



Llywodraeth Cymru
Welsh Government

Improving the Planning of Welsh-Medium Education

Recommendations of the Welsh in
Education Strategic Advisory Board

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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- Recommendations of the Welsh in Education Strategic Plans Advisory Board

Introduction

1. The Welsh in Education Strategic Plans (WESPs) Advisory Board was established in May 2018. The purpose of the Board is to advise the Minister on plans to strengthen the planning infrastructure for Welsh-medium education in line with the vision within the Welsh Government's Welsh language strategy *Cymraeg 2050: A million Welsh speakers*.¹ The Board's main functions as set out in the terms of reference are:
 - To consider and prioritise the 18 recommendations submitted as part of the Rapid Review of the WESPs;
 - To consider proposals to review the current legislation underpinning the regulations and guidance for the WESPs;
 - To review the definitions and categories of schools in Wales according to the language used as the medium of instruction;
 - To consider and bring forward proposals to strengthen the way in which local authorities plan linguistic progression from one stage of education and training to another in their WESPs;
 - To consider the role of the 4 consortia and local authorities in strategically planning a Welsh-medium workforce.
2. Membership of the Board:
 - Aled Roberts (Chair)²
 - Meirion Prys Jones, Director, LinguaNi Ltd
 - Sarah Mutch, Early Years Manager, Caerphilly Borough Council
 - Bethan Morris Jones, Headteacher of Ysgol Pendalar, Caernarfon
 - Dylan Foster Evans, Head of School of Welsh, Cardiff University

Context

3. The purpose of this report, is to identify the work accomplished by the Advisory Board in responding to the recommendations of the Rapid Review,

¹ <http://www.assembly.wales/laid%20documents/gen-ld11108/gen-ld11108-e.pdf>

² Aled Roberts was Chair of the WESP Advisory Board between May 2018 and February 2019. A written statement was issued by the Education Minister on 15 February 2019 stating that he would step down as Chair of the WESP Advisory Board and that Dylan Foster Evans would be taking his place as Chair to oversee the completion of the work.

giving further detail on issues that should be given particular attention when revising the regulations and guidance for the WESPs. The report also comments on some issues which are beyond the Board's specific terms of reference but which require further consideration by the Government if the WESPs are to achieve the ambition set out in the *Cymraeg 2050* Welsh language strategy. This report cannot include details of all matters on which the Board has offered advice as it is for the Minister in the first instance to reach a view on those proposals and to decide which elements of the advice should go to public consultation.

4. The *Cymraeg 2050* Welsh language strategy poses a significant challenge to the education system in Wales in terms of increasing the proportion of our children and young people receiving Welsh-medium education and in terms of improving Welsh language skills of pupils who receive their education mainly through the medium of English:

Increase the proportion of each school year group receiving Welsh-medium education from 22 per cent (based on 7,700 seven-year-old learners in 2015/16) to 30 per cent (about 10,500 in each year group) by 2031, and then 40 per cent (about 14,000 in each year group) by 2050.

Transform how we teach Welsh to all learners in order that at least 70 per cent of those learners report by 2050 that they can speak Welsh by the time they leave school.

Cymraeg 2050 – A million Welsh speakers (p.12)³

5. In order for this to be realised, far-reaching changes will be required in the planning of Welsh-medium education and the teaching of Welsh as a language. The current position in relation to planning for Welsh language provision within local authorities in Wales is that it is a statutory requirement, under Section 84 of the School Standards and Organisation (Wales) Act 2013, for each local authority to prepare and submit to the Welsh Ministers a Welsh in Education Strategic Plan (WESP). The aim of these plans is to provide an opportunity for each local authority to set out its vision for expanding Welsh-medium education, and improving the Welsh language skills

³ These targets should be considered in the light of the following: 'A number of factors will influence the precise journey towards a million and therefore we will continuously review progress so that we can monitor gains made and revisit the trajectory as necessary' (*Cymraeg 2050: A million Welsh speakers*, p.23)

of pupils who are taught in English mainly, identifying clearly the necessary steps to achieve that vision.

6. There is a requirement on local authorities to plan in the light of the outcomes below:
 - more seven year old children being taught through the medium of Welsh as a percentage of the Year 2 cohort
 - more learners continuing to improve their language skills on transfer from primary to secondary school
 - more learners studying for qualifications through the medium of Welsh
 - more learners aged 16-19 studying Welsh and subjects through the medium of Welsh
 - more learners with higher language skills in Welsh
 - Welsh-medium provision for learners with additional learning needs
 - workforce planning and continuing professional development.
7. The plans are currently presented in 3 year cycles. The second WESP cycle will expire in 2020. Local authorities are expected to submit a progress report by the end of December on an annual basis.
8. Aled Roberts published a Rapid Review of the Welsh in Education Strategic Plans in August 2017.⁴ The review itself contains 18 recommendations.
9. The Board was asked to consider how best to implement those recommendations, in line with current Welsh Government policy direction and development.

This report

10. Although the Board's terms of reference do not require a formal written report, the Board agreed at the beginning of the process to submit a written report to the Minister at the end of the period of its deliberations.
11. The Advisory Board looked in detail at the Rapid Review and concluded that a number of the recommendations in the review had already been addressed and acted upon. The Advisory Board hopes that, following its own recommendations to the Minister, the new regulations in respect of the revised WESPs will ensure a much more robust and purposeful system in the future to ensure better forward planning and delivery by a number of local authorities.

⁴ <https://gov.wales/sites/default/files/publications/2018-02/rapid-review-of-the-welsh-in-education-strategic-plans-2017-20.pdf>

12. Reports received by the Advisory Board from the Welsh Government have shown that there has already been a willingness by local authorities to respond more positively and proactively in their discussions with the Welsh Government, and that the relationship with a number of authorities is a much more constructive and supportive one, despite an element of reticence in the past. This was particularly evident following the announcement in 2018 that capital funding was available to expand Welsh-medium provision. Confirmation has also been received that all education authorities have now agreed their current WESP with the Welsh Government.

New regulations

13. In view of the structuring of the existing WESP, the Board concluded that the secondary legislation (the Welsh in Education Strategic Plans and Assessing Demand for Welsh Medium Education (Wales) Regulations 2013⁵) needs to be amended which sets out the duration, form and content of the WESP. The window for introducing any legislative amendments that support the WESP is limited as it is necessary to lay revised regulations by the time the current WESP cycle expires in 2020. Draft regulations are currently being prepared by the Government. We propose that these revised regulations should be formally consulted upon in late Spring 2019 before the new regulations are formalised in November 2019. The Board's recommendations to the Minister in this context comment on a number of issues including the duration and circle of influence of the new regulations, the start date of the new WESPs, and how they could be monitored more effectively. In addition, careful consideration was given to the statement in the Welsh Government's policy document, *Cymraeg 2050: A million Welsh speakers* outlining the desire to move away from measuring the demand for Welsh-medium education to a more systematic and proactive planning arrangement.⁶

14. Changes to some of the outcomes are also recommended, including a new outcome relating to the age range of children and pupils who should be directly or indirectly covered by the new WESPs. With regard to the most important elements, the Advisory Board's recommendations touch upon:

- those elements that are at the heart of the planning process in terms of developing Welsh-medium education
- revising the approach to agreeing targets to put in place a system that will ensure that all local authorities agree challenging and achievable targets based on the contribution of each local authority towards achieving the Government's ambition, as set out in *Cymraeg 2050*;

⁵ <http://www.legislation.gov.uk/wsi/2013/3048/made>

⁶ <http://www.assembly.wales/laid%20documents/gen-ld11108/gen-ld11108-e.pdf>, p. 37.

- the length of the plans cycle to allow better strategic planning and ensure that the timetable is aligned with the Government's capital programmes.

Changes to the curriculum: taking the opportunity

15. One consideration that became apparent during our discussions was the significant changes that are happening in terms of education policy in Wales. A great many of these proposed changes will come into effect once this process of proposing amendments to the WESP regulations has come to an end. Therefore, in relation to what is currently being discussed, consideration must be given to whether the following will have an impact on the process of agreeing upon WESPs and how that might be addressed:

- the new curriculum proposed for Welsh schools
- removing the concept of introducing Welsh as a second language
- introducing and assessing Welsh as a single continuum within the new curriculum
- possible changes to the terminology used to describe the different stages within the education system replacing terms such as Key Stage, etc.

16. The intention to remove reference to key stages and the potential changes in qualifications have also created a situation where the Advisory Board had to ensure that the potential wording of the proposed regulations was sufficiently flexible to respond to these changes so that it would not be necessary to constantly return to the regulations in order to revise them. However, the Board believes that this issue will need to be monitored closely and that the regulations may have to be re-examined within a few years in order to keep them up to date.

County-level forums

17. It was agreed that the county-level forums should continue to include appropriate representation from the region and that an element of consistency between membership should be sought. But the Board also agreed that the membership should appropriately represent the county and that this could vary from area to area. It was also agreed that the list of bodies to be consulted should be re-examined when discussing the draft plans as some of the bodies listed there were no longer relevant.

Additional Learning Needs

18. One of the areas that caused the greatest concern to the Board originally was an area of additional learning needs. The approach taken by most WESPs to

this was very weak although the published guidance asks councils to consider how they would increase their capacity to provide education for pupils with additional learning needs through the medium of Welsh. At the time of the Rapid Review, given their most recent audits, very few of them had done so.

19. New legislation relating to ALN has created an opportunity to ensure that Welsh is central to the general planning requirements of ALN. The collaboration between additional learning needs officers and Welsh language officials within the Welsh Government is a good example of how Welsh should be mainstreamed within policy developments from now on. This co-operation ensured that no additional burden is placed on local authority officials as the requirements within the new WESPs align with the requirements of the sector in relation to planning for ALN.

Linguistic categorisation of schools

20. As part of the review of the implementation of the WESPs, it was decided that the current definitions for categorising schools according to their linguistic nature should be revisited. The group set up to look at this issue is chaired by Meirion Prys Jones. The Rapid Review concluded that it was time to simplify the process of categorising our schools in terms of language. It is now clear that the current method of categorisation does not deal appropriately with the linguistic provision in many of our schools. This creates some confusion in the understanding of parents about the linguistic nature of some schools but also creates a blurred picture of the nature of local provision. The result is that it is unclear to parents what Welsh-medium provision can be expected in different categories. This was referred to in the Estyn report in 2014: "Official categorisation [...] is not always used correctly"⁷. It seems that it is now more difficult for local authorities to be aware of the linguistic situation within schools given that the responsibility for standards and learning has been transferred to the regional education consortia. There is a need to gain a better understanding of the effect of the curriculum's linguistic continuum on the categorisation of schools according to their provision of Welsh-medium education.

21. During Autumn 2019, it is intended to consult on new draft definitions for the Welsh Education sector.

7

https://www.estyn.gov.wales/sites/default/files/documents/Linguistic_progression_and_standards_of_Welsh_in_ten_bilingual_schools_-_November_2014.pdf

Presentations to the Advisory Board

22. A number of organisations were invited to contribute to the Board's discussions orally or in writing over the last 9 months. The Advisory Board would like to thank the following:

Aberystwyth University
Bangor University
Cardiff Metropolitan University
Central South Consortium
Dathlu'r Gymraeg
Dyfodol i'r Iaith
EAS (Education Achievement Service for South East Wales)
Education Departments and Welsh Language Division, Welsh Government
Education Workforce Council
ERW (Education through Regional Working)
Estyn
GwE
Mudiad Meithrin
RhAG (Parents for Welsh Medium Education)
The Welsh Language Society
UCAC (Undeb Cenedlaethol Athrawon Cymru)
University of Wales Trinity Saint David
Urdd Gobaith Cymru
Welsh Language Commissioner
WJEC
WLGA (Welsh Local Government Association)
Y Coleg Cymraeg Cenedlaethol

To close

23. If accepted, the recommended changes to the new WESPs will create a stronger foundation for strategic planning for the Welsh language in education.

We want to take this opportunity, however, to outline those issues which we, as Advisory Board, feel need further attention by the Government. We have placed those issues in Annex 1 to this report. We sincerely trust it will be possible for the Government to further consider those issues that we were unable to tackle, partly due to the legal restrictions of the current legislation and the fact that some areas are outside the terms of reference of the WESP Advisory Board.

We would also like to note that all of us on the Board have enjoyed the opportunity to participate in this work and appreciate the opportunity to do so.

Annex 1

For the attention of the Education Minister specifically:

Areas requiring further action

24. Having considered the Rapid Review, the Advisory Board believes that there are some areas where further action is required by the Government.
25. The Rapid Review envisaged that legislative changes would be needed to implement all the recommendations proposed. The terms of reference of the Advisory Board, however, indicated that only changes to subordinate legislation would be possible within the current Assembly due to the pressure on the Government's legislative timetable. Subordinate legislation has been completed and, as already stated, draft regulations are currently being prepared by the Welsh Government. The work of the Advisory Board will end when presenting this report, which mainly relates to the introduction of secondary legislation.
26. The Board believes that the introduction of new legislation needs to be considered, that would amend and replace the 2013 School Standards and Organisation Act, which includes imposing the duty on local authorities to prepare WESPs. It is entirely appropriate for the Government to agree some changes to the existing subordinate legislation in the face of the challenge set by the Welsh language policy document, *Cymraeg 2050*, but the Board believes that careful consideration will need to be given to how to significantly strengthen the process of linguistic and educational planning that will ensure that a much higher percentage of pupils have the opportunity to speak Welsh over these next decades.
27. The structures in terms of provision, improvement and monitoring of education in Wales have changed since the concept of Welsh Education Schemes has been introduced and since legislation has been agreed which supports this provision. The role of education authorities, regional consortia and schools has now changed, and there are impending proposed curriculum changes. Therefore, in order to ensure better provision in terms of planning and provision for Welsh-medium education and the generally more effective teaching of Welsh, more purposeful and effective legislation will be required to deal with all these developments and create a system that will be more inclusive and ambitious than the present one.

The WESP's circle of influence

28. One of the main weaknesses of the current WESPs is that the primary legislation requires plans to be based on how the local authority will exercise its "education functions" to:

- (i) improve the planning of the provision of education through the medium of Welsh ("Welsh-medium education") in its area; and
- (ii) improve the standards of Welsh-medium education and of the teaching of Welsh in its area. The term "education functions" is defined under the Education Act 1996.

Although the original plans include outcomes that require planning in terms of pre-school and post-16 provision, as the Advisory Board discussed possible changes, questions were raised about the legal validity of some of those outcomes. Given the importance of these areas in terms of growing and expanding Welsh language provision, questions were raised by the Board regarding whether it is possible to extend the scope of the plans for pre-school and post-16 provision, but it was evident that this was problematic in terms of current legislation.

Childcare

29. The Rapid Review stated that there is a need to ensure sufficient planning at a national and local level and in relation to the impact of 30 hour childcare provision on local patterns that may affect the *Cymraeg 2050* Welsh language strategy. The initial intention of the Advisory Board, therefore, was to introduce a new outcome requiring local authorities to consider the sufficiency of Welsh-medium childcare provision when planning for 3 to 16 Welsh-medium education. The intention was to see that planning occurring in relation to children under 3, so that planning Welsh-medium education provision includes childcare, statutory education and beyond, forming one continuous language pathway. The understanding of the Advisory Board is that this cannot be achieved through this legislation alone, as it is beyond local authorities education functions under the Education Act 1996.

30. The Advisory Board therefore considers that the only way forward under the current legislation is to ensure that the planning of Welsh-medium education provision for children aged 3 and over is done using data derived from a local authority's annual review of the sufficiency of childcare provision for their area (under section 118A of the School Standards and Framework Act 1998).

Local authorities currently have a duty to ensure adequate, sustainable and flexible childcare provision that responds to the requirements of parents in each county in accordance with the Childcare Act 2006. Under that Act the annual review of the sufficiency of childcare provision is considered part of the planning process in relation to local authority educational responsibilities. They are a useful source of data for planning Welsh-medium provision.

31. Although we have suggested a practical way to include childcare within planning for Welsh-medium education, this is not as good as the solution originally considered. Effective linguistic planning is required throughout the 0-25 age range if we are to achieve the *Cymraeg 2050* ambition. Planning appropriately for the above age range requires legislative changes to enable us to do that which is outside the remit of 3-16 compulsory education plans. Careful consideration must be given to this need when planning any relevant legislation in the future.

The post-16 sector

32. We face the same situation in terms of post-16 provision. The Advisory Board concluded that, under current legislation, it is not possible to place requirements on local authorities to plan Welsh language provision for the further education sector. Due to the fact that the further education sector has been given a new status under the Further and Higher Education (Governance and Information) (Wales) Act 2014, one of the recommendations of the Rapid Review was that the lack of provision in Welsh within the post-16 and vocational sector needed a new focus.

Estyn noted in its *Wider choice and the learning core* report (2010): *'Providing Welsh-medium vocational courses at post-16 is a particular challenge, and progression is difficult for learners who wish to continue their vocational studies through the medium of Welsh. Most Welsh-medium schools are unable to offer vocational courses that require specialist staff and equipment, and other Welsh-medium schools are often too far away to share provision. Colleges and work-based learning providers who have the facilities often do not have Welsh-speaking tutors who are confident enough to deliver these courses in Welsh'*.⁸

There are no signs that the situation has improved since then. The Government's plans and the proposed role of the Coleg Cymraeg Cenedlaethol in this regard will be particularly important in the future but a better understanding is needed of how planning Welsh-medium education at

⁸ <https://www.estyn.gov.wales/thematic-reports/wider-choice-and-learning-core-progress-implementing-wider-option-choice-and>

individual county level is promoted or inhibited by a smaller number of larger education colleges, which is an increasing pattern at a cross-county level.

33. Estyn's recent thematic review of *Welsh-medium and bilingual teaching and learning in further education (2017)* shows that there is much work to be done in the sector.⁹ The Board believes that it would be beneficial in terms of Welsh language provision to resolve the conflict between the ability of local authorities and the Government itself to plan purposefully in respect of the use of Welsh within the post-16 education and training sector. It is impossible to do so within the constraints of the existing WESPs.
34. The Board has sought to offer a practical way forward for the new WESPs. However, we believe that there is a need to ensure a more effective language planning system within the education and training sector for Welsh language provision. The only way forward, without the necessary legislative changes, is to highlight the need for joint planning by local authorities and colleges. One approach would be to include a requirement in the funding letter of each college by the Minister, clearly indicating the need to work with the counties. That planning would report on the learning pathways of those young people who were within Welsh-medium education before they transfer to further education and try to increase the provision of Welsh within the sector at the same time.

Social use of Welsh

35. The task of trying to use the WESPs as a means to stimulate an increase in the opportunities to use Welsh socially has proved to be harder than expected. The creation of outcomes and requirements on local authorities within WESPs is very difficult where arrangements and opportunities are often beyond the statutory education system. We concluded that increasing the opportunities to use Welsh outside of education settings is crucial to the success of *Cymraeg 2050*. However we also concluded that it was extremely difficult to identify ways of doing so within the formal WESP systems, as measurable outcomes can not be included within the local authority's educational responsibilities.
36. However, we believe that there is a need to work in close partnership with organisations such as the Mentrau Iaith, Urdd Gobaith Cymru and Young Farmers to ensure that children and young people across Wales enjoy more opportunities to experience the Welsh as a living language. In fact we believe that there is a need to increase the links between them and that they have a leading role to play.

⁹ <https://www.estyn.gov.wales/sites/default/files/documents/Bilingual%20Teaching%20in%20FE.pdf>

Teacher training

37. Teacher training is another area that urgently requires the Government's policy intervention. We welcome the steps taken during the past year to understand the nature of the current workforce. As we improve our understanding of the demands of the workforce over the next few years, it is imperative for the Government to use its influence and take great steps forward, in collaboration with the Education Workforce Council, in terms of increasing the numbers of teachers that will be available to teach Welsh as a subject and to teach through the medium of Welsh.
38. Despite the recent improvement in obtaining a fuller picture of the education workforce, it is necessary to ensure that the needs of the provision in Welsh are considered in much more detail when discussing the provision of initial teacher training, and the type of data collected when planning the future education workforce. To date, little attention has been given to the planning of the education workforce as a whole in terms of developing Welsh language provision, a situation that is, in fact, difficult to comprehend. In the future, the Government will need to have a much clearer picture of the needs in terms of teachers who can teach through the medium of Welsh, setting **specific and ambitious targets** for recruiting Welsh-speaking teachers to initial teacher training providers. This will also require more purposeful planning with higher education institutions, local education consortia and local authorities.
39. The situation regarding the collection of education workforce data has recently improved, but the Welsh Government needs to keep track of the situation and decide who should collect what data for the Welsh-medium sector, and ensure that the data has national credibility and that planning can be done with confidence based on that data.

Welsh medium exams

40. Another issue that needs attention from the Government Education Department, Qualifications Wales and WJEC is the lack of clarity of data when pupils are registered for examination papers in bilingual schools. It would be good to know exactly how many pupils are taking their exams through the medium of Welsh so that there is an objective and definite baseline for planning and measuring progress.