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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 32

Ymateb gan: CYDAG

Response from: CYDAG

Response from CYDAG - Cymdeithas Ysgolion Dros Addysg Gymraeg (Association of Schools for Welsh Education)

CYDAG appreciates the opportunity to respond to the Bill and to submit comments and suggestions on behalf of Welsh-medium and bilingual schools. We also welcome the opportunity to give oral evidence to the Children, Young People and Education Committee on 26 September 2024.

The background of CYDAG

CYDAG is an active and progressive national body that provides a voice, support and opportunities for Welsh-medium and bilingual schools in Wales. CYDAG was originally established to respond to the needs, concerns and aspirations of schools, and those principles remain at the heart of its vision as it supports and leads developments in the sector.

CYDAG aims to support and empower the sector by:

- Promoting Welsh-medium and bilingual education
- Facilitating collaboration through professional learning communities
- Providing professional development opportunities
- Establishing and coordinating national networks
- Encouraging and facilitating the sharing of good practice and educational expertise
- Celebrating and sharing successes
- Acting as a strategic partner in the education sector, and the Welsh-language education sector specifically
- Providing a voice and support for the sector and the profession.

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

- 1.1.1. CYDAG welcomes and supports the general principles of the Welsh Language and Education (Wales) Bill and strongly believes that the intention of this policy and the objectives of Cymraeg 2050 will be realised through legislation.
- 1.1.2. We strongly believe that formalising the objectives by setting targets for increasing the number of Welsh speakers and ensuring growth in Welsh education is vital in order to ensure that all stakeholders in the process commit to action towards achieving the goals and objectives.
- 1.1.3. The Bill in itself sets Welsh language education to be a greater priority in terms of planning, funding and accountability for progress at local and national level, which is to be welcomed.
- 1.1.4. The Welsh language belongs to everyone, but circumstances must be ensured that allow everyone to learn and use it. We believe that introducing the Bill is a vital step towards creating and maintaining those favourable circumstances, tackling some of the weaknesses

of the current situation, and specifically therefore the weaknesses of the Welsh language education planning system, and the lack of ambition and commitment to teaching Welsh in a way that ensures that all pupils leave school fluent in Welsh – something that we would consider a fundamental right and expectation.

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

- 1.2.1. CYDAG welcomes the intention in the Bill to give a statutory basis to the target of increasing the number of Welsh speakers to one million by 2050, and the requirement to set targets for increasing the use of the Welsh language in the workplace and socially. We trust that giving a statutory basis to the aim and ambition will ensure action and investment in order to realise the target; while also increasing the status of the Welsh language in the eyes the general population.
- 1.2.2. We very much welcome the intention to set targets for increasing the provision of Welsh language education and increasing the number learning Welsh, and also see these targets as a powerful tool to ensure progress, and accountability for progress, at local and national level.
- 1.2.3. We also welcome the intention to strengthen the role of the Welsh Language Commissioner in this context, and the requirement in the Bill to review the Welsh Language Standards.

1.3. *Part 2: Describing Welsh language ability*

- 1.3.1. We agree that using a code based on the Common European Framework of Reference for Languages (CEFR) to define the categories of language use is relevant and sets a consistent and standardised context for the different definitions of the types of different users of the language and their level of competence.
- 1.3.2. Using such a code will establish an understanding of levels of linguistic proficiency in Welsh, and enable progression planning across education sectors, and afterwards in the workplace.
- 1.3.3. Despite the benefits of introducing the code, it must be acknowledged that the use of such a new common framework will have a clear impact on school curricula and staffing, and implications within further education and adult education. With that in mind, the following will need to be considered:
 - (i) The practicality of implementing the code and how it will be used in situations where there is also a range of other methods of measuring the proficiency of statutory school age learners.
 - (ii) How will these definitions align with the literacy framework in the new curriculum?
 - (iii) How will this affect Welsh language qualifications?
 - (iv) How will measuring the proficiency of individuals within these categories take place beyond education systems?
 - (v) How will the assessment of the definitions be moderated to ensure consistency?
- 1.3.4. It is understood that many of the above issues are details beyond the Bill currently, but the implications of the high level statements set out in the Bill need to be considered.
- 1.3.5. We strongly believe that schools should be consulted when tackling some of the above issues.

1.4. *Part 3: Welsh Language Education*

- 1.4.1. We welcome the intention to simplify the terminology in the context of categorising schools. Nevertheless, we believe that there are significant risks of seeing unintended consequences if

the Bill were to go ahead with the language categories specified, and the lack of detail in the Bill as it stands is cause for concern.

- 1.4.2. While we accept the intention to define the categories in more detail in secondary legislation, we believe that more detail is needed in the Bill itself in this context. As stated in the Welsh Language Commissioner's evidence - *"this is too important and fundamental an issue to be included in regulations alone; it is central to the meaning and implications of the rest of the Bill"*. We completely agree with that view.
- 1.4.3. Specifically from the perspective of Welsh-medium schools, we have a significant concern regarding the 'Main Language – Welsh' category. Without a detailed definition in place, there is reason to be concerned that this category will not reflect Welsh-medium education in its current form. The Welsh-medium education sector must be protected and maintained without weakening the current provision or undermining the definition of Welsh-medium education.
- 1.4.4. We believe that there is scope to argue for the establishment of a fourth language category, namely, the category of 'Welsh schools'. Welsh-medium schools are absolutely essential for producing Welsh speakers that have the confidence, proficiency and habit of using the Welsh language across the whole range of their educational and extracurricular experiences at school, even if they do not speak Welsh at home and in their social lives outside of school. Therefore the Welsh-medium sector must be fully protected, maintained and developed, and we believe that there must be clear recognition of the importance of Welsh-medium schools in realising the Bill's objectives.
- 1.4.5. We welcome the fact that Section 17 of the Bill prevents schools from falling from one category to another, and the fact that the Explanatory Memorandum clearly states that schools should not offer less Welsh-medium provision in the future than in the past; this is a vitally important statement. However, it is not clear to what extent progress or decline within an individual category will be measured and monitored, preventing backsliding within categories. For the purposes of planning and measuring progress, we believe that there is scope to consider sub-categories within the current categories, but it must be ensured that these would be sub-categories for the purpose of setting targets and planning a continuum of progress.
- 1.4.6. We agree with the principle of allowing voluntary designation for special schools, and it is assumed that this is also true for pupil referral units? The question remains however as to what happens to individual learners if they attend these institutions temporarily? Will there be an expectation to maintain Welsh language provision for learners who attend these locations full time / part time for an extended period, full time / part time for short periods?
- 1.4.7. In order to ensure that the categories presented in the Bill are fit for purpose, and suitable for ensuring the progress aimed towards, we believe that a careful feasibility study is needed to see if the current education institutions will fit in with the categories, and that they can move either within any sub-categories, or from one category to another.
- 1.4.8. We note that there is no mention in the Bill of all-age schools. It would be appropriate to specify in the Bill how the language categories will relate to those schools – will they operate as primary schools for their primary age learners, and secondary for those of secondary age? There is no mention in the Bill either of pre-statutory education. Mudiad Meithrin and meithrin groups have a key role in planning and creating growth in the demand for Welsh-medium education by ensuring Welsh-medium pre-statutory education and care, and by promoting Welsh-medium education, and encouraging progression from the pre-statutory to the statutory sector. Indeed, attending a meithrin group can inform the decision of many parents in terms of choosing Welsh education where they have not previously considered it. We believe that it would be appropriate to recognise the importance of the sector in the Bill, and it goes without saying that it will be key to include them in the work of implementing elements of the Bill.

- 1.4.9. At first sight, the requirement for all schools to create a Welsh Education Delivery Plan is entirely appropriate and reasonable – it would ensure consistency in the approach across schools, ensure a common method of setting targets and measuring progress, and set clear lines of accountability. Nevertheless, it will mean more bureaucracy for schools that already have to draw up a range of other plans. There is general concern about the workload situation of schools, so it must be ensured that this does not become too burdensome by having to respond through self-evaluation (which forms the basis of the plan) against a range of different performance measurements.
- 1.4.10. In section 15, it is stated that local authorities will need to approve each delivery plan. This will put additional pressures on schools and local authorities and this additional workload needs to be recognised. It must also be ensured that the steps in the 'approval' process do not delay any action within schools.
- 1.4.11. We welcome the commitment in the Bill to formalise late immersion education provision and ensure that that provision is consistent and available in the primary and secondary sector in all parts of Wales. Additional investment will be key in this context, and sharing good practice between schools and learning from the experience of successful schools will be vital.

1.5. Part 4: Planning Welsh language education and learning

- 1.5.1. The content of section 23 of the Bill is applauded in terms of the duty on Ministers to improve and increase the provision of Welsh language education within schools. We note however the need to re-examine the definition of '*Welsh education*' in the Bill, and ensure a clear distinction between "*teaching Welsh*" and "*teaching through the medium of Welsh*". This clarity is absolutely key, and the wording of sections of the Bill will need to be adjusted to reflect the difference between one and the other in order to avoid any ambiguity or misunderstanding.
- 1.5.2. Without doubt, one of the main challenges, if not the main challenge in order to implement the Bill and achieve its objectives, is to ensure an adequate education workforce that has the necessary skills to teach Welsh as a language and as a subject, and to teach through the medium of Welsh. Without the workforce, any target or plan to move schools along a linguistic continuum will be futile. Significant investment and immediate action is required to achieve the objectives. We are not fully confident that there is full recognition of the scale of the challenge, or the level of investment needed in order to achieve the step change required in order to create a qualified and suitable workforce to achieve the aims presented in the Bill. We are also not confident that there is consideration of each option and every possible direct intervention in order to ensure the required progress.
- 1.5.3. There is currently strong emphasis on developing the language proficiency of the current workforce, and strengthening the language skills of those already in the system. While welcoming this, and the investment it is assumed that will follow in order to implement those plans, it must be acknowledged that that will not be a solution in itself, and it will be necessary to be realistic about the timetable for progress if the focus is on that cohort – recognizing the time and commitment it takes to learn a language, and to gain confidence in the language, not to mention honing the skills to teach through the language.
- 1.5.4. In addition to investing in the work of upskilling the current workforce, we believe that there needs to be serious examination of the content of qualification routes to become teachers, ensuring that developing Welsh language skills to a certain level is part of the content of these courses in the future. In order to reach the ambition of moving all schools along the continuum, we also believe that serious consideration should be given to setting an expectation that reaching a certain level of proficiency in Welsh is essential to qualify to teach in Wales in the future.

- 1.5.5. As well as presenting plans to increase the language skills of the current and future education workforce, the challenge of attracting significantly higher numbers to the profession must be recognised and faced, and ensure that they are retained in the profession. Schools face significant challenges in recruitment which need to be addressed urgently. This means that the way the profession is seen must be examined seriously, that fair and attractive working conditions are secured, and that steps are taken to reduce workload.
- 1.5.6. Welsh-medium schools have a key role to play as centres of expertise to support those schools in lower categories to move along the continuum. This could include consultation work, the provision of training, supporting language immersion sessions etc. A number of schools have been doing this on an informal basis throughout the years, but there is an opportunity to recognise the role as part of the planning procedure when introducing the Bill. However, this does not come without cost and planning needs to take place for the funding of this work and the time that will be needed. Sharing good practice between schools, and setting up support structures between schools, will be key to achieving elements of the objectives of the Bill; CYDAG will be in a position to facilitate and support those aspects of the work.

1.6. *Part 5: National Welsh Language Learning Institute*

- 1.6.1. We welcome the intention to establish a National Welsh Language Learning Institute. The establishment of the Institute will ensure clear strategic guidance for lifelong Welsh learning, and its expertise and success in the field of Welsh learning will be a solid foundation for expanding its responsibilities in the context of language training for the education workforce. We trust that centralising the guidance will be a way of ensuring consistency in the provision across the country, while also giving appropriate consideration to meeting local needs. Moving towards the establishment of the Institute as an incorporated organisation will also ensure that provision can be planned for the medium to long term, offering stability to the sector and continuity to successful plans.
- 1.6.2. When establishing the Institute and building on what is currently part of the remit of the National Centre for Learning Welsh, it is absolutely key that the Institute consults and collaborates with schools when developing its strategies and training programmes. It is vital that the voice of the profession and its understanding of the needs, obstacles, challenges and opportunities is included. CYDAG is looking forward to collaborating with the Institute in this context by providing a direct line between schools and the new body, and ensuring a voice for the profession in the planning and implementation processes.

2. 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)

- 2.1. The greatest challenge or obstacle to implementing the provisions of the Bill will undoubtedly be securing an adequate education workforce with the necessary skills to teach Welsh as a language and as a subject, and to teach through the medium of Welsh. A step change is needed to realise the objectives is a big one, and unless ambitious and inventive specific plans are introduced, and the financial investment necessary to lead that step change is secured, other efforts to achieve the objectives of the Bill will be futile. Schools will not be able to move along the continuum without a qualified workforce with the necessary Welsh language skill levels. It is therefore essential that this aspect of the Bill receives prompt attention and adequate investment.
- 2.2. There are specific issues to be considered in the context of post-16 education that will have a direct and indirect effect on achieving the objectives of the Bill, especially so in terms of the viability of sixth forms in our schools. Without a doubt, increasing the numbers studying their A

Level subjects through the medium of Welsh, and increasing the numbers studying Welsh as an A Level subject is key in order to increase the Welsh-medium education workforce of the future. Without that continuity in studying academic subjects through the medium of Welsh, nurturing a confident and skilled education workforce to teach through Welsh in a wide range of subjects will be challenging. Specific steps must be taken to protect and support sixth forms in schools, which will require prompt attention alongside the development of this Bill, and the establishment of Medr.

- 2.3. Transport continues to be an obstacle to the growth of Welsh education, and access to Welsh education in some areas, and the post-16 transport policy for schools is a fundamental problem, which has a direct impact on progress in Welsh education in some areas. It must be ensured that the availability of transport does not affect decisions about the medium of education. We therefore believe that it is necessary to legislate to ensure that free transport is available to Welsh schools, from nursery age to the end of sixth form.

3. The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation

- 3.1. We believe that the powers in the Bill for Ministers to make subordinate legislation are appropriate.

4. Whether there are any unintended consequences arising from the Bill

- 4.1. CYDAG is concerned about the lack of recognition of the importance and significance of Welsh-medium schools and immersion education. As stated earlier in our evidence, Welsh medium education and linguistic immersion are without a doubt the most powerful tools to ensure growth in Welsh speakers who not only know the language but use it. The most fluent and confident speakers in the Welsh language will be generated through Welsh-medium education, and they, in turn, will ensure a Welsh-medium workforce across the sectors and indeed ensure an education workforce for the future. It must be ensured that the Welsh-medium sector does not shrink or weaken as investment and efforts are focused on raising standards in the English-medium and bilingual sector. That could certainly lead to adverse unintended consequences that could see a decline in the Welsh-medium sector.
- 4.2. We need specific and completely unambiguous definitions of school language categories, and similarly it must be ensured that there is no ambiguity when referring to "learning Welsh" and "teaching through the medium of Welsh". Failure to do so would be a significant risk – not only from the point of view of planning and measuring progress, but also as schools define and promote the provision of individual schools, leaving parents open to misunderstanding or being misled when making decisions when choosing schools and medium of their children's education. There is a risk, for example, of parents seeing 'Dual Language' or 'Main Language – English, partly Welsh' schools as schools that will ensure that their children reach higher levels of proficiency and confidence in the language than will be possible within those contexts, and certainly so in the short term. This must be avoided by being completely clear about the extent of Welsh-medium provision, use of the language in the school, and the expected attainment of pupils in the language by the time they are 11 years old and then 16 years old.

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

- 5.1. It goes without saying that implementing the Bill has significant financial implications. The Explanatory Memorandum outlines the Institute's budget, but does not highlight the intended investment to develop the education workforce in the manner necessary to realise the objectives of the Bill. We note this as one aspect that needs prompt and detailed attention,

including consideration of supply costs in the case of upskilling the current workforce and the costs of training a new workforce, including any incentives that are intended to be introduced or offered to trainees. We also note the need to consider the likely costs for continuous professional development pathways in order to maintain and increase the workforce's linguistic proficiency as schools move along the continuum, and the need for the staff to be continuously upskilled in order to enable that to happen in practice.