

Welsh Language and Education (Wales) Bill: Stage 1 Report

December 2024



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Welsh Language and Education (Wales) Bill: Stage 1 Report

December 2024



About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:
www.senedd.wales/SeneddChildren

Current Committee membership:



**Committee Chair:
Buffy Williams MS**
Welsh Labour



Cefin Campbell MS
Plaid Cymru



Gareth Davies MS
Welsh Conservatives



Vaughan Gething MS
Welsh Labour



Tom Giffard MS
Welsh Conservatives



Carolyn Thomas MS *
Welsh Labour

* Carolyn Thomas MS is a Member of the Committee but did not participate in the Stage 1 scrutiny of this Bill.

The following Members attended as substitutes during the scrutiny of the Bill:



Alun Davies MS
Welsh Labour



Lesley Griffiths MS
Welsh Labour

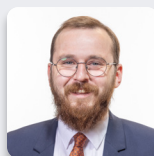


Julie Morgan MS
Welsh Labour

The following Members were also members of the Committee during the scrutiny of the Bill:



Hefin David MS
Welsh Labour



Jack Sargeant MS
Welsh Labour

The following Members attended in accordance with Standing Order 17.49 during this inquiry:



Heledd Fychan MS *
Plaid Cymru



Lee Waters MS *
Welsh Labour

* Heledd Fychan MS and Lee Waters MS, members of the Culture, Communications, Welsh Language, Sport and International Relations Committee.

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Chair's foreword

The Welsh language belongs to everybody in Wales. But is everybody being given the opportunity to speak, use and learn the language? The Welsh Government has set an ambitious target of a million Welsh speakers by 2050, yet recent Census results have suggested a decrease in the number of people saying they are Welsh speakers.

Education has a critical role to play in supporting the development of the language. In the Welsh-medium school sector we have seen real strides forward. It's clear that attending a Welsh-medium school, where children are immersed in the language provides the best route to becoming confident Welsh speakers.

The picture in English-medium schools is more mixed. This Bill seeks to increase and improve language outcomes for all children, but in particular those in English-medium schools. It is also seeking to change the way in which this is strategically managed across Wales, and at a local authority and school level.

We support the general approach taken in the Bill, and think it will be an important tool to deliver the one million target. But it is ambitious, and it will take considerable effort by everyone in the education system, from the Welsh Government, through to local authorities, and down to each school in Wales.

Most importantly, the Welsh Government needs to ensure there is the workforce across Wales to deliver on these ambitions. We know that is currently not the case, and while the Welsh Government is seeking to address this issue, more needs to be done.

We welcome this Bill and agree its general principles. We look forward to continuing our scrutiny of the Bill if the general principles are agreed by the Senedd.

Buffy Williams MS

Chair

Recommendations

Recommendation 1. The Senedd agrees the general principles of the Welsh Language and Education (Wales) Bill.....Page 19

Recommendation 2. The Welsh Government commits to bringing forward a more detailed Workforce Impact Assessment. This should be developed with meaningful engagement from the education sector, and its workforce representatives. This Assessment should be used in the development of the Workforce Plan and then should be updated in light of the Workforce Plan. (See recommendation 3).....Page 42

Recommendation 3. The Welsh Government identifies the most appropriate legislative mechanism to place a duty on the Welsh Ministers to prepare a statutory education workforce plan which includes targets, and a timeframe, for recruitment and retention. This workforce plan should cover all aspects of the education workforce, and look in particular at shortage areas, as well as likely future need, and the ways in which this need will be addressed. It should take account of the variations across Wales.Page 44

Recommendation 4. The Welsh Government sets out how it will seek to make clearer the distinction between teaching Welsh as a subject, and teaching through the medium of Welsh in the definition of Welsh language education.Page 114

Recommendation 5. The Welsh Government provides greater clarity on each of the school language categories, in particular the likely amount of Welsh-medium provision in both Primarily Welsh language and Dual Language school categories. In doing this, the Welsh Government should also provide greater clarity as to what the Dual Language school category means. Additionally, we ask the Welsh Government to consider the evidence and views we have heard calling for an additional category to mirror the current non-statutory 3P category.....Page 116

Recommendation 6. The Welsh Government should set out clearly what school activities would be counted towards meeting the 10 per cent minimum of Welsh language provision. In doing so, the Welsh Government should outline whether it still intends to increase the amount of education delivered through the medium of Welsh above that of teaching Welsh as a subject.Page 117

Recommendation 7. The Welsh Government should provide clarity on whether the Welsh Language Education Delivery Plans can be incorporated into existing

School Development Plans, or whether schools will have to produce separate stand alone plans..... Page 117

Recommendation 8. The Welsh Government should clarify the role of the tertiary education sector in delivery of the National Framework. In doing so they should specify what role Medr will play. This could be done in the Bill’s Explanatory Memorandum..... Page 137

Recommendation 9. The Welsh Government should consider how the Bill can be amended to include tertiary education in the definition of Welsh language education for the purpose of the National Framework. Page 137

Recommendation 10. The Welsh Government strengthens the Bill’s provisions on Local Strategic Plans to ensure that they will take account of youth services and other mechanisms to encourage opportunities for Welsh to be used in the community.....Page 138

Recommendation 11. The Welsh Government should provide greater clarity as to how the National Institute will fit into the wider tertiary education sector, in particular how the roles of Medr, Coleg Cymraeg Cenedlaethol and the National Institute will interact..... Page 152

1. Introduction

The Bill was introduced in July 2024. Our scrutiny has consisted of oral and written evidence, and citizen engagement. While we have focused on the policy aspects of the Bill, other Senedd committees have looked at the financial and constitutional aspects.

1. On 15 July 2024, Jeremy Miles MS, the then Cabinet Secretary for Economy, Energy and Welsh Language introduced the Welsh Language and Education (Wales) Bill (“the Bill”)¹, and the accompanying Explanatory Memorandum². The Statement of Policy Intent for Subordinate legislation³ was also published.
2. On 16 July 2024, Eluned Morgan MS, the then Cabinet Secretary for Health and Social Care made a statement to Plenary on the introduction of the Bill.⁴ On 17 September 2024, the First Minister wrote to the Llywydd to advise that the Member in Charge was now Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language (“the Cabinet Secretary”).⁵
3. On 25 June 2024 the Business Committee agreed to refer the Bill to our Committee to consider the general principles of the Bill. On 9 July 2024, they agreed that we should report to the Senedd by 13 December 2024.⁶

Our approach

4. On 17 July 2024 we agreed our approach to scrutiny, including the terms of reference.

¹ [Welsh Language and Education \(Wales\) Bill, as introduced, 15 July 2024](#)

² [Welsh Government, Explanatory Memorandum as introduced, 15 July 2024](#)

³ [Welsh Government, Statement of Policy Intent for Subordinate Legislation to be made under this Bill, 15 July 2024](#)

⁴ Jeremy Miles MS had resigned from the Cabinet on 16 July 2024.

⁵ [Letter from First Minister to Llywydd, Member in Charge, Government Bill, 17 September 2024](#)

⁶ [Business Committee, Timetable for consideration, The Welsh Language and Education \(Wales\) Bill, July 2024](#)

Terms of reference

The general principles of the Welsh Language and Education (Wales) Bill and the need for legislation to deliver the stated policy intention. In coming to a view on this you may wish to consider addressing the individual Parts of the Bill:

- Part 1: Promotion and facilitation of use of the Welsh Language
- Part 2: Describing Welsh Language Ability
- Part 3: Welsh Language Education
- Part 4: Planning Welsh Language Education and Learning
- Part 5: National Institute for Learning Welsh
- 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)

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

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).

Matters relating to the competence of the Senedd including compatibility with the European Convention on Human Rights

Whether there are any unintended consequences arising from the Bill; and

Any matter related to the quality of the legislation.

5. While the Bill was remitted to our Committee, we were aware that the Culture, Communications, Welsh Language, Sport and International Relations Committee (“the Culture Committee”) would have a keen interest in the Bill. We therefore invited them to participate in our Stage 1 scrutiny.⁷ The Culture

⁷ [Letter from the Chair, Children, Young People and Education Committee \(“CYPE Committee”\) to Chair, Culture, Communications, Welsh Language, Sport and International Relations Committee \(“Culture Committee”\), Welsh Language and Education \(Wales\) Bill, 5 August 2024](#)

Committee agreed to send two Members, Heledd Fychan MS and Lee Waters MS to participate in our Stage 1 scrutiny.⁸ We are grateful for their time and contribution to our work.

6. The written consultation was launched on 18 July, and closed on Friday 11 October. 32 responses were received. Details of who responded are available in Annex 2. All consultation responses are available on the Committee's website.

7. The Welsh Government provided us with a private technical briefing on 17 July. We held 16 oral evidence sessions between September and October. Details of these are available in Annex 1.

8. We wanted to undertake some citizen engagement, despite the limited time for this in Bill scrutiny timetables. We therefore undertook some small scale engagement. During the 2024 National Eisteddfod in Pontypridd, we held a drop in session where people could share their views. We published a summary note of this engagement.⁹ We also held a survey to seek the views of children and young people in English-medium schools in Wales about their experiences of learning Welsh. We have published analysis of these findings.¹⁰

Other committees' consideration of the Bill.

9. The Finance Committee took oral evidence from the Cabinet Secretary on 23 October 2024. They published their report on 13 December 2024.

10. The Legislation, Justice and Constitution Committee took evidence from the Cabinet Secretary on 21 October 2024. They published their report on 10 December 2024.

⁸ [Letter from the Chair, Culture Committee to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 13 September 2024](#)

⁹ [CYPE Committee, Engagement summary - National Eisteddfod, Welsh Language and Education \(Wales\) Bill, 30 September 2024](#)

¹⁰ [CYPE Committee, Welsh Language and Education \(Wales\) Bill, Survey findings, October 2024](#)

2. General principles and the need for legislation

There is broad support for the general principles of the Bill, although many are concerned about implementation. There were different opinions as to how bold the legislation is. We believe the case has been made for the general principles of the Bill, and the need for legislation.

Background

11. In 2017, the Welsh Government published its Welsh Language Strategy, “Cymraeg 2050: A million Welsh speakers”. The strategy set two overarching targets:

- *The number of Welsh speakers to reach 1 million by 2050.*
- *The percentage of the population that speak Welsh daily, and can speak more than just a few words of Welsh, to increase from 10 per cent (in 2013-15) to 20 per cent by 2050.”*

Cymraeg 2050 also has specific objectives on education including:

- increasing the proportion of each school year group receiving Welsh-medium education from 22 per cent in 2015/16 to 30 per cent by 2031, and 40 per cent by 2050;
- transforming how Welsh is taught to all learners so that by 2050 70 per cent of learners report they can speak Welsh by the time they leave school;
- increasing the number of primary and secondary teachers who can teach through the medium of Welsh (and teach Welsh as a subject in secondary schools); and

- reforming the post-16 Welsh-medium and bilingual education and skills offer.¹¹

12. The Welsh Government’s Programme for Government published in 2021 committed to “legislate to strengthen and increase our Welsh language education provision.”¹² The Co-operation Agreement between the Welsh Government and Plaid Cymru which was in place between December 2021 and May 2024 included this commitment:

“Introduce a Welsh Language Education Bill, which together with more immediate non-legislative work, will strengthen Welsh in Education Strategic Plans; set new ambitions and incentives to expand the proportion of the education workforce who can teach and work through the Welsh language; establish and implement a single continuum of Welsh language learning; enable existing schools to move into a higher Welsh language category and incentivise the increase of Welsh-medium provision in all education settings.”¹³

Policy objectives

13. The Explanatory Memorandum states that the Bill’s “main objective” is to contribute to one million Welsh speakers by 2050 by ensuring that “all pupils are independent Welsh language users, at least, by the time they reach the end of compulsory school age.” The long-term aim is that pupils will reach at least level B2 of the Common European Framework of Reference for Languages. (“CEFR”) in oral skills.¹⁴ Although initially for pupils in schools in the Primarily English Language, partly Welsh category the objective will be reaching A1 / A2.

14. Schedule 1 to the Bill outlines the different levels of Welsh ability A1/A2 is classed as a “Basic Welsh Language user” where someone can understand familiar everyday expressions, and can communicate in a simple way. B1/B2 is classed as an “Independent Welsh user” where someone can communicate with more fluency. C1/C2 is classed as a “Proficient Welsh user” where someone has a high level of fluency.

¹¹ [Welsh Government. Cymraeg 2050: A million Welsh speakers. 10 July 2017.](#)

¹² [Welsh Government. Programme for Government -- Update. 7 December 2021](#)

¹³ [Welsh Government. The Co-operation Agreement. July 2021.](#)

¹⁴ [Welsh Government. Explanatory Memorandum. paragraph 11. July 2024](#)

15. The Bill as currently drafted does a number of things, including:

- Placing the target of one million Welsh speakers in Wales by 2050 and the setting of other targets on a statutory basis.
- Establishing a standard method of describing Welsh language ability, through a statutory code, which will be based on the CEFR.
- Designating three categories of school based on the amount of Welsh language education provided, and setting Welsh language goals for each of these categories.
- Linking linguistic planning at a national, local and school level.
- Establishing a National Institute for Learning Welsh (“the National Institute”), which will be responsible for supporting people of all ages to learn Welsh.¹⁵

16. The Explanatory Memorandum states that “the education system is integral” to meeting the Cymraeg 2050 target. Achieving this target means both growing Welsh-medium education and also increasing Welsh language provision in English and bilingual schools.¹⁶

The need for legislation

17. The Explanatory Memorandum says that the Bill is “not the starting point” but is the “next natural step” in meeting the ambitions of Cymraeg 2050. It also acknowledges that the Bill is “only one part of the bigger picture” outlining other “critical” steps that are necessary. These include secondary legislation flowing from the Bill; non-legislative actions to increase the capacity of the education workforce; and setting ambitious targets.¹⁷

18. Since the Bill was introduced, the Welsh Government’s Commission for Welsh-speaking Communities published its report saying that education is “the policy area with the greatest potential for creating new Welsh speakers.” The Commission said that “no other policy field has as much influence on the ability to acquire and use the language.”¹⁸

¹⁵ [Welsh Government. Explanatory Memorandum, paragraph 14, July 2024](#)

¹⁶ [Welsh Government. Explanatory Memorandum, paragraphs 3.4-3.5, July 2024](#)

¹⁷ [Welsh Government. Explanatory Memorandum, paragraphs 3.13-3.15, July 2024](#)

¹⁸ [Commission for Welsh-speaking Communities. Empowering Communities, strengthening the Welsh Language, 8 August 2024](#)

19. Others who highlighted the important role education will play included:

- CYDAG¹⁹;
- Cymdeithas yr Iaith²⁰;
- Estyn²¹;
- Medr²²;
- Mudiad Meithrin²³;
- NAHT²⁴;
- Professor Enlli Thomas²⁵;
- TUC Cymru²⁶; and
- UCAC²⁷.

20. The Cabinet Secretary said the education system must be “at the centre of that effort” to achieve the target.²⁸

21. Stakeholders were broadly in agreement that legislation was needed to deliver on the policy objectives. The Welsh Language Commissioner called it “necessary” and said that it had the “potential to make a substantial contribution” to meeting Cymraeg 2050.²⁹ Others who also agreed legislation was needed included:

- ADEW and WLGA³⁰;
- Coleg Cymraeg Cenedlaethol³¹;

¹⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 222](#)

²⁰ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

²¹ [Written evidence, WLE 11, Estyn](#)

²² [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 2.1](#)

²³ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 1.3](#)

²⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 12](#)

²⁵ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 116](#)

²⁶ [Written evidence, WLE 27, TUC Cymru](#)

²⁷ [Written evidence, WLE 09, UCAC, paragraph 1.1](#)

²⁸ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 203](#)

²⁹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 1.1](#)

³⁰ [Written evidence, WLE 12, ADEW and WLGA](#)

³¹ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.1](#)

- CYDAG³²;
- Estyn³³;
- Golingo³⁴;
- Professor Enlli Thomas³⁵;
- RhAG³⁶;
- The National Centre for Learning Welsh³⁷; and
- UCAC³⁸.

22. Professor Enlli Thomas said the “sound legislative precedent provided by the Bill” means it is likely that the Welsh Government’s aims would be “taken seriously and jointly adopted” by everyone, including local government, education and families.³⁹ A view shared by Coleg Cymraeg Cenedlaethol who felt that it would “lay the foundation” for the collaboration that is needed.⁴⁰

23. RhAG believed that the linking of education and Welsh in law creates “real opportunities to set in law the ability to deliberately plan for the further development of Welsh education.”⁴¹

General principles

24. Overall there was broad support for the general principles of the Bill although some stakeholders raised a number of issues including:

- implementation concerns, in particular around financial resources and staffing;
- the applicability of the CEFR in a Welsh context;
- the definition used in the Bill to describe Welsh language education;

³² [Written evidence WLE 32 CYDAG paragraph 1.11](#)

³³ [Written evidence WLE 11 Estyn](#)

³⁴ [Written evidence WLE 25 Golingo](#)

³⁵ [Written evidence WLE 02 Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

³⁶ [Written evidence WLE 14 RhAG paragraphs 1.7 and 2.1](#)

³⁷ [CYPE Committee 17 October 2024 Record of Proceedings paragraph 13](#)

³⁸ [Written evidence WLE 09 UCAC paragraph 1.4](#)

³⁹ [Written evidence WLE 02 Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁴⁰ [Written evidence WLE 16 Coleg Cymraeg Cenedlaethol paragraph 1.1](#)

⁴¹ [Written evidence WLE 14 RhAG paragraphs 1.7 and 2.1](#)

- the breadth of the Primarily Welsh language category;
- areas missing from the Bill that have a direct relation to education, such as the early years sector, and learner travel;
- how the National Framework applies to the post-16 education sector;
- the role of the post-16 education sector and how they will interact with the National Institute for Learning Welsh;
- links between compulsory schooling and post 16 education choices; and
- the importance of community transmission, and opportunities to use Welsh outside of school settings.

We look at these in more detail throughout this report.

25. One of the issues we explored was the ambition of the Bill. For some, such as the Welsh Language Commissioner it is an “exciting ... and a vital ...” development.⁴² She said the Bill represented a “historic turning point” which includes “powerful legislative mechanisms”.⁴³ UCAC said that the Bill was a “key turning point”.⁴⁴ Professor Enlli Thomas said it was “far-reaching and groundbreaking”. She added that if “we get this right, then we have a golden opportunity ...” to put Welsh on a sustainable footing.⁴⁵

26. UCAC said the aim for every pupil to leave compulsory education as an independent user of Welsh was “commendable and ambitious.”⁴⁶ While the National Training Federation for Wales said the Bill was “a significant step towards the revitalisation” of Welsh.⁴⁷ Coleg Cymraeg Cenedlaethol also described it as a “significant step forward”.⁴⁸ TUC Cymru called the Bill’s aims “ambitious”,⁴⁹ a term also used by the National Centre for Learning Welsh.⁵⁰ Estyn said the Bill will be “very powerful in moving the agenda forward.”⁵¹

⁴² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 8](#)

⁴³ [Written evidence, WLE 07, Welsh Language Commissioner, paragraphs 14-15](#)

⁴⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 148](#)

⁴⁵ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 116](#)

⁴⁶ [Written evidence, WLE 09, UCAC, paragraph 11](#)

⁴⁷ [Written evidence, WLE 15, National Training Federation for Wales](#)

⁴⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 10](#)

⁴⁹ [Written evidence, WLE 27, TUC Cymru](#)

⁵⁰ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 13](#)

⁵¹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 258](#)

27. However, for others it was not ambitious enough. Cymdeithas yr Iaith welcomed the Bill, but wanted to see “significant changes” made to it.⁵²

“The Welsh language belongs to everyone in Wales, from all walks of life, and everyone should be entitled to become confident Welsh speakers. The Bill in its current form will not achieve that, even in the long term.”

They called for a statutory duty to be added to the Bill for all schools to eventually become Welsh-medium schools. They said that despite the Welsh Government’s “good intentions” they were concerned that the Bill would just “maintain the status quo”. They cited the recent 2021 Census data which showed a drop in people indicating they were Welsh speakers, and the low levels of Welsh being used in the home, as factors driving their calls for a more ambitious approach.⁵³

28. RhAG said that while the Bill showed “clear progress” there was “backslide in places.” They said the Bill should have at its core the principle that all learners in Wales have “default access to Welsh-medium education.”⁵⁴

29. For others, the Bill is too ambitious or they do not feel the time is right. ASCL Cymru said they supported the development of the Welsh language in education but they do not support the Bill’s introduction at the current time. This was due to financial, workforce and workload pressures across the system.⁵⁵ (We will look at these aspects in more detail in the next Chapter.)

30. NAHT Cymru were supportive of the Bill’s aspirations but were concerned about implementation, in particular the expectations on schools to deliver. They said they could not currently support the Bill as it was unclear what the impact would be on schools and the workforce.⁵⁶

31. The Cabinet Secretary recognised the “spectrum” of views on the Bill, but told us that it strikes a “sensible balance”. He was clear that the Bill has a “very ambitious aim at the heart of it.”⁵⁷ He did not agree that the Bill lacked ambition, saying that the aims were “radical and ambitious”.⁵⁸

⁵² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 336](#)

⁵³ [Written evidence, WLE.06, Cymdeithas yr Iaith](#)

⁵⁴ [Written evidence, WLE.14, RhAG, paragraph 2.1](#)

⁵⁵ [Written evidence, WLE.10, ASCL Cymru, paragraph 3](#)

⁵⁶ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 12](#)

⁵⁷ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 5](#)

⁵⁸ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 8](#)

32. In responding to the views that the Bill was too ambitious, he emphasised the incremental nature of the “very ambitious journey”.

“... it is a journey, and the journey is designed to be incremental, and to be flexible, to enable people to come on that journey with us. And it’s a journey that extends well over a decade. For those mainly English-medium schools, who apply for and obtain two extensions to the time period that is allowed in the Bill for achieving a 10 per cent minimum, that is 2033. So, it’s well over a decade that schools will have to reach the ambitious targets that the Bill lays out.

And along that journey, there will be a series of milestones that are particularly designed to help those who will find themselves discharging the obligations of the Bill in the classroom. So, the journey begins with the production of a code, which has to be produced by the Welsh Government by July 2026. The athrofa comes into being in July 2027. The national framework is produced in July and August of 2027. The Welsh in education strategic plans are in 2028. And it’s August 2029 before any headteacher has to do anything at all under the terms of this Bill. That is five years from the Bill to the actual school delivery plans having to be prepared—and that’s not executed, that’s prepared. There is a further year before they will have to be put into practice.”⁵⁹

As a result, the Cabinet Secretary told us he believed that the Bill struck the right balance between the different viewpoints.⁶⁰

Our view

33. There is clear and broad support for the general principles of the Bill. But we acknowledge that for some the Bill is currently too ambitious because of workforce capacity and financial constraints, and for others it does not go far enough. Between these viewpoints, there was general agreement.

34. After careful consideration, we support the general principles of the Bill, and believe the Senedd should agree them. We believe that the Bill would benefit from greater clarity, and that more work is needed around the implementation of

⁵⁹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 6-7](#)

⁶⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 8](#)

the Bill, particularly in relation to the workforce. These are all issues we will explore in more detail throughout the report.

Recommendation 1. The Senedd agrees the general principles of the Welsh Language and Education (Wales) Bill.

35. The Bill is ambitious, and needs to be to deliver Cymraeg 2050. It asks a lot of all involved, from the Welsh Government to local authorities, and in particular, schools and the education workforce. By being clear on the ambitions and creating the statutory targets and frameworks, we believe it is a golden opportunity to make the step change that is needed to achieve the target of one million Welsh speakers.

36. To achieve this, however, there is a clear need for this legislative commitment to be backed by the Welsh Government financially and via other means. This is a commitment that will need to be made not just by the current Welsh Government, but future governments. Placing this commitment in legislation makes it more likely that it will be maintained. It will take far longer than a single Senedd term to get to where we all agree we need to be. This is why it is important to enshrine this commitment in legislation, as well as creating statutory frameworks and processes that will help deliver the commitment.

37. This is not the first and is unlikely to be the last time when education is being used as a key mechanism to deliver wider policy goals. This demonstrates the hugely important role schools play. Not just in delivering high quality education, but also the wider role they have in the lives of their learners; workforce and wider community. But we must acknowledge these additional calls have wider consequences for the education system, and in particular create pressures on individual schools, local authorities and the education workforce. We look at workforce and capacity issues in the next Chapter.

3. Workforce and capacity issues

Having the right number of staff with the right level of skills to deliver the aims of this Bill is critical to its success. The education workforce currently faces a number of challenges, which need to be addressed to ensure this Bill can be delivered. Some of these issues are outside the scope of the Bill.

38. Even before this Bill was introduced, we were acutely aware of issues surrounding teacher recruitment and retention. We wrote to the Cabinet Secretary for Education about these issues, ahead of a potential inquiry. We asked specifically about Welsh language capacity. In responding, the Cabinet Secretary highlighted the 10-year Welsh in Education Workforce Plan (“the Workforce Plan”), published in May 2022. This plan, she wrote, was seeking to address four key issues:

- *Increasing the number of Welsh and Welsh-medium teachers*
- *Increasing the number of Welsh-medium teaching assistants*
- *Developing the Welsh language skills of all practitioners*
- *Increasing leadership capacity in the Welsh-medium sector and developing the leadership of Welsh in all schools.*”

39. She said that while progress was being made in increasing the number of Welsh-medium teachers, it “remains a huge challenge.” There has been a particular focus on recruitment for Welsh-medium secondary teachers. Alongside this, she said there has been work to support “all practitioners to develop their Welsh language skills”. She acknowledged that the workforce would be “crucial to the realisation of the aims ... in the Bill and the steps that we are taking will support the implementation.”⁶¹

⁶¹ [Letter from Cabinet Secretary for Education to Chair, CYPE Committee, 6 September 2024](#)

40. One of the predominant themes throughout our evidence gathering was the importance of the workforce in the successful implementation of the Bill and the achievement of the policy objectives.

41. Professor Enlli Thomas said that the education workforce was “integral to the Bill’s aims and objectives.”⁶² This view was supported by:

- ASCL⁶³;
- ColegauCymru⁶⁴;
- Medr⁶⁵; and
- the National Centre for Learning Welsh⁶⁶.

42. UCAC said “it cannot be overemphasised how crucial” the workforce is.⁶⁷ Coleg Cymraeg Cenedlaethol said the Bill’s ambitions were “dependent” on the workforce. They said a “bigger supply” would be needed.⁶⁸

43. CYDAG called workforce matters as “one of the main challenges, if not the main challenge”. They said without the workforce, any plans would be “futile”. They were concerned that there is not:

“... 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.”⁶⁹

They felt that neither recruitment nor upskilling current staff were given sufficient recognition within the Bill.⁷⁰

⁶² [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁶³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 111](#)

⁶⁴ [Written evidence, WLE 20, ColegauCymru](#)

⁶⁵ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 2.6](#)

⁶⁶ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 3.2](#)

⁶⁷ [Written evidence, WLE 09, UCAC, paragraph 2.1](#)

⁶⁸ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 2.2](#)

⁶⁹ [Written evidence, WLE 32, CYDAG, paragraph 1.5.2](#)

⁷⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 299](#)

44. The Welsh Language Commissioner said the “obvious obstacle” to successful implementation of the Bill was increasing the bilingual workforce. She said nothing can “go further than the capacity of the workforce to offer and develop their Welsh language provision.”⁷¹ ASCL Cymru said meeting Cymraeg 2050 necessitates “a significant increase” in Welsh language capacity.⁷² ADEW and WLGA cited recruitment, retention and training of staff with Welsh language skills as one of the greatest barriers to the Bill’s implementation.⁷³

45. Estyn called on the Welsh Government to take “purposeful and swift action to address the shortfalls in the education workforce.”⁷⁴ The Education Workforce Council said the workforce challenges should not be “underestimated.”⁷⁵

46. Cymdeithas yr Iaith said the Bill does not deal “in a meaningful way with the workforce” and that this “risks undermining the objectives of the Bill altogether.”⁷⁶ RhAG also felt that the Bill did not consider workforce issues “sufficiently.”⁷⁷ Medr said that the Bill did not “sufficiently recognise” the workforce that was needed or “the financial implications” of the workforce requirements. They called for this to be recognised within the Bill.⁷⁸

47. The Cabinet Secretary said that as with other aspects of the Bill he has sought to balance “reasonable ... but also ambitious” expectations. He acknowledged the strain the system was under, but:

“... what we’re trying to do is to seek the position on the spectrum where we don’t lose people’s confidence, so people don’t think, ‘Well, this is impossible to do, so there’s no point in trying’, but that we convince them that they will perhaps need to do a little bit more, but that there are things that they can do with the support that the Bill will now provide people. Not everyone will agree that we’ve decided on the best point, but what we’ve tried to do is to be reasonable and ambitious at the

⁷¹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.1](#)

⁷² [Written evidence, WLE 10, ASCL Cymru, paragraph 10](#)

⁷³ [Written evidence, WLE 12, ADEW and WLGA](#)

⁷⁴ [Written evidence, WLE 11, Estyn](#)

⁷⁵ [Written evidence, WLE 23, Education Workforce Council](#)

⁷⁶ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁷⁷ [Written evidence, WLE 14, RhAG, paragraph 3.18](#)

⁷⁸ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 2.6](#)

same time, and to find those things that we think that, with help and with effort, can be achieved in Wales.”⁷⁹

48. He said his “starting point is to recognise that the single biggest change that the Bill will mobilise to meet its objectives is what will be needed in the workforce”.⁸⁰

49. He did not accept that the Bill is silent on the workforce:

“... workforce obligations run all the way through the Bill. There are obligations on Welsh Ministers in producing the national framework, of various sorts, to include workforce considerations there. The WESPs will have obligations inside them to deal with these matters. The athrofa is designed to be a focus on developing the workforce; there will be obligations there. Workforce runs like a stick of rock through the whole of the Bill.”⁸¹

But he did say he was “open-minded about a number of suggestions” in strengthening the Bill on the workforce “while continuing to make the point that it’s there in every part of the Bill already.”⁸²

The impact of the Bill on the workforce

50. The education system in Wales has been undergoing significant change over recent years, with the introduction of the Curriculum for Wales and a reformed ALN system. We have been considering the implementation of both in our ongoing work on “Implementation of Education Reforms”.

51. These challenges have been compounded by the COVID-19 pandemic and its impacts, as well as financial challenges facing all public services. This challenging context was highlighted by a number of stakeholders as adding increasing pressure to the education workforce.

- ADEW and WLGA⁸³;
- ASCL Cymru⁸⁴;

⁷⁹ CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 316

⁸⁰ CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 10

⁸¹ CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 13

⁸² CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 14-15

⁸³ Written evidence, WLE 12, ADEW and WLGA

⁸⁴ Written evidence, WLE 10, ASCL Cymru, paragraph 20

- Cymdeithas yr Iaith⁸⁵; and
- TUC Cymru⁸⁶.

52. NAHT said:

“... 50 per cent of people that come into initial teacher training leave within the first five years. Well, that’s a damning indictment of the system. What we need to do is make sure that we promote being a teacher as the best career possible. ... We need to make sure that we create the conditions of service where teachers and leaders can thrive, where it is a positive experience, where they’re allowed to focus on what they went into it for, which is teaching and learning, and not a box-ticking exercise of assessment and accountability. Of course, there must be accountability—we’re talking about education—but not overburdensome accountability. If we create the conditions of service, and we do that right, and we start to see an increase in people coming into the profession, that will help, and that’s all we can talk about.”⁸⁷

53. A number of stakeholders wanted to see a detailed Workforce Impact Assessment to accompany the Bill. These included:

- ASCL Cymru⁸⁸;
- NAHT⁸⁹;
- NEU Cymru⁹⁰; and
- TUC Cymru⁹¹.

54. Some of the issues they wanted to see covered in such an impact assessment included:

“... the pressures created by the need to cover regular staff absence for training, including availability of supply cover, not

⁸⁵ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁸⁶ [Written evidence, WLE 27, TUC Cymru](#)

⁸⁷ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 116](#)

⁸⁸ [Written evidence, WLE 10, ASCL Cymru, paragraph 17](#)

⁸⁹ [Written evidence, WLE 08, NAHT](#)

⁹⁰ [Written evidence, WLE 21, NEU Cymru](#)

⁹¹ [Written evidence, WLE 27, TUC Cymru](#)

adding supply duties to leaders workload, impact on pupils and parental responses to teacher absence; an assessment of the cost of ensuring that all training is fully funded; the workload associated with any tracking and reporting of language progress against targets, both for staff and pupils; the impact on school management in encouraging and supporting staff and pupils; the interplay between this policy and other new initiatives for leadership capacity and overload; and questions about how schools will be held to account and by whom, including mitigation of any unintended consequences or perverse incentives flowing from this.”⁹²

55. While ASCL Cymru called for the impact assessment to include:

“The interventions required to improve Welsh language skills amongst the existing workforce so that they have the level of confidence and skill required for high quality Welsh medium provision

- The nature and level of intervention required*
- The time allocation required to deliver interventions*
- Appropriate funding for provision*

As the provision outlined above does not exist within the current workload, directed hours or finances of school, it would be necessary for it to be funded in addition to the current level of schools’ allocated financial and time budgets.”⁹³

56. ASCL Cymru said the impact assessment needed to be done “urgently”. They said it had not been done before the Bill was published and needs to be done “retrospectively.”⁹⁴ NEU said that the Welsh Government had previously committed to doing a workload impact assessment before the introduction of a Bill or new policy.⁹⁵

⁹² [Written evidence WLE.08.NAHT](#)

⁹³ [Written evidence WLE.10.ASCL Cymru paragraph 19](#)

⁹⁴ [Written evidence WLE.10.ASCL Cymru paragraph 17](#)

⁹⁵ [CYPE Committee 2 October 2024, Record of Proceedings paragraph 230](#)

57. TUC Cymru said that the Bill should include a requirement on individual schools to produce workload impact assessments in relation to the Bill's provisions.⁹⁶

58. The Integrated Impact Assessment which was published alongside the Bill included a section on the "Impact of the Bill on the Workload of Education School Staff."⁹⁷ This impact assessment was not included in the Explanatory Memorandum.

59. We asked the Cabinet Secretary why it was not included. He said it was "an experimental impact assessment. The Bill was used to pilot the process." He told us that teaching unions were involved in its preparation. He also expected that later versions of the Explanatory Memorandum will have "further information ... around that workload impact assessment, as a result of the ongoing conversations that we are having."⁹⁸

60. NASUWT were "concerned" about the broader issues of the impact of the Bill on the workforce. They wanted assurances from the Welsh Government that it "will militate against the possibility of the proposals impacting adversely on the education workforce." Their concerns were "heightened by the lack of detail" within the Bill on a number of issues, including resources.⁹⁹

61. UCAC said it was important that teaching "is appealing, with the best possible working terms and conditions." They called for "immediate attention to teachers' workload." They said it was "quite clear" that they currently face "an excessive workload." They called for support throughout a teacher's career.¹⁰⁰ CYDAG agreed that more needed to be done to ensure fair terms and conditions, as well as workload reduction. They said "the way the profession is seen must be examined seriously".¹⁰¹

62. NEU Cymru said there would need to be an increase in non-contact / planning time for teachers.¹⁰²

⁹⁶ [Written evidence, WLE 27, TUC Cymru](#)

⁹⁷ [Welsh Government, Welsh Language and Education \(Wales\) Bill, Integrated Impact Assessment, July 2024, Annex F](#)

⁹⁸ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 10-11](#)

⁹⁹ [Written evidence, WLE 03, NASUWT, paragraphs 4-6](#)

¹⁰⁰ [Written evidence, WLE 09, UCAC, paragraph 2.3](#)

¹⁰¹ [Written evidence, WLE 32, CYDAG, paragraph 1.5.5](#)

¹⁰² [Written evidence, WLE 21, NEU Cymru](#)

Workforce planning

63. Some stakeholders highlighted the current Workforce Plan (see paragraph 36.) UCAC acknowledged that “some work” had been done as a result, but that more work was needed, with a need to ensure the actions in the plan “are realised.”¹⁰³ Estyn also appreciated the work that had begun but said it had to be “built upon”. They said that “it will be necessary to ensure a clear strategy for developing a professional workforce with the necessary language skills.”¹⁰⁴

64. The Welsh Language Commissioner said the Workforce Plan should be revisited in the context of the Bill. She said that interventions needed to be “developed and delivered on a much larger scale.” While she believed that the establishment of the National Institute would be important, it would need to be “combined with a comprehensive education workforce strategy that reflects the ambition of the Bill, and that would give clear context and direction to the work of the Institute and other key partners.”¹⁰⁵

65. Coleg Cymraeg Cenedlaethol agreed with the Commissioner, and her calls for a duty to be placed upon the Welsh Ministers “to produce and publish a Welsh in Education Workforce Plan as part of the National Framework for Welsh Language Education and Learning Welsh.”¹⁰⁶ They said that the current Workforce Plan was an “important development but it hasn’t sparked the kind of fundamental change that we need to see in numbers. ... something needs to change”.¹⁰⁷

66. The Education Workforce Council called for the Workforce Plan to be reviewed so that the actions are “sufficiently ambitious” to meet the Bill’s objectives. They believed that a “comprehensive” plan would also help “give clear context and direction” to the new National Institute (see Chapter 8) and other “key partners”. They also wanted to see any strategy “reflect the roles of teachers at all levels”, in particular early years provision.¹⁰⁸

67. Cymdeithas yr Iaith said the current Workforce Plan was “completely inadequate” and that it “totally underestimates the scale of the task of achieving an adequate workforce for the future.”¹⁰⁹

¹⁰³ [Written evidence, WLE 09, UCAC, paragraph 2.2](#)

¹⁰⁴ [Written evidence, WLE 11, Estyn](#)

¹⁰⁵ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.2](#)

¹⁰⁶ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 2.4](#)

¹⁰⁷ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 96](#)

¹⁰⁸ [Written evidence, WLE 23, Education Workforce Council](#)

¹⁰⁹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

68. Many stakeholders raised the simple need for more teachers who can teach through the medium of Welsh, and those who can teach Welsh as a subject. Dyfodol i'r Iaith highlighted the Welsh Government's own estimates of the additional number of teachers needed:

*"... an additional 1,000 primary teachers to teach through the medium of Welsh by 2031 and a further 1,300 by 2050. In the secondary sector the Government's estimate was that an additional 400 Welsh teachers were needed by 2031 and a further 300 by 2050. In addition to these the Government says an additional 1,400 Welsh-medium teachers are needed in the secondary sector by 2031 and a further 1,000 by 2050."*¹¹⁰

69. NASUWT Cymru also highlighted the current "severe shortages" of teachers who can deliver education through the medium of Welsh which will impact on the Bill's implementation. They said the Welsh Government should "concentrate on the huge staffing crisis already in recruiting those proficient in Welsh, at all levels of the education sector (early years to FE and HE)." They said that recruitment "depends on appropriate resourcing".¹¹¹

70. NEU Cymru said they "repeatedly asked that the Welsh Government undertakes a comprehensive audit of education professionals' Welsh Language ability, so that they know the recruitment and training needs of the workforce. Without this, it is impossible to develop a realistic costings for the Bill."¹¹²

71. The Children's Commissioner highlighted the importance of a diverse teaching body. She said the "lack of diversity among Welsh-speaking teachers, particularly regarding representation for LGBTQ+, Black, Asian, and ethnic minority individuals, is a significant concern." She said having a diverse teaching body is "crucial for all students to see themselves reflected in their educators" as well as ensuring children feel included in school. She called for workforce plans 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."¹¹³

72. The need for more investment in the workforce was raised by a number of respondents, including Mudiad Meithrin¹¹⁴, and Estyn¹¹⁵. The Welsh Language

¹¹⁰ [Written evidence, WLE 01 Dyfodol i'r Iaith, paragraph 4](#)

¹¹¹ [Written evidence, WLE 03, NASUWT, paragraph 9b](#)

¹¹² [Written evidence, WLE 21, NEU Cymru](#)

¹¹³ [Written evidence, WLE 24, Children's Commissioner for Wales](#)

¹¹⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 252](#)

¹¹⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 295](#)

Commissioner called for “substantial investment.” This was the “one area” where Welsh Ministers could make the most “direct and significant” intervention to meet both the Bill’s policy objectives and Cymraeg 2050.¹¹⁶

73. The Education Workforce Council said that the Welsh Government should ensure that schools have “adequate resources and support ... 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.”¹¹⁷

74. Cymdeithas yr Iaith called for “more significant investment”, saying they believed a minimum of £20million annually would “start making a real difference.”¹¹⁸ Estyn said that “significant funding” would be needed if language training was to be offered to teachers in schools.¹¹⁹

75. Some felt that an important tool in addressing these capacity issues would be a statutory workforce plan with targets underpinning the plan. This included Dyfodol i’r Iaith¹²⁰; and Cymdeithas yr Iaith¹²¹.

76. Dyfodol i’r Iaith said “now is the time” for statutory targets. They said they had to be “at the core of the Bill” if it was to meet its aims.¹²² They called for the Bill to set targets for:

“... (a) Numbers of Welsh subject teachers in the secondary sector

(b) Numbers of teachers who teach through the medium of Welsh in the primary and secondary sectors

(c) Other relevant workforce numbers in the primary and secondary sectors.

These targets should be linked to

(a) Methods to encourage students to study at Welsh Universities

¹¹⁶ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.1](#)

¹¹⁷ [Written evidence, WLE 23, Education Workforce Council](#)

¹¹⁸ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹¹⁹ [Written evidence, WLE 11, Estyn](#)

¹²⁰ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 4](#)

¹²¹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹²² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 377](#)

(b) Language learning and refreshing as an integral part of all PGCE courses in Wales

(c) Expanding Sabbatical Schemes for teachers to learn the language and/or refresh it.”¹²³

77. Cymdeithas yr Iaith called for the Bill to be amended to include two quantitative targets on the face of the Bill: “increasing the [proportional] capacity of all the workforce to teach through the Welsh language over time” and increasing the proportion of “teachers training to be able to teach through the medium of Welsh.”¹²⁴

78. RhAG said the Bill did not include how the workforce will be “strategically planned”. They said it was important this was clearly on the face of the Bill, so that both the National Framework (see Chapter 7) and the National Institute (see Chapter 8) address current gaps. They said the Bill should be amended “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.”¹²⁵

79. Coleg Cymraeg Cenedlaethol said that it is a “complex problem”, but that this does not mean it should not be dealt with strategically. They said a statutory plan:

“... in the context of the national framework would ensure that every relevant stakeholder would need to make this a priority. And that’s one of the ways that making this statutory could make a difference, because setting targets within the current framework hasn’t made a difference in reality, and not all stakeholders take this and see it as the priority that it needs to be if it is to succeed. So, looking far more ambitiously at the whole issue of developing the workforce, as well as upskilling the current workforce, as we’ve already heard, is a priority and crucial to the success of this Bill.”¹²⁶

80. Cymdeithas yr Iaith said any workforce plan needs to include teaching assistants, highlighting the higher number of teaching assistants than teachers in Welsh schools. They said many teaching assistants “fall outside the usual arrangements in terms of training at a national level and at a local authority level.”

¹²³ [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 4.](#)

¹²⁴ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹²⁵ [Written evidence, WLE 14, RhAG, paragraphs 3.15 and 3.18](#)

¹²⁶ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 97](#)

Yet, they said many teaching assistants with the “right support, encouragement and guidance, could teach through the medium of Welsh, but there is a need for a plan and a strategy for the workforce as a whole.”¹²⁷ NASUWT also highlighted the importance of teaching assistants, but also other education staff, including estates and kitchen staff.¹²⁸

81. CYDAG said that further plans were needed to accompany the Bill which:

*“... acknowledges ... and responds to the challenge by setting targets and setting out how the Government will deliver against those targets in terms of upskilling the current workforce, whilst, simultaneously, and more importantly, perhaps, creating the future workforce.”*¹²⁹

82. The representative for WLGA gave a personal view rather than speaking on behalf of the WLGA, saying she did not believe there should be recruitment targets included in the Bill. She said “I don’t think we have the means to meet them, and, in that case, we are putting our local authorities into a position of failure before we even start. Unless we have the means to meet the targets, there’s no point in setting the targets.”¹³⁰

83. The Education Workforce Council highlighted the requirements in the National Framework (see Chapter 7) to include an assessment of education practitioners needed to meet specific targets. This needed more clarity on “workforce requirements”. These figures could “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.”¹³¹

84. ADEW reminded us that local authorities currently have objectives within the current Welsh in Education Strategic Plans on developing the education workforce. They said these are “challenging targets” which are reported upon annually. The National Centre for Learning Welsh also highlighted the importance of the current Welsh in Education Strategic Plans in relation to their own education workforce programme.¹³²

¹²⁷ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 386](#)

¹²⁸ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 235](#)

¹²⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 298](#)

¹³⁰ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 109](#)

¹³¹ [Written evidence, WLE 23, Education Workforce Council](#)

¹³² [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 95](#)

85. As well as issues within the statutory school sector, stakeholders raised the importance of considering the capacity within either or both the early years and post-16 education sectors. This was raised by Mudiad Meithrin¹³³ and NASUWT¹³⁴.

86. The Cabinet Secretary said he was not “yet convinced” of the arguments for placing statutory workforce targets on the face of the Bill. Part of the issue, he argued, is the “wide and varied” nature of the Welsh language skills which are needed to deliver the Bill’s ambitions. He said it will range “from people who are teaching Welsh language and literature through the medium of Welsh at one end of the spectrum, to people who will be contributing to the 10 per cent requirement in a primarily English-speaking school, where you may be a reception teacher.” He felt targets may be “a rather blunt instrument” and was unconvinced that “a single target can actually reflect the complexity of what will be required of the workforce”.¹³⁵

Current Welsh language capacity within the workforce

87. Many raised the challenges of recruiting Welsh speaking staff, in particular in shortage subjects. This included ASCL Cymru.¹³⁶ They described “particularly in English-medium schools, we could go out four, five, six times for a Welsh specialist, we could still not short list and we could still not recruit.”¹³⁷ They said that they have repeatedly raised the “recruitment and retention crisis, it’s listened to, but nothing changes.”¹³⁸

88. NAHT Cymru said that in the instances where a school is successful in recruiting someone with these skills that teacher is “then not available to meet another school’s needs.”¹³⁹ The Catholic Education Service said the current challenges would be “exacerbated if provision through the medium of Welsh had to [be] increased.”¹⁴⁰

89. The Education Workforce Council said there aren’t enough Welsh speaking teachers or support staff currently to meet the Cymraeg 2050 goal. They said the level of expansion of the workforce has “some way to go”.¹⁴¹

¹³³ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 4.9](#)

¹³⁴ [Written evidence, WLE 03, NASUWT, paragraph 9b](#)

¹³⁵ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 20](#)

¹³⁶ [Written evidence, WLE 10, ASCL Cymru, paragraph 10](#)

¹³⁷ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 30](#)

¹³⁸ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 43](#)

¹³⁹ [Written evidence, WLE 08, NAHT](#)

¹⁴⁰ [Written evidence, WLE 22, Catholic Education Service](#)

¹⁴¹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 232](#)

90. ASCL Cymru said that recruiting Welsh speaking staff “is highly competitive, not just in education”.¹⁴² The Education Workforce Council agreed.¹⁴³

91. ASCL Cymru said that the education system has a variety of priorities that it has to support but that:

“... for the other targets that we may face, there is a pool of people we can recruit from to maintain those targets. In this case, we can't, and therefore we would have to divert significant resource, significant time to train or to find or identify where these people could come from, and we still wouldn't be secure that we could find them.”¹⁴⁴

92. Estyn said that recruitment can be more challenging in particular areas in Wales. There can also be challenges for local authorities to appoint officers responsible for promoting Welsh.¹⁴⁵ ColegauCymru agreed that there are particular challenges in “lower concentration Welsh speaking areas”.¹⁴⁶ ADEW said that while the challenge will vary across Wales, it remains a challenge even in Welsh speaking areas.¹⁴⁷

93. ADEW and WLGA said that there are particular challenges in recruitment in English-medium secondary schools.¹⁴⁸ While ASCL described trying to find a physics teacher who speaks Welsh as “like hen's teeth—they don't exist.”¹⁴⁹

94. The shortage of Welsh language capacity extends beyond teachers, and encompasses teaching assistants. We know the critical role that teaching assistants play in schools. ASCL Cymru said that the Bill would lead to an inevitable increase in demand for Welsh teaching assistants. They said that current figures indicate that 20.3% can speak Welsh, and 17.5% can work through the medium of Welsh. They said there has been an increase over five years but there was still a need to “recruit significantly more”.¹⁵⁰

95. However, we were also told that there is some untapped Welsh capacity currently in schools. Cymdeithas yr Iaith cited statistics from 2024, which

¹⁴² [Written evidence, WLE 10, ASCL Cymru, paragraph 23](#)

¹⁴³ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 237](#)

¹⁴⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 25](#)

¹⁴⁵ [Written evidence, WLE 11, Estyn](#)

¹⁴⁶ [Written evidence, WLE 20, ColegauCymru](#)

¹⁴⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 103](#)

¹⁴⁸ [Written evidence, WLE 12, ADEW and WLGA](#)

¹⁴⁹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 43](#)

¹⁵⁰ [Written evidence, WLE 10, ASCL Cymru, paragraph 14](#)

indicated that while 26.5 per cent of teachers can teach in Welsh, 33 per cent can speak Welsh. Bridging this 6.5 per cent gap could, with a “little investment and support”, help lead to “very rapid growth” of the workforce:

“According to Statistics Wales, teachers’ ability in terms of the Welsh language in the 2023/24 school year is as follows: 24.7% have a proficiency level (C1); 6.7% with a higher level (B2); 7.7% with intermediate level (B1); 18.7% with basic level (A2); 24.3% have entry level (A1); 17.8% have no Welsh skills. According to these figures, 31.4% already have the ability to teach through the medium of Welsh and a further 7.7% have very strong skills, according to the National Centre for Learning Welsh’s work ability definitions.”¹⁵¹

Cymdeithas yr Iaith said that “we can build on a much stronger basis than is being suggested.”¹⁵²

96. ASCL Cymru highlighted that the most recent figures show a “gradual decline” in Welsh language capacity since 2020, both in terms of teachers who can teach through the medium of Welsh and those who can speak Welsh.¹⁵³ They were also concerned about teachers who are trained in other subjects but are teaching Welsh. They said that the “qualities and skills of a linguist are specialist. Since 2021 ... the number of Welsh teachers in secondary schools teaching but not trained to teach Welsh has risen from 25.7 to 27.7%.”¹⁵⁴

97. The Education Workforce Council said that their data has shown that the number of Welsh speaking teachers and teachers who can teach through the medium of Welsh:

“... has not changed in 20-odd years. It has not really gone up, it has not really gone down. With the 2050 aspiration, I think that’s a key point and it’s not an easy one with a ready fix.”¹⁵⁵

98. In terms of retention rates, the Education Workforce Council said that teacher retention has “generally been better than other countries, particularly England.” They said that of the 2019 cohort, 75 per cent are still registered with the Council. For those who speak Welsh or teach through the medium of Welsh “it’s

¹⁵¹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹⁵² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 384](#)

¹⁵³ [Written evidence, WLE 10, ASCL Cymru, paragraph 11](#)

¹⁵⁴ [Written evidence, WLE 10, ASCL Cymru, paragraph 13](#)

¹⁵⁵ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 239](#)

around about the same, if not a little bit higher, so the retention isn't worse, actually."¹⁵⁶ They said it was important to look at the causes of the issues:

*"... in the area of recruitment and retention ... there needs to be efforts to try and look at the causes and treat the causes of why recruitment and retention may not be where we wish them to be. It's not easy, it's very hard, and you're competing against lots of other attractive professions for graduates. But the areas that come up regularly from the surveys we've done and from trade unions include workload, bureaucracy, accountability, student behaviour, and matters like that. And then it's the perception of what a career into teaching might be, taking on board those sorts of matters. ..."*¹⁵⁷

99. The retention rates for support staff are quite different to those for teachers. They said that 40-45 per cent of support staff registered in 2019 were no longer registered now. They said that the terms and conditions contribute to the much higher levels of turnover: "Salaries are lower, contracts are not necessarily permanent, term-time working—"¹⁵⁸

100. The importance of providing opportunities for current education staff to develop or improve their Welsh skills is important. NEU Cymru said that it was "vital" for existing staff to have "time outside of the classroom to learn, improve and practice their Welsh."¹⁵⁹ They said there cannot be a reliance on increasing Welsh capacity through new teachers, and that existing teachers and support staff should have the opportunities to learn and develop Welsh skills.¹⁶⁰ Similarly, ASCL Cymru argued that a "comprehensive national professional learning programme would need to be put in place."¹⁶¹

101. Cymdeithas yr Iaith cited the experiences of Catalonia which:

"... managed to increase the proportion of Catalan medium schools from 3% to almost 100% in 15 years between 1978 and 1993, despite an almost complete ban on Catalan education during Franco's time and a shortage of language literate teachers, by investing in learning courses for the

¹⁵⁶ [CYPE Committee, 9 October 2024, Record of Proceedings paragraph 261](#)

¹⁵⁷ [CYPE Committee, 9 October 2024, Record of Proceedings paragraph 278](#)

¹⁵⁸ [CYPE Committee, 9 October 2024, Record of Proceedings paragraph 262](#)

¹⁵⁹ [Written evidence, WLE 21, NEU Cymru](#)

¹⁶⁰ [Written evidence, WLE 21, NEU Cymru](#)

¹⁶¹ [Written evidence, WLE 10, ASCL Cymru, paragraph 20](#)

workforce, namely 'reciclatge' courses for teachers who were in work."¹⁶²

102. Cymdeithas yr Iaith wanted to see the Bill strengthened in relation to training. They said that if the capacity within the workforce is to be increased significantly then a "strong mechanism will be required at a national level." They called for a "central body" to be responsible for developing a strategy and promoting training. They said the new National Institute could take on this responsibility, but there was a need for such work to be adequately funded. They suggested placing a duty on the Welsh Ministers in the Bill:

*"... to ensure that the Institute is adequately resourced to deliver intensive courses for increasing the Welsh language capacity of the existing workforce in order to achieve the objectives of the Bill, and a duty, support and incentives for the education system to undertake that provision."*¹⁶³

103. The Welsh Language Commissioner said the establishment of the Institute would help address "the key issue of planning language support and training for the education workforce." But she said it was important that "sufficient numbers within the education workforce undertake the training on offer, and that this takes place in a strategic way and on a scale consistent with the objectives of the Bill."¹⁶⁴

104. She also called for a "national and comprehensive strategy for ensuring language training for the education workforce of the future." She said this would need to have "sufficient resources and funding" attached to it. Additional funding was likely to be needed.¹⁶⁵ The National Centre for Learning Welsh agreed on the importance of securing additional funding to support widening access to training for education staff. They thought that this would be the "biggest additional cost" for the National Institute and its new functions.¹⁶⁶ NEU Cymru said that any training offered by the National Institute for education staff must be "fully" funded by the Welsh Government.¹⁶⁷

¹⁶² [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹⁶³ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹⁶⁴ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.3](#)

¹⁶⁵ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 5.2](#)

¹⁶⁶ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraphs 6.4- 6.5](#)

¹⁶⁷ [Written evidence, WLE 21, NEU Cymru](#)

105. UCAC agreed that there was a need for training for teachers to be “planned strategically, as soon as possible.”¹⁶⁸

106. The Welsh Language Commissioner highlighted the important role the National Institute can play in “developing the resources and materials to improve” teaching of Welsh in English-medium schools. Reflecting on her own experience in the adult education sector, she said:

*“... there would be a way, quite quickly, of developing better resources and better support to schools to teach Welsh as a subject. It doesn’t make any sense to me ... that there’s been a vast investment in developing resources for adults but no corresponding investment on that scale for school pupils. So, there are quick wins that are possible in this process.”*¹⁶⁹

107. The National Centre for Learning Welsh reflected on their work in this space. They currently have a “Learn Welsh Education Workforce programme” which is being extended into 2025. This includes the current sabbatical courses. Their programme “matches” the current Workforce Plan.¹⁷⁰ They said it was important that staff were able to access training and called for greater clarity “on the approach for funding release time for local authorities.”¹⁷¹ They said their programme is “flexible ... and varied” with a range of different types of opportunities.¹⁷²

108. The Sabbatical Scheme was highlighted as an important opportunity for existing staff to improve their Welsh language skills. The National Centre for Learning Welsh said it has been “particularly successful”.¹⁷³

109. However, the Catholic Education Service said that, while it has benefitted individual staff, it has not had the systematic impact “because improved skills are lost if there are insufficient Welsh speakers within the school to maintain and extend the use of spoken Welsh.”¹⁷⁴ NAHT agreed, saying while valued by those who participated in it, it was having “limited long-term impact”.¹⁷⁵

¹⁶⁸ [Written evidence, WLE 09, UCAC, paragraph 2.4](#)

¹⁶⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 74-75](#)

¹⁷⁰ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 3.1](#)

¹⁷¹ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 3.3](#)

¹⁷² [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 95](#)

¹⁷³ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 95](#)

¹⁷⁴ [Written evidence, WLE 22, Catholic Education Service](#)

¹⁷⁵ [Written evidence, WLE 08, NAHT](#)

110. The Catholic Education Service highlighted some “unintended consequences” of the Sabbatical Scheme in terms of financial cost and workforce capacity. They said the scheme “does not cover the cost of providing supply cover.” These issues can be particularly challenging for smaller schools.¹⁷⁶

111. The Cabinet Secretary highlighted the range of programmes that exist to support Welsh language skill development within the existing education workforce. He said there is a “big pool of untapped talent”, citing around 1,500 of teachers in the workforce who could teach through the medium of Welsh but do not currently do so. He said the Bill will “try to draw more of that latent pool into the work that we need to see done.” He accepted that that it would require effort, but felt that there were already things in place which would be enhanced by the Bill.¹⁷⁷

112. On the other hand, the National Education Union (NEU) warned against assuming that just because a teacher is a Welsh speaker this means they are able to teach through the medium of Welsh or teach Welsh as a subject, or indeed that they wish to do so.¹⁷⁸ ASCL Cymru also highlighted this as a concern.¹⁷⁹

113. The Cabinet Secretary said the sabbatical scheme has been “the biggest driver of our ability to turn people who are in the system already into effective classroom practitioners.”¹⁸⁰ He said that the Welsh Government currently spends £3.8million a year, and that the “commitment in the Bill is that that level of funding continues, because the Bill is predicated on those funding streams that are currently in place being there over the 10-year haul.”¹⁸¹ The Welsh Government’s Deputy Director, Cymraeg 2050 said that the scheme supports 120 teachers a year, and highlighted that in the south east “one from every primary school has accessed the sabbatical scheme in the last five years.”¹⁸²

Initial Teacher Training

114. The Education Workforce Council said that of the 2024 teacher training intake, around 20 per cent of primary school trainees were Welsh-medium, and 18 per cent for secondary school trainees. This is short of the Welsh Government’s aspiration for 30 per cent, and “we’ve been short of that for some years”.¹⁸³ Data

¹⁷⁶ [Written evidence, WLE 22, Catholic Education Service](#)

¹⁷⁷ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 33](#)

¹⁷⁸ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 165 and 167](#)

¹⁷⁹ [Written evidence, WLE10, ASCL Cymru, paragraph 13](#)

¹⁸⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 40](#)

¹⁸¹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 52](#)

¹⁸² [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 41](#)

¹⁸³ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 236](#)

going back further shows that the proportion of trainee teachers for primary and secondary combined has been at or around 20 per cent since 2020/21, having increased from 16 per cent in 2018/19 to 22 per cent in 2019/20.¹⁸⁴

115. The numbers become even lower when looking at shortage subjects. The Education Workforce Council said that of the new teachers in 2024:

“... we turned out 27 new maths teachers, of which three had their teacher training through the medium of Welsh. Physics was seven in total, of which two had their training through the medium of Welsh.”¹⁸⁵

116. ASCL Cymru said that recruitment into initial teacher training “remains an issue, particularly at secondary level and does not currently meet its targets.” They reported that shortage subjects in Welsh-medium schools and Welsh language in English-medium schools “remain undersubscribed “in terms of teaching capacity.¹⁸⁶ Medr also said that there was a struggle to recruit sufficient numbers into initial teaching training.¹⁸⁷

117. Currently, the National Centre for Learning Welsh provides resources for teaching training providers:

“... to help them to include 35 hours of Welsh learning training as part of the course along the continuum (from A1 to C2). ... We believe that this collaboration is the basis for further development at the Institute to integrate more Welsh learning provision, including intensive opportunities, as an integral part of teacher training in Wales and to ensure a smooth continuation of the education workforce’s professional development programme. ...”¹⁸⁸

118. Cymdeithas yr Iaith said teaching training needed to be transformed so that everyone who completes the training can teach through the medium of Welsh. This could be done by “adding periods of intensive Welsh learning to the course,

¹⁸⁴ [Welsh Government \(StatsWales\). First years on ITE courses in Wales by ability to teach in Welsh, school level and year](#)

¹⁸⁵ [CYPE Committee, 9 October 2024, Record of Proceedings paragraph 242](#)

¹⁸⁶ [Written evidence, WLE 10, ASCL Cymru, paragraph 12](#)

¹⁸⁷ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 6.2](#)

¹⁸⁸ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 3.2](#)

extending the current year course to up to two years depending on the language skills of the trainees involved.”¹⁸⁹

119. CYDAG called for a “serious examination of the content of qualification routes to become teachers”, and called for the development of Welsh skills to be “part of the content” of future courses. They said “serious consideration” should be given to placing an expectation that “reaching a certain level of proficiency in Welsh is essential to qualify to teach in Wales in the future.”¹⁹⁰

120. The Welsh Language Commissioner called for an “integration of the proposed provision as an integral part of teaching training in Wales”.¹⁹¹ She said that “a Welsh language training programme” should be a “core part of all” initial teaching training which then continues into their induction and professional development “for the first four years of their career.”¹⁹² UCAC said that initial teaching training must take account of the Bill’s requirements and ensure that “appropriate training” is offered.¹⁹³

121. There are a number of different schemes to support and encourage entrants into teacher training and in particular for shortage subjects including Welsh.

122. Dyfodol i’r Iaith said that these schemes “seek to compensate for the deficiencies in the workforce recruitment and retention regime, without being able to address a fundamentally flawed element, namely the unsustainable and increasingly large percentage of students studying outside Wales”.¹⁹⁴

123. UCAC said when incentives are available there should be tracking of the career journeys of recipients, and that conditions such as a commitment to teach in Wales for a particular period should be attached.¹⁹⁵

124. The Education Workforce Council said that incentives were not “uncommon ... in lots of countries and professions.” But they said it was important to review whether incentive programmes have worked and have value.¹⁹⁶

125. They provided further information on the key factors that influence people to join the teaching profession. These included “intrinsic motivation/passion to teach”

¹⁸⁹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

¹⁹⁰ [Written evidence, WLE 32, CYDAG, paragraph 1.5.4](#)

¹⁹¹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.3](#)

¹⁹² [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.4](#)

¹⁹³ [Written evidence, WLE 09, UCAC, paragraph 2.4](#)

¹⁹⁴ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 37](#)

¹⁹⁵ [Written evidence, WLE 09, UCAC, paragraph 2.3](#)

¹⁹⁶ [CYPE Committee, 9 October 2024, Record of Proceedings paragraphs 267-268](#)

and “job security”. They also noted the different “positive initiatives that Welsh Government has put in place to attract prospective teachers in recent years.” These included:

- reform of ITE;
- changes to the qualification requirements;
- increasing numbers of salaried PGCE places;
- introduction of part time routes;
- the establishment of Educators Wales; and
- different financial incentives.

They also noted some of the constraints to teacher recruitment including; employer competition for graduates; workload; flexibility / work-life balance; accountability; behaviour in schools; salary and benefits; pay progression and the portrayal of teaching.¹⁹⁷

126. We heard that the education system itself is “currently not producing enough Welsh speakers to meet the number of teachers needed”.¹⁹⁸ The Education Workforce Council cautioned that “initial teaching training can’t fix everything.” They said it’s about the “supply chain of Welsh speakers coming through” who can then choose to be teachers or support staff.¹⁹⁹ They cited figures for pupils taking Welsh Language A-Level in 2024, which was 0.5 per cent. They said the “pipeline there isn’t a convincing one.”²⁰⁰

127. The challenges of accessing subjects up to A-Level through the medium of Welsh was also highlighted. This then potentially reduces the number of people who would be able to take up teaching training in Welsh.

“So, how do we expect to create a workforce if children can’t study A-level subjects through the medium of Welsh and then return to their native areas later on? If a subject isn’t available through the medium of Welsh at A-level, then you reduce the ability for them to return to their areas to teach that subject

¹⁹⁷ [Additional information from Education Workforce Council to CYPE Committee, 30 October 2024](#)

¹⁹⁸ [Written evidence, WLE 11, Estyn](#)

¹⁹⁹ [CYPE Committee, 9 October 2024, Record of Proceedings paragraph 240](#)

²⁰⁰ [CYPE Committee, 9 October 2024, Record of Proceedings paragraph 280](#)

and to inspire the next generation. So, we need to look at where the weaknesses are and then tackle those weaknesses according to their geographical location to build a complete picture.”²⁰¹

Our view

128. It could not be clearer that the success of the Bill is dependent on having the education workforce to deliver it. This is not just about teachers in schools, but support staff, as well as education professionals in early years and post-16 provision. As we have stated in the previous Chapter, this is a Bill that will be delivered over the lifespan of multiple Seneddau and Governments. The Bill clearly sets the direction of travel, and places requirements on future Welsh Ministers to deliver on this commitment, but more could be done in relation to the workforce elements of the Bill.

129. We note the Cabinet Secretary’s comments that workforce “runs like a stick of rock” throughout the Bill. But some stakeholders in contrast felt that the workforce issues should be more prominent within the Bill itself.

130. While the Welsh Government has published a Workload Impact Assessment as part of the supporting documentation for the Bill, we imagine that this is not as extensive as the Impact Assessment which trade unions have been calling for. We also note that the Cabinet Secretary described it as an “experimental impact assessment”. We do not feel it is either robust or comprehensive enough. We would urge the Cabinet Secretary to consider this further. We believe a more robust Workforce Impact Assessment is needed. The impact on the workforce is a significant and genuine area of concern for many and needs to be considered seriously.

Recommendation 2. The Welsh Government commits to bringing forward a more detailed Workforce Impact Assessment. This should be developed with meaningful engagement from the education sector, and its workforce representatives. This Assessment should be used in the development of the Workforce Plan and then should be updated in light of the Workforce Plan. (See recommendation 3).

131. We think it is important to acknowledge the level of change that the education system has been going through over recent years, some of it the direct result of changes in Government policy, such as the new Curriculum for Wales

²⁰¹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 200](#)

and ALN reforms, others the result of unexpected events, such as the pandemic. As we highlight in paragraph 37, education is often used as a vehicle to deliver wider policy goals, so the volume of change facing the sector does not just directly relate to changes in education policy,

132. All education staff, teachers, teaching assistants, school leadership teams, kitchen and estates staff, school governors, local authority education staff and others are currently working hard to rise to these multiple challenges and priorities. We have to acknowledge the impact that level of change has, and we must be mindful of the pressure it places on everyone. The teaching unions were clear that when other significant reform has been passed, promises have been made on support and resources, which they feel has not always been followed through. This mistake cannot be repeated.

133. This Bill is ambitious, and requires a significant step change to deliver it. This is to be applauded. But the flip side of setting these ambitions is that it can be challenging to deliver. It is critical that the Welsh Government works with the education workforce and its representatives to ensure that the Bill is delivered in a way that brings everybody along with it, and does not create unnecessary undue pressure on a system that is already creaking. Goodwill is essential to ensuring that everybody in Wales feels that they have ownership of the language regardless of their level of fluency. It is understandable why some may be nervous about this Bill, but the Welsh Government needs to show its thinking in detail in terms of the workforce impact, and set out clearly the steps it will take to mitigate or remove these pressures to alleviate concerns.

134. Numerous stakeholders made the case for both a statutory workforce plan, and statutory targets being placed on the face of the Bill. We are very mindful that recruitment and retention are much broader issues than those raised by this Bill (in recognition of which, we will shortly be looking at those issues in more detail via a dedicated inquiry). There are workforce shortages across different subjects and Welsh-medium, including Welsh, science and modern foreign languages. A holistic approach is needed, and not one that only looks at a single part of the education system in isolation. It is too important to take a fragmented approach. There are issues that extend outside of education, and are linked to the wider economy and jobs market. These cannot be addressed by individual schools or local authorities, and need a national approach which the Welsh Government can shape and direct. Without an overarching vision set by the Welsh Government, there is a risk that any plans to increase capacity will fail.

135. We are seeing changes to how society and individuals approach careers and jobs generally. People are more likely to change careers over their lifetimes, sometimes multiple times. This provides both opportunities as well as challenges to expanding the education workforce. All of which need consideration in a workforce plan which has statutory force.

136. There needs to be a clearer plan on how all these issues can be addressed. 2050 is not as far away as it might seem, and we were not convinced by the Cabinet Secretary's view that the falling birth rate would help address any workforce shortfalls. We are not convinced that the Welsh Government should be depending on falling birthrates to address school workforce gaps, and we would want to see more information and data on this included in the Explanatory Memorandum.

137. All of these factors have convinced us that a more robust approach to workforce planning is needed with a statutory workforce plan including targets, which could look holistically across the education system and the varied contexts across Wales.

138. We acknowledge that this is outside of the scope of the Bill because such a plan would look beyond the capacity of the education workforce to deliver either teaching Welsh as a subject, or teaching through the medium of Welsh. We are therefore calling for the Welsh Government to identify the appropriate legislative mechanism to bring forward a duty to prepare a statutory workforce plan. This will be an issue we will be looking at in more detail in our forthcoming inquiry on teacher recruitment and retention. But for now, the case has clearly been made to us for such a statutory plan. It will be critical to the delivery of this Bill, as well as having wider benefits to address other shortages across the education workforce.

Recommendation 3. The Welsh Government identifies the most appropriate legislative mechanism to place a duty on the Welsh Ministers to prepare a statutory education workforce plan which includes targets, and a timeframe, for recruitment and retention. This workforce plan should cover all aspects of the education workforce, and look in particular at shortage areas, as well as likely future need, and the ways in which this need will be addressed. It should take account of the variations across Wales.

139. While such a plan and targets will play an important role in increasing education workforce capacity, we also acknowledge that ensuring there is sufficient funding is critical. In some ways, budgets are more important than targets. We know the public finances are in a difficult state, but this is an issue we

will continue to follow with a keen interest throughout all our policy and financial scrutiny.

140. Incentive schemes can play an important role in encouraging more people to join, but they are only one part of the jigsaw.

141. It is clearly essential that we encourage more people to enter the education workforce, whether that is as a teacher, support worker or another professional. The truth is that much of the narrative about the education system at the moment can often be negative, which can discourage people from entering the workforce. Yet working in education can be one of the most rewarding of roles, as a number of us know from our own personal experience. More needs to be done to shine a light on the benefits and joys of working in education. Without this cultural shift, we will struggle to increase the numbers joining the profession.

142. We note the evidence that suggests there is a decent amount of untapped Welsh language capacity within the workforce. But we think more work is needed to understand the barriers to people either using, or building on their Welsh language skills so that they can use them in a professional capacity. Such work should also look at the ways in which these barriers could be overcome.

143. The Sabbatical Scheme and other initiatives to develop the Welsh language capacity within the current workforce are clearly very important. But they need sufficient levels of funding and resource. While we note that the Cabinet Secretary is not responsible for delivery of these schemes, he is responsible for the Welsh Government's overall budget. While he committed to the Sabbatical scheme continuing, he did not commit during our sessions to any additional funding beyond its £3.8 million annual allocation. There needs to be a clear and ongoing commitment that this programme will be fully funded and potentially increased if it is going to make a real difference. This includes ensuring that schools are able to secure cover for teachers who are away undertaking training on this programme. Funding is critical to delivering on the workforce step change that is needed to deliver on this Bill.

144. Throughout our evidence gathering, we have heard about relevant international experiences, in particular that of the Basque Country. In relation to the workforce, it has been widely reported that the Basque Government has invested heavily in teacher training through its equivalent sabbatical scheme and other initiatives to increase the number of teachers who could speak and teach through the medium of Basque. There is much we can learn from other countries, in particular those where a minority language co-exists with an internationally

dominant language such as English or Spanish. It is clear that the Welsh Government have been looking to international examples in the development of the Bill and wider language policy. But, as they move into the implementation stage, it is important that they continue to do this. We can learn from the challenges others have faced, how they have overcome them, and in particular, how they have successfully invested to deal with these issues. It is also important that other key stakeholders, including the Welsh Language Commissioner, also continue to maintain and develop these international relationships.

4. Part 1: Promotion and facilitation of use of the Welsh Language

Part 1 gives the one million Welsh speakers by 2050 target statutory force. We agree with this approach. In this chapter we explore the statutory target, and issues relating to how you define who is and who isn't a Welsh speaker.

A million Welsh speakers target

145. Section 1 of the Bill requires the Welsh Ministers to include the Cymraeg 2050 target of a million Welsh speakers in their Welsh language strategy. It also requires the Welsh Ministers to set targets to increase the:

- social use of Welsh;
- use of Welsh in the workplace;
- provision of Welsh language education; and
- number of people who are learning Welsh.

146. Section 2 requires the Welsh Ministers to report at least once every five years with an “analysis of the situation of the Welsh language in Wales”.²⁰² If this analysis shows that a target is unlikely to be met, this section places a duty on Welsh Ministers to lay a statement explaining why that target is not likely to be met, and the actions that will be taken to achieve the target.

147. Section 3 makes provision on how the number of Welsh speakers will be calculated for the purposes of sections 1 and 2. This section gives the Welsh Ministers powers to make regulations that specify the sources of data that are to be used to calculate the number of Welsh speakers. Although it does state that any relevant data from the Census must be taken into account. This section also

²⁰² [Welsh Language and Education \(Wales\) Bill, section 2\(1\), as introduced, July 2024](#)

makes it clear that self-assessment is the basis of deciding whether a person is a Welsh speaker.

148. There was broad support for placing the target of one million Welsh speakers on a statutory basis. Those who supported it included:

- ADEW²⁰³;
- Coleg Cymraeg Cenedlaethol²⁰⁴;
- CYDAG²⁰⁵;
- Education Workforce Council²⁰⁶;
- Dyfodol i'r laith²⁰⁷;
- Medr²⁰⁸;
- Mudiad Meithrin²⁰⁹;
- NAHT²¹⁰;
- The National Centre for Learning Welsh²¹¹;
- RhAG²¹²;
- Swansea Council²¹³;
- UCAC²¹⁴;
- Welsh Language Commissioner²¹⁵; and
- WLGA²¹⁶.

²⁰³ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 23](#)

²⁰⁴ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.2](#)

²⁰⁵ [Written evidence, WLE 32, CYDAG, paragraph 1.2.1](#)

²⁰⁶ [Written evidence, WLE 23, Education Workforce Council](#)

²⁰⁷ [Written evidence, WLE 01, Dyfodol i'r laith, paragraph 1](#)

²⁰⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 197](#)

²⁰⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 218](#)

²¹⁰ [Written evidence, WLE 08, NAHT](#)

²¹¹ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.3](#)

²¹² [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 153](#)

²¹³ [Written evidence, WLE 31, Swansea Council](#)

²¹⁴ [Written evidence, WLE 09, UCAC, paragraph 1.1](#)

²¹⁵ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 10](#)

²¹⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 17](#)

149. ASCL did not support the setting of a statutory target, saying that it was “unrealistic and would place school leaders under significant pressure to channel resources ... to the detriment of other educational priorities ...” Although they did not oppose a non-statutory target.²¹⁷ NEU said that while supporting Cymraeg 2050 they were “not sure” if the target should be statutory “especially without a commitment for significant funding”. They cited the pressure facing local authorities and schools.²¹⁸

150. While Medr recognised the policy intent of putting the target on a statutory basis, they said it was important that the policy objectives should not just be seen through the “lens of targets.” They said there was a need for “a more nuanced approach to balance monitoring of progress to achieve the targets with ongoing support” for those who are trying to achieve the targets but are not yet meeting them.²¹⁹

151. Professor Gwenno Ffrancon called for specific targets to be confirmed, and for the timetable to be tightened to ensure there is no slippage in delivery on Cymraeg 2050.²²⁰

152. We explored what impact placing the target on a statutory basis would have in practice. For a number of respondents it would increase its status and make the importance of the ambition clear, including:

- Clybiau Plant Cymru Kids²²¹;
- CYDAG²²²;
- Medr²²³;
- NAHT Cymru²²⁴;
- Professor Gwenno Ffrancon; and
- WLGA²²⁵.

²¹⁷ [Written evidence, WLE 10, ASCL Cymru, paragraphs 5-6](#)

²¹⁸ [Written evidence, WLE 21, NEU Cymru](#)

²¹⁹ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.1](#)

²²⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 121](#)

²²¹ [Written evidence, WLE 26, Clybiau Plant Cymru Kids](#)

²²² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 235](#)

²²³ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 169](#)

²²⁴ [Written evidence, WLE 08, NAHT](#)

²²⁵ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 17](#)

The Coleg Cymraeg Cenedlaethol said it could enable the Welsh Government to increase expectations in grant and remit letters.²²⁶

153. Other reasons included ensuring that it was not subject to changes in political priorities. This was cited by ADEW.²²⁷ The Education Workforce Council said it would help ensure leadership was “provided and sustained over time.”²²⁸ While the Welsh Language Commissioner said it would mean that current aspirations would not be “reduced or diluted” in the future.²²⁹

154. The Cabinet Secretary told us that placing the target on a statutory basis would both “underline the importance ... and safeguard it for the future.”²³⁰ A senior lawyer for the Welsh Government said that the legislation would “drive performance” because the targets will “drive” the behaviour needed for change.²³¹

155. We were warned though that the target should not just be aspirational, and that funding and resources were needed to support delivery.²³² The Education Workforce Council said that the challenges faced by meeting this target cannot be “underestimated.”²³³ We looked at the issues around workforce in the previous Chapter.

156. Cymdeithas yr Iaith said that the Welsh Government was “seeking to change the definition of the million” through this Bill. They called for amendments to ensure that the Census, for as long as it is being held, should be the basis on which the number of Welsh speakers is calculated.²³⁴ Some, including Mudiad Meithrin raised concerns about the future continuation of the Census and the impact this would have on calculating the number of Welsh speakers. This showed the need for:

“... a thorough and objective monitoring system in order to measure progress and performance, and where more specific attention needs to be given to this target over time.”²³⁵

157. ADEW called for greater clarity on how the targets will be set. They called for “realistic” targets which will take account of local contexts. They also queried how

²²⁶ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 34](#)

²²⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 23](#)

²²⁸ [Written evidence, WLE 23, Education Workforce Council](#)

²²⁹ [CYPE Committee, 26 September, 2024, Record of Proceedings, paragraph 10](#)

²³⁰ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 220](#)

²³¹ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 244](#)

²³² [Written evidence, WLE 08, NAHT](#)

²³³ [Written evidence, WLE 23, Education Workforce Council](#)

²³⁴ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

²³⁵ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 1.34](#)

“accurate data could be analysed within a cycle of five years” when the Census data is available every 10 years.²³⁶

158. The Cabinet Secretary said the intention is to use the Census as a “starting point” because this has been “central” to counts previously. But he said that “we can’t rely on the census” in the future as it could cease. He said the provisions enable different data points to be used alongside the Census. He was clear “we’re not putting the census to one side”.²³⁷

159. Stakeholders welcomed the proposal to set a target for increasing the use of Welsh socially. Mentrau Iaith Cymru said they “particularly” welcomed this, highlighting the “permanent battle” they face to ensure continued community use of Welsh.²³⁸

160. A number of stakeholders highlighted the importance of recording use of Welsh. Dyfodol i’r Iaith called for statistics on the use of spoken Welsh. They said these may be “more important” than simple counts of how many people can speak Welsh.²³⁹ They also wanted to see more measuring of use of the language more generally.²⁴⁰ Mentrau Iaith Cymru were concerned about the “lack of emphasis” on measuring use of Welsh.²⁴¹ RhAG highlighted the approach taken in the Basque Country which uses a “social method of counting speakers by carrying out a street survey.” They called for this idea to be given further consideration.²⁴²

161. Professor Enlli Thomas said that recording use of a language was “key” to understand if there has been a “meaningful increase”. She said use indicates the viability of a language, and that data on this could “move the narrative away” from Welsh as a “minority language” which is important in providing a stronger status for Welsh.²⁴³ Professor Gwenno Ffrancon agreed that it is language use, rather than the number of speakers, that demonstrates the viability of a language.²⁴⁴

162. The Welsh Language Commissioner highlighted the language use survey which is currently conducted every five years in conjunction with the Welsh Government. However, she would welcome a “firmer commitment” for it be held regularly, or a longer-term agreement for it to be done in a more systematic

²³⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraphs 33-34](#)

²³⁷ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 58](#)

²³⁸ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 1.1](#)

²³⁹ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 3](#)

²⁴⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 34-5](#)

²⁴¹ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 1.4](#)

²⁴² [Written evidence, WLE 14, RhAG, paragraph 3.3](#)

²⁴³ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 123](#)

²⁴⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 124](#)

way.²⁴⁵ Mentrau Iaith Cymru said that this survey has not been “consistent ... or comprehensive enough”. They said it needed to measure use at both a national and a ward level, in the same way as the Census. This, they believe, will allow a real picture of use to be available.²⁴⁶

163. The Cabinet Secretary said that including targets for the use of Welsh would be tricky, in relation to definitions and data collection. He felt that the Bill’s provisions would lead to a “reliable” measure of use of Welsh.²⁴⁷ He reminded us that Cymraeg 2050 does also include an ambition to double the use of Welsh.²⁴⁸

164. The Welsh Government’s Deputy Director, Cymraeg 2050 said there was discretion for targets to be set on use of Welsh. She also highlighted the language use survey, saying it is “quite wide-ranging”. The latest survey had shown that the more confident someone is with Welsh, the more likely they will use it on a daily basis.²⁴⁹

165. We explored the provision on how Welsh speakers will be calculated. There was a range of views on this issue. Cymdeithas yr Iaith highlighted that there are “consistent assessments” during school and said that either an end of Key Stage or GCSE assessment would be a more reliable measure without needing extra assessments.²⁵⁰

166. UCAC considered the Bill to be ambiguous as to who would be considered a Welsh speaker. They were concerned about the robustness of the Census 2021 data. ADEW and WLGA called for greater clarity on how a Welsh speaker would be calculated and recorded.²⁵¹

167. Carmarthenshire Council said that the experiences of the Census show that “many underestimate” their Welsh language ability. They called for consistent data collection.²⁵²

168. The Cabinet Secretary stressed the principle of self-assessment as being at the heart of identifying Welsh speakers. He said that while this can cause some “tricky consequences” it was a “really important principle”.

²⁴⁵ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 16](#)

²⁴⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 348](#)

²⁴⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 231](#)

²⁴⁸ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 232](#)

²⁴⁹ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 233](#)

²⁵⁰ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

²⁵¹ [Written evidence, WLE 12, ADEW and WLGA](#)

²⁵² [Written evidence, WLE 19, Education and Children’s Services, Carmarthenshire County Council](#)

“You know, if Welsh belongs to everybody, then, it is the individual’s own assessment of the extent to which they believe themselves to be users of the Welsh language that we have to rely on, and that principle is at the heart of this Bill as well.”²⁵³

He said that the introduction of the CEFR (see next Chapter) would mean it would become easier for people to identify where they are on that scale. He added that the current lack of such a guide can lead to “distortions at either end of the spectrum ...” and the CEFR would help deal with some of these tricky issues.²⁵⁴

169. The Welsh Government’s Deputy Director, Cymraeg 2050 also made the links with the CEFR, as well as the data that will be available from schools. She emphasised the importance of children and young people in meeting the Cymraeg 2050 target. She said there will be links between the CEFR and the curriculum, which will mean the data will be clear and available.²⁵⁵

170. We explored the provisions in section 2 imposing reporting requirements on the Welsh Ministers every 5 years. The Welsh Language Commissioner did not see conflict with the statutory requirements on her office to publish a 5-year report on the position of the Welsh language, and the new requirements this Bill places on Welsh Ministers. She said that the reports “are very different things.” The Commissioner’s report is “independent ... that looks at a range of policy areas” where as the requirements in this Bill “will naturally focus more on education and its influence.” She said it would be important to have conversations with the Welsh Government to avoid duplication. Finally, she said the Welsh Government has “more capacity ... and more expertise” in conducting research.²⁵⁶

171. The Cabinet Secretary also emphasised the differences between the two reports. He said the Commissioner’s report is “far more wide ranging” and highlighted the independent nature of the Commissioner’s report. He said that he was “confident” of finding ways of co-operating and working together on any areas where there might be overlap between the two reports.²⁵⁷

172. We also considered the timing of the reporting requirements. The Cabinet Secretary said that these issues had been considered, in the context of the

²⁵³ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 229](#)

²⁵⁴ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 230](#)

²⁵⁵ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 259](#)

²⁵⁶ [CYPE Committee, 26 September, 2024, Record of Proceedings, paragraph 14](#)

²⁵⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 227](#)

different electoral cycles (Senedd and local authority); and the timings for the census results.

“... the message from the WLGA is that they want to adhere to those five-year cycles for them. The timing of the announcement of census results—that will happen every 10 years, so that helps if we divide that in half—and the fact that the current Welsh in education strategic plans have a 10-year vision, that also has an influence. So, there is a great deal to try to fit in. We’re trying to fit in with several other timetables, and, at the end of the day, ultimately, we currently think that every five years would work most effectively.”²⁵⁸

Reviewing the Welsh language standards

173. Section 4 places a duty on the Welsh Ministers to review the Welsh language standards specified under section 26 of the Welsh Language (Wales) Measure 2011. The Welsh Government must consult the Welsh Language Commissioner as part of this review.

174. The Welsh Language Commissioner welcomed this duty. She said that the standards specified in the Bill “have the potential to make a difference.” The link being made between education policy and the Standards regime is “very much” welcomed.²⁵⁹ She added that while the Standards “are currently limited” in impact, with further changes and more support from her office, they could “play a key role” in increasing use of the Welsh language.²⁶⁰

175. She also highlighted that the review was important to take account of the development of the Code to describe Welsh language ability (see the next Chapter). She expected that the Code descriptors would be included in revised Standards which would help “complete that circle” so that workforces and workplaces know what level is needed for each role.²⁶¹

176. This duty was also welcomed by stakeholders, including:

- Coleg Cymraeg Cenedlaethol²⁶²;

²⁵⁸ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 225](#)

²⁵⁹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 1.7](#)

²⁶⁰ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 1.9](#)

²⁶¹ [CYPE Committee, 26 September, 2024, Record of Proceedings, paragraph 35](#)

²⁶² [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.3](#)

- CYDAG²⁶³;
- Dyfodol i'r Iaith²⁶⁴;
- Mentrau Iaith Cymru²⁶⁵;
- The National Centre for Learning Welsh²⁶⁶; and
- RhAG²⁶⁷.

Our view

177. The one million Welsh speakers by 2050 target has captured the imagination in a way other government policies often don't. It is clear and understandable, and people can see the direction of travel. It feels like this is a target that is owned by the whole of Wales, regardless of whether you are a Welsh speaker or not. We can all play our part, regardless of our own individual level of fluency or confidence. Making the target statutory will help strengthen and convey this ambition clearly to the nation.

178. There is no doubt it is a stretch target, and it touches on the work of almost every Welsh public body, as well as the third and private sectors. It's a policy that will trickle down and impact in some way on every individual living in Wales. Delivering against the target will take decades, and requires the commitment of multiple government administrations. Putting it in legislation reduces the risk that it will be watered down, and it will help drive funding and policy decisions which will help support organisations to deliver it.

179. The Census has been the basis for counting the number of Welsh speakers for decades. But the Census is itself imperfect, and we are acutely aware that people can easily either under or over estimate their Welsh language skills, distorting census findings. We note the view of the Cabinet Secretary however that the introduction of the CEFR as the basis to describe Welsh ability may help reduce these risks over time. It is important that as long as the Census is still being run, it should remain the baseline for any count. The Census remains the acid test of whether we are meeting the Cymraeg 2050 test.

²⁶³ [Written evidence, WLE 32, CYDAG, paragraph 1.2.3](#)

²⁶⁴ [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 4](#)

²⁶⁵ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 4.1](#)

²⁶⁶ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.8](#)

²⁶⁷ [Written evidence, WLE 14, RhAG, paragraph 3.4](#)

180. This does not mean however that it is not important to consider what other measures can be used to ensure we have the most sophisticated understanding of numbers of those who speak, and how they use Welsh. It is important that the Welsh Government considers different data points, and how they can best support collection and analysis of this data.

181. A number of stakeholders emphasised the importance of measuring the use of Welsh along with the number of speakers. But we also heard of the complexities around measuring usage. We are aware of the work that is already being undertaken in this field, like the Welsh language use survey that is currently run every five years.²⁶⁸

182. Those who provided their views on the provisions in relation to the Welsh language standards – particularly the Welsh Language Commissioner – were consistent in their support for the proposals. We believe with all the changes in the Welsh language policy space which this Bill is bringing forward, it is sensible that there is the opportunity for review. It will help ensure that all elements of the legislative and regulatory frameworks are coherent and consistent. In particular, it is important that the Welsh language standards are aligned with the Code (which we look at in more detail in the next Chapter).

²⁶⁸ [Welsh Government, Welsh language use survey webpage \[accessed 22 November 2024\]](#)

5. Part 2: Describing Welsh Language Ability

The Code on Welsh language ability is a critical element of the Bill. It is based on the Common European Framework of Reference for Languages, a long-standing framework used in many countries. We support the approach taken in this Part of the Bill.

Common European Framework of Reference for Languages

183. Section 5 and Schedule 1 establish a new, standardised framework for describing Welsh language ability. It is based on the Common European Framework of Reference for Languages (“CEFR”). The table in Schedule 1 includes a reproduced Table of the CEFR. This table specifies three types of Welsh language user (Basic, Independent and Proficient). It also introduces six different levels which describe these three types. They are:

- Basic user (levels A1 and A2);
- Independent user (levels B1 and B2); and
- Proficient user (levels C1 and C2).

184. Section 5 also gives Welsh Ministers the power to amend the Table in Schedule 1 by regulations. But, this power is limited to only making changes when it is necessary in response to changes made to the CEFR by the Council of Europe.

185. Section 6 places a requirement on Welsh Ministers to prepare a Code describing Welsh language ability which is based on the CEFR. This Code must explain how the common reference levels from Table 1 of the Schedule should be used and describe the “specific characteristics” of each level.

186. Section 7 places a requirement on Welsh Ministers to both publish and review the Code. It also requires Welsh Ministers to consult with anyone they think appropriate before publishing the Code.

187. The introduction of a standardised Code was broadly welcomed. Mudiad Meithrin said such harmonisation would be an “important step forward” which would support planning to develop individual’s skills, as well as supporting

recruitment.²⁶⁹ UCAC said it would support the alignment between qualifications and employment. They believed it would be a “foundation for individuals, schools, examination boards, local authorities and workplaces.”²⁷⁰ Coleg Cymraeg Cenedlaethol also described the Code as laying a “solid foundation”. Consistency was a word regularly used in connection with these proposals, with Carmarthenshire County Council²⁷¹; ColegauCymru²⁷²; CYDAG²⁷³ and Coleg Cymraeg Cenedlaethol²⁷⁴ all using it.

188. A number of stakeholders, including ADEW and WLGA²⁷⁵; Coleg Cymraeg Cenedlaethol²⁷⁶; and Estyn²⁷⁷, highlighted how it would help employers. WJEC said that as an employer they would find it helpful for recruitment.²⁷⁸ While Professor Gwenno Ffrancon from Swansea University said the university was currently introducing the CEFR framework in their employment policies.

189. The Cabinet Secretary highlighted this, suggesting it will support a more sophisticated approach to recruitment:

“At the moment, if people advertise for people to do the work, the only choice they have is to say that Welsh is essential or Welsh isn’t essential. Now, there’ll be an opportunity for an employer to say, ‘We’re looking for somebody who can speak Welsh’ on a level that they require in the workforce. And by using the framework not just in schools, but outside also, I think, on the language journey, that people will see and become more familiar with the framework, and, in turn, that will help people to be clearer themselves, when the question is asked, ‘Do you speak Welsh?’, to say, ‘I do speak Welsh, but I speak Welsh at this level’ and they’ll refer to the framework. ...”²⁷⁹

190. Some noted the importance of establishing a linguistic continuum, which the Code would do. Estyn said that such a continuum was important in showing that the language is for everyone and that “we have something where we can

²⁶⁹ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 2.1](#)

²⁷⁰ [Written evidence, WLE 09, UCAC, paragraph 1.2](#)

²⁷¹ [Written evidence, WLE 19, Education and Children’s Services, Carmarthenshire County Council](#)

²⁷² [Written evidence, WLE 20, ColegauCymru](#)

²⁷³ [Written evidence, WLE 32, CYDAG, paragraph 1.3.1](#)

²⁷⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 4.8](#)

²⁷⁵ [Written evidence, WLE 12, ADEW and WLGA](#)

²⁷⁶ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 4.8](#)

²⁷⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 3.17](#)

²⁷⁸ [Written evidence, WLE 13, WJEC](#)

²⁷⁹ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 2.56](#)

move to the next steps in supporting people. But we need to celebrate the fact that people can use the Welsh that they have in whatever context, and to ensure that people are enthusiastic to use whatever Welsh they have. ...”²⁸⁰ A view supported by the WLGA who said it would help promote learning Welsh to be “a lifelong skill”.²⁸¹

191. As we have highlighted in the previous Chapter, a common framework, was cited by the Cabinet Secretary as helping with self-assessment, and could potentially lead to people being able to self-assess Welsh language ability more confidently. This was supported by ADEW and WLGA²⁸².

192. There was some difference of opinion however, as to whether the CEFR should form the basis of the Code.

193. Those who supported the use of the CEFR included:

- Coleg Cymraeg Cenedlaethol²⁸³;
- ColegauCymru²⁸⁴;
- CYDAG²⁸⁵;
- Estyn²⁸⁶;
- Professor Enlli Thomas²⁸⁷;
- Mudiad Meithrin²⁸⁸;
- The National Centre for Learning Welsh²⁸⁹;
- Welsh Language Commissioner²⁹⁰; and
- UCAC²⁹¹.

²⁸⁰ [CYPE Committee 2 October 2024, Record of Proceedings, paragraph 278](#)

²⁸¹ [CYPE Committee 9 October 2024, Record of Proceedings, paragraph 49](#)

²⁸² [Written evidence, WLE 12, ADEW and WLGA](#)

²⁸³ [CYPE Committee 17 October 2024, Record of Proceedings, paragraph 48](#)

²⁸⁴ [CYPE Committee 17 October 2024, Record of Proceedings 351](#)

²⁸⁵ [Written evidence, WLE 32, CYDAG, paragraph 1.3.1](#)

²⁸⁶ [Written evidence, WLE 11, Estyn](#)

²⁸⁷ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

²⁸⁸ [CYPE Committee 26 September 2024, Record of Proceedings, paragraph 239](#)

²⁸⁹ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.4](#)

²⁹⁰ [CYPE Committee 26 September 2024, Record of Proceedings, paragraph 30](#)

²⁹¹ [Written evidence, WLE 09, UCAC, paragraph 1.2](#)

194. Professor Enlli Thomas said one of the past challenges for measuring the success of the Welsh language has been the lack of the CEFR. She said both the labels provided by the CEFR and the flexibility it offers, as a learning continuum will help support learners “to be involved with and learn Welsh throughout their lives.”²⁹²

195. Some said that the Bill would enable the CEFR to be modified to reflect the Welsh context, such as Professor Enlli Thomas²⁹³; and Coleg Cymraeg Cenedlaethol²⁹⁴. Coleg Cymraeg Cenedlaethol said the opportunity to take CEFR and tailor it for the Welsh context provided an opportunity to “create something that is genuinely powerful and helps the Bill’s policy objectives and beyond.”²⁹⁵

196. The National Centre for Learning Welsh shared their own experiences of adapting the CEFR into the Welsh context. They said they had a “great experience”, and that it measures a learner’s “attainment along the journey.” Although they emphasised the importance of people using their Welsh skills, rather than waiting until they reach a particular level.²⁹⁶ They also believe that the CEFR can be applied and tailored for children “of primary age onwards.”²⁹⁷ They called it an “effective framework that can work to a range of audiences and a range of different people.”²⁹⁸

197. The Commissioner also highlighted this work in the adult learner sector. She believed that work would happen to ensure the Code could be applicable to children and young people. She was supportive of using the CEFR as the basis for describing and measuring Welsh ability in children and young people.²⁹⁹

198. Mudiad Meithrin said that learning Welsh isn’t “fundamentally different” to learning other languages, so queried why the CEFR would not work in Wales.³⁰⁰ On the other hand, Qualification Wales reflected on the “generic” nature of the CEFR and said there would need to be “detailed work” to look at how it translates to a Welsh context. As part of this work, qualifications and curriculum could be considered. They said there was “synergy between what the framework will look

²⁹² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 127](#)

²⁹³ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

²⁹⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 49](#)

²⁹⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 49](#)

²⁹⁶ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 53](#)

²⁹⁷ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.4](#)

²⁹⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 43](#)

²⁹⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 30](#)

³⁰⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 241](#)

like and what's there at the moment."³⁰¹ They did not think there would be "any particular points of disjuncture".³⁰²

199. Mudiad Meithrin welcomed a move away from using terms such as confident or fluent, saying it was often difficult to define either of these terms. They said assessing proficiency, as the CEFR does, is easier than assessing fluency.³⁰³

200. UCAC said that using CEFR would enable comparative work to be done to better understand how the Welsh language learning model works in comparison with different approaches in other countries.³⁰⁴

201. Those who did not support the use of the CEFR for the basis of the Code raised concerns about its use in a school setting, or for people for whom Welsh is a first language.

202. Cymdeithas yr Iaith did not agree with the CEFR being used at all. They said it was not appropriate to apply to the Welsh language and called it a "diversion". They cited existing descriptors of attainment levels that are currently used in schools, and asked why these are not being used in the Bill. They said they are "well understood". They said that using the CEFR to describe Welsh ability will not mean the learner is "better off" as a result. They said that "playing around with things, that in reality, aren't going to make much of a difference" will not deal with the "essence of the problem, namely that the education system is failing our children".³⁰⁵

203. Dyfodol i'r Iaith said the CEFR does not "fully apply" to learning and using Welsh in school. They said that it had been developed for second language users, and primarily works in professional contexts (for which they were supportive of it being used³⁰⁶). They said it was "less beneficial" for schools and "particularly for first language Welsh speakers." They called for a "skills code" to be developed "according to the different skills aimed at by age, learning media and enriched experiences."³⁰⁷ They explained why they did not think it was relevant in children's education:

³⁰¹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 316](#)

³⁰² [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 317](#)

³⁰³ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 242](#)

³⁰⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 174](#)

³⁰⁵ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 360-361](#)

³⁰⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 355-356](#)

³⁰⁷ [Written evidence, WLE 01 Dyfodol i'r Iaith, paragraph 5](#)

“You will have children in rural areas speaking Welsh entirely confidently and perhaps they wouldn't get close to C1. We have to measure children's language ability according to their age and according to their inherent ability, and I do think that we need a different system of measuring attainment and ability in terms of schoolchildren, particularly in the primary sector. ... but that places all of the English-medium schools in Wales in great difficulty, because they could never achieve the levels that are possible for those attending Welsh-medium schools. Is a continuum the solution? Perhaps it is. But, essentially, we have to think of a system that's realistic and that is appropriate for children and schools so that every child and every pupil in a school is confident in terms of using what language they have. In terms of English-medium schools, it would be far more useful to place an emphasis on spoken Welsh, rather than on the professional levels that would be required to reach C1 standard, ... But we have to aim towards the kind of language that pupils could use realistically in their daily life. ... We need levels that are appropriate for pupils and fit for purpose in daily life, and that, in the English-medium sector, mainly has to focus on spoken Welsh; ... I would be a little suspicious of accepting CEFR as a framework, or the only framework, that is mentioned in the Bill.”³⁰⁸

204. Stakeholders made suggestions to ensure the Code worked as effectively as possible:

Suggestion	Made by
Include easy to understand details about each skill level	Mudiad Meithrin ³⁰⁹
Support public bodies using other language levels to transition	Mentrau Iaith Cymru ³¹⁰
Include a way of supporting assessors to recognise confidence as well as ability	Mentrau Iaith Cymru ³¹¹
Clear guidance to ensure consistent application	ADEW and WLGA ³¹²

³⁰⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 356](#)

³⁰⁹ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.12](#)

³¹⁰ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 2.1](#)

³¹¹ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 2.2](#)

³¹² [Written evidence, WLE 12, ADEW and WLGA](#)

Suggestion	Made by
Rename the categories and have three separate categories “basic, medium and advanced”.	Early Years Wales ³¹³
Make the language used in the Code more easily understood by parents and children	ADEW ³¹⁴

205. The Cabinet Secretary described the CEFR as something that was “so exciting” and that the Welsh Government were drawing on the years of experience of using it, to help inform the application of it in Wales.³¹⁵

206. He believed that the CEFR was appropriate for people who were first language Welsh speakers. He said it’s how CEFR has been used in both the Basque Country and Finland. While it started out as a tool for second language use, it’s now “widely used in places where there are two languages in common usage”.³¹⁶

207. The Welsh Government Deputy Director, Cymraeg 2050 said that in countries using the CEFR, the “whole system works holistically”. She said that it enabled employers to ask for skills in a more sophisticated way.³¹⁷

208. She described the Code as the “silver thread” which “binds the Bill” and said it would create a lifelong continuum and “binds and bridges between school education and workplaces”.³¹⁸ The Deputy Director also outlined the plans for consultation on the Code, saying that this would involve “meaningful” consultation with all sectors involved, as well as drawing on European experts.³¹⁹

209. We explored the issue around the range of abilities covered by the CEFR. The Welsh Language Commissioner suggested there may be a need to look at pre-A1 levels “for young children particularly.”³²⁰ However, Estyn did not envisage there being issues with pre-A1 skills, noting that there has always been a pre-A1 CEFR level which is about “welcoming people to the language.”³²¹ While the National Centre for Learning Welsh said it provides a “broad range”, citing the pre-A1 level

³¹³ [Written evidence, WLE 30, Early Years Wales](#)

³¹⁴ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 65](#)

³¹⁵ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 248](#)

³¹⁶ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 97-99](#)

³¹⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraphs 250](#)

³¹⁸ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 82](#)

³¹⁹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 87](#)

³²⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 32](#)

³²¹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 273](#)

and saying that C1 and C2 levels measure “the skills of those speakers who have full mastery” of Welsh.³²²

210. NAHT Cymru said that the Code would not capture children at either ends of the language spectrum. They said that it was not “particularly designed for schools.” However, they still felt it was a “welcome step forward”.³²³

211. The Cabinet Secretary said the Code will “draw nearly everyone in”. But he acknowledged that there will be some people who are not on level A1, and others who will be higher than C2.³²⁴ He said the Code will have descriptors which “enable people to see whether they are on the very foothills of this system, and we’ll use the code to offer people help to know how to do that.”³²⁵

212. The Code, the Cabinet Secretary said:

“... will help not just with the pre-A1 issues, but the way in which, in practice, in other places where the code is more well-known and embedded, there are those sort of plus and minus categories that are used when people are moving, or are on the cusp of, ‘Am I B1? Am I B2?’ and I think it will offer a helpful flexibility to people on the ground. ... It’ll be for individuals to decide how they use it. ... It will offer them a bit of extra flexibility, not designed to complicate their lives, but just to help them in the work that they do.”³²⁶

213. The Deputy Director, Cymraeg 2050 said that the Code would have a “granularity” which reflected the multiple levels in each CEFR level (e.g A1.1 and A1.2). But that the Code would reflect the specifics of the Welsh language.³²⁷

214. In correspondence, the Cabinet Secretary highlighted that in the most recent review of the CEFR in 2020, pre-A1 level descriptors were added. This level would “include someone at the beginning of their journey to learn a language.” This level though is “a sub-level ... not relevant to all of the CEFR descriptive scales.” He noted that CEFR recognises levels above C2, which are not identified in the framework. Additionally, the CEFR also has ‘plus’ level descriptors which “represent a very

³²² [CYPE Committee, 17 October 2024, Record of Proceedings, paragraphs 44-45](#)

³²³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 48](#)

³²⁴ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 255](#)

³²⁵ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 75](#)

³²⁶ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 80](#)

³²⁷ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 83](#)

strong competence at a level that does not yet reach the minimum standard for the next level.”³²⁸

215. It became clear from the Cabinet Secretary’s letter that the Code will go further than CEFR in describing people’s varying Welsh language ability. He said CEFR “is simply a reference tool used to facilitate this process” of developing the Code, which will “include descriptors developed specifically for the Welsh language”.³²⁹

216. The Cabinet Secretary also said in this letter:

*“The provisions in section 6 of the Bill allow for the ‘Code to describe Welsh language ability’ to include anything else related to describing ability in Welsh, including the CEFR’s pre-A1 and ‘plus’ level descriptors. When developing the Code under Section 6 the extent to which the CEFR’s entire ‘menu’ of descriptor scales can be used to describe Welsh language ability will be considered.”*³³⁰

217. Another important issue was the link between the CEFR and the Curriculum for Wales. Mudiad Meithrin said linking the CEFR with GCSE and A Level qualifications is “a fundamental element” needed to ensure there is “consistency between the standard descriptions of ability in Welsh and the grades” people get. They said this had already happened with the Welsh for Adult examinations.³³¹ RhAG also emphasised the need for the Code to match the “needs of qualifications.”³³²

218. Estyn said that consideration was needed as to how the CEFR maps into different contexts such as schools. They cited a trial with a “small number of secondary schools” working with the National Centre for Learning Welsh to look at how it can be mapped into secondary schools. They were also aware of a “handful of pilots” of schools with years 8 and 9 looking at how the National Centre for

³²⁸ [Letter from the Cabinet Secretary for Finance and Welsh Language to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 11 October 2024](#)

³²⁹ [Letter from the Cabinet Secretary for Finance and Welsh Language to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 11 October 2024](#)

³³⁰ [Letter from the Cabinet Secretary for Finance and Welsh Language to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 11 October 2024](#)

³³¹ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 2.3](#)

³³² [Written evidence, WLE 14, RhAG, paragraph 3.5](#)

Learning Welsh “can evolve the curriculum that they have, based on the CEFR, and apply it in the school context.”³³³

219. The National Centre for Learning Welsh said there is a “close relationship” between the literacy framework and the CEFR. They felt it would be “fairly easy” to align the two. This is work that they have already started.³³⁴

220. WJEC also highlighted the work that has been done to align Welsh for Adult qualifications with the CEFR. They said they would welcome developing other qualifications in the future in line with the CEFR. This, they said would create a “single continuum of Welsh language learning” from GCSE through to Welsh for Adults.³³⁵ They accepted that there was “some work to do”, and said there would be a “lot of pre-work that would happen in schools before we get to GCSEs as well.”³³⁶ They said the current descriptors are “fairly limited” and would need adaptation including making sure they “reflect” the 14-16 curriculum, qualifications and specification.³³⁷

221. CYDAG said it was important to look at how CEFR will map across to qualifications. They called for “detailed” discussions and consultation with schools to support them in implementing it.³³⁸ Mentrau Iaith Cymru also highlighted the need to map the CEFR across to assessment methods in both English and Welsh-medium schools.³³⁹

222. Qualifications Wales said that once the Code has been developed, work can then start on mapping qualifications against the CEFR, as well as mapping it against the curriculum.

“There is one area where the Bill, if it progresses, and the CEFR work to develop a more detailed code, can have a more immediate impact, in that whilst GCSEs have been designed with the intent to have seamless progression into existing A-Levels, we are about to initiate the WJEC review of AS and A-levels, which we think will be a light-touch exercise for most subject areas, and really like a due diligence exercise to make sure there are no broken links from progression, not by looking

³³³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 273](#)

³³⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 54](#)

³³⁵ [Written evidence, WLE 13, WJEC](#)

³³⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 314](#)

³³⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 320](#)

³³⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 245](#)

³³⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 358](#)

at GCSE upwards but by looking at A-Level backwards. But we do think that there is probably scope for more substantive changes for Welsh and Welsh second language A-levels.”³⁴⁰

223. ASCL Cymru said that they understood that the CEFR levels were taken into account when developing the Language, Literacy and Communication element of the curriculum. They were concerned that an additional framework such as CEFR could create “additional workload ... and confusion” for those who work with the Learning and Progression Code.³⁴¹ They called for the CEFR to be brought within the curriculum to avoid adding complexity to the system.³⁴²

224. RhAG highlighted that there has been a successful literacy framework³⁴³ used in Wales “for decades”, and said the new framework must be “age appropriate from the early years to post-16 and beyond”.³⁴⁴ They queried whether the Code was needed in Welsh-medium schools, saying that the current framework is working and the Code may undermine that. However, they were open to the Code being used in English-medium schools.³⁴⁵

225. Estyn said it was “key” that the new Code was supported by a “comprehensive programme of professional development for teachers and classroom assistants.”³⁴⁶

Our view

226. The introduction of the Code is clearly a key element to unlocking the rest of the Bill’s provisions. The case for using the CEFR as the basis for this Code has been made strongly. We already have examples of it being used successfully in a Welsh context with the Welsh for Adults curriculum. It is clear that it is an appropriate framework to use for a skills based approach. It will help develop a lifelong learning continuum for the Welsh language. This will hopefully help support people continuing to develop their Welsh language skills when they leave school. It will also help support employers in identifying the level of Welsh

³⁴⁰ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 306](#)

³⁴¹ [Written evidence, WLE 10, ASCL Cymru, paragraphs 8-9](#)

³⁴² [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 52](#)

³⁴³ The Welsh Government established a [statutory national literacy and numeracy framework \(LNF\)](#) in 2013, which replaced elements of a former non-statutory skills framework. The LNF was subsequently incorporated into statutory programmes of study for English, Welsh and Mathematics and then into the [Curriculum for Wales](#). The Cabinet Secretary for Education, Lynne Neagle, has initiated a [review of the LNF](#) as part of action to support literacy and its role in improving standards.

³⁴⁴ [Written evidence, WLE 14, RhAG, paragraph 3.5](#)

³⁴⁵ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraphs 162-163](#)

³⁴⁶ [Written evidence, WLE 11, Estyn](#)

language skills they need within their workforce, thereby helping with recruitment and learning and development.

227. We think there is a case for being confident that with a well developed and well publicised Code, it will enable people to better self-assess their own language skills. This, in turn, will hopefully ensure that data relating to whether someone is a Welsh speaker for the purposes of the Census, or any other form of data collecting on the Welsh language, will be more robust.

228. We are optimistic that the Code will help demonstrate that Welsh language ability is not binary: it is not that you are either a Welsh speaker or you are not. Actually, there are different levels which more people will be able to identify with. This could potentially improve people's confidence with their own language skills, regardless of where they sit on the language continuum. It could also help encourage people to further develop their skills, if they wish. We think it will help more people see the wider cultural benefits of living in a bilingual country.

229. We do not share the concerns of a small number of stakeholders about its applicability to the Welsh context. There are already examples of it being used effectively in countries with first language speakers, such as Finland and the Basque Country, as well as those learning a language as a second, third or even fourth language.

230. We were reassured by the information from the Cabinet Secretary that the Code would include more detailed descriptors than those included in Schedule 1 to the Bill. In particular, we would welcome further descriptors for those who are not yet at A1 level.

231. We were also reassured by the views of organisations like Estyn, WJEC and Qualifications Wales about the applicability of a Code based on CEFR in school settings. It will be essential that the work they have all described in mapping the CEFR to the curriculum and qualifications happens to ensure that the Code can be integrated in a sensible way into the curriculum, and assessment frameworks. This is particularly important for the GCSE and A Level qualifications.

6. Part 3: Welsh Language Education

There were concerns about the definition of Welsh language education, and the school categories. We think this is an area of the Bill where greater clarity is needed in a number of places.

232. Part 3 of the Bill is about schools' Welsh language provision. Section 8 provides an overview of this Part.

Definitions

233. Section 8 also defines two key terms for the purposes of this Part; 'Welsh language education' and 'school'. It states that for this Part, Welsh language education means teaching Welsh, and education and training through the medium of Welsh, delivered in a school to pupils of compulsory school age. This means it does not cover a school's nursery or sixth form provision. School means a maintained school. (The term "maintained school" is defined later in the Bill in section 49.)

234. The definition of Welsh language education was an issue that some stakeholders raised concerns about, including

- Coleg Cymraeg Cenedlaethol³⁴⁷;
- Cymdeithas yr Iaith³⁴⁸;
- Dyfodol i'r Iaith³⁴⁹;
- Mudiad Meithrin³⁵⁰;
- RhAG³⁵¹; and
- the Welsh Language Commissioner³⁵².

³⁴⁷ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 4.4](#)

³⁴⁸ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

³⁴⁹ [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 8](#)

³⁵⁰ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.11](#)

³⁵¹ [Written evidence, WLE 14, RhAG, paragraph 3.6](#)

³⁵² [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 4.5](#)

235. Dyfodol i'r laith said that this definition combined two different issues. By using “Welsh language education” to cover both teaching Welsh and providing education through the medium of Welsh, “the meaning of ‘Welsh language education’ is lost”.

“Learning a language as a subject has never been considered ‘education’. If it is, it is possible to say that a school that teaches French as a subject offers ‘French education’. While ‘French education’ is offered in French lessons, it is not factually correct to say that the school offers ‘French education’. The school is likely to offer Welsh / English / bilingual education.

We definitely think it is necessary to distinguish between ‘Welsh language education’, which is schools that offer most of their education to all pupils through the medium of Welsh, and other schools.

Claiming that all schools in Wales can offer ‘Welsh language education’ is a mis-perception, and is likely to confuse education planning and cloud parental expectations and lead to unsuitable long-term decisions for pupils.”

They said the use of “Welsh language education” throughout the Bill is “misleading”. The way this term is used is “contrary” to discussions with the Welsh Government, as well as those that “have occurred in Wales in general since the second world war.”³⁵³

236. They were also concerned about the lack of terms in the Bill to describe Welsh-medium schools or any reference to early age immersion education which they described as the “foundation of language recovery in Wales, since the second world war, and the standard to aspire to.” They made suggestions to changing the definitions in this section to address these concerns.

“Our proposal is that the definition in Part 3, 8 (2) changes to this:

(a) “Welsh language education” means (i) immersion education in the period under 7 years old (ii) education in Welsh-medium schools where 100% of the pupils receive at least 80% of their education through the medium of Welsh

³⁵³ [Written evidence, WLE 01 Dyfodol i'r laith, paragraph 8](#)

(b) “Welsh language provision” means – (i) the teaching of Welsh in non Welsh-medium schools (ii) education and training through the medium of Welsh in non Welsh-medium schools”³⁵⁴

237. RhAG were also concerned about the combination of these two concepts within a single definition. They said this was most probably done to be “concise” but that it risks “being misleading” rather than clarifying. They said the current definition of Welsh language education is “well established” and that the new term runs a risk that “linguistic outcomes could be further complicated by this definition.” They also highlighted that parents and carers have an understanding of the term and how it is currently used.³⁵⁵ They said that the definition in the Bill “weakens the meaning of Welsh language education.”³⁵⁶

238. Coleg Cymraeg Cenedlaethol also had concerns about the “lack of distinction” between the two. They said this could result in a “lack of focus on protecting and increasing ‘Welsh-medium education’” which is central to delivering on Cymraeg 2050. They called for the Bill to be “crystal clear”.³⁵⁷ They believed that the changes would be “relatively minor” and would just be about defining “Welsh-medium education, Welsh lessons, and the Welsh language as a subject” separately within the Bill.³⁵⁸

239. Without this, they were concerned it “could hinder the ability of the national framework to tackle the different needs.”³⁵⁹ In particular, they believed, it would make it more difficult to identify and implement the right interventions and support. This was because the interventions needed will be different between Welsh-medium education, and Welsh as a subject.³⁶⁰

240. Cymdeithas yr Iaith also had concerns around the definition, saying that the redefinition “unnecessarily muddies the waters, and risks undermining” the Bill’s objectives. Like Dyfodol i’r Iaith they wanted to see this section amended. They wanted the reference to “education and training through the medium of Welsh” to be removed.³⁶¹

241. Mudiad Meithrin said that the definition “brings an element of ambiguity to the traditional interpretation of the term.” They called for a distinction to be made

³⁵⁴ [Written evidence, WLE 01 Dyfodol i’r Iaith, paragraph 8](#)

³⁵⁵ [Written evidence, WLE 14, RhAG, paragraph 3.6](#)

³⁵⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 172](#)

³⁵⁷ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 4.4](#)

³⁵⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 69](#)

³⁵⁹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 62](#)

³⁶⁰ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 71](#)

³⁶¹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

between expectations to teach Welsh, and expectations on the provision of education and training through the medium of Welsh. They were concerned that the current definition could lead to teaching Welsh being prioritised over Welsh-medium education.³⁶²

242. RhAG were also concerned that it “causes problems later on in the Bill by using the term far too loosely and generally without giving sufficient detail” as to which element of Welsh language education it is referring to. They called for the difference to be made clearer both in the definition but also throughout the references to Welsh language education in this Part.³⁶³

243. The Welsh Language Commissioner also raised this issue, particularly in reference to the provisions in section 1 which call for targets to be set to increase the provision of Welsh language education. She said the “concept of ‘increasing the provision of Welsh language education’ does not differentiate between the two.”³⁶⁴ She said that while she believes the policy intention of the Bill and within the Explanatory Memorandum was clear, “it’s a matter of wording in some places in order to make that clearer, because I don’t want to see that reduction or dilution of the idea of Welsh-medium education, and that needs to be clear.”³⁶⁵

244. On the specific issue of the definition in relation to section 1, raised by the Welsh Language Commissioner, we note that there is not currently one. The Legislation, Justice and Constitutional Committee raised this with the Cabinet Secretary³⁶⁶, and he said that this would be considered further.³⁶⁷

245. Medr felt there was “quite a bit of ambiguity” in the Bill, which is “largely present through the Bill when making references to types of learning that could fit into that definition of describing the learning of the Welsh language, Welsh as a subject itself, and learning delivered through the medium of Welsh or bilingually”. They said that “improved and clearer definitions” would help both providers as well as “supporting organisations” such as themselves. They were also concerned that the language they are using in their strategic plan needs to align with the

³⁶² [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.11](#)

³⁶³ [Written evidence, WLE 14, RhAG, paragraph 3.6](#)

³⁶⁴ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 4.5](#)

³⁶⁵ [CYPE Committee, 26 September, 2024, Record of Proceedings, paragraph 86](#)

³⁶⁶ [Letter from Chair, Legislation, Justice and Constitution Committee to Cabinet Secretary for Finance and Welsh Language, Welsh Language and Education \(Wales\) Bill, 24 October 2024](#)

³⁶⁷ [Letter from Cabinet Secretary for Finance and Welsh Language to Chair, Legislation, Justice and Constitution Committee, Welsh Language and Education \(Wales\) Bill, 15 November 2024](#)

Bill's language.³⁶⁸ Universities Wales also felt that the Bill was unclear on what is meant by Welsh language education.³⁶⁹

246. The Cabinet Secretary said that the definition has been “deliberately designed to capture both the effort we want to see and want to support”. He did not feel that the definition would undermine Welsh-medium education and described it as “very carefully thought about and much debated”.³⁷⁰ (We look at the issues around Welsh-medium education in the next section.)

247. While the Cabinet Secretary acknowledged and recognised the concerns raised about the definition, he did not believe the Bill would have the “practical” impact some had suggested. He said:

“... the fact that we use ‘Welsh language education’ in the Bill to encapsulate more than that doesn’t conflict with everything that we’ve already done, and everything we want to do in the future— ...”³⁷¹

248. The Welsh Government’s Deputy Director, Cymraeg 2050 said this definition was not “an attempt ... to change what the term ... is”. She said the definition was “for implementing Part 3 and how the delivery plans are implemented.”³⁷² However, the concept of “Welsh language education” and the same definition for the term, is also used in Part 4, which deals with the National Framework (section 35(a)).

Language categories

249. Section 9 establishes a statutory school language category system based on a school’s Welsh language education. This does not include special schools, who are covered in section 20. The Bill sets three categories:

- Primarily Welsh Language;
- Dual Language; and
- Primarily English Language, partly Welsh.

³⁶⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 158](#)

³⁶⁹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 294](#)

³⁷⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 106-107](#)

³⁷¹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 139-140](#)

³⁷² [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 211](#)

250. There is already a school language category system set out in non-statutory guidance.³⁷³ This consists of three categories and one sub-category:

- 1. English-medium;
- 2. Dual language;
- 3. Welsh-medium; and
- Subcategory 3P. Designated Welsh-medium (where all pupils undertake at least 90% of their school activities (curricular and extra-curricular) in Welsh).

251. Section 9 states that the language category of a school will determine the amount of Welsh language education that must be provided.

252. Section 10 requires the Welsh Ministers to make regulations to determine the amount of Welsh language education for each category of school. The amount is to be specified as a range. Section 10(2) sets out that the amount will be determined as a percentage across the whole school year, and is limited to “school sessions”. This means the percentage does not include extra-curricular activities. Section 10(3) specifies that the Welsh Ministers cannot set a minimum percentage for the range that is less than 10 per cent for primarily English language, partly Welsh schools. It is the responsibility of each school governing body to ensure that a school meets the requirements for its category.

253. Section 11 sets the Welsh language learning goals for each category of school:

- Primarily Welsh Language – pupils reach “proficient” level by the time they leave compulsory schooling. (This equates to C1 / C2 on the CEFR scale.)
- Dual Language – pupils reach “independent” level by the time they leave compulsory schooling. (This equates to B1/B2 on the CEFR scale.) They will have to reach B2 in oracy by a date to be specified by Welsh Ministers in regulations.
- Primarily English Language, partly Welsh – pupils reach “basic” level by the time they leave compulsory schooling. (This equates to A1/A2 on the CEFR scale.) In the future, the Welsh Ministers will be able to make regulations to change the language goal so that pupils are expected to

³⁷³ [Welsh Government, School categories according to Welsh-medium provision \(2021\)](#)

reach “independent” level (B1 or B2) and, by a further date specified by the Welsh Ministers in regulations, reach B2 in oracy.

254. Section 12 provides that when the Welsh Ministers make arrangements for assessment under the Curriculum for Wales under section 56 of the Curriculum and Assessment (Wales) Act 2021, they may make provision for the purpose of ensuring progress of pupils towards a school’s Welsh language learning goal. Section 12(3) amends the 2021 Act to place a requirement on the Welsh Ministers to have regard to the Welsh language learning goals when preparing and reviewing the Progression Code.

255. Section 13 gives the Welsh Ministers powers to make regulations to make further provision about school language categories. This includes powers to amend section 9 and section 10(3). The power to amend section 9 would enable the Welsh Ministers to add or revise a language category. The power to amend section 10(3) would enable the Welsh Ministers to increase over time the minimum provision of Welsh language education in a primarily English language, partly Welsh school. Section 13 does not require the Welsh Ministers to make regulations, but it does impose a duty to consider exercising the power to increase the minimum amount of Welsh language education once every five years.

256. Section 21 requires local authorities to maintain and publish a register of the school language categories in its area. This register must include details of any schools that are currently exempted from providing the minimum amount, and details of when that exemption will end. We look at exemptions later in this Chapter.

257. There was broad support for the concept of school categories, which has been a feature of the Welsh education system for some years. Mudiad Meithrin said it will “ensure consistency”, and they welcomed that they will be based on the amount of Welsh language education.³⁷⁴ They believed it would also be a “firm step” to ensuring that current provision levels are maintained.³⁷⁵ ADEW and WLGA also felt that categorisation would ensure greater consistency and transparency.³⁷⁶

258. Others who agreed with the introduction of statutory school categories included:

³⁷⁴ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.1](#)

³⁷⁵ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.14](#)

³⁷⁶ [Written evidence, WLE 12, ADEW and WLGA](#)

- ADEW³⁷⁷;
- Carmarthenshire County Council³⁷⁸;
- Clybiau Plant Cymru Kids Clubs³⁷⁹;
- Early Years Wales³⁸⁰;
- Estyn³⁸¹;
- Swansea Council³⁸²;
- Welsh Language Commissioner³⁸³; and
- WJEC³⁸⁴.

259. Mentrau Iaith Cymru welcomed the categorisation saying it would ensure “clear accountability between the amount of provision and the quality and nature of the provision and is bound to trigger an increase in pupils’ outcomes.”³⁸⁵ Professor Enlli Thomas said that the simplicity of the categories was to be “commended”. She said she was aware of teachers who currently “aren’t perfectly sure” what category of school they are working in.³⁸⁶ The Education Workforce Council also highlighted the “greater clarity” it would bring, and would ensure all schools contribute to Welsh language acquisition.³⁸⁷

260. The Welsh Language Commissioner, while accepting that the detail of the categories should be specified in subordinate legislation, felt more detail was needed on the face of the Bill “regarding the fundamental nature” of them. She believed they were “too important and fundamental an issue to be included in the regulations alone; it is central to the meaning and implications of the rest of the Bill.”³⁸⁸ CYDAG said they “completely agree” with this evidence from the Welsh Language Commissioner.³⁸⁹

³⁷⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 84](#)

³⁷⁸ [Written evidence, WLE 19, Education and Children’s Services, Carmarthenshire County Council](#)

³⁷⁹ [Written evidence, WLE 26, Clybiau Plant Cymru Kids](#)

³⁸⁰ [Written evidence, WLE 30, Early Years Wales](#)

³⁸¹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 282-283](#)

³⁸² [Written evidence, WLE 31, Swansea Council](#)

³⁸³ [CYPE Committee, 26 September, 2024, Record of Proceedings, paragraph 46](#)

³⁸⁴ [Written evidence, WLE 13, WJEC](#)

³⁸⁵ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 3.1](#)

³⁸⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 150](#)

³⁸⁷ [Written evidence, WLE 23, Education Workforce Council](#)

³⁸⁸ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 3.2](#)

³⁸⁹ [Written evidence, WLE 32, CYDAG, paragraph 1.4.2](#)

261. UCAC also agreed and called for more detail on the categories, saying that they are at the heart of the “success or failure of the Bill.”³⁹⁰ Estyn also felt there was a need for more specific definitions of the categories, and were concerned it could “cause confusion for the authorities and parents alike.”³⁹¹ They welcomed the simplification of the categories, but said they wanted to see them leading to an increase in Welsh-medium schools.³⁹²

262. Coleg Cymraeg Cenedlaethol were also concerned that the power to make regulations is “too open-ended.” They called for the Bill to “state clearly” that the amount of Welsh language education “applies to all pupils within the relevant range.” They said it should not be an average across cohorts because this could lead to different groups receiving different amounts. They said if this was the case, “they will need to be designated under different categories.”³⁹³ They were also concerned that because the detail on the categories will be set out through regulations there was a risk that the definition of Welsh-medium education could be “weakened” which would “undermine the ability of the education system to reach the targets set through the National Framework.”³⁹⁴

263. Cymdeithas yr Iaith had “real concerns” about the categories, and that they are “static” with “no assurance” that schools will progress through the categories. For them, this “raises fundamental questions about the effectiveness of the Bill.” They wanted to see the removal of categories, but with Primarily Welsh language schools defined in the Bill as schools where Welsh is the medium of all lessons except for English lessons.³⁹⁵ They said they did not believe in the categorisation of schools.³⁹⁶

264. NEU queried why the school categories were being changed so recently since the last review in 2021. They said that the impact of those changes have not yet “had time to have a real effect” on delivery of Cymraeg 2050. They were concerned that the provisions were “a response to a situation which has not yet had time for full implementation, and therefore may contain unintended consequences.”³⁹⁷

³⁹⁰ [Written evidence, WLE 09, UCAC, paragraph 3.1](#)

³⁹¹ [Written evidence, WLE 11, Estyn](#)

³⁹² [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 283](#)

³⁹³ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraphs 3.1 - 3.4](#)

³⁹⁴ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 3.6](#)

³⁹⁵ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

³⁹⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 401](#)

³⁹⁷ [Written evidence, WLE 21, NEU Cymru](#)

265. The issue of monitoring provision against the minimum for each category was raised. This applies to all three of the school language categories. NASUWT, as noted in paragraph 313, were concerned about Estyn having a role in this. Mudiad Meithrin said that Estyn’s role in this should be “collaborative and encouraging, rather than threatening”.³⁹⁸ UCAC suggested the monitoring should be done by local authorities and the Welsh Government.³⁹⁹ Mentrau Iaith Cymru said they were unclear who would be monitoring that the minimum is achieved.⁴⁰⁰

266. Estyn said that they would “ensure” that inspections would “have due regard” to the amount of Welsh language provision, to ensure schools “do not go below the minimum.” They also emphasised the importance of looking at quality of provision as well.⁴⁰¹

Primarily Welsh language school category

267. In exploring the provisions around school categorisation, we heard about concerns around the balance struck in the Bill between English and Welsh language provision. Some felt that the Bill did not say enough on Welsh language schooling. This included CYDAG⁴⁰²; Dyfodol i’r Iaith⁴⁰³; and RhAG⁴⁰⁴.

268. Dyfodol i’r Iaith called it “one of the main shortcomings of the Bill” and called for a “whole section” to be added to the Bill on Welsh language schools.⁴⁰⁵ They said the Bill needed to “talk about the growth of Welsh-medium education.” They said to do this would mean changing “a lot of the wording ... from almost the beginning to the end, in terms of categorising schools and also defining what Welsh-medium education is.”⁴⁰⁶

269. The Welsh Language Commissioner while welcoming the Bill’s provisions in relation to English-medium schools said that developments in this sector should not be at “the expense of the development of Welsh-medium education”.⁴⁰⁷ RhAG asked why the Bill “ignore the very sector that has been growing ...” They suggested that there was a “backslide”.⁴⁰⁸

³⁹⁸ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.17](#)

³⁹⁹ [Written evidence, WLE 09, UCAC, paragraph 2.9](#)

⁴⁰⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 391](#)

⁴⁰¹ [Written evidence, WLE 11, Estyn](#)

⁴⁰² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 228](#)

⁴⁰³ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 8](#)

⁴⁰⁴ [Written evidence, WLE 14, RhAG, paragraph 3.6](#)

⁴⁰⁵ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 8](#)

⁴⁰⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 399](#)

⁴⁰⁷ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 57](#)

⁴⁰⁸ [Written evidence, WLE 14, RhAG, paragraph 3.6](#)

270. The National Centre for Learning Welsh said that:

*“... developing the Welsh language in all schools is important and that it shouldn’t be a debate about developing Welsh in one at the expense of the other. ...”*⁴⁰⁹

They said the contribution of one part of the education sector needs to be respected and protected but that there is also a need to “develop a regime where the majority of our young people come into contact with the Welsh language.”⁴¹⁰

271. We regularly heard about the importance of Welsh-medium provision (currently the non-statutory category 3P Designated Welsh-medium)⁴¹¹ in creating the most fluent and confident speakers. Those who raised this included:

- Cymdeithas yr Iaith⁴¹²;
- CYDAG⁴¹³;
- Dyfodol i’r Iaith⁴¹⁴;
- Mentrau Iaith Cymru⁴¹⁵;
- National Centre for Learning Welsh⁴¹⁶;
- RhAG⁴¹⁷; and
- Welsh Language Commissioner⁴¹⁸.

272. We were told that Welsh-medium provision is the “golden standard” and that it is the only model:

“... (a) that enables the school to be a Welsh-speaking community and (b) its ability to produce fluent Welsh speakers, regardless of their linguistic background, has been proven. This

⁴⁰⁹ [CYPE Committee 17 October 2024. Record of Proceedings, paragraph 87](#)

⁴¹⁰ [CYPE Committee 17 October 2024. Record of Proceedings, paragraph 88](#)

⁴¹¹ This is a school which delivers all area of learning and experience through Welsh, with 100% of learners undertaking at least 90% of their school activities (both curricular and extra curricular) in Welsh.

⁴¹² [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁴¹³ [Written evidence, WLE 32, CYDAG, paragraph 4.1](#)

⁴¹⁴ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 9](#)

⁴¹⁵ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 3.1](#)

⁴¹⁶ [CYPE Committee 17 October 2024. Record of Proceedings, paragraph 87](#)

⁴¹⁷ [Written evidence, WLE 14, RhAG, paragraph 3.7](#)

⁴¹⁸ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 4.2](#)

model is the only way to provide inclusive Welsh language education."⁴¹⁹

273. RhAG said that it is not just teaching in a classroom which supports fluency, but:

*"... 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."*⁴²⁰

274. Dyfodol i'r laith also highlighted the role these schools play in being "a bridge between the Welsh that they use in school and the Welsh that they use within their community".⁴²¹

275. These issues were linked to the school categorisations proposed in the Bill, and in particular the definition of a Primarily Welsh language school category. For many the introduction of an additional category, which would mirror the current non-statutory category of 3P Designated Welsh-medium school, would help address these issues. We heard that the current proposals within the Bill were too broad.

276. For Dyfodol i'r laith the lack of this additional category was their "major concern" with the current Bill.⁴²² They said that the proposed Welsh language school category "does not come close to defining how Welsh schools operate." They were concerned that this category would encompass schools where "51% of the pupils learn through the medium of Welsh." But they said that Welsh language schools are where pupils have "a complete immersive education" and that no other category gives pupils the opportunity to become fluent Welsh speakers. They wanted an additional category:

*"... (d) the 'Welsh-medium school - schools where 100% of the pupils receive at least 80% of their education in Welsh' category".*⁴²³

⁴¹⁹ [Written evidence, WLE 01 Dyfodol i'r laith, paragraph 9](#)

⁴²⁰ [Written evidence, WLE 14, RhAG, paragraph 3.8](#)

⁴²¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 400](#)

⁴²² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 400](#)

⁴²³ [Written evidence, WLE 01 Dyfodol i'r laith, paragraph 9](#)

277. Mentrau Iaith Cymru were concerned that not having a higher category could disincentivise schools to offer the fully immersive education, which can then impact on pupils' experiences:

“The danger is that a school that provides the specified percentage of Welsh-language learning for the highest category but does not provide a holistic experience of Welsh for the pupil would fall into the same category as a school that provides a space in which pupils are immersed in the Welsh language, with nothing to distinguish between the two types of school.”⁴²⁴

278. CYDAG had “significant” concerns about the category as set out in the Bill. They said it does not reflect current Welsh-medium provision, which “must be protected and maintained without weakening the current provision or undermining the definition of Welsh-medium education.”⁴²⁵ Mudiad Meithrin said the minimum should match “at least” what was in the current non-statutory guidance. They said these new categories should not “undermine” current provision, of 90 per cent in designated Welsh-medium schools, and 70 per cent in non-designated Welsh-medium schools.⁴²⁶

279. The Welsh Language Commissioner was concerned about the “broad range that could exist” in this category.⁴²⁷ She believed the Bill could be amended, to include an additional section in section 10 which specified a minimum for this category of school. “For example, it could be stated that in specifying the range for the ‘Primarily Welsh Language’ category, Welsh Ministers may not specify a minimum for the range that is less than 80% of Welsh language education.”⁴²⁸

280. Cymdeithas yr Iaith said it was “crucial” there was this type of category. They also wanted this to be the “final progression step on the Continuum, and the destination for every school.”⁴²⁹ RhAG also wanted to see the Bill amended to include this type of school. They said it was “essential” with the “highest percentage” being “firmly” defined on the face of the Bill.⁴³⁰ Coleg Cymraeg Cenedlaethol said achievement of the policy objectives of the Bill would be at risk,

⁴²⁴ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 3.1](#)

⁴²⁵ [Written evidence, WLE 32, CYDAG, paragraph 14.3](#)

⁴²⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 257](#)

⁴²⁷ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 47](#)

⁴²⁸ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 1.1](#)

⁴²⁹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁴³⁰ [Written evidence, WLE 14, RhAG, paragraph 3.7](#)

if the regulations did not make the Primarily Welsh category the equivalent of the current 3P category.⁴³¹ CYDAG also wanted to see this “fourth” category.⁴³²

281. Professor Gwenno Ffrancon also wanted to see changes to the Bill so that the Primarily Welsh category was defined along these grounds: “only Welsh-medium education delivered in that school, except for teaching English as a subject, and provide clarity and safeguard the opportunities for those pupils to develop fully their Welsh language skills.”⁴³³

282. CYDAG were concerned that an additional risk to the current category was that “schools misrepresent what they are by saying that they are primarily Welsh.”

“On a percentage basis, on paper, they may well be, but that could be very, very far from being a Welsh-medium school that is fully immersive and provides education wholly through the medium of Welsh, ensuring that all pupils leave as fluent Welsh speakers, proficient to discuss all the subjects that they’ve learnt through the medium of Welsh, having also had a strong Welsh ethos within school life.”⁴³⁴

283. Coleg Cymraeg Cenedlaethol did not believe that a more ambitious definition of Welsh-medium education would have an impact on the “other end of the continuum”. They were concerned about “unintended consequences” for the Welsh-medium school sector and wanted to see those schools that currently operate through the medium of Welsh to be protected.⁴³⁵

284. Both Mudiad Meithrin⁴³⁶ and Cymdeithas yr Iaith wanted to see all new schools in Wales to be Welsh-medium. Cymdeithas yr Iaith called for the education system to be fully Welsh-medium by 2050. They called for a statutory target on growth of Welsh-medium education to be put in the Bill. They said that previous experience has shown the “weaknesses of setting non-statutory targets”. This target should be that “100% of children will receive Welsh-medium education by 2050.”⁴³⁷ While RhAG called for a stop to new English-medium

⁴³¹ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 3.5](#)

⁴³² [Written evidence, WLE 32, CYDAG, paragraph 14.4](#)

⁴³³ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 160](#)

⁴³⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 267- 268](#)

⁴³⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 74](#)

⁴³⁶ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.7](#)

⁴³⁷ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

schools being opened, with a “system” that moves current English-medium schools “along a continuum”.⁴³⁸

285. We were told this approach would “normalise” Welsh language education, and would help increase demand, as well as contributing significantly to meeting Cymraeg 2050.⁴³⁹

286. The Cabinet Secretary was clear in saying he did not believe the Bill undermined Welsh-medium education, which he said has “been hugely successful in the last 30 years. It’s been a major success story.” The Bill was “equally supportive” of growth in this sector, whilst also improving English-medium schools in “producing confident and capable speakers”.⁴⁴⁰ He said the Bill was trying to “harness” efforts across all the education sector, and that the area where the most ground had to be made up was in the English-medium sector.⁴⁴¹ He said that:

“... I think the language of, ‘Does the Bill do too much for this and not enough for that?’ does play in a bit to that view that some people have that somehow this is a zero-sum game—you know, if you do more over here you must be doing less over there—and I just don’t believe that that is the case.”⁴⁴²

287. He told us that concerns about the breadth of the Primarily Welsh category did not take “properly into account” the regulation making powers within the Bill. These powers will enable the Welsh Ministers to set out the range for Primarily Welsh and Dual language schools.⁴⁴³ He said that there was not a need to set these out in the Bill because there are “already categories and percentages for these other schools that are used now.” The 10 per cent minimum set out for Primarily English, partly Welsh schools was set out in the Bill “in order to create a basic floor where we know that all schools are able to reach that level.”⁴⁴⁴ We asked about the lack of a “Designated Welsh” category in the Bill, and he said this would be captured “through the regulation-making process.”⁴⁴⁵

288. The Cabinet Secretary did not agree that the categories in the Bill would cause any confusion. He said:

⁴³⁸ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 177](#)

⁴³⁹ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.7](#)

⁴⁴⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 106-107](#)

⁴⁴¹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 109](#)

⁴⁴² [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 110](#)

⁴⁴³ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 112](#)

⁴⁴⁴ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 116](#)

⁴⁴⁵ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 114](#)

“Those schools exist. They already advertise what they do. They are already understood by parents who use them. I don’t think the Bill adds any degree of confusion in that way, and, as I say, there will be regulations, it will be laid out there. Schools, in their delivery plans, will be obliged to reflect the obligation that the regulations place on them.

... I think some of the evidence undervalues the sophistication of parents in making the choices that they do, because I think they will be weighing up all sorts of things when they make a choice. And I sometimes think that some of the evidence teeters into a belief that the Bill should narrow parental choice in a way that I don’t think would be sensible. ... It will guide the choices that they make and, in the end, we must allow parents to make those calculations for themselves.”⁴⁴⁶

Dual language school category

289. ADEW and WLGA were concerned about the potential confusion between the Dual Language category, and the previous “Dual Stream” category. Before the revision of the 2021 category guidance, Dual Language schools were known as Bilingual schools.

290. ADEW and WLGA said:

“Dual language schools need clarity in terms of the nature of the provision as the expectations may not be as clearly defined as Welsh medium (3) or English medium (1). Dual language is being linked to and confused with the previous category of dual stream.”⁴⁴⁷

291. ADEW felt there was a need to “to define the change to category 2.” This would make it clear that this is a school where teaching happens in both languages, and not a school with an English and a Welsh stream. This would make it clearer to everyone what the expectations of that category of school was.

⁴⁴⁸

⁴⁴⁶ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 118-119](#)

⁴⁴⁷ [Written evidence, WLE 12, ADEW and WLGA](#)

⁴⁴⁸ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 85](#)

292. Mudiad Meithrin also had concerns about how a dual language school would be defined.⁴⁴⁹

Primarily English Language, partly Welsh school category

293. Unlike the other categories, the Bill does stipulate a minimum amount of Welsh language provision in Primarily English language, partly Welsh schools. The Bill sets it at 10 per cent, with powers for the Welsh Ministers to increase it at a future date. Much of the evidence we took in relation to this related to the level of change this would mean for schools, and how achievable it is. Issues around temporary exemptions and whether 10 per cent would meet the Welsh language learning goals are covered in the following sections.

294. As the Explanatory Memorandum states, the current non-statutory guidance requires English-medium schools to provide 15 per cent of provision in Welsh. This covers both curricula and extra-curricula provision. It states that because the language categories will be statutory:

“... it is not practical to impose a statutory requirement on schools in relation to their extra-curricular provision as it is much more difficult to monitor this type of provision.”⁴⁵⁰

295. We explored the extent to which 10 per cent was achievable. Much of this was closely linked with the broader workforce issues which we explored in Chapter 3. Estyn said it was “reasonable”. They said that while a minimum amount of time was important, it’s about quality of “provision ... pedagogy and the impact that has on” learning. It was important that the time was not spent “doing the same language patterns and doing the same thing over and over again”.⁴⁵¹

296. The WLGA said 10 per cent was achievable “if you throw enough money at it, if you throw enough resources”.⁴⁵² They said a “road-map” along with the means to deliver it were needed. They emphasised the “positive attitude” to Welsh in schools across Wales. They believed the will to deliver was there, but the means currently were not.⁴⁵³ ADEW said it was realistic but that it would be challenging in some areas. They also emphasised the importance of funding, and a gradual approach to the change.⁴⁵⁴

⁴⁴⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 258](#)

⁴⁵⁰ [Welsh Government, Explanatory Memorandum, paragraph 3.114, July 2024](#)

⁴⁵¹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 263-265](#)

⁴⁵² [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 38](#)

⁴⁵³ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 82](#)

⁴⁵⁴ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraphs 41-43](#)

297. Some raised concerns that the minimum 10 per cent was lower than the current non-statutory guidance. Mudiad Meithrin asked how “reducing the minimum contact hours will contribute to developing” Welsh skills.⁴⁵⁵ They also said that if Welsh only stays within formal Welsh lessons (which they believed would be the case with a minimum of 10 per cent), it will be difficult to increase fluency.⁴⁵⁶

298. Cymdeithas yr Iaith were also concerned about this amount. They said Welsh has been compulsory since 1988 and that “almost every single child already received this minimum 20 years ago.” They said this amount does not “create confident Welsh speakers.” They called for a minimum of 30 per cent, with schools working towards this “immediately, with significant Government support to do so”, and that all schools would have to comply with this requirement “within five years”.⁴⁵⁷ Others who agreed with concerns as to whether 10 per cent is sufficient to create fluent speakers included Mentrau Iaith Cymru. They called for the minimum to be increased.⁴⁵⁸

299. Professor Enlli Thomas also said that if there was simply a continuation of current practice, with 10 per cent being delivered through teaching Welsh as a subject, then there will not be the increase in the number of Welsh speakers. She said “the status quo doesn’t work.” She felt this was a “golden opportunity to provide something new.”⁴⁵⁹ She said that there are strategies that the new National Institute (see Chapter 8) could help schools embed which would help.⁴⁶⁰

300. CYDAG called 10 per cent “a very low percentage” of a pupil’s time in school, and said it was not sufficiently ambitious, especially in the context of the policy objectives of the Bill.⁴⁶¹

301. UCAC said it was important for these schools to “provide enough contact hours to ensure that learners develop into confident speakers.” They were concerned that there should not be an unintended consequence where English-medium schools were offering a “more varied range of subjects” than a Welsh-medium school, because the English school is not “required to offer as many contact hours in terms of the Welsh language.”⁴⁶²

⁴⁵⁵ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.8](#)

⁴⁵⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 253](#)

⁴⁵⁷ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁴⁵⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 374](#)

⁴⁵⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 171](#)

⁴⁶⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 172](#)

⁴⁶¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 278](#)

⁴⁶² [Written evidence, WLE 09, UCAC, paragraph 2.9](#)

302. Estyn said that 10 per cent “of every school year for every pupil builds into a significant sum by the end of the statutory school period.” They said that with the creation of a continuum with the chance for “meaningful development within that, there is the possibility of creating independent Welsh speakers.” They said the current system was “too piecemeal” to do this.⁴⁶³ They also indicated that currently, where 10 per cent of time is spent on Welsh, this doesn’t result in an increase in use of Welsh by pupils.⁴⁶⁴

303. In relation to what is currently happening in English-medium schools we heard different things. ASCL said the “majority of schools at key stage 4 are very close to the 10 per cent” but that it was lower at key stage 3.⁴⁶⁵ This was borne out by a headteacher of a secondary school representing NAHT, who said that in their school they were close to 10 per cent at key stage 4, but at key stage 3, it was around 6 per cent.⁴⁶⁶

304. In relation to primary schools, NAHT said it would vary between individual schools with 10 different primary schools all having different levels of percentages. This was often down to workforce capacity.⁴⁶⁷ (An issue we look at in more detail in Chapter 3.)

305. The WLGA representative from Blaenau Gwent said that while Welsh was spoken and taught in all schools in Blaenau Gwent, they were confident not all schools were reaching 10 per cent currently.⁴⁶⁸ They also felt getting to 10 per cent would be “a big leap”.⁴⁶⁹

306. ADEW said the picture varied “significantly” across Wales, and is dependent on the local context.⁴⁷⁰

307. In our survey of children in English-medium schools (which we acknowledge was not a representative sample across Wales) the majority of respondents said they are currently taught Welsh for between 2.5 to 6 hours a week. When asked about having a minimum of 10 per cent, there was mixed views with some

⁴⁶³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 266](#)

⁴⁶⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 285](#)

⁴⁶⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 72](#)

⁴⁶⁶ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 76](#)

⁴⁶⁷ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 73](#)

⁴⁶⁸ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 71](#)

⁴⁶⁹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 73](#)

⁴⁷⁰ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 77](#)

pleased, some indifferent, and some negative. Those who were negative about the proposal referenced finding the language boring or difficult.⁴⁷¹

308. Concerns were raised about setting the minimum at 10 per cent. NEU Cymru, while agreeing with a minimum amount of provision being set, did not think this minimum should be in terms “of Welsh language contact hours”. They called for “care” to be taken when “imposing a minimum amount ... on an English-medium school” particularly if they do not have the Welsh language capacity within the workforce.⁴⁷²

309. The Children’s Commissioner said it was important that the introduction of the minimum amount of Welsh provision was done collaboratively “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.”⁴⁷³

310. The Education Workforce Council also agreed that there will be some schools which have:

“... 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.”⁴⁷⁴

311. There was exploration of what the 10 per cent would look like. Professor Enlli Thomas said that the 10 per cent provision was “vague” and needed “further consideration.”⁴⁷⁵ She said if she were working in this category of school, “I wouldn’t know exactly what would count” and that there was a risk of “ticking a box” in meeting the minimum amount, but that it might not be “delivering its ambition.”⁴⁷⁶ She asked whether it was a percentage of “the school day ... the school week ... of subjects. What exactly is the concept there?” She said that if the intention is to increase pupils’ engagement with Welsh “there are all sorts of ways

⁴⁷¹ [CYPE Committee, Welsh Language and Education \(Wales\) Bill, Survey findings, October 2024, paragraphs 25-30](#)

⁴⁷² [Written evidence, WLE 21, NEU Cymru](#)

⁴⁷³ [Written evidence, WLE 24, Children’s Commissioner for Wales](#)

⁴⁷⁴ [Written evidence, WLE 23, Education Workforce Council](#)

⁴⁷⁵ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁴⁷⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 156](#)

of doing that that could perhaps be more beneficial to pupils ...” citing the importance of social spaces within schools to do this.⁴⁷⁷

312. However, CYDAG welcomed that the 10 per cent is about curriculum activities, and not extra-curricula activities.⁴⁷⁸

313. The teaching unions were particularly concerned about what would happen if a school could not meet the 10 per cent minimum provision. (We look at the opportunity for exemptions in a separate section below.) NASUWT said that the “consequences” of this happening needed to be “managed sensitively.” They said it was unclear what the consequences would be and what was the “ultimate sanction.” Involving Estyn in monitoring this would “go against a collaborative, non threatening ethos of language development.” They were concerned it would “impact badly on the mental health” of non Welsh speaking teachers.⁴⁷⁹

314. We also heard different views on how the 10 per cent would be measured. Coleg Cymraeg Cenedlaethol said that using an average across a whole school “would muddy the waters.” As well as making it more difficult to understand what was being provided across different school years. They called for categorisation by cohort within schools.⁴⁸⁰ This would be particularly important in those schools which have different language streams, saying that an average across two streams “would be utterly meaningless”.⁴⁸¹

315. The Catholic Education Service said that a potential unintended consequence could be that the new requirements within the Bill could “become a new accountability which seems counter intuitive to the objective focussing on language ethos and culture and nurturing a desire to use the language in everyday life.”⁴⁸²

316. We also heard concerns that an increase in the number of hours teaching Welsh, may have an impact on the wider curriculum of a school. The Catholic Education Service, asked whether this potential unintended consequence had been considered, in particular in light of the potential GCSE curriculum offer at a school.⁴⁸³ NAHT also raised this describing the current curriculum as “already crowded” and said that if there is an increase “then something’s got to not be

⁴⁷⁷ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 155](#)

⁴⁷⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 263](#)

⁴⁷⁹ [Written evidence, WLE 03, NASUWT, paragraph 9d](#)

⁴⁸⁰ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 79](#)

⁴⁸¹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 81](#)

⁴⁸² [Written evidence, WLE 22, Catholic Education Service](#)

⁴⁸³ [Written evidence, WLE 22, Catholic Education Service](#)

taught". Identifying what would not be taught would be a "challenge for schools."⁴⁸⁴

317. On the question as to whether 10 per cent was achievable, the Cabinet Secretary highlighted the evidence from the 2021 consultation on the non-statutory targets. He said that then around half of English-medium schools believed 15 per cent was "within their grasp." He acknowledged that this was when it included extra-curricula activities as well. He said at that point some schools were below 10 per cent, but that it was felt this was a "reasonable figure".⁴⁸⁵ He acknowledged that during the previous consultation some of the "bottom end" of provision was five per cent.⁴⁸⁶

318. In relation to the concerns raised that 10 per cent is a reduction to the current non-statutory guidance of 15 per cent, the Cabinet Secretary said the Bill did not prevent using Welsh in extra-curricular activities. He also highlighted the requirement for schools to "promote an ethos around the language and sense of a Welsh culture" alongside the minimum amount of Welsh provision. He said that it was to help local authorities measuring what activity was happening in their schools.

"... Now, the only really reliable way you can do that is to capture what goes on during the compulsory school day, because that is the one thing that is common to everybody. Different schools will have different approaches to extra-curricular activities. They're voluntary; some children will take them up, and other children will be doing other things, so you wouldn't be capturing comparable forms of data, and the effort in this part of the Bill is to improve comparability. So, that's why we decided, not in any way to devalue the importance of those extra-curricular activities, to capture, for data purposes, the things that go on inside the compulsory school day."⁴⁸⁷

319. The Welsh Government's Deputy Director, Cymraeg 2050 said that they envisaged that schools meeting the minimum 10 per cent would "just teach Welsh as a subject" but that there was nothing preventing such a school from delivering the minimum through other ways such as studying other subjects

⁴⁸⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 76](#)

⁴⁸⁵ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 30](#)

⁴⁸⁶ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 124](#)

⁴⁸⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraphs 267-268](#)

through the medium of Welsh. They said teaching through the medium of Welsh “isn’t just for category 3 schools.”⁴⁸⁸

320. The Cabinet Secretary accepted there would be a “preponderance” of teaching Welsh as a language, but he said it was important that Welsh was also used as a form of instruction. This would help demonstrate that it’s a “living language” as well as addressing concerns about crowding out other parts of the curriculum. He said other parts of the curriculum can be used to increase Welsh use in learners,⁴⁸⁹ giving the example of a weekly school assembly conducted in Welsh as counting towards the 10 per cent. He was confident that alongside the traditional methods there would be “some creativity, some innovation, some new ways”. He said that:

“... 20 minutes a day—and you’re almost there. You’ve then got to do some other things alongside it, and you’ll be at that floor, and then we’ll be in a position to push on from there.”⁴⁹⁰

321. In relation to how the 10 per cent would be measured, a senior lawyer from the Welsh Government confirmed that the 10 per cent was not per pupil. He said it is “what the school does overall, rather than necessarily to each individual.” Although he emphasised that the objective of the Bill is that every child leaves school with a certain level of Welsh skill.⁴⁹¹ This flexibility within the system will enable it to “take into account the particular needs of particular children.”⁴⁹²

Welsh language learning goals

322. Dyfodol i’r Iaith said they had a “very mixed view” of the learning goals. They said they did not feel categories designed for adults learning a second language was “fully relevant” to the state school system.⁴⁹³ (We explore the issues around the appropriateness of the CEFR framework in schools and for first language speakers in the previous Chapter.)

323. Some were concerned that the learning goals would set unreasonable expectations, and could even put people off from choosing Primarily Welsh

⁴⁸⁸ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 210](#)

⁴⁸⁹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 100](#)

⁴⁹⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 126](#)

⁴⁹¹ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 311](#)

⁴⁹² [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 313](#)

⁴⁹³ [Written evidence, WLE 01 Dyfodol i’r Iaith, paragraph 11](#)

language schools. Dyfodol i'r Iaith said there was not enough “differentiation” in particularly between Dual language and Primarily English, partly Welsh schools.⁴⁹⁴

324. UCAC were concerned that the language goal for Dual Language schools was B1/B2. They said a “vast number” of pupils in these schools could be expected to reach C1 / C2. They were concerned that expectations for some schools “will fall” and “not be challenging enough.”⁴⁹⁵

325. UCAC also raised concerns about schools which currently say they are bilingual “but ultimately they aren’t bilingual schools at all”. They said there were “several examples of those schools in all four corners” of Wales.⁴⁹⁶

326. In relation to concerns about any potential mis-representations of a school’s category, a senior lawyer from the Welsh Government said that there are requirements for each category which must be met, “so there is an argument that it in itself meets the concerns”.⁴⁹⁷

327. One of the issues we explored was how feasible the Welsh language learning goals would be.

328. Professor Enlli Thomas thought the aim of Primarily Welsh language schools producing C1 / C2 speakers was “ambitious considering the type of Welsh language usage amongst children and young people”. She said that research has “repeatedly shown” differences between children attending Welsh-medium schools based on their language at home. She said it was “not guaranteed or necessarily achievable” for all pupils in the Welsh sector “unless there is appropriate support and training for teachers to understand how, when and why they should differentiate.”⁴⁹⁸

329. The Welsh Language Commissioner had similar views and referred to a “1970s” mindset that “dropping a child from a non-Welsh speaking background into that regime [a Welsh-medium school] means that the child will then turn into a proficient and confident Welsh speaker.” She said that while these schools are the most likely to develop fluent and confident speakers, there was a need to be “realistic” about whether they would automatically be able to reach C1 / C2

⁴⁹⁴ [Written evidence, WLE 01 Dyfodol i'r Iaith, paragraph 11](#)

⁴⁹⁵ [Written evidence, WLE 09 UCAC, paragraph 2.6](#)

⁴⁹⁶ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 210](#)

⁴⁹⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 212](#)

⁴⁹⁸ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

levels. She said there was a risk that setting that target could have a “knock on effect on their ability to be completely fluent and be very good B speakers.”⁴⁹⁹

330. Professor Enlli Thomas thought that Primarily English language, partly Welsh school pupils reaching B2 “in due course is extremely challenging.” But she believed that setting stretching targets was the way to bring about change, and felt both were achievable “if the appropriate actions (which are proposed in the Bill) are in place and effective.”⁵⁰⁰

331. The Education Workforce Council while welcoming the “ambitious” learning goals, said there could be practical issues in achieving them. In particular, having sufficiently qualified staff, who they believed would need to be “qualified beyond independence (B1/B2), which is equivalent to A level standard.” They also raised the issue of schools where pupils may not have access to any Welsh at home or within their local community.⁵⁰¹

332. NEU Cymru said that schools should decide a child’s outcome, rather than there being a “universal expectation of B2.”⁵⁰²

333. Cymdeithas yr Iaith said the learning goals set in the Bill would not be the result of the Bill as currently drafted. They said there “is a risk of reliance on teaching Welsh as a second language as a pathway to creating confident speakers. ... there has been consensus that learning Welsh as a second language is completely ineffective as a pathway to creating confident speakers.”⁵⁰³

334. Mudiad Meithrin said that for learners to “truly achieve” B1/B2 levels, the minimum amount of provision would have to be increased.⁵⁰⁴ They were not convinced that 10 per cent would be enough.⁵⁰⁵ Cymdeithas yr Iaith said that 10 per cent “does not create confident speakers.”⁵⁰⁶ Coleg Cymraeg Cenedlaethol said that studying Welsh was “necessary but insufficient” to meet the B2 level. They said it would have to be “reinforced with learning experiences through the medium of Welsh in other areas of learning.”⁵⁰⁷

⁴⁹⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 137-138](#)

⁵⁰⁰ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁵⁰¹ [Written evidence, WLE 23, Education Workforce Council](#)

⁵⁰² [Written evidence, WLE 21, NEU Cymru](#)

⁵⁰³ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁵⁰⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 252](#)

⁵⁰⁵ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 276](#)

⁵⁰⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 372](#)

⁵⁰⁷ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 4.7](#)

335. NEU Cymru believed that the differences in the necessary “guided learning hours” to reach B2 and the C1/2 levels was significant, with around “320 and 400 guided learning hours” for B2, and between 520 to 900 “guided learning hours” to reach C1 and C2:

“... This will have a significant impact on the timetable, and the Welsh Government need to set out what learners and the workforce can stop doing, in order to make this ambitious Bill a reality.”⁵⁰⁸

336. In relation to these figures, Qualifications Wales said that if these figures were related to Y10 and Y11, it would “seem an awful lot” saying it’s likely it is equivalent to five GCSEs in terms of time. But if this was hours across the whole of secondary period then it “might be realistic.”⁵⁰⁹

337. NDCS Cymru raised a particular issue about the language goals and deaf children. They called for them to have “some flexibility for deaf children and consider their communication needs.” They were concerned that the Bill currently only excludes those in special schools from meeting these goals. Yet “the vast majority of deaf children are in mainstream education.” They wanted assurances that these children will not “struggle” in securing a place in a school because of concerns they will not meet the B2 level. This said this could be rectified by “an amendment to the target in relation to children with ALN or local authority-recognised sensory loss.”⁵¹⁰

338. Clearly a key issue is how the language goals might map onto qualifications and assessments. (We have already covered in the previous section some concerns about how requirements to deliver a certain amount of Welsh might impact on delivery of the curriculum.)

339. Mentrau Iaith Cymru said they were “extremely pleased” that the Bill links the assessment arrangements from the Curriculum and Assessment (Wales) Act 2021 with the learning goals of this Bill. They believed that “ensuring that pupils’ linguistic outcomes can be measured in a way that matches the learning goal of various categories is essential to the successful implementation of the aims of this Bill”.⁵¹¹

⁵⁰⁸ [Written evidence, WLE 21, NEU Cymru](#)

⁵⁰⁹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 327](#)

⁵¹⁰ [Written evidence, WLE 29, The National Deaf Children’s Society](#)

⁵¹¹ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 3.4](#)

340. Qualifications Wales said that learners currently taking GCSE Welsh as a second language would be likely to be at a level around A1/A2. They said that for these learners to get to B2 will be a “significant change”. It will need a “lot of inputs” and the amount of time would likely be one of those inputs.⁵¹²

341. WJEC said it would be “very difficult to define a B2 as an equivalent to an A-level”. Currently GCSE Core Cymraeg has approximately 120 guided hours, while Level 2 Additional Core Cymraeg is 60 guided learning hours. They said there was the need for a broader offer and more qualifications before the CEFR could be mapped directly across. They said care needed to be taken in trying to map them across and ensuring like was being compared with like, and that information is being presented “in the most appropriate way.”⁵¹³

342. In terms of the timing for the language goals, Cymdeithas yr Iaith said

*“We are deeply concerned about the wording of section 11(2)(b) of the Bill, which sets out a children’s language attainment goal “by a date specified by the Welsh Ministers by regulations”, rather than “by 2050” as set out in the White Paper. This would give ministers free rein to push the target forward through regulations if they are not on course to meet it, repeating the pattern of recent years of lowering targets rather than acting firmly to meet them.”*⁵¹⁴

343. ColegauCymru highlighted the potential impact of these learning goals on the FE sector. They asked whether there would be an:

*“... expectation on FE colleges in supporting those learners who had not managed to meet the B2 level? Given the changes to the GCSE structures, this could be challenging to achieve. ... It is important that any implications for learners taking a Welsh GCSE resit in post-16 education are carefully and fully considered, both in terms of the legislation and also subsequent qualification development.”*⁵¹⁵

⁵¹² [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 326](#)

⁵¹³ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 325](#)

⁵¹⁴ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁵¹⁵ [Written evidence, WLE 20, ColegauCymru](#)

344. The Cabinet Secretary accepted that reaching B2 was a stretching target, but said it needed to be stretching.⁵¹⁶

345. The Welsh Government's Deputy Director, Cymraeg 2050 said that they didn't yet know how the CEFR aligns with grades in GCSE Welsh First Language, but that GCSE Welsh Second Language is "around A1." They said that, with increased ambitions combined with upskilling of staff, "over time, the levels and language skills will increase."⁵¹⁷

Linguistic progression

346. While RhAG welcomed the assumption set out in section 11(4) that pupils will continue in the same language category school when they transition to secondary school, they wanted to see it strengthened. They said a move between the Welsh to English school sector, is often because English language schools "are closer ... or easier to reach as a result of a lack of suitable and accessible transport." They said the Bill:

*"... 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. ..."*⁵¹⁸

347. RhAG suggested replacing the words "it is assumed" with "there is a strong presumption" so that section 11(4) would read:

*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.*

348. They said it is in areas where there is "clear linguistic progress within the education system" that children remain within that language medium. They said it was important that the linguistic progress is supported "from infancy up to post-16 education and higher and further education."⁵¹⁹

⁵¹⁶ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 27](#)

⁵¹⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 260](#)

⁵¹⁸ [Written evidence, WLE 14, RhAG, paragraph 3.9](#)

⁵¹⁹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 186](#)

349. A lawyer from the Welsh Government said that the aim of section 11(4) was to give primary schools a “planning steer ... so that they know what the trajectory will be when the pupil reaches the secondary sector”.⁵²⁰

350. We asked the Cabinet Secretary whether he would be open to considering changing section 11(4) so that it reads “at least the same language category” rather than “the same language category” so as not to discount the possibility that a pupil may progress to a school with a higher level of Welsh language education provision.

351. He was not convinced about strengthening this provision, saying he did not want to see “planning parameters to topple into a space” which restricts choice for families to make.

“I think there is a relationship with the planning expectations that this section sets out, because if you state them too powerfully, I think they begin to impinge on those choices that parents can make. But it’s not primarily about parental choice, it’s primarily about planning parameters.”⁵²¹

352. He highlighted that for children who move out of Welsh-medium schools into English-medium schools the system has “invested” in them, and he was “loath” not to see that investment compounded. He said he was keen that children continued through Welsh-medium schooling, but that these were choices for families to make, and he didn’t want people to “feel that we are making a judgment on the choices they make.”⁵²²

Welsh Language Education Delivery Plans

353. Section 14 requires school governing bodies to prepare a Welsh language education delivery plan (“the delivery plan”). The delivery plan must set out:

- the school’s language category;
- the amount of Welsh language education provided at the time of preparing the plan;
- how the governing body will ensure that the school provides Welsh language education in accordance with its language category;

⁵²⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 168](#)

⁵²¹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 173](#)

⁵²² [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 184-185](#)

- how the school will promote late immersion education;
- the governing body's proposals on the amount of Welsh language education the school intends to provide for the period of the delivery plan and how this will be maintained and increased when reasonably practicable;
- the governing body's proposals on how the school will promote a Welsh language ethos and culture within the school; promote use of Welsh within the school; and facilitate continuous improvement in its Welsh language education; and
- how the governing body will prepare for changing the school's language category, if it intends to increase the amount of Welsh language education provided.

Section 14(2) requires governing bodies to have regard to the local authority's local Welsh in Education Strategic Plan and to consult certain specified people. Section 14(3) states that delivery plans will be in effect for a period of three school years. The Welsh Ministers have powers under section 14(4) to make regulations to change the length of time which delivery plans have effect, and to make provisions on the form and content of a delivery plan.

354. Section 15 sets out the approval process for a delivery plan. Governing bodies must submit a draft delivery plan to their local authority at least 9 months before the plan comes into effect. Section 15(4) sets out that the local authority can:

- Approve the delivery plan as submitted;
- Approve the delivery plan with changes agreed with the governing body; or
- Reject the delivery plan and direct the governing body to reconsider the delivery plan.

Section 15(6) states that if a local authority rejects the delivery plan, it must give its reasons for the rejection, and must specify when the governing body must submit a further draft. Once a plan has been approved, a school governing body must, under section 15(8), publish the approved plan.

355. Section 16 requires school governing bodies to review the delivery plan at least once during the plan's lifetime. Section 16(2) allows school governing bodies to amend the plan (although section 17 then sets out further provisions if a

governing body wants to change the school’s language category.) Section 16 also sets similar provisions to those for the original plan, in that the governing body must have regard to the Local Strategic Plan; and it must be submitted to the local authority for approval. Again, the local authority can approve, approve with changes or reject the plan. Once approved, it must be published. In doing this, under section 16(5) the governing body must provide a summary of the proposed changes and the reasons for these proposed changes.

356. Section 17 applies when a governing body wants to amend a delivery plan to change the school’s language category. It prohibits a change of language category from:

- The Dual Language category to the Primarily English Language, partly Welsh category; or
- The Primarily Welsh language category to either the Dual Language category or the Primarily English language, partly Welsh category.

357. There was broad agreement with the proposals. Those who agreed included:

- Carmarthenshire County Council⁵²³;
- Education Workforce Council⁵²⁴;
- Estyn⁵²⁵;
- CYDAG⁵²⁶;
- UCAC⁵²⁷; and
- Welsh Language Commissioner⁵²⁸.

358. Mentrau Iaith Cymru welcomed the link between the school and local authority plans which will help with accountability and is “likely to trigger improvements.”⁵²⁹ Estyn also said it would “complete the circle” between national and local plans.⁵³⁰

⁵²³ [Written evidence, WLE 19, Education and Children’s Services, Carmarthenshire County Council](#)

⁵²⁴ [Written evidence, WLE 23, Education Workforce Council](#)

⁵²⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 290](#)

⁵²⁶ [Written evidence, WLE 32, CYDAG, paragraph 14.9](#)

⁵²⁷ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 214](#)

⁵²⁸ [CYPE Committee, 26 September, 2024, Record of Proceedings, paragraph 59](#)

⁵²⁹ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 3.5](#)

⁵³⁰ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 289](#)

359. RhAG said that planning already happened in Welsh-medium schools through a school’s development plan and they, therefore, saw “no difficulty” with the proposals.⁵³¹ UCAC also said that for their members this was not a substantial change, and that it was “crucial” for all schools to do this planning.⁵³²

360. The Education Workforce Council was optimistic that the plans would help schools develop strategies that met their school’s specific context. They felt that the “consultative” approach set out in the Bill would help “foster a more consensual environment for implementing (and, where there is demand, expanding) Welsh-medium and bilingual education.”⁵³³

361. Although some raised some practical issues. These focused on four areas:

- Whether a stand alone plan was needed and whether it could be incorporated into other existing plans.
- Capacity and expertise within schools to produce plans, and within local authorities to approve plans.
- Whether Primarily Welsh language schools would need such a plan.
- The timespan for such plans and how it fitted into other planning frameworks such as the Welsh in Education Strategic Plans.

362. ADEW and WLGA raised concerns about the “additional burden” of preparing further documents. They said that the delivery plan “should be integrated into school improvement plans [School Development Plans] to reduce workload and provide a cohesive approach to school improvement.” They called for guidance that will minimise duplication and maximise alignment between the Welsh language education delivery plans and other plans.⁵³⁴ ADEW said it needed to be part of “an integrated part of current school improvement systems in schools.”⁵³⁵ While WLGA said it would work very well to be added into the school improvement plan.⁵³⁶

363. Carmarthenshire County Council agreed that the delivery plan should be incorporated into a school’s development plan because “it is central to the school’s work.” They wanted to see the use of templates to help with consistency.

⁵³¹ [Written evidence, WLE 14, RhAG, paragraph 3.11](#)

⁵³² [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 214](#)

⁵³³ [Written evidence, WLE 23, Education Workforce Council](#)

⁵³⁴ [Written evidence, WLE 12, ADEW and WLGA](#)

⁵³⁵ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 91](#)

⁵³⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 95](#)

They also suggested that it may be appropriate for “similar schools to collaborate on a plan where there are shared issues and then adapt it to reflect a school’s particular needs”.⁵³⁷ ASCL said that “90 per cent of schools” currently have a Welsh language plan within their school development plan.⁵³⁸

364. The Education Workforce Council called for local authorities to “play a strong role in supporting schools”.⁵³⁹ CYDAG said the additional workload for both schools and local authorities needed to be recognised.⁵⁴⁰ Swansea Council also highlighted concerns about workload, in particular the “potential administrative burden on school leadership teams”.⁵⁴¹

365. The Catholic Education Service stressed the potential impact on governors. They said the workload around the delivery plan will lead to a higher workload and responsibility which “in turn may add to the difficulty of recruiting governors.”⁵⁴² Although the Education Workforce Council said the preparation of the plan should be led by practitioners with “governors performing a supporting role in line with their designated role (which is strategic and not operational).” They also called for processes to avoid becoming too time consuming or bureaucratic for schools.⁵⁴³

366. NASUWT said the problem was not with the creation of plans, but implementing such plans, which is about financing, staffing capacity and working with children and parents.⁵⁴⁴

367. ADEW and WLGA also highlighted the additional workload for local authorities in having to approve the plans. This will add “significant workload on local authorities, even if templates and guidance are available”. They said the impact on both school and local authority staff has been “under-estimated.”⁵⁴⁵ ADEW said that:

“... if there’s an expectation for every local authority to approve individual school delivery plans, and the language categorisation, nine months before implementation, I think that that then leads to a problem in terms of capacity for local

⁵³⁷ [Written evidence, WLE 19, Education and Children’s Services, Carmarthenshire County Council](#)

⁵³⁸ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 82](#)

⁵³⁹ [Written evidence, WLE 23, Education Workforce Council](#)

⁵⁴⁰ [Written evidence, WLE 32, CYDAG, paragraph 1.4.10](#)

⁵⁴¹ [Written evidence, WLE 31, Swansea Council](#)

⁵⁴² [Written evidence, WLE 22, Catholic Education Service](#)

⁵⁴³ [Written evidence, WLE 23, Education Workforce Council](#)

⁵⁴⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 215](#)

⁵⁴⁵ [Written evidence, WLE 12, ADEW and WLGA](#)

authorities too. The officer teams within local authorities are small, as they've had to make cuts over recent years, and I am concerned that there won't be sufficient provision and sufficient capacity within local authorities to deal with all of these plans."⁵⁴⁶

368. Carmarthenshire County Council also raised this, highlighting that in their local authority there would be 111 schools / learning locations which would “place greater time requirements on experienced and qualified officials.”⁵⁴⁷ CYDAG said it was important that the approval process did not delay schools taking actions.⁵⁴⁸

369. Dyfodol i'r Iaith said it was “difficult to believe” that all governing bodies would have the expertise to produce such a delivery plan.⁵⁴⁹ ADEW and WLGA said “some work” was needed within communities to ensure that “all stakeholders share the aims of an LA's WESP, especially as governing bodies will now be tasked with providing Welsh in education delivery plans.” This, they felt, was another reason for ensuring sufficient funding and that there was flexibility in the timetable for changes. They also indicated that some governors may need extra training to help them deliver this work.⁵⁵⁰

370. Estyn, however, did not think the plans would be too “burdensome” or would create too much “additional work”.⁵⁵¹

371. A number of stakeholders questioned whether Primarily Welsh language schools would need such a plan. This included Dyfodol i'r Iaith who said that it was “irrelevant” to these schools as their language policy has already been set.⁵⁵²

372. ADEW and WLGA highlighted that the three year timespan for the delivery plans was “far shorter” than the timespan for Welsh in Education Strategic Plans.⁵⁵³

373. ASCL raised concerns about how the timespan for the delivery plans would fit in with the financial planning cycle. They said to be strategic you need longer term plans, such as “three, five, seven-year plans” but that currently “school leaders will be lucky to have a one-year financial plan. So, if you haven't got that long-term

⁵⁴⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraphs 90-91](#)

⁵⁴⁷ [Written evidence, WLE 19, Education and Children's Services, Carmarthenshire County Council](#)

⁵⁴⁸ [Written evidence, WLE 32, CYDAG, paragraph 14.10](#)

⁵⁴⁹ [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 14](#)

⁵⁵⁰ [Written evidence, WLE 12, ADEW and WLGA](#)

⁵⁵¹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 289](#)

⁵⁵² [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 14](#)

⁵⁵³ [Written evidence, WLE 12, ADEW and WLGA](#)

financial stability, it makes planning superficial, and it can mean that you can't achieve what you're trying to achieve."⁵⁵⁴

374. A specific issue raised by Medr, was the issue of schools with sixth forms. School sixth forms are “critical” for Welsh language education, Medr said, but the regulatory regime is complex. Medr has regulatory oversight of sixth forms. They wanted to see this role recognised in the Explanatory Memorandum, so that it is clear for schools that when preparing the delivery plan “they must take account of Medr’s regulatory requirements particularly set out, for example, within the learner engagement code.”⁵⁵⁵

375. The Cabinet Secretary said the delivery plan was not “a major plan.” He said it would not need to be a “lengthy document” but that it was important that there was somewhere where school leaders and governors “can just focus on how they can make progress”. He said it went further than language and was also about “culture and ethos and everything that goes with that.” For these reasons, he said there was a “purpose” of Welsh schools having a delivery plan.⁵⁵⁶

376. In terms of the time span of the delivery plan, the Cabinet Secretary said that it was an attempt to bring it into the same “cycle” as school development plans.⁵⁵⁷

377. The Cabinet Secretary highlighted that during the consultation on the White Paper, they sought views on the proposal for local authorities to approve plans, and said that this was “welcomed by the majority of the respondents.”⁵⁵⁸

Exemptions

378. Section 18 provides for a school governing body when preparing or amending its first delivery plan, to apply to the local authority for a temporary exemption to the requirement to provide the minimum amount of Welsh language education currently specified in section 10(3) as 10 per cent. Section 18(2) sets out what the delivery plan must specify in relation to the proposed exemption:

- The reasons why it's not reasonably practicable for the school to provide the minimum amount.

⁵⁵⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 82](#)

⁵⁵⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraphs 208-209](#)

⁵⁵⁶ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 153](#)

⁵⁵⁷ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 156](#)

⁵⁵⁸ [Letter from the Cabinet Secretary for Finance and Welsh Language to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 11 October 2024](#)

- How the school plans to deliver the minimum amount.
- A date for when the school will be able to deliver the minimum amount, which must be within the three-year period of the delivery plan.
- Information on the support the school needs to enable it to meet the minimum amount of provision.

Section 18(3) provides that a temporary exemption is granted by virtue of the local authority approving the school's delivery plan with the information above included in it.

379. Section 19 provides for a school to apply for a further exemption for three years when preparing its second delivery plan. This is where a governing body continues to believe that it is not reasonably practicable for the school to provide the minimum amount of Welsh language education for a Primarily English Language, partly Welsh school. This exemption is only allowed at the beginning of the period of the second delivery plan, and not during the period of the delivery plan. It is also only available to schools that had an exemption under their first delivery plan. Section 19(2) sets out what information must be included in the delivery plan seeking a further exemption:

- Why the proposals in the first delivery plan were not implemented, or why they were not successful.
- The reasons why providing the minimum amount is still not reasonably practicable.
- The further plans for how the school will deliver the minimum amount.
- A date for when the school will be able to deliver the minimum amount (which can be no later than the end of the three year delivery plan).
- Information on the support the school needs to enable it to meet the minimum amount of provision.

The local authority must approve such an exemption, as part of its approval of the second delivery plan. However, section 19(3)(d) requires a local authority to inform the Welsh Ministers of the reasons why the delivery plan was approved, and information on the support being provided to the school.

380. There were mixed views on the exemptions. The Education Workforce Council called them “prudent”. They said it was important that the exemption

process was “accompanied by targeted support ... and a plan (including clear timelines) for progression.”⁵⁵⁹ ADEW said local authorities were supportive of the exemption proposals.⁵⁶⁰

381. The Welsh Language Commissioner said she understood why these proposals were being made. She said that “even in a position of an exemption, the planning should start now. But I welcome the concept and the method set out.”⁵⁶¹ Estyn also emphasised the importance of planning, and for this to start now.⁵⁶²

382. ASCL Cymru said the exemption provisions “delays the issue ... [it] does nothing to remove the issue; it just mitigates for it.” They said exemptions will not “suddenly mean that the workforce will appear.” It was important to ensure that “resources and facilities were available so that the exemption isn’t needed.”⁵⁶³

383. Mentrau Iaith Cymru said they did not disagree with an exemption if it makes the Bill “operationally possible” but wanted to see it set at 10 per cent. Therefore a school could seek an exemption “in very exceptional circumstances” to not have to increase their level of provision from 10 per cent. This is because schools should already be providing this level of provision. They could not see “any benefit at all” in granting an exemption allowing schools not to provide this basic level of provision.⁵⁶⁴ For these reasons, Estyn said they expected to see “very few exemptions”. As a result, they wanted greater clarity on when exemptions might be used.⁵⁶⁵

384. While others did not agree with the proposals, including Cymdeithas yr Iaith. They called for these sections of the Bill to be removed completely. They said it was possible for schools to be exempted for up to six years, which would be “almost a quarter (24%) of the period to 2050.” They said that the exemptions would mean children will be missing out on the opportunity to become Welsh speakers.⁵⁶⁶ Mudiad Meithrin also highlighted the impact on children in schools with exemptions, saying that they will miss out on chances to develop their Welsh that children in other schools benefit from.⁵⁶⁷

⁵⁵⁹ [Written evidence, WLE 23, Education Workforce Council](#)

⁵⁶⁰ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 111](#)

⁵⁶¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 60](#)

⁵⁶² [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 301](#)

⁵⁶³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 92](#)

⁵⁶⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 374](#)

⁵⁶⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 299](#)

⁵⁶⁶ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁵⁶⁷ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 275](#)

385. Mudiad Meithrin said they had “concerns” about the exemptions. In instances where exemptions had been granted they should be:

“... for the shortest time period, with a specific action plan put in place by the school and the local authority, and in collaboration with nearby schools, or in other ways, in order to ensure that we don’t fail those children in the longer term who attend that school.”⁵⁶⁸

386. Professor Enlli Thomas said she did not support exemptions “unless there were very, very specific reasons for its use.” She said the only reason she could think of that would require an exemption would be when the workforce was not in place. But even in these circumstances she said you don’t need fluent staff to “introduce” Welsh to pupils or to engage them with Welsh.⁵⁶⁹ Overall, she therefore did not think there were any situations where an exemption would be needed.⁵⁷⁰ Professor Gwenno Ffrancon agreed, and said if exemptions are to be permitted, they would need to be for “very short periods” in order to meet the Bill’s objectives.⁵⁷¹

387. Some were concerned about the exemptions becoming the norm. Mudiad Meithrin said that there must be “clear and firm” limits on the exemption period. They said it would not be acceptable for schools to have a “permanent exemption”.⁵⁷² Estyn shared concerns about it becoming the norm.⁵⁷³

388. CYDAG said that exemptions should not be seen as an option. They were concerned that “in allowing schools to seek exemptions for a particular set of reasons, are we actually providing it as an option to them to be exempted?” Exemptions should not be an option but:

“... a process that can be put in place to recognise the existing position of the school, for whatever set of reasons, but with a robust plan in place then to ensure that there is a specific timetable to take them out of that exemption period, and certainly not to go into a second exemption ...”.

⁵⁶⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 275](#)

⁵⁶⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 164-165](#)

⁵⁷⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 175](#)

⁵⁷¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 166](#)

⁵⁷² [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.18](#)

⁵⁷³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 298](#)

They said there was a “very real risk” that exemptions would be “more common than anyone would want”.⁵⁷⁴

389. UCAC were concerned about the length of exemptions, calling them “worrying”. They said that plans must be put in place to “ensure the Bill’s success and that no school needs an exemption.” They said that exemptions would be more likely for “schools on the border and those in very English areas.”⁵⁷⁵

390. ADEW said that they did not think many schools would need two exemption periods. But that the provisions reflected “the different starting points of schools and where they are along the journey and the different staffing challenges faced across Wales.” It also provided flexibility for “any unexpected issues or crisis that may arise.” They said that recent safety issues with RAAC in some schools showed the sort of unexpected situation that means having flexibility would be helpful.⁵⁷⁶

391. There were some questions as to how the exemptions would work. Cymdeithas yr Iaith questioned if additional exemptions would be available in the future when the minimum level of Welsh provision increased, even if a school had already used both its temporary and further exemptions.⁵⁷⁷ Estyn said that there would need to be “strong evidence” setting out why an exemption had been granted.⁵⁷⁸

392. The Education Workforce Council said they would welcome “further guidance for schools regarding the circumstances in which workload considerations may be a factor in the granting of exceptions for schools.”⁵⁷⁹

393. The Cabinet Secretary was clear that the Bill “provides for two extensions and no further extension.” He said that the end of the second exemption period is 2036 which is “perilously close to 2050”. He said meeting the policy objectives would not be helped by ongoing exemptions. He felt that two exemption periods was “very reasonable.”

“It’s designed, as I say, to make sure that those schools continue to want to be on the journey, but we’ll get to a point where I

⁵⁷⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 278-281](#)

⁵⁷⁵ [Written evidence, WLE 09, UCAC, paragraph 2.7](#)

⁵⁷⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraphs 112 - 113](#)

⁵⁷⁷ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁵⁷⁸ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 300](#)

⁵⁷⁹ [Written evidence, WLE 23, Education Workforce Council](#)

*think you have to say, 'You've had as long as we're able to give you.'*⁵⁸⁰

394. He said that if during the exemption periods schools are not able to work towards meeting that 10 per cent:

*"... in a way that is meaningful, in a way that does result in young people who've gone through that experience coming out of it in ways that allow them to be confident and competent users of the language—. If we can't achieve that, then the Bill really will not have achieved what it set out to do at all. ... we've built in some safeguards ... but the risk is one that the Bill was constructed to try to grapple with from the beginning."*⁵⁸¹

395. He was clear that he did not want to see schools "using the exemption as the norm." He said that exemptions would not be a "please take one' system" but that there will be a conversation with the local authority, with them able to say that they don't think a school needs an exemption. This is why he thinks they will be "exceptional". He did not believe that schools "will be out just to game the system." But that some will not be:

*"... as confident as I would be of their own capacity to do the things we ask them to do. That's why we must give them the comfort of there being some exclusions when they really are up against it, but they are exceptions. They are not the norm ..."*⁵⁸²

396. He said that the exemption periods provide the flexibility to ensure that schools that will find it more challenging to meet the 10 per cent requirement will have a longer lead-in time. He acknowledged that there will be certain areas which are more likely to need exemptions, such as Blaenau Gwent (an example raised in questioning to the Cabinet Secretary). However, he emphasised the amount of time before schools will have to meet the minimum provision, saying that no school will have to meet this for "at least another five or six years." He said that during this time support would be available. He did not think it was "beyond the capacity of any education authority, particularly given that they're able to co-operate with others in this effort, to reach that bare minimum over that long haul."⁵⁸³

⁵⁸⁰ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 279](#)

⁵⁸¹ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 308](#)

⁵⁸² [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 145-146](#)

⁵⁸³ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 121](#)

Special schools

397. There is no requirement on special schools to provide a specific amount of Welsh language provision or to designate themselves a language category. However, section 20 requires a special school’s governing body to prepare a community special school Welsh language education plan which sets out:

- how much Welsh language education the school provides;
- how the governing body will promote a Welsh language ethos and culture; and
- how it will promote use of the Welsh language in the school.

Section 20(3) does provide for a governing body to voluntarily designate a language category for the school, if it wishes.

398. The proposed approach to special schools was broadly welcomed by a number of stakeholders including ADEW and WLGA⁵⁸⁴; Carmarthenshire County Council⁵⁸⁵; and CYDAG⁵⁸⁶.

399. However, a number of stakeholders did raise concerns that the Bill was silent on learners with ALN in mainstream schools. NEU Cymru highlighted this, saying there is “no differentiation in terms of expectations” for these children and also for “disabled children without ALN and [an] associated Individual Development Plan”. They were particularly concerned that there is a cohort of children who previously were assessed as having special educational needs, but are not identified as having ALN under the current system.⁵⁸⁷ These children may need additional support, and it might be “unhelpful to expect them to carry out higher levels of Welsh Language learning, without support in place.” They felt schools should decide the likely outcome for each child rather than setting universal expectations.⁵⁸⁸

400. NEU Cymru also highlighted this cohort of learners, and said this needed to be considered. They said these groups are already not getting the right support,

⁵⁸⁴ [Written evidence, WLE 12, ADEW and WLGA](#)

⁵⁸⁵ [Written evidence, WLE 19, Education and Children’s Services, Carmarthenshire County Council](#)

⁵⁸⁶ [Written evidence, WLE 32, CYDAG, paragraph 1.4.6](#)

⁵⁸⁷ See chapter 2 of our [interim report on the implementation of education reforms](#) (July 2024) for discussion of the reduction in SEN/ALN numbers. The [latest statistics](#) show a 44% decrease from 92,688 (19.5% of all pupils) in 2020/21 to 51,152 (11.2% of all pupils) in 2023/24.

⁵⁸⁸ [Written evidence, WLE 21, NEU Cymru](#)

and “it’s hard to see how they would get the help they would need to be fluent in Welsh as well.”⁵⁸⁹

401. UCAC however were not concerned and said it has been very clear that the Bill does not mean “every pupil in every school” having to reach certain standards. They said children with ALN currently “received a different education at times” and that pupils will be “able to access the language at the level that is appropriate for them.”⁵⁹⁰

402. Professor Enlli Thomas said there was “no guidance regarding ALN children.” She questioned whether support and resources for supporting ALN children would be the responsibility of the National Institute proposed by Part 5 or Adnodd.⁵⁹¹ She said that it is “difficult to understand exactly what support is necessary” within the context of the Bill. She highlighted that there is a “very broad range” of children with ALN, and that there is “no reference to that in the Bill”.⁵⁹² She called for the Bill to include references to ALN, but accepted that the guidance would “be better developed” in ALN specific guidance.⁵⁹³

403. CYDAG queried if these provisions would also include pupil referral units. They also wanted to know what the expectations would be on “individual learners” who may attend either a special school or a pupil referral unit for a short period. They asked whether there will 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?”⁵⁹⁴

404. The Cabinet Secretary said that while special schools were not having statutory requirements placed upon them, that there were “many ... that are very committed indeed both to the teaching of the language and certainly to those other requirements to create a Welsh ethos in the school.”⁵⁹⁵ It was also highlighted that the Bill provides for special schools to “express that they were Welsh-medium special schools” which is “the first time” that has been available.⁵⁹⁶

⁵⁸⁹ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 216-217](#)

⁵⁹⁰ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 218](#)

⁵⁹¹ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁵⁹² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 142-143](#)

⁵⁹³ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 145](#)

⁵⁹⁴ [Written evidence, WLE 32, CYDAG, paragraph 1.4.6](#)

⁵⁹⁵ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 302](#)

⁵⁹⁶ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 304](#)

405. The Welsh Government’s Deputy Director, Cymraeg 2050 clarified that for schools with special units as part of their provision, the delivery in the unit “would be in line with that school category.”⁵⁹⁷

406. The Cabinet Secretary said that there is a:

“... requirement on the school with a specialist unit to ensure that it provides Welsh language education in accordance with the range specified by its language category, this requirement applies over a school year. The requirement to provide the minimum of 10%, for example, does not mean that every individual pupil within the school must receive 10%. Referring to the education provided over a school year allows flexibility for a school to provide less than 10% in some circumstances where necessary, and to provide more than 10% in other circumstances. This will likely apply in the context of specialist units in mainstream schools.”⁵⁹⁸

407. The Cabinet Secretary confirmed that while special schools must have a delivery plan, the content would be different to the delivery plan for a mainstream school. This, he believed, “strikes the right balance between recognising the role that special schools can play in creating Welsh speakers and any profound needs they also deal with.”⁵⁹⁹

Late immersion education

408. Section 22 defines late immersion education as “intensive education in Welsh” for children who are at least 7 and wish to attend either a Primarily Welsh Language or a Dual Language category school, which “immerses children in Welsh to enable them to fully benefit” from education in one of those categories of schools.⁶⁰⁰ This section requires local authorities to encourage demand for and participation in such education. In doing this, they must ensure information and advice is available, and take all reasonable steps to provide late immersion provision which meets demand in their area.

⁵⁹⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 303](#)

⁵⁹⁸ [Letter from the Cabinet Secretary for Finance and Welsh Language to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 11 October 2024](#)

⁵⁹⁹ [Letter from the Cabinet Secretary for Finance and Welsh Language to Chair, CYPE Committee, Welsh Language and Education \(Wales\) Bill, 11 October 2024](#)

⁶⁰⁰ [Welsh Language and Education \(Wales\) Bill, section 22\(1\), as introduced, July 2024](#)

409. There was support for these provisions, with many highlighting the important role late immersion can play in contributing to Cymraeg 2050.

410. We were told that the benefits and opportunities of late immersion needed to be publicised so that children and their families are aware of the option. This was highlighted by Estyn⁶⁰¹; Mudiad Meithrin⁶⁰²; and UCAC⁶⁰³.

411. Estyn said if Welsh use is to be increased within families, “promoting and emphasising the importance of immersion for parents is essential.”⁶⁰⁴ While RhAG said that Welsh language should be offered to “newcomers to our communities as default rather than directing them to English-medium education, as is currently happening in some areas.”⁶⁰⁵

412. ADEW and WLGA welcomed these duties, and said that demand is increasing. But they said for it to be a success “more funding will be needed to cover the capital and revenue costs, as well as national messaging to promote and reassure non-Welsh speaking parents of the advantages of this provision to increase demand.”⁶⁰⁶ Swansea Council also raised the issue of ensuring there is funding for increased immersion provision. They welcomed the targeted funding that has been available previously, and said “sustainable funding” would enable local authorities to deliver provision that meets local needs.⁶⁰⁷ CYDAG also called for “additional investment”.⁶⁰⁸

413. Mudiad Meithrin said that ensuring this option was available for “non-Welsh speaking newcomers should be a priority”. But that it should be available to anyone who wanted to change school not just pupils new to the area. They said the most effective method was immersion centres. They also proposed “family immersion centres, placing the learning experiences of the child and the parent / carer in the same setting.”⁶⁰⁹ UCAC agreed that late immersion should be available to “all children”, and that to deliver this there was a need for “a network of immersion centres throughout Wales.”⁶¹⁰ RhAG emphasised the importance of

⁶⁰¹ [Written evidence, WLE 11, Estyn](#)

⁶⁰² [Written evidence, WLE 04, Mudiad Meithrin, paragraphs 3.19 and 3.21](#)

⁶⁰³ [Written evidence, WLE 09, UCAC, paragraph 2.8](#)

⁶⁰⁴ [Written evidence, WLE 11, Estyn](#)

⁶⁰⁵ [Written evidence, WLE 14, RhAG, paragraph 3.10](#)

⁶⁰⁶ [Written evidence, WLE 12, ADEW and WLGA](#)

⁶⁰⁷ [Written evidence, WLE 31, Swansea Council](#)

⁶⁰⁸ [Written evidence, WLE 32, CYDAG, paragraph 1.4.11](#)

⁶⁰⁹ [Written evidence, WLE 04, Mudiad Meithrin, paragraphs 3.21-3.23 and 3.25](#)

⁶¹⁰ [Written evidence, WLE 09, UCAC, paragraph 2.8](#)

“consistent” provision available for both primary and secondary schools across Wales.⁶¹¹

414. Cymdeithas yr Iaith, in welcoming the provisions, called for local authorities to have a “responsibility to actively increase uptake of late immersion provision”. They called for sections 22(2)(a) and (c) to be amended to “state that local authorities have a responsibility to encourage increased uptake of late immersion education provision and to proactively increase provision over time.”⁶¹²

415. Estyn also called for the wording in the Bill to be strengthened, suggesting that section 22(2)(b) be amended so that local authorities have a duty to promote and encourage late immersion to children and parents of children in its area.⁶¹³

416. Mudiad Meithrin said that good practice on late immersion across both local authorities and other sectors should be shared across Wales.⁶¹⁴ CYDAG also highlighted the importance of sharing good practice in this area.⁶¹⁵

417. ADEW and WLGA accepted that there are different stages of immersion provision across Wales. They said for those local authorities at the earlier stages they would like “more evidence on the long-term impact on immersion education on numbers of pupils in Welsh-medium education.” Whereas for larger local authorities “with more geographic challenges, running the provision is costly and more information is needed on the return on the investment before being statutorily obligated to run the provision.”⁶¹⁶

418. A number of respondents highlighted the importance that the early years sector can play in relation to immersion. Dyfodol i’r Iaith said that the early immersion “under the age of 7, which is the most important age of language acquisition, needs greater attention.”⁶¹⁷ RhAG also said that work needs to be focused on early immersion in the early years sector.⁶¹⁸

419. The Cabinet Secretary said that promotion around the language, and in particular late immersion, went “broader than the Bill.” He said that there was an opportunity to:

⁶¹¹ [Written evidence, WLE 14, RhAG, paragraph 3.10](#)

⁶¹² [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁶¹³ [Written evidence, WLE 11, Estyn](#)

⁶¹⁴ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 3.20](#)

⁶¹⁵ [Written evidence, WLE 32, CYDAG, paragraph 1.4.11](#)

⁶¹⁶ [Written evidence, WLE 12, ADEW and WLGA](#)

⁶¹⁷ [Written evidence, WLE 01, Dyfodol i’r Iaith, paragraph 22](#)

⁶¹⁸ [Written evidence, WLE 14, RhAG, paragraph 3.10](#)

“... celebrate the fact that we have created something quite novel ... There’s an increase in the number of children going through that late immersion process, it’s increased, and we’ve demonstrated to people that we can succeed in a period of— It’s only a few weeks ...”⁶¹⁹

420. The Deputy Director, Cymraeg 2050 said it was the “local case studies that encourage and provide confidence to parents that it is possible”.⁶²⁰

Our view

421. This is the Part of the Bill where much of the heavy lifting is done through the introduction of statutory school language categories, including identifying Welsh language learning goals and setting a minimum amount of Welsh language education in the Primarily English Language, partly Welsh school category. However, there is clearly confusion about how some elements of this Bill will operate. It is important that these areas of confusion are cleared up during the legislative process. We note the range of stakeholders who raised concerns about the definition of Welsh-medium education. While we were reassured by the Cabinet Secretary’s responses to these concerns, we note there is a difference between this, and such reassurances being reflected explicitly within the Bill. We think it would be helpful for the Cabinet Secretary to consider further the concerns raised.

422. The conflation in the single definition of teaching Welsh; and teaching through the medium of Welsh is at the root of some of these confusions. These are two different things, and in some instances it is not clear which aspect of the definition is relevant. It is essential that legislation is clear and explicit. We believe the Bill needs to be clearer about when it is referencing teaching Welsh as a subject, and teaching through the medium of Welsh. It is important that this issue is resolved, and the links between the definition, the school language categories and the Welsh language learning goals are made more explicit, where relevant in the Bill.

Recommendation 4. The Welsh Government sets out how it will seek to make clearer the distinction between teaching Welsh as a subject, and teaching through the medium of Welsh in the definition of Welsh language education.

⁶¹⁹ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 177](#)

⁶²⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 178](#)

423. The need for greater clarity is also an issue with the school language categories. We think the Welsh language learning goals for each category can help provide some of this clarity. When looking at the Welsh language learning goals for each category it becomes clearer what level of Welsh skills each category of school will deliver. These links need to be made explicit to the sector, as well as to learners and their families so that they can make informed choices.

424. We note that the Bill itself does not set the range of the amount of Welsh language provision for each language category, and that this is for the Welsh Ministers to do in regulations. In the evidence we heard, people have therefore reflected on experiences based on the amounts that are currently stipulated in the non-statutory guidance.

425. At this stage, without more information on the likely amounts of Welsh-medium provision, it means the school categories are unclear, and difficult for us to come to a view on. But there are inferences that can be taken from the Welsh language learning goals for each category. For example, we do not think a school which is providing 51 per cent of Welsh language education provision will be able to meet the Welsh language learning goal for a Primarily Welsh language category school.

426. We would like to see greater clarity from the Welsh Government at this stage about the categories, and what that is likely to mean in terms of the amount of Welsh language provision. In providing this clarity, we think the Welsh Government should consider the evidence and views we have heard calling for an additional category to mirror the current non-statutory 3P category.

427. The Welsh Government should also provide more information on the Dual Language category. Currently we are unclear as to what a dual language school under this Bill will be. We are aware that there are a range of different models across Wales, but what does it mean in the Bill? This confusion was shared by stakeholders.

428. This lack of clarity is compounded by the range of different terms that are used for these types of schools, for example the term dual stream school (which we acknowledge is not a term in the Bill). Would a dual stream school be a dual language school? We do not know, and neither did stakeholders. Ambiguity can cause confusion, which can then lead to disagreement and conflict. We do not want to see this as an unintended consequence of the Bill, and therefore we are calling for greater clarity on the school categories.

429. Dual language schools can play an important role in delivering the one million speakers. Such schools can help mainstream the language, and if such schools are supporting learners to leave school at level B2 they will be essential to the delivery of the one million target. But we come back to the point that the school categories must be clearly linked with the learning goals so everyone is clear what each category of school will be able to achieve.

Recommendation 5. The Welsh Government provides greater clarity on each of the school language categories, in particular the likely amount of Welsh-medium provision in both Primarily Welsh language and Dual Language school categories. In doing this, the Welsh Government should also provide greater clarity as to what the Dual Language school category means. Additionally, we ask the Welsh Government to consider the evidence and views we have heard calling for an additional category to mirror the current non-statutory 3P category.

430. The Bill does set a minimum amount of 10 per cent of Welsh language provision for the Primarily English Language, partly Welsh school category. Yet, there was confusion as to what this will actually mean in practice. While we know it will not include extra-curricula activities, as is currently the case with the non-statutory guidance, it was unclear what activities throughout the rest of the school day would be eligible. The Cabinet Secretary highlighted that it could include activities such as school assemblies. He was very clear that he did not think the 10 per cent should just come from the teaching of Welsh as a subject, and that it should encompass different aspects of education, in particular teaching through the medium of Welsh.

431. This is very ambiguous. It is important that those who will be implementing this Bill, in particular schools and local authorities, are clear on exactly what they are being asked to do. Without this clarity, they cannot make the plans which will lead to effective implementation.

432. We note that in the Ministerial Forward of the White Paper, it said there was a commitment to “ensuring over time that all children receive a portion of their education provision through the medium of Welsh beyond Welsh as a subject, in order to nurture Welsh language skills across the curriculum.” This commitment was not reflected in the specific proposals consulted on in the White Paper, nor is it reflected in the Bill. We acknowledge this is part of the process of developing policy proposals and turning them into legislation. But it would be helpful to have more information from the Government as to whether this is their intention. We believe this can be done in response to recommendation 6.

Recommendation 6. The Welsh Government should set out clearly what school activities would be counted towards meeting the 10 per cent minimum of Welsh language provision. In doing so, the Welsh Government should outline whether it still intends to increase the amount of education delivered through the medium of Welsh above that of teaching Welsh as a subject.

433. Clearly, many schools are already delivering 10 per cent as part of the non-statutory guidance. We note the views of those stakeholders who asked how maintaining this as the minimum amount will lead to the step-change in Welsh language learning outcomes.

434. We acknowledge the views of some stakeholders calling for a strengthening of the language in section 11 on linguistic progression. But, we feel that the section as it is currently drafted is appropriate. We know that language progression can be an issue, but are very mindful that there will be varying reasons for moves in and out of a particular type of school.

435. However, we are aware that there is not sufficient data to understand the reasons why children move in and out of a particular language category school, and whether these are for reasons for which there may be a suitable policy response. These reasons may be specific to a particular geographic area. We understand that this is an issue the Welsh Government is looking at in more detail, and we will be interested in any outcomes from this work. We also believe this could be an area which the National Institute for Learning Welsh (see Chapter 8) could look at in the future.

436. We support the approach to Welsh Language Education Delivery Plans, but we note that the Bill is unclear as to whether this would be a separate plan or whether it could be incorporated into the wider School Development Plan. We think there is a need for greater clarity on this issue. Whatever decision is made on this, it is important that the approach to Welsh Language education is coherent with a school's wider outlook to school improvement.

Recommendation 7. The Welsh Government should provide clarity on whether the Welsh Language Education Delivery Plans can be incorporated into existing School Development Plans, or whether schools will have to produce separate stand alone plans.

437. We explored the issue around the potential temporary exemptions in detail. This is clearly very closely linked to workforce issues which we look at in Chapter 3. It is most likely that it would be staffing issues which would result in an exemption

being requested or approved. We note that it is possible that exemptions could happen in particular geographic clusters, which could lead to competition for those teachers with the necessary Welsh language skills. This is why we are calling for a statutory workforce plan which will help support local authorities in addressing these issues.

438. Through our work on the implementation of education reforms, and on disabled children and young people's access to education and childcare, we are very aware of the challenges that some children can face in accessing Welsh-medium education. This issue as well as access to Welsh-medium education for those with Additional Learning Needs is well-documented, with others, including the Children's and Welsh Language Commissioners highlighting concerns about this. We know that these challenges can lead to families changing the language of their home as a result of the failure to access Welsh-medium education. This is a long standing issue. And it could be argued that the approach to special schools in the Bill will not change this.

439. Yet, on the other hand, special schools face a wide range of challenges of which language provision is only one. They face the same workforce issues as the mainstream sector, if not in some instances, greater issues. It is a sensitive and nuanced issue. One which we do not feel we have had the time to look at in great detail. We think there is a need for further consideration of these issues.

440. The successes of late immersion education are clear, and can be seen in communities across Wales. One of the most publicised successes have been children who have come to Wales from parts of the world facing conflict such as Ukraine and Afghanistan, quickly picking up Welsh. Late immersion education provides opportunities for every child in Wales who may wish to develop their Welsh language skills, and it is important that these opportunities are available. But we are conscious that late immersion education is expensive. This links with our views about the need for funding and resources to be made available for the delivery of the Bill.

7. Part 4: Planning Welsh Language Education and Learning

There was broad support for connecting language planning from the National Framework, through to the local authority plans and then to individual school development plans.

441. Part 4 makes provisions around the planning of Welsh language education at a national, local authority and school level.

National Framework

442. Section 23 requires the Welsh Ministers to prepare a National Framework for Welsh Language Education and Learning Welsh (“the National Framework”) which will set out how the Welsh Government will implement its Welsh language strategy in the context of Welsh language education, and acquiring and learning the Welsh language.

443. Section 23(3) requires the National Framework to include the steps the Welsh Ministers will take to promote and facilitate the use of Welsh by:

- Increasing the provision of Welsh language education in schools.
- Improving the provision of Welsh language education in schools.
- Promoting education in “Primarily Welsh Language” and “Dual language” schools and increasing the number of pupils attending these schools.
- Ensuring that training, professional development and support is available for educational practitioners for the purpose of improving ability in Welsh.
- Facilitating progression in teaching Welsh as a subject and education through the medium of Welsh between pre-school and compulsory schools, and between school and post-16 education and training.

444. Section 23(4) states that the National Framework must set out the steps the Welsh Ministers will take to ensure opportunities for all people in Wales to learn Welsh, including through childcare and early years education; compulsory schooling; tertiary education; in the workplace and in the community.

445. Section 23(5) provides for the National Framework to include targets for local authorities for implementing the National Framework in their own area. These targets must reflect national targets, including targets around increasing the:

- Number of pupils receiving their education in “Primarily Welsh Language” schools.
- Number of “Dual Language” or “Primarily Welsh Language” schools.
- Amount of Welsh language education in “Dual Language” and “Primarily English Language, partly Welsh” schools.

Section 23(6) sets out that for the purpose of setting these targets the National Framework must include an:

- Assessment of the Welsh language education provided at the time in schools in each local authority.
- Analysis of the amount of Welsh language education needed in order to meet any set targets.
- Assessment of the number of education practitioners needed in each local authority to meet any set targets.

Section 23(7) states that the National Framework may also set targets on the National Institute for Learning Welsh (which is established under Part 5 of the Bill) to increase the number of people over compulsory school age learning Welsh and improving the ability of those over compulsory school age who are learning Welsh.

446. Section 24(1) requires Welsh Ministers to take all reasonable steps to implement the National Framework. Section 24(2) requires local authorities to take all reasonable steps to achieve the targets set for them in the National Framework. They must also provide any information to the Welsh Ministers that the Welsh Ministers need to set targets and complete the assessments and analysis required of them under section 23(6).

447. Section 25 sets out that while the National Framework is continuous, the actions in it must cover a 10 year period, and that it must be reviewed every five

years. Section 25(5) provides the Welsh Ministers with the powers to amend the National Framework or prepare a new one.

448. Section 26 places consultation requirements on the Welsh Ministers when preparing or amending the National Framework. It also requires the Welsh Ministers to publish the National Framework and to lay it before the Senedd. Section 26(3) requires the Welsh Ministers to lay the first National Framework before 31 July 2028.

449. Section 27 places a duty on the Welsh Ministers to include information on the implementation of the National Framework in its annual report and annual plan on the Welsh language strategy. (This annual report and plan is a statutory requirement under the Government of Wales Act 2006).

450. There was support for the National Framework from a range of stakeholders including:

- ADEW and WLGA⁶²¹;
- Catholic Education Service⁶²²;
- Coleg Cymraeg Cenedlaethol⁶²³;
- CYDAG⁶²⁴;
- ColegauCymru⁶²⁵;
- Dyfodol i'r Iaith⁶²⁶;
- Early Years Wales⁶²⁷;
- Estyn⁶²⁸;
- Professor Enlli Thomas⁶²⁹;

⁶²¹ [Written evidence, WLE 12, ADEW and WLGA](#)

⁶²² [Written evidence, WLE 22, Catholic Education Service](#)

⁶²³ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.6](#)

⁶²⁴ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 307](#)

⁶²⁵ [Written evidence, WLE 20, ColegauCymru](#)

⁶²⁶ [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 23](#)

⁶²⁷ [Written evidence, WLE 30, Early Years Wales](#)

⁶²⁸ [Written evidence, WLE 11, Estyn](#)

⁶²⁹ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

- Mentrau Iaith Cymru⁶³⁰;
- Mudiad Meithrin⁶³¹;
- The National Centre for Learning Welsh⁶³²;
- RhAC⁶³³;
- Swansea Council⁶³⁴;
- UCAC⁶³⁵; and
- The Welsh Language Commissioner⁶³⁶

451. The National Framework was described as “ambitious” because it covers “childcare, nursery education, statutory education, tertiary education sectors as well as paths outside of education in the workplace and in the community.”⁶³⁷ It also creates a “chain of accountability between language planning undertaken at school, local authority and national level.”⁶³⁸ The Welsh Language Commissioner said the proposals were “far stronger” than previous approaches.⁶³⁹

452. The Cabinet Secretary said the Bill, and the National Framework will give “everybody a clear line of sight between the ambition, which is set here, and the delivery of the ambition, which happens in the classroom.” He highlighted that the National Framework will feed into local authority and then individual school delivery plans, creating a “clear link between the WESPs and the national ambition.”⁶⁴⁰

453. While there was broad support for the National Framework, stakeholders highlighted areas which they felt should be strengthened within the Framework.

454. As we have outlined in Chapter 3, workforce issues have been a constant theme throughout our inquiry. The Welsh Language Commissioner said that Part 4 of the Bill should be amended to place a duty on Welsh Ministers to publish a

⁶³⁰ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 4.1](#)

⁶³¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 305](#)

⁶³² [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.10](#)

⁶³³ [Written evidence, WLE 14, RhAC, paragraph 3.15](#)

⁶³⁴ [Written evidence, WLE 31, Swansea Council](#)

⁶³⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 234](#)

⁶³⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 79](#)

⁶³⁷ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁶³⁸ [Written evidence, WLE 11, Estyn](#)

⁶³⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 79](#)

⁶⁴⁰ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 283](#)

“Welsh in Education Workforce Plan” as part of the National Framework. She believed that an “education workforce strategy” should be “central” to the National Framework. Such a requirement would “place a duty on Welsh Ministers to set out the steps they intend to take to ensure that the education workforce has sufficient Welsh language skills to achieve the objectives of the National Framework”. She said such a duty would be “consistent” with other requirements, and would be “one obvious way to strengthen the Bill and to address one of the main challenges of its implementation.”⁶⁴¹

455. RhAG were also concerned that the National Framework had “a significant and obvious gap” in relation to workforce planning. They called for a duty to be added to section 23(3) of “increasing and strengthening the Welsh education workforce in schools.” They said that regardless of how it is done “we cannot continue without a statutory plan to develop the workforce. It leaves the circle incomplete.”⁶⁴²

456. The Education Workforce Council also said it was “important” that the National Framework is “aligned with broader workforce planning initiatives”.⁶⁴³ We look at the issues of the workforce, including whether there should be a statutory workforce plan in Chapter 3

457. Some raised specific issues around the content of the National Framework. ADEW and WLGA said that timescales within the National Framework should allow flexibility in meeting targets and objectives to help “reflect changes” which are outside a local authority’s control. They also highlighted the time and resources that would be needed for data collection and analysis, in particular they called for clarity on “any arrangements to improve the assessment of workforce skills and some consultation before decisions are made.”⁶⁴⁴ NASUWT also raised concerns about the recording, collation and sharing of data, saying it would “need careful consideration” to ensure it can fit into existing practice “without creating more and enormous barriers.”⁶⁴⁵

458. Implementation was also raised by the Education Workforce Council. They said it needed to be underpinned with funding and support. “Overloading the system” needed to be avoided. They said it was important that change was being

⁶⁴¹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraphs 2.6-2.7](#)

⁶⁴² [Written evidence, WLE 14, RhAG, paragraph 3.15](#)

⁶⁴³ [Written evidence, WLE 23, Education Workforce Council](#)

⁶⁴⁴ [Written evidence, WLE 12, ADEW and WLGA](#)

⁶⁴⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 235](#)

driven not by targets but “by the right sense of culture, expectation, language acquisition, and a pride in this country and the language that is spoken.”⁶⁴⁶

459. We look at the issue of learner travel in the next section. Some, including Dyfodol i'r Iaith called for the National Framework to include reference to this. They said it needed to “deal with the unfairness of the inconvenience of transport to Welsh schools which is contrary to the spirit and wording of the Welsh Language Bill[Measure] 2011.”⁶⁴⁷ The importance of transport to accessing Welsh-medium education, specifically that a current lack of it can be a barrier at present, was also raised by Mudiad Meithrin and CYDAG.⁶⁴⁸

460. Mudiad Meithrin welcomed that the National Framework covered early years. They said it could help stabilise funding for both the “Cam wrth Gam’ national training scheme” and the “Croesi'r Bont’ immersion scheme.”⁶⁴⁹

461. All post-16 stakeholders expressed concern that the National Framework is not clear in how it will apply to post-16 education:

- Coleg Cymraeg Cenedlaethol⁶⁵⁰;
- Colegau Cymru⁶⁵¹;
- Medr⁶⁵²;
- National Training Federation for Wales⁶⁵³; and
- Universities Wales⁶⁵⁴.

462. Coleg Cymraeg Cenedlaethol felt this could:

“... lead to unintended consequences such as ambiguity and misunderstanding about responsibilities, and missed opportunities to ensure holistic strategic planning that would lay the foundations for progression routes for learners.”⁶⁵⁵

⁶⁴⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 273](#)

⁶⁴⁷ [Written evidence, WLE 01 Dyfodol i'r Iaith, paragraph 23](#)

⁶⁴⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraphs 224, 293 and 311-314](#)

⁶⁴⁹ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 4.5](#)

⁶⁵⁰ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.8](#)

⁶⁵¹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 320](#)

⁶⁵² [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.6](#)

⁶⁵³ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 322](#)

⁶⁵⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 267](#)

⁶⁵⁵ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 4.2](#)

463. There is a further confusion about whether the National Framework applies (and should apply) to tertiary education only in the context of learning to speak Welsh, or more broadly in terms of advanced study of Welsh as a subject and education and training through the medium of Welsh. Medr, the funding and regulatory body of the tertiary sector believed the first, narrower definition, whereas the Coleg Cymraeg Cenedlaethol and the National Training Federation for Wales favoured the second, broader definition.

464. Medr said that the Bill’s lack of recognition of the role of Medr combined with:

“... no clear definition ... for Welsh language education ... means that references to the tertiary education sector could be read to imply that the framework covers Welsh medium education and Welsh subjects in tertiary education not just ‘learn Welsh’ provision. This particularly has the potential for creating confusion and incoherence in the tertiary education sector in the context of the references to tertiary education as set out in sections 23 (3) and (4) of the Bill, ... Our recommendation would be that, in the explanatory memorandum, the role of Medr is clearly set out in relation to Welsh as a subject and Welsh medium provision in tertiary education and being clear that it is not within scope of the Welsh Government framework.”

They believed these changes would clarify the National Framework, and provide “certainty” on the roles of different bodies.⁶⁵⁶ Coleg Cymraeg Cenedlaethol also called for Medr’s role to be clarified.⁶⁵⁷

465. Medr said their interpretation of this Part is that the National Framework “would only directly impact on tertiary education provision for those providers delivering Welsh for adults, ... touching into school sixth form provision, in the context that it’s quite difficult to separate school sixth form provision from a school’s general provision.” This was a matter of concern because it could undermine “coherence and simplifying the messaging going to our providers, and the last thing that we want is that lack of understanding of how a national framework applies to those organisations”.⁶⁵⁸ They called for the definition to be

⁶⁵⁶ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.6](#)

⁶⁵⁷ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 28](#)

⁶⁵⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraphs 154](#)

amended to include tertiary education, saying it would be “100 per cent helpful, ... that’s the clarity that people are looking for”.⁶⁵⁹

466. Universities Wales supported Medr’s call for clarification over its role. They said that “Medr has to be the key body for tertiary education in this space.”⁶⁶⁰ They highlighted that providers are “awash with regulators”.⁶⁶¹ They also wanted greater clarity about Medr’s role in comparison with the National Institute.⁶⁶² Estyn also said there was a need for more clarity around Medr’s role in relation to the National Framework.⁶⁶³

467. Coleg Cymraeg Cenedlaethol said they understood that the policy intention was for tertiary education to be within the scope of the National Framework (which they welcomed), but that the Bill as drafted does not provide this clarity. This could lead to a “crucial opportunity ... being missed to ensure a comprehensive strategic planning and implementation framework that would facilitate progression routes for learners.” They believed this could be solved by amending the definition in section 35 (see section below) to include tertiary education.⁶⁶⁴ They called this change as “the single most significant change that ... would strengthen everything.”⁶⁶⁵ The National Training Federation for Wales agreed that the definition needed to include tertiary education.⁶⁶⁶

468. Coleg Cymraeg Cenedlaethol felt the National Framework could be strengthened in relation to progression into Welsh-medium tertiary education. They said section 23(3)(e)(ii) could be amended “to refer to ‘encouraging and maintaining progression’”. They said this would “likely lead to strategic planning that would focus on ensuring appropriate progression routes.”⁶⁶⁷ They also highlighted that “encouraging progression belongs to wording used in a past time. ... we have the aim of empowering every learner, without having to go and look for the provision, to have the provision offered to them as a default.”⁶⁶⁸

469. The National Training Federation for Wales said the National Framework needed to include “specific provisions for how Welsh language goals will be monitored within apprenticeships. This could involve regular reviews of how

⁶⁵⁹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 156](#)

⁶⁶⁰ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 267](#)

⁶⁶¹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 324](#)

⁶⁶² [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 318](#)

⁶⁶³ [Written evidence, WLE 11, Estyn](#)

⁶⁶⁴ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraphs 1.10-1.11](#)

⁶⁶⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 100](#)

⁶⁶⁶ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 322](#)

⁶⁶⁷ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.13](#)

⁶⁶⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 102](#)

Welsh language training is incorporated into apprenticeship frameworks, and how it contributes to the overall linguistic goals of Wales.”⁶⁶⁹

470. The Cabinet Secretary accepted that “there is more that we need to do as a result of the evidence that you have heard. So, I think there is more that we can do in the explanatory memorandum. There may be some things we might even want to do in the Bill itself to be clearer about the roles and relationships of the major players in this tertiary post-16 field.” He believed there was scope to provide greater clarity in the Explanatory Memorandum and “in some of the memorandums of understanding that will be created between these new bodies.”⁶⁷⁰

471. Some stakeholders proposed adding additional statutory consultees for the National Framework:

New consultee	Suggested by
Coleg Cymraeg Cenedlaethol	Coleg Cymraeg Cenedlaethol ⁶⁷¹ ; and Professor Gwenno Ffrancon ⁶⁷²
Recognised education workforce trade unions	NEU Cymru ⁶⁷³
Trade unions	TUC Cymru ⁶⁷⁴
Education Workforce Council	Education Workforce Council ⁶⁷⁵
Universities	Professor Gwenno Ffrancon ⁶⁷⁶

Local plans

472. Section 28 requires all local authorities to prepare a local Welsh in Education Strategic Plan (“Local Strategic Plan”). The Local Strategic Plan must set out how the local authority will promote and facilitate Welsh language education and the use of Welsh in schools; and how they will fulfil the duties imposed on them through the National Framework.

⁶⁶⁹ [Written evidence, WLE 15, National Training Federation for Wales](#)

⁶⁷⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 193-194](#)

⁶⁷¹ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 112](#)

⁶⁷² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 186](#)

⁶⁷³ [Written evidence, WLE 21, NEU Cymru](#)

⁶⁷⁴ [Written evidence, WLE 27, TUC Cymru](#)

⁶⁷⁵ [Written evidence, WLE 23, Education Workforce Council](#)

⁶⁷⁶ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 186](#)

473. Sections 28(2) and (3) set out what local authorities must include in the Local Strategic Plan. This will include information on how it will:

- Improve provision of Welsh language education in its schools.
- Improve the process of planning Welsh language education provision.
- Ensure it has enough education practitioners working in its area.
- Promote and provide information about the Welsh language education provided in “Primarily Welsh Language” and “Dual Language” schools in its area.
- Meet its late immersion duties under section 22 of the Bill.
- Facilitate progression in teaching Welsh and education through the medium of Welsh between nursery and school education, and between schools and tertiary education.

The Local Strategic Plan must also provide information on the education practitioners working in the local authority’s area and, for future plans, a report on progress made since the previous plan.

474. Section 28(4) places a requirement on local authorities to have regard to the National Framework when preparing the Local Strategic Plan. It also sets out the people who must be consulted on the draft Local Strategic Plan.

475. Section 29 sets out the duration of a Local Strategic Plan. It is a five year plan but section 29(2) stipulates that the Plan must set out the steps a local authority will take over 10 years. The Welsh Ministers will set, through regulations, when local authorities have to first prepare a Local Strategic Plan.

476. Section 30 outlines the approval process for the Local Strategic Plan. Local authorities must under section 30(1) submit a draft Local Strategic Plan to Welsh Ministers for approval. In submitting this Local Strategic Plan for approval, the local authority must provide a summary of consultation responses and their response to the consultation.

477. Section 30(3) states that the Welsh Ministers can:

- Approve it;
- Approve it with modifications as agreed with the local authority; or

- Reject it and direct the local authority to reconsider the plan.

If Welsh Ministers reject the Local Strategic Plan, they must give the reasons for this, and specify when the local authority must submit a revised draft to Welsh Ministers. This is a similar process to the process that school delivery plans are subject to under Part 3 of the Bill.

478. Section 31 requires local authorities to publish the Local Strategic Plan as soon as practicable once it has been approved. They must also send it to a number of specified people. Section 31(2) places a requirement on the local authorities to take all reasonable steps to implement the approved Local Strategic Plan.

479. Section 32 makes provision for the review and amendment of Local Strategic Plans. Local authorities must keep their Local Strategic Plans under review and amend them when necessary. This section also enables Welsh Ministers to direct a local authority to consider amending its Local Strategic Plan if Welsh Ministers think a local authority is unlikely to meet a target in the National Framework. Section 32(4) states that where a direction is made, and the local authority decides not to amend its Local Strategic Plan, it must give the reasons for this to Welsh Ministers. If a local authority decides to amend its Local Strategic Plan it must submit an amended plan to Welsh Ministers for approval.

480. Section 33 gives the Welsh Ministers the power to make regulations that make further provision about Local Strategic Plans.

481. Section 34 amends the School Standards and Organisation (Wales) Act 2013 as it relates to Welsh in Education Strategic Plans.

482. There was broad support for these proposals which build upon the current Welsh in Education Strategic Plans (“WESPs”). Mudiad Meithrin said that the shift in focus for the Local Strategic Plans would help measure progress on increasing Welsh-medium education.⁶⁷⁷ They also said that the link with the National Framework was welcomed.⁶⁷⁸

483. The Welsh Language Commissioner said that the current WESP regime is “starting to work well.” But that the weakness has been a lack of national targets, which the revised approach with the introduction of the National Framework will rectify. She said it will “provide more connection” between Local Strategic Plans

⁶⁷⁷ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 4.20](#)

⁶⁷⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 309](#)

and the “national vision and ambition.”⁶⁷⁹ ADEW also highlighted the “clear line of accountability” and said that it will help with consistency.⁶⁸⁰

484. However, Cymdeithas yr Iaith said that a “glaring weakness” of the Bill was that it “does not replace nor significantly strengthen the organisation of these plans. They said WESPs have “proven ineffective.” They called for both the National Framework and the Local Strategic Plans to be changed so:

“... that they incorporate a duty to wilfully and continuously increase Welsh medium provision. The Welsh Government should provide targets, resources and motivation to ensure that local authorities contribute to achieving Welsh language education for all by 2050.”⁶⁸¹

They said currently the WESPs “tend to describe where schools are at the moment, rather than being implementation plans to generate change and to ensure that there is progress.”⁶⁸²

485. NASUWT Cymru also emphasised the importance of plans leading to action. They said that plans “can sit in a cupboard and not really work” and that the important element is “what’s going to happen on the ground, how would it work, how will the local authorities link with the schools and the governors and the rest of it.”⁶⁸³

486. The Welsh Government’s Deputy Director, Cymraeg 2050 said that the combination of the Local Strategic Plans along with individual school development plans means that “they will have the ownership, and the consultation will happen between the headteacher, the school governors and that school community, so that they all own the journey, and that they all own and understand the language journey that they’re on.”⁶⁸⁴

487. In its 2023 White Paper, the Welsh Government signalled a “shift in mindset” to one where “the Welsh Ministers would set the local authority’s strategic aim for planning Welsh in education. The function of the local authority will be to plan and implement”. The White Paper proposed changing the title of Welsh in Education Strategic Plans (WESPs) to Welsh in Education Implementation Plans

⁶⁷⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 89](#)

⁶⁸⁰ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 133](#)

⁶⁸¹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁶⁸² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 405](#)

⁶⁸³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 242](#)

⁶⁸⁴ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 277](#)

(WEIPs) to reflect that shift in mindset.⁶⁸⁵ However, the Bill retains the WESP title, albeit with “local” included. The EM refers to them as “Local Strategic Plans” as we have here in this report.

488. Stakeholders were all content with the retention of the WESP name, agreeing that what the plans do rather than what they are called is the most important thing. When asked whether they supported the shift in purpose and approach of Local Strategic Plans, whereby the Welsh Government sets the targets and local authorities plan and implement them, ADEW said they did:

“Yes, I am supportive of that. I think it establishes a clear line of accountability in doing that. Councils are supportive of introducing a national framework for teaching and learning Welsh, and believe that this will set a clear direction for the sector and will help with consistency too.”⁶⁸⁶

489. While there was the broad support for the approach to the Local Strategic Plans, organisations did raise specific issues.

490. As with all aspects of this Bill, workforce issues were raised. ASCL Cymru said that the approach to the Local Strategic Plans would be “heavily bureaucratic” and will result in the “allocation of many man hours for their administration and monitoring.” This would be a further pressure on already constrained finances. They called for this approach to be considered within the broader “evaluation, improvement and accountability framework” in the education system.⁶⁸⁷

491. The Education Workforce Council highlighted the challenges that some smaller local authorities may face in preparing and implementing Local 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.”⁶⁸⁸

492. The issue of the definition of Welsh language education was also raised again. RhAG said that the definition needed clarification in relation to this Part “so that local authorities do not neglect their responsibilities to increase numbers in full immersion Welsh education.”⁶⁸⁹ (See also the next section.)

⁶⁸⁵ [Welsh Government, Proposals for a Welsh Language Education Bill](#) (March 2023)

⁶⁸⁶ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 133](#)

⁶⁸⁷ [Written evidence, WLE 10, ASCL Cymru, paragraph 21](#)

⁶⁸⁸ [Written evidence, WLE 23, Education Workforce Council](#)

⁶⁸⁹ [Written evidence, WLE 14, RhAG, paragraph 3.14](#)

493. Dyfodol i'r laith called for closer links between the Local Strategic Plans and the capital programme for schools. They said “there’ll be no growth, really, in Welsh schools until you co-ordinate the capital side of it.”⁶⁹⁰

494. The issue of monitoring implementation of Local Strategic Plans was raised. Cymdeithas yr Iaith were concerned about a “lack of criteria and ways of monitoring” local authorities. They proposed a role for Estyn in scrutinising and reporting on “local authority performance and practical steps for growing Welsh-medium education provision.” They said this was suggested in the White Paper and that its “omission ... is a further weakness” that could be changed.⁶⁹¹ They said that while Estyn have the “right” to do it currently “it’s not happening”. They wanted to see it “happening regularly as an integral part of their work.”⁶⁹²

495. Estyn confirmed that they already have these powers, and that WESPS are considered as part of their inspections of local authorities. They were also involved in the work “looking at the quality of the WESPs”. They said that WESPs are also part of conversations they have during their regular “contact visits with local authorities”.⁶⁹³ They were clear that they are not a regulatory body and that they would not want “regulatory powers” in this Bill. But they said they can provide “challenge in the system.”⁶⁹⁴ They also reminded us that the “annual [remit] letter” from the Cabinet Secretary “which provides a direction for our work, is also an opportunity to focus on aspects of this.”⁶⁹⁵

496. The Cabinet Secretary said that it was decided not to include this power in the Bill because Welsh Ministers already have it.

“... a general principle of good law making that you don’t just restate powers that you already have. The Welsh Government has these powers already; we don’t need to restate them. It doesn’t mean that we don’t intend to use them in the way that we set out in the White Paper. But, the use of the powers is not the issue, it’s whether you need to take powers you’ve already got again in this Bill. ...”⁶⁹⁶

⁶⁹⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 409](#)

⁶⁹¹ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁶⁹² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 394](#)

⁶⁹³ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraphs 303-304](#)

⁶⁹⁴ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 306](#)

⁶⁹⁵ [CYPE Committee, 2 October 2024, Record of Proceedings, paragraph 326](#)

⁶⁹⁶ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 288](#)

497. In terms of the lifespan of the Local Strategic Plans, we heard that it was important that there were opportunities to monitor the plans “relatively regularly” because as Professor Enlli Thomas said “... five years is a long time, isn’t it, and it can be a pupil’s whole experience in the secondary sector, ... if something doesn’t work for five years, then we’ve lost a number of speakers.”⁶⁹⁷ Professor Gwenno Ffrancon agreed, and highlighted the need to “balance having enough time to implement and to see the impact of changes or interventions that are introduced.”⁶⁹⁸

498. ADEW felt that the reporting cycle for the Local Strategic Plans were “acceptable”, although they contrasted this with the timespan for school delivery plans, which as we highlight in Chapter 6, ADEW felt are “too short” at three years long.⁶⁹⁹

499. Mentrau Iaith Cymru “enthusiastically” welcomed that the Local Strategic Plans would promote and facilitate use of Welsh in schools, but called for this duty to “extend beyond the school walls.” They said that local authorities should be required to “to create opportunities to use the Welsh language in school and in the community.” They were concerned that the education system would develop pupils’ Welsh language skills but then there would not be the places within the community where they could be used.

“... a direction should be included for local authorities to intertwine their local strategies with their promotion strategies, as required under the Welsh Language Wales Measure. ...”⁷⁰⁰

500. Dyfodol i’r Iaith also wanted to see more emphasis within the Local Strategic Plans on increasing the use of Welsh. They agreed that there was not enough on what happens outside the classroom. This applied to the National Framework, the Local Strategic Plans and the individual school plans.⁷⁰¹

501. We heard suggestions for additional people to be added to the list of statutory consultees a local authority must consult when developing its Local Strategic Plan.

⁶⁹⁷ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 194](#)

⁶⁹⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 195](#)

⁶⁹⁹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 128](#)

⁷⁰⁰ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 4.5](#)

⁷⁰¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 392](#)

New consultee	Suggested by
RhAG	Dyfodol i'r Iaith ⁷⁰²
Local Mentrau Iaith	Mentrau Iaith Cymru ⁷⁰³
Medr	Medr ⁷⁰⁴
Local Higher Education Institutions	Medr ⁷⁰⁵
Recognised education trade unions	NEU Cymru ⁷⁰⁶
Trade unions	TUC Cymru ⁷⁰⁷
Early years providers	Early Years Wales ⁷⁰⁸

502. Additionally, Medr said that the Bill should be amended to ensure that the Local Strategic Plan “takes account of any proposals for restructuring sixth-form provision in accordance with the School Standards and Organisation (Wales) Act 2013.”⁷⁰⁹

503. The important role that the early years sector plays in relation to family choices about statutory schooling was highlighted by a number of stakeholders. Mudiad Meithrin said “the majority of families make decisions about the language medium of their children’s formal education in the period before starting statutory education.” They said that current targets within Welsh in Education Strategic Plans relating to choices of nursery education and reception choices were important.⁷¹⁰

504. Mudiad Meithrin said they hoped they can continue to be part of the “planning and discussion” that they are currently involved with in the development of WESPs. They also hoped that “necessary investment in terms of capital and revenue will continue to be planned in a way that promotes Welsh-medium childcare and early years education”.⁷¹¹

⁷⁰² [Written evidence, WLE 01 Dyfodol i'r Iaith, paragraph 8](#)

⁷⁰³ [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 4.7](#)

⁷⁰⁴ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.7](#)

⁷⁰⁵ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.8](#)

⁷⁰⁶ [Written evidence, WLE 21, NEU Cymru](#)

⁷⁰⁷ [Written evidence, WLE 27, TUC Cymru](#)

⁷⁰⁸ [Written evidence, WLE 30, Early Years Wales](#)

⁷⁰⁹ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.7](#)

⁷¹⁰ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 1.1](#)

⁷¹¹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 306](#)

505. There were areas that people called for to be included within the Local Strategic Plans. Estyn said that youth work either delivered by local authorities or contracted out by local authorities should be within the scope of the Local Strategic Plans. They said this sector plays “an important role educationally and socially.”⁷¹² The Education Workforce Council agreed that this sector should be included in these plans.⁷¹³

506. Our engagement findings have highlighted a lack of opportunities to use Welsh in social settings. 82 per cent of the survey respondents said they hardly ever used Welsh outside of school and none said they use it always, most of the time or fairly often.⁷¹⁴ At the Eisteddfod in August, when asked what could be done to improve take up of Welsh outside of school, one of the most popular suggestions was more informal opportunities such as after school and holiday clubs. Someone suggested this would help children to “get used to socialising in Welsh”, while another suggested there was a need for Welsh language youth clubs.⁷¹⁵

507. The Children’s Commissioner highlighted the importance of raising awareness of Local Strategic Plans with families, in particular those moving into Welsh-speaking areas. She said it was “vital” that families are aware of the benefits of bilingual education, “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.”⁷¹⁶

508. The importance of available learner transport was highlighted by a number of stakeholders including:

- Mudiad Meithrin⁷¹⁷;
- Cymdeithas yr Iaith⁷¹⁸;
- CYDAG⁷¹⁹; and

⁷¹² [Written evidence, WLE 11, Estyn](#)

⁷¹³ [Written evidence, WLE 23, Education Workforce Council](#)

⁷¹⁴ [CYPE Committee, Welsh Language and Education \(Wales\) Bill, Survey findings, October 2024](#)

⁷¹⁵ [CYPE Committee, Engagement summary - National Eisteddfod, Welsh Language and Education \(Wales\) Bill, 30 September 2024](#)

⁷¹⁶ [Written evidence, WLE 24, Children’s Commissioner for Wales](#)

⁷¹⁷ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 11.7](#)

⁷¹⁸ [Written evidence, WLE 06, Cymdeithas yr Iaith](#)

⁷¹⁹ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 314](#)

- RhAG⁷²⁰.

509. Learner travel can be more of a challenge for pupils wishing to attend Welsh-medium schools, because such schools may be further away. RhAG said they were “shocked” that there was no reference to the Learner Travel Measure in the Bill. They raised concerns that as local authorities are facing financial challenges, they are changing their learner travel provision “and that indirectly—or directly, I would argue—is having an impact on children’s ability to access Welsh-medium education.”⁷²¹

510. While the focus was on transport to school, some also highlighted that there are no statutory requirements for learner travel for children in pre-school. There were also concerns about learner travel for post-16 education choices.⁷²²

511. The Cabinet Secretary said the current WESPs:

“... already require a reference to transport as part of the efforts to extend the availability of Welsh-medium education. I would fully expect that to continue to be part of the remit of WESPs in future, but I don’t think that this is the Bill that can solve the complex issue of school transport.”⁷²³

Definitions

512. Section 35 defines a number of terms for the purposes of Part 4 of the Bill, including the definition of Welsh language education, which is defined in the same way as in Part 3 of the Bill (see the section on definitions in Chapter 6).

Our view

513. While there was general support for the National Framework, there were also calls for greater clarity, in particular how it will relate to the tertiary education sector. We were particularly persuaded by the sector’s evidence on this part of the Bill, and we welcome the Cabinet Secretary’s openness to revisit these issues. While the Bill is focused on the statutory school sector, both early years and post 16 education will play a vital role in reaching the one million target. While both are referenced in the National Framework, there is a lack of clarity in particular for the tertiary education sector. It is unclear what role the tertiary education sector will

⁷²⁰ [Written evidence, WLE 14, RhAG, paragraph 3.20](#)

⁷²¹ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraphs 204-205](#)

⁷²² [Written evidence, WLE 04, Mudiad Meithrin, paragraphs 11.8-11.9](#)

⁷²³ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraph 208](#)

play in relation to the National Framework, as well as the specific roles of individual organisations, in particular Medr. These concerns come directly from the organisations themselves, and should not be ignored. We heard that the lack of clarity could lead to ineffective implementation of the Bill, a lack of coherence and unnecessary duplication. Medr called for their role, within the context of the legislation, to be clarified in the Explanatory Memorandum. We agree. Such clarification should make specific reference to what their role will be in relation to Welsh as a subject as well as Welsh-medium provision within the sector.

Recommendation 8. The Welsh Government should clarify the role of the tertiary education sector in delivery of the National Framework. In doing so they should specify what role Medr will play. This could be done in the Bill's Explanatory Memorandum.

514. Some called for the definition of Welsh language education in this Part of the Bill to be amended to include tertiary education, however, we note this is more complex than may first appear. At the moment, this definition applies to both the National Framework and the Local Strategic Plans. Therefore to change the definition for the purposes of the National Framework would involve having two different definitions for this Part of the Bill, one for the National Framework and one for the Local Strategic Plans. We think the Welsh Government needs to consider this in more detail and provide us with information on how they would like to address this issue.

Recommendation 9. The Welsh Government should consider how the Bill can be amended to include tertiary education in the definition of Welsh language education for the purpose of the National Framework.

515. While Welsh in Education Strategic Plans have been part of the Welsh language education planning process for a number of years, their success has been mixed. We know quality varies between local authorities. Any attempt to increase consistency and quality is to be warmly welcomed. We think the revised Local Strategic Plans will form a vital part of the architecture which will help us achieve one million Welsh speakers.

516. We agree with those stakeholders who wanted to see a greater emphasis in the Local Strategic Plans on the use of Welsh in the community, in particular the role that youth services and other organisations such as the Urdd and Mentrau Iaith can play. We heard directly from young people that one of the challenges they face is being able to use Welsh outside of the school environment. To reach

the target there must be plenty of opportunities for people to use Welsh in their community and not just see it as the language of school.

Recommendation 10. The Welsh Government strengthens the Bill's provisions on Local Strategic Plans to ensure that they will take account of youth services and other mechanisms to encourage opportunities for Welsh to be used in the community.

517. Both as Committee Members but also in our representative roles in our constituencies and regions we are acutely aware of the challenges facing children accessing or seeking to access learner travel. We are also incredibly mindful of the budgetary pressures local authorities are facing. In our previous work including on pupil absence, and disabled access to education and childcare, we have emphasised the importance of having access to safe, reliable and affordable transport to get to school. We are aware this is also relevant to being able to choose to go to the school that provides education in the language(s) of your choice. We know this is wider than the scope of this Bill, and are aware that the Welsh Government's forthcoming Bus Bill may start to help address some of these challenges.

8. Part 5: National Institute for Learning Welsh

There was broad support for the establishment of the National Institute for Learning Welsh. Greater clarity is sought on the National Institute's relationship with the tertiary education sector.

518. Part 5 of and Schedule 2 to the Bill establishes a new statutory body, the National Institute for Learning Welsh ("the National Institute").

519. Section 36 establishes the National Institute, and introduces Schedule 2. This Schedule sets out that the National Institute will not be a Crown Body, and makes provisions for a range of matters including members, staff, procedures and financial matters.

520. Section 37(1) sets the core objective of the National Institute, which is to support people to learn Welsh, and facilitate their progression so that more people of all ages are learning the language. Section 37(2) places a number of duties on the National Institute to meet its objective. These duties include:

- Providing strategic leadership and direction to Welsh language learning providers.
- Providing or facilitating the provision of Welsh language learning materials.
- Making arrangements to provide opportunities to learn Welsh and improve levels of ability in the language amongst the education workforce, in the workplace, and to people over compulsory school age.
- Developing and maintaining a national curriculum for Welsh language learning for learners over compulsory school age.

Section 37(3) gives the National Institute powers to:

- Co-ordinate or commission research on teaching or learning Welsh.
- Advise anyone on teaching or learning Welsh.

- Give financial assistance to any Welsh language education provider in relation to teaching or learning Welsh.
- Do anything else which is related to supporting people to learn Welsh and support their progress, if it believes it will be appropriate to meet a target set in the National Framework.

521. Section 38 gives Welsh Ministers the power to make regulations to confer additional functions on the National Institute.

522. Section 39 requires the National Institute to promote equality of opportunity when exercising its functions. In particular, it must promote:

- Increased participation in people over compulsory school age who are under-represented in Welsh language learning.
- Retention to the end of Welsh language courses of people over compulsory school age who are under-represented in Welsh language learning.
- Reduction of any gaps in attainment in Welsh language learning between different groups of learners over compulsory school age where those differences are the result of social, cultural, economic or organisational factors.

523. Section 40 requires the National Institute, when exercising its functions, to promote innovation and continuous improvement as it relates to learning Welsh. It also requires the National Institute to promote the raising of standards in learning Welsh. In discharging this duty, the National Institute must have regard to the quality of Welsh teaching; professional development for educational practitioners and the views of learners over compulsory school age.

524. Section 41 requires the National Institute, when exercising its functions, to promote collaboration between Welsh language learning providers; as well as between such providers and schools; other tertiary education providers; and employers in Wales.

525. Section 42 requires the National Institute, when exercising its functions, to promote co-ordination in Welsh language learning provision for learners over compulsory school age, and to promote sharing of best practice of teaching methods and transmission of Welsh for those over compulsory school age.

526. Section 43 brings the National Institute under the Welsh language standards.

527. Section 44 places a duty on the National Institute to prepare a strategic plan. Section 44(2) requires the National Institute to set out how it will exercise its functions to meet its objective, and how it will do this in accordance with the duties placed upon it under sections 39 to 42.

528. Section 44(4) states that the National Institute must submit the strategic plan to the Welsh Ministers for approval at least three months before the beginning of the planning period to which it relates. The Welsh Ministers under section 44(5) may approve the Strategic Plan subject to any modifications agreed with the National Institute.

529. Section 44(6) places a requirement on the National Institute to publish the strategic plan once approved. Section 44(7) enables the National Institute to review the strategic plan, and the amended plan must be submitted to the Welsh Ministers for approval.

530. Section 45 requires the National Institute to prepare and publish an annual report as soon as practicable after the end of the financial year. This must be sent to the Welsh Ministers who must then lay a copy before the Senedd.

531. There was broad support for the establishment of the National Institute from stakeholders. They included:

- ASCL Cymru⁷²⁴;
- ADEW and WLGA⁷²⁵;
- Catholic Education Service⁷²⁶;
- Coleg Cymraeg Cenedlaethol⁷²⁷;
- CYDAG⁷²⁸;
- Dyfodol i'r Iaith⁷²⁹;
- Education Workforce Council⁷³⁰;

⁷²⁴ [Written evidence, WLE 10, ASCL Cymru, paragraph 22](#)

⁷²⁵ [Written evidence, WLE 12, ADEW and WLGA](#)

⁷²⁶ [Written evidence, WLE 22, Catholic Education Service](#)

⁷²⁷ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.14](#)

⁷²⁸ [Written evidence, WLE 32, CYDAG, paragraph 1.6.1](#)

⁷²⁹ [Written evidence, WLE 01, Dyfodol i'r Iaith, paragraph 37](#)

⁷³⁰ [Written evidence, WLE 23, Education Workforce Council](#)

- Estyn⁷³¹;
- Mentrau Iaith Cymru⁷³²;
- Mudiad Meithrin⁷³³;
- The National Centre for Learning Welsh⁷³⁴;
- NEU Cymru⁷³⁵;
- Professor Enlli Thomas⁷³⁶;
- Qualifications Wales⁷³⁷;
- RhAG⁷³⁸; and
- UCAC⁷³⁹.

532. Estyn believed the new body had the potential to be “a powerhouse to share good practice, raise expectations for all sectors and align what is happening across statutory and in fact non-statutory education sectors”.⁷⁴⁰ RhAG said there was “real opportunity ... to create a body of authority”.⁷⁴¹

533. ADEW highlighted it would provide:

“... national consistency; everyone would have the same opportunity, be they in Blaenau Gwent or in Ynys Môn, and it also ensures that schools and local authorities can turn to high-quality specialists to access services, and it also would respond to school priorities, such as upskilling staff, ...”⁷⁴²

⁷³¹ [Written evidence, WLE 11, Estyn](#)

⁷³² [Written evidence, WLE 05, Mentrau Iaith Cymru, paragraph 5.1](#)

⁷³³ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 5.3](#)

⁷³⁴ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.2](#)

⁷³⁵ [Written evidence, WLE 21, NEU Cymru](#)

⁷³⁶ [Written evidence, WLE 02, Professor Enlli Thomas FHEA, FLSW, Bangor University](#)

⁷³⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 341](#)

⁷³⁸ [Written evidence, WLE 14, RhAG, paragraph 3.16](#)

⁷³⁹ [Written evidence, WLE 09, UCAC, paragraph 2.10](#)

⁷⁴⁰ [Written evidence, WLE 11, Estyn](#)

⁷⁴¹ [Written evidence, WLE 14, RhAG, paragraph 3.17](#)

⁷⁴² [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 136](#)

534. The National Centre for Learning Welsh⁷⁴³ said the National Institute would be a “long-term solution that offers stability to the sector.”⁷⁴⁴ They said the current approach of regular tendering makes it “difficult to plan for the long term and to operate within procurement periods, and it can be a barrier ... to looking to the future and planning as needed.”⁷⁴⁵ They also welcomed the powers in the Bill to confer additional duties on the National Institute as this will “ensure that the organisation can adapt, evolve and respond to what is needed when implementing the Bill.”⁷⁴⁶

535. The Cabinet Secretary told us the National Institute would make:

“... sure that, at the delivery end, there is a body whose primary focus is on doing the things that we’ve talked about so far today: supporting the workforce, improving its skills, giving advice to parts of the system where we can see that the system is maybe struggling to achieve all the things that we want it to achieve and does so in an authoritative way. That’s what the institute is designed to do.”⁷⁴⁷

536. The Welsh Government’s Deputy Director, Cymraeg 2050 said the National Institute will be a “centre of excellence, a powerhouse to ensure that we have the best research, the best pedagogical practice, the best understanding of what translanguaging is. We could be a lead in best practice ...”.⁷⁴⁸

537. While there was broad support for establishing the National Institute, a number of issues were highlighted regarding the transition of functions from the National Centre for Learning Welsh to the National Institute. The National Centre for Learning Welsh said that that the Centre’s work has “laid the basis” for the National Institute.⁷⁴⁹ But that it was important that the establishment of the National Institute does not “destabilise” the work of the National Centre to date.⁷⁵⁰

538. UCAC said there was a need for “a thorough examination of what has already been achieved, while being ready to evaluate critically and honestly, in

⁷⁴³ The National Institute will assume the functions of the current National Centre for Learning Welsh, which currently supports Welsh language learning for those over compulsory school age. As the Bill states it will also acquire additional responsibilities.

⁷⁴⁴ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.2](#)

⁷⁴⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 18](#)

⁷⁴⁶ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 4.2](#)

⁷⁴⁷ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 326](#)

⁷⁴⁸ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 328](#)

⁷⁴⁹ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.2](#)

⁷⁵⁰ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 5.2](#)

order to move forward in the most effective and most appropriate way for the future.”⁷⁵¹

539. Mudiad Meithrin highlighted the importance of maintaining the current expertise within the National Centre for Learning Welsh.⁷⁵² The National Centre for Learning Welsh called for a continuation of its work with Mudiad Meithrin and Cwlwm developing the skills of the early years workforce, so that the “continuum is active for every individual from cradle to grave.”⁷⁵³ Early Years Wales did query whether the early years sector would fall under the National Institute’s remit.⁷⁵⁴

540. In particular, we heard about the partnerships that the National Centre for Learning Welsh has fostered between Mudiad Meithrin and other sectors, such as higher education institutions, further education colleges and the Coleg Cymraeg Cenedlaethol. Mudiad Meithrin noted its hope that the “Institute will facilitate building on the[se] partnerships”⁷⁵⁵ RhAG also highlighted the importance of the current partnership working.⁷⁵⁶

541. The National Centre for Learning Welsh said that it has “established strong partnerships” which have supported co-operation and reduced duplication. They cited the memorandums of understanding they have with different organisations including the Coleg Cymraeg Cenedlaethol and Mudiad Meithrin, and the discussions they are currently having with Medr. They said it was important the Bill established “who the main partners are, what everyone’s functions are in terms of contributing to the aims of the Bill” and that this will support the Institute in delivering on its objectives.⁷⁵⁷

542. Medr confirmed that they have had “really constructive conversations” with the National Centre for Learning Welsh. They said a Memorandum of Understanding will “hopefully provide clarity to our providers” as to how the two organisations will work together.⁷⁵⁸

543. The Cabinet Secretary said that the approach to the National Institute is to build “on the achievements of this sector over the years.” He highlighted that the National Centre for Learning Welsh is a “commissioned body” with regular tenders. This was a process that he said he has “never ... been comfortable with” because of

⁷⁵¹ [Written evidence, WLE 09, UCAC, paragraph 2.10](#)

⁷⁵² [Written evidence, WLE 04, Mudiad Meithrin, paragraph 5.4](#)

⁷⁵³ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.9](#)

⁷⁵⁴ [Written evidence, WLE 30, Early Years Wales](#)

⁷⁵⁵ [Written evidence, WLE 04, Mudiad Meithrin, paragraph 5.10](#)

⁷⁵⁶ [Written evidence, WLE 14, RhAG, paragraph 3.16](#)

⁷⁵⁷ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 24](#)

⁷⁵⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 132](#)

the risks that “experience and the expertise built up over the seven-year period” is lost. The National Institute will “avoid that” and will “provide a greater stability of advice to the sector”.⁷⁵⁹ The Cabinet Secretary said that having the National Institute’s expertise “over the long haul not just a seven-year horizon in which, by the time you get to year 5, you’re worrying about having to tender again for the work you’re doing” will lead to it having a more significant impact.⁷⁶⁰

544. The importance of clarity on the role of the National Institute, what is expected of it, and how it will work with other organisations was highlighted by a number of stakeholders including ColegauCymru⁷⁶¹; RhAG⁷⁶²; and UCAC⁷⁶³. Estyn said that it was important “that roles and responsibilities are clearly identified showing how the Institute is intertwined with any other relevant bodies.”⁷⁶⁴ The National Centre for Learning Welsh said that establishing the National Institute with “specific duties” will be a means of addressing concerns about duplication of work.⁷⁶⁵

545. The National Centre for Learning Welsh said that “effective collaboration” with partners was “essential ... to create better progression, experience and outcomes for learners”. They said that the National Institute would have a “specific place in leading on many of the partnership discussions”.⁷⁶⁶

546. ADEW and WLGA said some local authorities “would also welcome more information on the role and responsibilities of the new Institute and its relationship with other public bodies already operating in the field.” In particular they thought there was some work which could overlap with the Welsh Language Commissioner’s responsibilities, such as commissioning research or giving advice. They also asked how the National Institute’s responsibility around continuous improvement would “sit with Estyn’s work?”⁷⁶⁷

547. The Children’s Commissioner sought clarity on the relationship between the National Institute and the Welsh Language Commissioner. She also asked if there

⁷⁵⁹ [CYPE Committee 19 September 2024, Record of Proceedings, paragraph 327](#)

⁷⁶⁰ [CYPE Committee 19 September 2024, Record of Proceedings, paragraph 334](#)

⁷⁶¹ [Written evidence, WLE 20, ColegauCymru](#)

⁷⁶² [Written evidence, WLE 14, RhAG, paragraph 3.16](#)

⁷⁶³ [Written evidence, WLE 09, UCAC, paragraph 3.2](#)

⁷⁶⁴ [Written evidence, WLE 11, Estyn](#)

⁷⁶⁵ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 5.3](#)

⁷⁶⁶ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.11](#)

⁷⁶⁷ [Written evidence, WLE 12, ADEW and WLGA](#)

was a “a risk of duplicating work of the education consortia in supporting schools?”⁷⁶⁸

548. One theme frequently raised by stakeholders was the relationship between the National Institute and the tertiary education sector. This was highlighted by ColegauCymru⁷⁶⁹; Professor Gwenno Ffrancon⁷⁷⁰; and the National Centre for Learning Welsh⁷⁷¹. RhAG said:

“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.”⁷⁷²

549. Professor Gwenno Ffrancon said this area was where “the main ambiguity within the Bill lies.” This area is “key to delivery of some of those [Welsh language] skills”. She called for “particular consultations with universities and the schools of education within universities, and also with the Coleg Cymraeg Cenedlaethol”.⁷⁷³

550. Coleg Cymraeg Cenedlaethol said that the Bill does not:

“... clearly state whether tertiary education is captured within the national framework or not, and, by tertiary education, I define that in the way that it's defined in the 2022 Act, including universities, colleges, sixth forms in schools, apprenticeship providers and lifelong learning. One could read the Bill as it's currently drafted one way or the other. There are indirect references to tertiary education in relation to encouraging continuity in relation to learning Welsh, but that doesn't provide clarity.”⁷⁷⁴

⁷⁶⁸ [Written evidence, WLE 24, Children's Commissioner for Wales](#)

⁷⁶⁹ [Written evidence, WLE 20, ColegauCymru](#)

⁷⁷⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 205](#)

⁷⁷¹ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.6](#)

⁷⁷² [Written evidence, WLE 14, RhAG, paragraph 3.16](#)

⁷⁷³ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 205](#)

⁷⁷⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 26](#)

They said addressing this lack of clarity would “strengthen the Bill significantly, because we understand that the intention is that tertiary education should be captured within this.”⁷⁷⁵

551. The National Centre for Learning Welsh said that the National Institute will have to work in collaboration with Medr, and the Coleg Cymraeg Cenedlaethol to ensure that young people can access Welsh learning provision after school, and to develop Welsh language skills for the workplace.⁷⁷⁶

552. The National Institute’s relationship with Medr was specifically highlighted by some stakeholders. The Coleg Cymraeg Cenedlaethol said that amending the definition of Welsh language education in Part 4 of the Bill would address the issues around different remits for different organisations “and would provide a foundation for effective collaboration between Medr, the Coleg and the Athrofa.”⁷⁷⁷ Medr agreed on the need to amend the definition.

“... the lack of reference to Medr’s role and that of the Coleg Cymraeg Cenedlaethol, alongside the absence of definitions for language learning and language learning providers creates further potential for ambiguity. We understand that the Bill, as drafted, refers to Welsh language learning in this part of the Bill as solely learning to improve Welsh language skills in the tertiary education sector. Our recommendation would be that clearly setting out definitions to clarify this in legislation and the roles of Medr, the Institute and the Coleg Cymraeg Cenedlaethol in the explanatory memorandum would provide helpful context to frame the new statutory duties for the Institute.”⁷⁷⁸

553. Medr called for clarity as to how the National Institute will “operate in tertiary education alongside both Medr and the Coleg Cymraeg Cenedlaethol.”⁷⁷⁹ As well as how the “Welsh Government, the Institute, Medr and Estyn ... operate in that

⁷⁷⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 29](#)

⁷⁷⁶ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 2.6](#)

⁷⁷⁷ [Written evidence, WLE 16, Coleg Cymraeg Cenedlaethol, paragraph 1.15](#)

⁷⁷⁸ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.10](#)

⁷⁷⁹ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 2.3](#)

context”.⁷⁸⁰ They specifically highlighted the role of school sixth forms in this space, “particularly in the context of a whole-school-system approach.”⁷⁸¹

554. Medr outlined how a lack of clarity could impact on tertiary education providers. The National Institute will have powers in relation to “equality of opportunity, continuous improvement, and setting quality frameworks” while Medr also has powers in these areas, so there could be a risk “that providers could be subject to additional burden if the requirements imposed by the Institute and Medr are not aligned.” They called either for a duty to be placed on the National Institute in the Bill, or through “expectations of ways of working in the Explanatory Memorandum” that the National Institute “takes account of the requirements set by Medr for tertiary education providers when delivering their duties in sections 39 and 40 of the Bill.”⁷⁸²

555. Both the National Training Federation for Wales and Universities Wales⁷⁸³ emphasised the important role Medr plays in their sectors, and that it is Medr that they are “looking to”.⁷⁸⁴

556. Medr reminded us that the purpose of their establishment was “around coherence, and actually trying to simplify processes, importantly, for learners, but also for providers.” They, therefore, did not want to see “enhanced administrative burdens” placed on providers because of two different organisations working in the same space. They were clear that “oversight of Welsh as a subject in tertiary education we feel will also continue to remain with Medr.”⁷⁸⁵

557. Medr highlighted the relationship they have with the National Centre for Learning Welsh and said that discussions were currently underway as to how they can “provide clarity to the tertiary education sector.” They said:

“We will work closely to ensure that: there is no duplication of our funding with its allocations; there is no additional administrative burden on providers between our requests and the Institute’s requests for data; information is shared to enable both Medr and the Institute to make evidence informed decisions; and tertiary education providers work with the

⁷⁸⁰ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.11](#)

⁷⁸¹ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 136](#)

⁷⁸² [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.12](#)

⁷⁸³ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 346](#)

⁷⁸⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 344](#)

⁷⁸⁵ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraphs 133-134](#)

*Institute to support learners to study through the medium of Welsh.*⁷⁸⁶

558. Medr believed that setting out the respective roles of both bodies in the Explanatory Memorandum would be “really helpful” in providing clarity to providers about each organisation’s role.⁷⁸⁷ They welcomed that Medr is a statutory consultee on the National Institute’s strategic plan, but said that:

*“... ensuring the institute takes account of Medr’s functions and requirements for tertiary education providers in developing its strategic plan would further address some of the potential issues and the risk of overlap.”*⁷⁸⁸

559. The Cabinet Secretary was clear on the distinctions between Medr and the National Institute. He said Medr is “tertiary, it is post-compulsory school age education” whereas the National Institute has a “genuine lifelong span.” He said the National Institute will create “continuity between a three-year-old and a 103 year-old wanting to improve their ability in the language ...”.⁷⁸⁹

560. The Cabinet Secretary said he was “open” to looking at how greater clarity could be provided, either in the Bill “or more likely in the EM” on the relationship between the National Institute and Medr:

“... we don’t want to see them wasting resources or time by working separately where they could work together, so there’s more work that we could do in order to provide more detail as to how we can provide clarity. What we want to see is two bodies collaborating and having the greatest possible impact through that, rather than conflicting with each other.

*... there’s more we can do, ... I think, to work on that and to provide more information ... to make sure that these are joint efforts, using their resources to the best possible effect, not where there’s any sense of competition or treading on one another’s toes.”*⁷⁹⁰

⁷⁸⁶ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.9](#)

⁷⁸⁷ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 137](#)

⁷⁸⁸ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 138](#)

⁷⁸⁹ [CYPE Committee, 19 September 2024, Record of Proceedings, paragraph 321](#)

⁷⁹⁰ [CYPE Committee, 24 October 2024, Record of Proceedings, paragraphs 218-219](#)

561. The Welsh Language Commissioner highlighted the importance of ensuring there are “stronger links” between the support offered by the National Institute and the national, local and school strategies and plans. She said that the resources and training needed to support schools “moving along the language continuum” should be “prioritised strategically and in alignment with planning at a national, local and school level.”⁷⁹¹

562. Some were concerned about the National Institute having sufficient levels of funding to deliver. This included Cymdeithas yr Iaith⁷⁹²; and UCAC⁷⁹³. UCAC highlighted that the National Institute will have “wider duties” than the National Centre for Learning Welsh, and they called for “more clarity” on its budget.⁷⁹⁴ The National Centre for Learning Welsh said that the budget must support the same scale of work as they currently provide while also allowing for the expansion of the National Institute’s remit.⁷⁹⁵ ColegauCymru said the effectiveness of the Institute would “depend on adequate funding and resources”,⁷⁹⁶ a view supported by WJEC.⁷⁹⁷

563. Cymdeithas yr Iaith called for a duty to be placed on the Welsh Ministers to “fund the new national institute adequately”.⁷⁹⁸

564. The Welsh Language Commissioner said that while the Explanatory Memorandum “discusses” the National Institute’s budget, “there is little clarity regarding the exact expectations that will be placed on the Institute in this context, or how much funding will be available to achieve this.” She noted that the Explanatory Memorandum does not “cover the current programme costs of the National Centre for Learning Welsh, which include the crucial funding allocations to providers of Welsh language training courses for adults.”⁷⁹⁹ She acknowledged that it was difficult to provide definitive figures because of the current changes to the “middle tier” of education support.⁸⁰⁰ Ultimately, she said, additional investment would be needed to expand the language learning offer to the educational workforce.⁸⁰¹

⁷⁹¹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 2.5](#)

⁷⁹² [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 412](#)

⁷⁹³ [Written evidence, WLE 09, UCAC, paragraph 2.10](#)

⁷⁹⁴ [Written evidence, WLE 09, UCAC, paragraph 5.4](#)

⁷⁹⁵ [Written evidence, WLE 17, The National Centre for Learning Welsh, paragraph 6.1](#)

⁷⁹⁶ [Written evidence, WLE 20, ColegauCymru](#)

⁷⁹⁷ [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 339](#)

⁷⁹⁸ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 414](#)

⁷⁹⁹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 5.1](#)

⁸⁰⁰ [CYPE Committee, 26 September 2024, Record of Proceedings, paragraph 102](#)

⁸⁰¹ [Written evidence, WLE 07, Welsh Language Commissioner, paragraph 5.2](#)

565. RhAG said it was important not to “overload” or “put too much pressure” on the National Institute. They said that it had to be “a recognised, authoritative body that is recognised as a body that improves Welsh language skills for all sectors in Wales.”⁸⁰²

566. Medr called for the Bill to be amended so that a learner engagement duty is placed upon the National Institute. They said this would bring it in line with the Tertiary Education and Research (Wales) Act 2022, and with the “principle that learners are at the heart of the tertiary education system in Wales.”⁸⁰³ They acknowledged that it could create:

“... potentially ... another overlap but, in our view, this is really helpful for ensuring coherence and keeping the learner at the heart of the system. ... But the opportunity for collaborative working and joint promotion of our respective duties within this space is a really strong place for us to be in.”⁸⁰⁴

567. NEU Cymru called for recognised trade unions of education workforce to be added as a statutory consultee on the National Institute’s strategic plan.⁸⁰⁵ Universities Wales also suggested that consideration should be given to including Universities Wales as a statutory consultee “given that we’ve got areas that fall outside Medr’s scope”.⁸⁰⁶

Our view

568. The National Institute is a promising development, which will build on the work of the current National Centre for Learning Welsh. It will play an important role in the delivery of the one million target as well as supporting implementation of the Bill.

569. As Medr highlighted, the National Institute will be joining a complex landscape of organisations in the post-16 sector. (Although the National Institute remit is not just restricted to the post-16 sector.) This is why clarity on roles, responsibilities and relationships between all these different organisations is absolutely essential. It also links to the issues about the National Framework raised in the previous Chapter,

⁸⁰² [CYPE Committee, 9 October 2024, Record of Proceedings, paragraph 207](#)

⁸⁰³ [Written evidence, WLE 18, Commission for Tertiary Education and Research \(Medr\), paragraph 3.13](#)

⁸⁰⁴ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 139](#)

⁸⁰⁵ [Written evidence, WLE 21, NEU Cymru](#)

⁸⁰⁶ [CYPE Committee, 17 October 2024, Record of Proceedings, paragraph 346](#)

Recommendation 11. The Welsh Government should provide greater clarity as to how the National Institute will fit into the wider tertiary education sector, in particular how the roles of Medr, Coleg Cymraeg Cenedlaethol and the National Institute will interact.

570. Estyn highlighted that within the wider sector, the role of sixth forms can be particularly complex, as they are part of a school, yet are within the tertiary sector, and come under the remit of Medr. It is important that we do not lose sight of this particular part of Welsh language education provision.

571. We note the concerns raised about the expectations placed upon the National Institute and proposed funding. It is important that the Welsh Government takes account of these concerns and ensures that the National Institute is adequately funded.

Annex 1: List of oral evidence sessions.

The following witnesses provided oral evidence to the committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on [the Committee's website](#).

Date	Name and Organisation
19 September 2024	<p>Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language</p> <p>Bethan Webb, Deputy Director, Cymraeg 2050 Welsh Government</p> <p>Iwan Roberts, Senior Lawyer, Welsh Government</p>
26 September 2024	<p>Efa Gruffudd Jones, Welsh Language Commissioner</p> <p>Professor Enlli Thomas, Pro Vice-Chancellor and Head of College of Arts, Humanities and Social Sciences, Bangor University</p> <p>Professor Gwenno Ffrancon, Deputy Pro Vice Chancellor Welsh Language, Heritage and Culture and Director Academi Hywel Teifi, Swansea University</p> <p>Dr Gwenllian Lansdown Davies, Chief Executive, Mudiad Meithrin</p> <p>Angharad Morgan, Policy Manager, Mudiad Meithrin</p> <p>Dr Gwennan Schiavone, Chief Executive Officer, Cymdeithas Ysgolion Dros Addysg Gymraeg (CYDAG)</p> <p>Toni Schiavone, Chair, Cymdeithas yr Iaith Education Group</p> <p>Osian Rhys, Member, Cymdeithas yr Iaith Education Group</p> <p>Heini Gruffudd, Chair, Dyfodol i'r Iaith</p> <p>Myfanwy Jones, Director, Mentrau Iaith Cymru</p>

Date	Name and Organisation
<p>2 October 2024</p>	<p>Claire Armitstead, Director, Association of School and College Leaders (ASCL) Cymru</p> <p>Julian Kennedy, Headteacher, Olchfa Comprehensive School, Swansea, Association of School and College Leaders (ASCL) Cymru</p> <p>Chris Parry, President, National Association of Headteachers (NAHT) Cymru</p> <p>Laura Doel, National Secretary Wales, National Association of Headteachers (NAHT) Cymru</p> <p>Nicola Fitzpatrick, Interim Wales Secretary, National Education Union (NEU) Cymru</p> <p>Mairead Canavan, Executive Member for Wales and Vale of Glamorgan District Secretary, National Education Union (NEU) Cymru</p> <p>Ioan Rhys Jones, General Secretary, Undeb Cenedlaethol Athrawon Cymru (UCAC)</p> <p>Urtha Felda, Policy and Casework Official, The National Association of Schoolmasters Union of Women Teachers (NASUWT)</p> <p>Jonathan Cooper, Assistant Director, Estyn</p> <p>Mererid Wyn Williams, Assistant Director/Corporate Services Director, Estyn</p>
<p>9 October 2024</p>	<p>Marc Berw Hughes, Director of Education, Skills and Young People, Isle of Anglesey County Council Association of Directors of Education in Wales (ADEW)</p> <p>Cllr Sue Edmunds, Cabinet Member People and Education, Blaenau Gwent County Borough Council Welsh Local Government Association (WLGA)</p> <p>Elin Maher, National Director, Rhieni dros Addysg Gymraeg (RhAG)</p> <p>Hayden Llewellyn, Chief Executive, Education Workforce Council (EWC)</p> <p>Eithne Hughes, Chair of Council, Education Workforce Council Education Workforce Council (EWC)</p> <p>Philip Blaker, Chief Executive, Qualifications Wales</p>

Date	Name and Organisation
	<p>Richard Harry, Executive Director, Qualifications and Assessment, The Welsh Joint Education Committee (WJEC)</p> <p>Ian Morgan, Chief Executive, The Welsh Joint Education Committee (WJEC)</p>
17 October 2024	<p>Dona Lewis, Chief Executive, National Centre for Learning Welsh</p> <p>Meinir Ebbsworth, Strategic Director, National Centre for Learning Welsh</p> <p>Dr Ioan Matthews, Chief Executive, Coleg Cymraeg Cenedlaethol</p> <p>Rebecca Williams, Senior Manager for Language Skills and Workforce Planning, Coleg Cymraeg Cenedlaethol</p> <p>Rhian Edwards, Executive Director for Policy, Medr (Commission for Tertiary Education and Research)</p> <p>Jonathan Morgan, Principal and Chief Executive of Coleg y Cymoedd, ColegauCymru</p> <p>Amanda Wilkinson, Director, Universities Wales</p> <p>Lisa Mytton, Strategic Director, National Training Federation for Wales (NTfW)</p>
24 October 2024	<p>Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language</p> <p>Bethan Webb, Deputy Director, Cymraeg 2050 Welsh Government</p> <p>Sioned Tobias, Lawyer, Welsh Government</p>

Annex 2: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on [the Committee's website](#).

Reference	Organisation
WLE 01	Dyfodol i'r Iaith
WLE 02	Professor Enlli Thomas FHEA, FLSW, Bangor University
WLE 03	National Association of Schoolmasters Union of Women Teachers (NASUWT)
WLE 04	Mudiad Meithrin
WLE 05	Mentrau Iaith Cymru
WLE 06	Cymdeithas yr Iaith
WLE 06b	Cymdeithas yr Iaith
WLE 07	Welsh Language Commissioner
WLE 08	National Association of Head Teachers (NAHT) Cymru
WLE 09	Undeb Cenedlaethol Athrawon Cymru (UCAC)
WLE 10	Association of School and College Leaders (ASCL) Cymru
WLE 11	Estyn
WLE 12	Association of Directors of Education (ADEW) and Welsh Local Government Association (WLGA)
WLE 13	The Welsh Joint Education Committee (WJEC)
WLE 14	Rhieni dros Addysg Gymraeg (RhAG)
WLE 15	National Training Federation for Wales (NTfW)
WLE 16	Coleg Cymraeg Cenedlaethol
WLE 17	The National Centre for Learning Welsh
WLE 18	Medr (Commission for Tertiary Education and Research)

Reference	Organisation
WLE 19	Education and Children's Services, Carmarthenshire County Council
WLE 20	CollegesWales
WLE 21	National Education Union (NEU) Cymru
WLE 22	Catholic Education Service
WLE 23	Education Workforce Council
WLE 24	Children's Commissioner for Wales
WLE 25	Golingo
WLE 26	Clybiau Plant Cymru Kids' Clubs
WLE 27	TUC Cymru
WLE 28	Canolfan Bedwyr, Bangor University
WLE 29	National Deaf Children's Society Cymru
WLE 30	Early Years Wales
WLE 31	Swansea Council
WLE 32	CYDAG

Additional Information

Title	Date
Mudiad Meithrin	07 October 2024
Association of School and College Leaders (ASCL) Cymru	7 October 2024
National Association of Head Teachers (NAHT) Cymru	8 October 2024
The National Association of Schoolmasters and the Union of Teachers (NASUWT)	10 October 2024
Estyn	17 October 2024
National Centre for Learning Welsh	17 October 2024
Welsh Local Government Association (WLGA)	23 October 2024
Education Workforce Council	30 October 2024