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**Ymateb i Ymgynghoriad / Consultation Response**

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<b>Pwnc / Subject:</b>	<b>School categories according to Welsh-medium provision</b>

**Background information about Estyn**

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

## Response

### Introduction

We welcome the draft 'School categories according to Welsh-medium provision: non-statutory guidance document'. The document:

- sets out clearly the new arrangements for categorising schools based on the amount of teaching and learning in Welsh
- provides clear guidelines for parents/carers on the school models according to language found in Wales
- establishes a national pattern of provision to enable parents/carers to make informed decisions when choosing their child's education pathway
- simplifies the current school linguistic categories which will support local authorities to evaluate their progress against the Welsh in Education Strategic Plan (WESP) through regular monitoring and to achieve their targets
- provides aspirational targets to support a developmental pathway for primary and secondary schools who wish to increase the amount of Welsh taught at their school
- sets out transition sub-categories which support the principle of schools moving along a language continuum
- establishes the principle that schools should not reduce the amount of Welsh language provision offered
- provides consistent definitions across Wales which will support continuity for learners who move within Wales and from outside of Wales
- supports the new regulations which came into force in January 2020 and set high expectations on local authorities to plan for the growth of Welsh-medium provision with greater ambition and pace

This is a timely consultation in light of the introduction of a new curriculum for Wales and a new WESP cycle. The proposals support the national ambition for the Welsh language outlined in Cymraeg 2050: a million Welsh speakers. The proposals also align with the descriptions of learning within the Languages, Literacy and Communication Area of Learning and Experience in the new Curriculum for Wales.

In order to strengthen arrangements and provide greater clarity, Welsh Government may wish to develop further guidance on:

- categorisation by provision in the primary phase
- how secondary schools who are currently in category 3 should interpret the guidance in terms of Welsh-medium curriculum provision
- practical arrangements for transitioning to a new category including potential models.

In parallel, Welsh Government may also wish to consider strategies to promote to parents the benefits of choosing increasingly Welsh-medium provision for their child.

## Consultation questions

**Question 1** – Do you agree with the need to revise the policy around school categories according to Welsh-medium provision?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Any additional comments:**

At present, the school categories for Welsh-medium education are ambiguous and complex to understand. They do not sufficiently support parents to make an informed decision regarding the linguistic journey of their child's educational pathway. In our thematic report '[Local authority Welsh in Education Strategic Plans – September 2016](#)' we stated that:

'Several terms are used for schools where Welsh is used extensively as the medium of teaching, such as 'Welsh schools', 'bilingual schools', 'traditional Welsh schools' or 'natural Welsh schools'. These terms do not explain well enough the extent of the provision for pupils through the medium of Welsh and English. Official Welsh Government categorisations are not always used consistently by schools and local authorities. This makes it challenging for parents to make informed decisions about their children's education'.

**Question 2** – Do the changes proposed encourage and support schools to increase the amount of Welsh-medium provision?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Any additional comments**

The changes proposed encourage and support the aspirations and targets set out in the Cymraeg 2050 work plan and Welsh in Education action plan 2017-21.

### **Primary**

The main proposal in the primary sector is to increase the amount of Welsh-medium provision by introducing transitional sub-categories. It would be helpful to provide further and practical clarification regarding categorisation by provision rather than by whole school. For example, there could be more than one category in a school such as a school that provides English medium education in one stream and Welsh medium provision in another stream, could be category 1 and category 3. A situation could also develop where dual stream schools offer an English/Welsh stream and a Welsh medium stream. Therefore, clarification in terms of implementing and

supporting more than one linguistic category within a school would be helpful to leaders and governing bodies.

The proposal allows flexibility so that schools will be able to move from one category to another within a maximum 10 year period in order to develop their Welsh-medium provision. In order for schools to be able to transfer from one category to another to strengthen and develop their Welsh provision, guidance is needed to ensure that a plan is agreed with the local authority to support the school in preparing for an increase in their provision of the Welsh language. In addition, to assist progression, collaboration with key stakeholders will be a determining factor in helping to make the transition as seamless as possible from one category to another. Inevitably, there are resource implications for this model to succeed, such as professional learning for staff regarding immersion methodology, employing additional teachers that are confident and proficient to teach through the medium of Welsh and Welsh learning resources. In order to ensure an effective transition from one sub-category to another, local authorities need to closely monitor the targets outlined in the WESP and the effectiveness of the provision to successfully enhance Welsh-medium provision within each provider.

### **Secondary**

Two criteria are proposed to support schools and governing bodies to increase progression levels from primary to secondary. It is proposed that category 2 and 3 models are defined according to an input and output model. To encourage and support secondary schools to increase the amount of Welsh-medium provision, it stipulates clearly the percentage of pupils following those areas of learning through the medium of Welsh up to the age of 16. For, example, at least 40% of learners following areas of learning in at least three subjects in Welsh. It is imperative that the uptake of pupils following or pursuing their subjects through the medium of Welsh is closely monitored in order for this model to succeed and that that the targets are monitored on uptake rather than on the appropriate range of subjects offered through the medium of Welsh. Category 3 could be perceived as weakening rather than strengthening the Welsh-medium provision as it states 'At least 70% of learners follow areas of learning in at least 5 subjects in Welsh (or equivalent within the current curriculum and excluding English and Welsh' (School categories according to Welsh-medium provision, p16). As it stands, this proposal is less aspirational than what is offered currently in many Welsh-medium schools where nearly all pupils follow their subjects through the medium of Welsh.

Although the document establishes the principle that schools should not reduce the amount of Welsh language provision offered, the category 3 model could potentially be detrimental to schools who already offer 100% of their provision (excluding English as a subject) through the medium of Welsh. This model could be open to misinterpretation by stakeholders who would advocate a change in language medium delivery. For example, a school that currently teaches science through the medium of Welsh could be challenged to teach this subject through the medium of English.

### **All age and Special schools**

There is no reference in how this policy supports these providers to increase the amount of Welsh-medium provision.

**Question 3** – Are we achieving our policy aim of introducing school categories that are clearer for:

(a) parents/carers?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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(b) local authorities?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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(c) schools?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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### Any additional comments

To further support parents and carers to make an informed decision, a user-friendly guide setting out the benefits of Welsh-medium education and of being bilingual at the end of their educational journey would be beneficial. In addition, a multi-media presentation illustrating how these models operate on a daily basis would help provide parents and carers with a clearer understanding of the nature of the provision and the linguistic output for their child. We noted in [Local authority Welsh in Education Strategic Plans – September 2016](#), that in order to strengthen Welsh-medium strategic plans and provision, a systematic approach by local authorities to measure demand for Welsh-medium education is key for this policy to succeed:

'Where progress is good there is a strong commitment by elected members and senior leaders to develop Welsh-medium education. Conversely, in a few local authorities where it is not regarded as a high priority and delivery is the responsibility of middle-tier officers progress against targets is slow'. ([Plans News article / 27 September 2016](#))

In addition, the report also recommends that the Welsh Government should ensure that:

- local plan targets align with the Welsh-medium education strategy
- local authorities regard delivering these targets as a strategic priority and
- the implementation of strategic plans is rigorously monitored.

As regards schools, it is helpful and clearer that the percentage of the curriculum in the primary sector which is taught in Welsh is stipulated, for example 80%. This allows leaders and governing bodies to plan, develop and monitor the provision effectively. In the secondary sector, the model is based on input and output which again gives the same expectations on leaders and governing bodies to ensure that the quantitative targets are actioned and adhered to in each school's language policy. This should be incorporated in each school's prospectus and in the local authority's Composite Prospectus.

**Question 4 – Do you agree with:**

(a) the use of numbering for categories?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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(b) having fewer categories but broader descriptions?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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(c) more focus on the linguistic outcomes descriptions for each category?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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(d) the introduction of sub-categories to facilitate transition?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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(e) the different approaches to categorising primary and secondary school provision?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Any additional comments**

Currently, the terms used to categorise according to Welsh-medium provision do not provide a clear picture of the extent to which pupils are taught through the medium of Welsh, English or bilingually. Official categorisation including sub-categories for bilingual schools is not always used correctly by schools. By having fewer categories but broader descriptions, this gives more clarity to ensure a better understanding to all stakeholders of the actual language provision offered by the school.

In addition, as noted in the consultation, this will make it easier for schools and local authorities to 'work together to ensure that school categorisation is aligned with the local authority's

commitment to increase the amount of Welsh-medium provision in accordance with its WESP' (School provision according to Welsh-medium provision, December, 2020, p6).

All the proposals support the national ambition for the Welsh language outlined in *Cymraeg 2050: a million Welsh speakers*. The proposals also align with the descriptions of learning within the Languages, Literacy and Communication Area of Learning and Experience in the new Curriculum for Wales. As noted, for the first time, the new curriculum will have a clear continuum of progression and expectations of Welsh Language acquisition across all school settings.

**Question 5** – In referring to percentages in the secondary categories, should we include a:

(a) a minimum percentage only?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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or

(b) a minimum **and** maximum percentage range?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Any additional comments**

By defining a minimum percentage, it does not encourage all stakeholders to aspire to develop or increase the percentage of learners following areas of learning through the medium of Welsh. By referring to a minimum and maximum percentage range, it would encourage schools to aim to reach an aspirational target which would align with the WESP.

In the current model proposed, it states that in category 2, at least 40% of learners follow areas of learning in at least 3 subjects in Welsh (or equivalent within the current curriculum and excluding English and Welsh up to the age of 16), and in category 3 at least 70% of learners follow areas of learning in at least 5 subjects in Welsh or equivalent within the current curriculum and excluding English and Welsh. These statements for category 2 schools could encourage the status quo in provision in bilingual schools with no aspirational target to aim for. Also, in the guidelines to categorise schools in category 3 they are less aspirational than the practice of nearly all Welsh-medium schools who currently provide nearly all subjects through the medium of Welsh. This could be to the detriment of Welsh medium schools who have successfully established a provision where all of the curriculum (other than English) is taught through the medium of Welsh.

**Question 6** – Do we need to publish additional guidance tailored towards specific groups such as schools and parents/carers following the final publication of this guidance?

<b>Yes</b>	✓	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Any additional comments**

Additional guidance could include:

**Parents/Carers**

- marketing and explaining the advantages of following courses through the medium of Welsh to pupils and parents/carers to ensure that parents are included more in their children’s education
- a proactive collaboration with all educational stakeholders such as Mudiad Meithrin and regional consortia to provide detailed information on the advantages of Welsh-medium education and the support available to parents to encourage their child’s linguistic development
- marketing the benefits of being bilingual and multilingual when seeking employability routes.

**Schools**

- professional learning to support and develop staff linguistic skills to deliver provision through the medium of Welsh
- sign-posting Welsh learning materials support through identifying Welsh-medium resources, for example HWB and regional digital platforms such as E-sgol, to share good practice across all key stages to ensure equity
- guidance to governing bodies on the implications and a clear understanding of the obligations of over-seeing a seamless transition from one category to another
- support for governing bodies to plan its workforce in line with this guidance and with the objectives set out in the WESPs to increase the number of teaching staff being able to teach Welsh as a subject and through the medium of Welsh
- guidance on school evaluation and improvement plans to support schools to increase their provision of Welsh
- guidance of working in partnership to implement and monitor targets as part of the transition process.

**ITE Providers**

- to fulfil the aims of this consultation, there will be a need for more practitioners who are able to deliver through the medium of Welsh on a regional and local level. ITE providers play a key role in their marketing and recruiting process to support more student teachers to be able to teach through the medium of Welsh. An additional guidance from ITE providers to support student teachers to attain the professional and leadership standards for teachers ‘to actively seek opportunities to apply and extend their understanding and skills in the use of the Welsh language’ would be valuable.



**Question 7** – We would like to know your views on the effects that the school categories according to Welsh-medium provision guidance would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

### Supporting comments

- 1) In both primary and secondary schools, ensuring and establishing a positive Welsh ethos to promote the opportunities for young learners to use Welsh with confidence should be a high priority. The proposals do not explicitly make reference to the ethos in the wording of 'What does this mean for schools?' in the primary categories. Inevitably, by increasing the percentage of pupils in secondary schools who follow their areas of study through the medium of Welsh, we foresee that these pupils will have more opportunities to be truly immersed in the language. In addition, providing information for parents to support their children to converse in informal activities through the medium of Welsh is also a key factor.
- 2) To ensure that the Welsh language is not treated less favourably than the English language, the following considerations should be made:
  - Ensure that pupils in all local authorities have access to a Welsh language immersion units so that there is an equitable provision for pupils wishing to move from English medium to Welsh medium provision across Wales.
  - This provision would enable learners to transfer to Welsh medium education at any point from year 3 onwards. This would also enable latecomers to be immersed in the language.
  - Expand the offer of qualifications available through the medium of Welsh. Collaboration between schools to produce and share Welsh learning resources to support equity in provision
  - As noted in Welsh Government's Welsh medium Education Strategy in April 2010, it stated that the vision of the WESP is to: 'have an education and training system that responds in a planned way to the growing demand for Welsh-medium education, reaches out to and reflects our diverse communities and enables an increase in the number of people of all ages and backgrounds who are fluent in Welsh and able to use the language with their families, in their communities and in the workplace.'

**Question 8** – Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

**Supporting comments**

- See response in Q5

In order to having increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language. Consideration should be taken of the following to strengthen the non-statutory guidance:

- Support by senior leaders to establish a strong vision regarding promoting the Welsh language and expanding Welsh-medium provision
- Clearer measures to hold local authority accountable to meet the targets outlined in the 7 specific outcomes in the WESPs
- Stronger partnership between local authorities and the Welsh Government in developing the WESPs particularly in setting targets
- A more systematic approach to measuring the demand for Welsh-medium education within local authority to ensure that planning is proactive more than reactive
- Ensuring that local authorities not only track the number of Welsh-medium courses in key stage 4 but work with individual schools to increase the number of pupils who follow them
- Promote more effective partnerships through 14-19 Learning pathway networks to increase the number of Welsh-medium courses being provided in key stages and post-16
- Secure sustained funding to support all providers to strengthen their Welsh-medium provision.

**Question 9** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

N/A

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: