assessment of the number of education practitioners needed in each local authority in order to meet any target set

Notes: Really positive

### **Page 18:**

- (d) to facilitate progression in teaching Welsh and education through the medium of Welsh between— (i) nursery education and education for pupils of compulsory school age

Notes: No learning pathway – what about helping parents to help with development? There seems to be a lack of information about children before nursery as well as an overlook on the the learning pathway in non-maintained settings.

### **Page 19:**

- (b) consult on a draft of the plan with the following— (i) its neighbouring local authorities; (ii) the head teacher of every school it maintains; (iii) the governing body of every school it maintains; (iv) the principal of every further education institution in its area; (v) in relation to any foundation or voluntary school in its area, the person who appoints the established governors, and if the school is a school with a religious character, the appropriate religious body; (vi) His Majesty's Chief Inspector for Education and Training in Wales; (vii) the National Institute for Learning Welsh; (viii) the Welsh Language Commissioner; (ix) persons specified in regulations made by the Welsh Ministers.

Notes: No consultation with the early years providers. This may account for the lack of transition policies from early education providers to school age children.

### **Page 21:**

- (c) “nursery education” means full-time or part-time education suitable for children who have not attained compulsory school age (whether provided at schools or elsewhere); (d) “childcare” means any form of supervised care or activity for a child, other than— (i) care provided for a child by a parent, relative or foster parent of the child, (ii) education (or any other supervised activity) provided by a school during school hours for a registered pupil, or (iii) any form of health care for a child;

Notes: Important to use for definitions of childcare and nurseries.

### **Page 22:**

- (1) The Learning Welsh Institute's objective is to support people to learn Welsh, and facilitate their progress, so that more people (of all ages) are learning the language.

- (e) make arrangements to improve levels of ability in Welsh— (i) amongst the education workforce,

Notes: This is the definition of the Learning Welsh institute. Good definition but can go further in including the importance of parents helping with Welsh language learning and transmission in children. Also needs to add in the early year's workforce. We would like to call for the continuation of funding for CWLWM to support the early years workforce with delivering these core Welsh language targets.

**Page 31:**

- Page indicates the types of Welsh language user outlined under the law and the general characteristics of each user.

Notes: Requires better presentation as there may be some confusion around how it will be interpreted by practitioners. Rename each of the categories too to avoid confusion – having basic, medium and advanced as three separate categories is much easier for people to understand than multiple levels per category.