

APPENDIX 1

THE RESPONSE OF CYNGOR GWYNEDD'S EDUCATION DEPARTMENT TO THE CONSULTATION:

PROPOSALS FOR THE WELSH LANGUAGE EDUCATION BILL

Thank you for the opportunity to submit observations on the 'Proposals for the Welsh Language Education Bill' consultation.

Cyngor Gwynedd's Education Department welcomes the proposals for the Welsh Language Education Bill in this consultation document in general and welcomes the robust commitment of the Welsh Government to legislate and plan appropriately to ensure that the long-term national policy aspiration of a million Welsh speakers by 2050 is realised.

It is acknowledged that the aspirations and outcomes noted in the proposals for the Welsh Language Education Bill must reflect the whole diversity of contexts seen across Wales in terms of the Welsh-medium education provision, the situation with the Welsh-language demography in the community, as well as the various challenges in relation to the education workforce seen across Wales, and consequently, that every authority is on its own unique journey towards maintaining growing Welsh-medium education.

Of course, Cyngor Gwynedd has been leading in this field for decades as a result of our Language Education Policy, which has ensured that generations of children and young people take advantage of the opportunity to procure Welsh through the education system and become proficient bilingual speakers by 11 years old. In fact, in Gwynedd the Welsh language belongs to everyone, and through the county's Education Language Policy every child is given the opportunity to develop skills in the Welsh language. Gwynedd's Education Language Policy is therefore an example for the rest of Wales, and it is one that the Welsh Government should consider promoting nationally in order to reach the goal of one million Welsh speakers by 2050.

As a result of our Education Language Policy in Gwynedd, the majority of children and young people in Gwynedd already possess Welsh skills that are beyond the minimum level (which equates to B2 CEFR) noted in the consultation document. However, we understand the need to consider the proposals in the consultation document in the context of Wales as a whole, and although the minimum level will not influence our ambition for the children and young people of Gwynedd to possess higher skills in Welsh, clearly defining the expected minimum for learners across Wales by the time they leave statutory education will ensure clarity regarding the Welsh language skills that learners across Wales will possess by the time they are 16 years of age, although Gwynedd would like to see the Welsh Government set this goal by the time learners are 11 years old rather than 16 years old.

Furthermore, the proposal to place a duty on Welsh Ministers to declare a Welsh skills continuum, and thus publish a framework that would describe the different levels of proficiency, will enable us in Gwynedd to note the expected level of Welsh skills that every child and young person would possess locally to us, which would be above the national minimum for learners (level 2 CEFR) by the time they are 16 years of age.

The Welsh Government's proposal to create a statutory categorisation system, compared with the current system, is supported, since it would be a means to ensure specific enforcement on every

maintained school in Wales to be categorised based on the Welsh-medium provision. This will be a firm foundation to monitor the performance of schools when realising their category requirements, and provide a clear context for progress targets that will be set in the proposed Welsh in Education Action Plan (CGCA). It is acknowledged that the Bill would create a framework that would place a duty on Ministers to determine the specific description of the categories in regulations including the minimum time provided in Welsh - this proposal is supported, although the minimum requirement must reflect the position across Wales. We also support the proposal to determine the descriptions of the categorisation in sub-legislation in order to allow Ministers to revisit and adapt and increase the minimum over time as factors change. We would also welcome the opportunity to contribute to any further consultation on categorisation and the associated descriptions. At the same time, we would welcome an opportunity to now revisit the descriptions of the categories in the non-statutory guidance, particularly so the description of the minimum for Category 3 - secondary.

We also support the proposals for local authorities to verify and approve the category of every school to ensure consistency, since it would enable the authority to monitor against the category that it has approved. It would also be a means for the local authority and the school to collaborate when deciding on the category that is a suitable description for the school. To ensure consistency across Wales, we also welcome the proposal that a duty should be placed on Welsh Ministers to publish guidance for schools and local authorities on how to set their category, and provide clarity regarding the data to be used to do this, any considerations to make and any processes and timetables that must be followed.

Although we are very supportive of the commitment to ensure that every school increases its Welsh provision over time, and that this commitment is a reflection of the national aspiration, and that there is also room for us in Gwynedd to consider what opportunities we have to further increase the Welsh provision in our schools, nevertheless, the consultation document does not acknowledge or refer to the end goal of that progress in Category 3, or acknowledge that maintaining the current situation in itself in some situations would be a worthy achievement. It is also acknowledged that it is not possible to ensure limitless progress, despite the worthiness of moving towards more Welsh-medium provision. The document, upon reading it, may reflect the situations in broad areas of Wales where increasing the designated schools at the detriment of English-medium schools is the only way to increase the Welsh-medium education provision, without reflecting the situation in areas such as Gwynedd, where the aim is to generate every school as a Category 3 school.

In order to ensure consistency across local authorities to increase the Welsh provision, we support the proposal that the authority's proposed CGCA, prepared in order to realise the county targets determined by the Welsh Ministers in the National Plan, notes how the authority will see progress in the Welsh provision across the county. We also support the acknowledgement afforded to the various demography of the Welsh language, which enables consideration to the Welsh-language demography on a more micro level, as an authority is able to determine in which catchment areas it wishes to see progress in the Welsh-medium provision. The accountability placed on schools by placing a duty on every school to note in a delivery plan how they will proceed to increase their Welsh provision in a practical sense, responding to the expectation that the proposed CGCA of its local authority is welcomed. Similarly, the proposal is supported for the local authority to monitor that a school provides an education in accordance with the category set, as well as monitor that a school is making progress, whether this is progress within a category or moving to a higher category.

Cyngor Gwynedd is of the opinion that a presumption should be set that any new school in a specific area would be Welsh-medium and that the Authority would have to note robust reasons for deciding that it would not be reasonable to designate a Welsh-medium school. By setting a presumption of

this type, there is a genuine opportunity to see progress in the number of Welsh-medium schools across Wales, forcing local authorities to give genuine consideration to Welsh-medium education in their areas. Of course, Cyngor Gwynedd has implemented this principle for decades, with a common language policy which ensures that every child and young person has the opportunity to procure the Welsh language, receive a Welsh-medium and bilingual education and become speakers - the exact aim of Welsh Government in *Cymraeg 2050*.

We support the aspiration of ensuring that all components in the context of procuring and learning Welsh work together in order to ensure that a learner, regardless of their age, is able to continue to learn and improve their language skills throughout their life. Therefore, we support the proposal that Welsh Ministers should draw up a statutory National Plan for procuring and learning Welsh with a 10-year vision and a duty to review and publish it in every Senedd term, with the aim of providing assurance for the future that a robust mechanism is in place to strengthen and set a more robust and clear foundation for the planning of Welsh education. One of the main purposes of the National Plan would be to create a link between the target of a million speakers and the Welsh in Education Action Plans (CGCA) of the local authorities. The CGCA would explain how the local authority would work to achieve the statutory target determined by Welsh Ministers. It is proposed that this local target would be set in the National Plan on a statutory basis.

As a part of the National Plan, it is proposed that Welsh Ministers would be expected to continue to determine national targets for the assumed number of teachers required to facilitate the growth in Welsh education. As part of the CGCA, local authorities would be expected to determine local targets to increase the number of Welsh and Welsh-medium teachers and increase the number of teachers and assistants with language skills at an appropriate level to teach and lead the Welsh provision across every school category. This proposal is supported as the only way to know how far we are from securing a sufficient Welsh-medium workforce to meet the needs of our schools is by determining targets and measuring attainment against them.

We agree that the existing outcomes in the Welsh in Education Strategic Plan (CSGA) continue to provide a clear focus for national and local planning, and we know that there is no desire in some parts of Wales at present to revisit the CSGA so soon after publishing the regulations and drawing up 10-year plans. Nevertheless, we believe that there is an opportunity to secure a silver thread between the outcomes of the CSGA and what the categorisation system seeks to achieve in the context of the minimum relating to the time provided in Welsh.

We support the proposal of introducing a duty on local authorities to review their CGCA after 5 years to align with the National Plan 5-year progress report. We also support the principle that Welsh in education targets should be imposed on local authorities by Welsh Ministers, as that would be a means to realise the national policy. Nevertheless, we acknowledge the importance of ensuring that the targets set by Welsh Ministers are suitable to the local circumstances whilst acknowledging the ambition to reach a million Welsh speakers by 2050 and creating an education system where every child becomes a Welsh speaker.

Cyngor Gwynedd supports the proposal to place a duty on local authorities to plan their workforce, and we support the proposal that Welsh Ministers would publish guidance to ensure consistency across all authorities in terms of how to proceed to analyse the needs of the workforce and plan ahead.

The Welsh in Education Strategic Plans (Wales) Regulations 2019 placed an additional duty on local authorities to submit an annual review report to Welsh Ministers, outlining the progress made since

approving the Plan or since the previous review period. There is no requirement to publish the review report. The Welsh Government believes that these annual review reports should be published and that they continue to include an annual summary of progress against the target(s) given to an authority by Welsh Ministers and the targets in the proposed CGCA, including priority fields for the local authority to develop further. This will be a means of giving the public confidence that the proposed CGCAs are achieved, and increase transparency and accountability. It is proposed that Welsh Ministers should be duty bound to publish a national progress report against the targets in the National Plan also, and for that to be done annually. The annual reports would provide a foundation for the planning of the National Plan for the next 5 years. Cyngor Gwynedd supports the proposal to publish these progress reports, in order to ensure transparency and accountability.

Considering that progress in Welsh-medium education has been slow in some areas of Wales since the last period, Cyngor Gwynedd supports the proposal to give Estyn a function to conduct a swift review and offer recommendations in situations where it appears that there is a risk that an authority will not meet its targets.

In Gwynedd, we have room to promote the advantages of a Welsh-medium education amongst learners and their parents/guardians, and particularly in some areas of the county where challenges exist as a result of a lack of language skills in the workforce to offer a Welsh-medium Category 3 education at present. Nevertheless, since the Education Language Policy is generic for all schools in Gwynedd, parents and guardians in Gwynedd do not have a choice in terms of the medium of the education in general. It is acknowledged, however, where there is a substantial variation in the medium of the provision in other parts of Wales, it makes sense to take definitive steps to promote the Welsh-medium education pro-actively, so that parents and guardians can make informed choices about the education of their children, and the linguistic outcomes that they wish for them.

The Education Department and Gwynedd schools have been very successful over the decades in encouraging and persuading parents to take advantage of the immersion provision of the county's Language Centres in order to assist their children to procure the Welsh language, and subsequently blend in and thrive in the Welsh and bilingual education system in Gwynedd. Likewise, Gwynedd schools refer learners who are newcomers, or learners who would benefit from an additional boost with their Welsh, to take advantage of the immersion provision and support at the Language Centres. Nevertheless, the Council has no objection to the proposal of placing a duty on local authorities to do more to further promote the late immersion provision.

Late immersion is a core provision in the Gwynedd education system, because without this late immersion provision, it would not be possible for learners who are newcomers to Gwynedd to cope in general within our Welsh and bilingual education system. In other counties, a late immersion provision can enable learners to move towards more Welsh-medium education provision at key periods in their education, and this means that there are opportunities at every step of the educational journey for learners to be able to take greater advantage of a Welsh-medium education, which is a good thing.

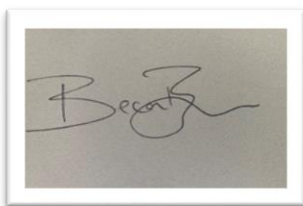
Cyngor Gwynedd supports the proposal considered by the Welsh Government to centralise the support for learning Welsh by supporting individuals, workplaces and schools within a single body. The picture is fragmented at present, and often, one must go in search of the most suitable provision that is available locally to support the workforce that wishes to improve its language skills. However, the said national body would need to be creative and effective and be able to innovate and create solutions to local, and national situations.

The content of the White Paper makes direct reference to proposals that would place a statutory duty on Welsh Ministers, Local Authorities (and thus, on schools), and Estyn, with further considerations in the context of the National Welsh Learning Centre, for example. Considering that the statutory responsibility currently lies on Local Authorities through the CSGA, and that further statutory duties are likely through the CGCA and the categorisation system (if it becomes a statutory system in due course), falls on authorities, it is believed that every financial source that the Welsh Government has for the purposes of supporting Welsh-medium education, is referred directly to the authorities as a result.

We trust that the recent opportunities that have existed for authorities to apply for grants directly to the Welsh Government, such as the late immersion grant, has proved the authorities' abilities to target support to the exact location of need when the resources are directly at their disposal. One must acknowledge the challenge that the variation in the position of the Welsh language across Wales poses, and it is difficult, if nigh on impossible, to be able to plan linguistically on a broad level such as on a regional level, when the position of the Welsh language varies so greatly from Aberdaron to Shotton, for example. Therefore, authorities are best placed to be able to target resources appropriately, to plan on a micro level in order to make a genuine difference to the aim of increasing Welsh-medium education, disseminate the immersion education, and support the workforce's language skills. Consequently, all financial resources and grants associated with realising the Welsh Government's aspiration for the Welsh language and Welsh education should be directly referred to authorities in accordance with the statutory duty placed on them to realise the aim.

It is acknowledged, if we are serious about realising the proposals of the Welsh Language Education Bill, then we need to see actual change on all levels in the commitment and actions taken across Wales. In order to be able to realise this, and ensure the expected progress at the expected scale, then more resources need to be at the disposal of authorities so that they can act more effectively, more precisely, and more promptly. If we wish to seek to achieve the requirement within our existing resources, then the results realised are likely to reflect the existing progress, and this progress across Wales is unlikely to enable the Welsh Government to realise the aim of a million Welsh speakers by 2050.

Cyngor Gwynedd's Education Department is grateful for the opportunity to make observations on the consultation document *Proposals for the Welsh Language Education Bill* for consideration by the Welsh Government, and is supportive of the intentions and direction in terms of legislating to increase Welsh-medium education and achieve the aim of a million Welsh speakers by 2050.

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'Beca Brown' written in a cursive style.

Beca Brown

Cabinet Member for Education, Cyngor Gwynedd

