
Ymateb i Ymgynghoriad / Consultation Response

Enw / Name:	Owen Evans
Rôl / Role:	His Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
Dyddiad / Date:	16.06.23
Pwnc / Subject:	Proposals for the Welsh Language Education Bill

Background information about Estyn

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

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Tertiary Education and Research Act 2022 and the Education Act 2005. In exercising its functions, we 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.

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

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have 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 Bill and hope that the comments below will be useful in developing the Bill further. The Bill is important to support the aims of growing the number of Welsh speakers across Wales and protecting Welsh-speaking communities where there has been a decline in the number of speakers. We agree that the education system has an important role when considering these challenges, along with the ambition for every learner to become a confident Welsh speaker through the statutory education system.

We have provided comments that build on our views in relation to the following issues:

- We believe that including the national target of a million Welsh speakers by 2050 in the Bill sets an important context.
- We believe that local authorities have an important role in working towards the outcome that is synonymous with level B2 by 2050.
- We welcome a Welsh language skills continuum that has a firm legal basis.
- We believe that creating a statutory system to categorise maintained schools according to language medium will provide a firm foundation for monitoring school performance in meeting the requirements of their category.
- We believe that it is the local authority's role to set and approve the category of each school, rather than individual governing bodies.
- It is not the duty of authorities alone to plan appropriate capacity in terms of the education workforce with suitable Welsh language skills. Financial investment, incentives and continuous monitoring are essential to improve the situation, in addition to co-operation between authorities, Welsh Government and initial teacher education institutions.
- We believe it is important to place a duty on local authorities to provide late immersion education for learners.
- It needs to be ensured that governing bodies monitor the progress of schools against their targets to develop the Welsh language annually.
- Welsh-medium education and immersion education need to be promoted to parents. We also believe that the benefits of bilingualism need to be promoted further by referring to the latest research.

Consultation questions

Question 1 – Do you agree that a provision on the national target of one million Welsh speakers by 2050 should be included in a Bill?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that including the national target of a million Welsh speakers by 2050 in the Bill is vital. The responsibility of education practitioners is key in achieving this aim and this proposal creates a more direct link between the education system and the aim of increasing the number of Welsh speakers. We are also aware that wider policies and action are needed both nationally and within communities to create and support Welsh speakers. Expanding Welsh-medium education and improving the linguistic outcomes of learners in Welsh-medium and English-medium schools is also a means of contributing

strongly to the expansion of the workforce who will be confident and proficient in their Welsh language skills. This, in turn, will support the aim to create a million Welsh speakers.

Question 2 – Do you think there should be a clear role for local authorities to work towards the outcome that's synonymous to level B2 by 2050? If so, what should that role be?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that the contribution of local authorities in working towards this outcome is an important aspect. We believe that the Bill needs to ensure that the outcome informs decisions that local authorities make when planning the authority's education provision. We support the proposal that local authorities need to promote opportunities to use the Welsh language proactively, aiming for all pupils to become confident in speaking the Welsh language by the time they leave school. We believe that each authority needs a measurable target to be able to promote and realise this fairly, in addition to ensuring that each authority has specific officers who would have responsibility for this work. Authorities need to work together to promote and share good practice in this area. It would be beneficial for Estyn to monitor provision as part of our work with local authorities. It also needs to be ensured that school improvement services provide cohesive professional learning programmes, with workforce development aims included in each authority's Welsh in Education Strategic Plan.

We would like to note that setting the B2 outcome should be considered a suitable overarching aim; however, there is an expectation for Welsh-medium and bilingual schools to aim for more ambitious levels.

Question 3 – Do you think there should be a clear role for Welsh Ministers to work towards the outcome that's synonymous to level B2 by 2050? If so, what should that role be?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that the contribution of Welsh Ministers in working towards this outcome is an important aspect. Although we recognise that it would be beneficial to delegate aspects of the work to local management, it is important that a national strategy is led centrally. It is also important to create accountability at a high level to ensure that deliberate action is taken and suitable progress is made against relevant milestones.

Question 4 – Do you agree with the proposal that the Welsh Ministers should have a duty to publish the Welsh language skills continuum?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the above proposal. We support the idea that the continuum emulated the concept of the international standards provided by the Common European Framework of Reference (known as CEFR) in terms of language levels. We also welcome that the continuum has a sound legal basis to enable the development of policies and action plans in the future. It is also important that it is reviewed and evaluated regularly. As a result, the document could be used confidently as a basis for planning provision for teaching Welsh. It is key that the introduction of the continuum is supported by a comprehensive programme of professional development for teachers and classroom assistants. Identifying the stages of linguistic development with guidance that tracks progress from one stage to the next would be a crucial resource and tool to equip teachers and assistants.

We have recognised the need to present a language continuum in recent thematic reports. The report on Welsh language acquisition (2021) draws attention to the fact that excellent provision deepens ‘practitioners’ understanding of the continuum of progress in language learning’. The report on Welsh immersion education (2022) identifies the importance of introducing ‘vocabulary and syntactical patterns purposefully and coherently’.

Question 5 – Do you agree that a statutory system should be created for categorising maintained schools according to language medium?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that the creation of a statutory categorisation system would place a specific requirement on all maintained schools in Wales to be categorised accurately and transparently. This will provide a sound basis for monitoring the performance of schools in realising the requirements of their category and will provide a clear context for the progress targets that will be set in their delivery plans.

The non-statutory categories outlined in the document School Categories According to Welsh-medium Provision (2021) are a useful starting point for this. However, it must be ensured that the definitions of these categories are clear to schools and stakeholders, such as members of the governing body. For example, it will be useful to note the

difference between a Welsh-medium school and a designated Welsh-medium school. This will also ensure better clarity for parents and pupils regarding the likely linguistic outcomes of learners in different schools.

Specific contact time needs to be allocated for developing the Welsh language, which provides the best opportunities to develop pupils' skills in line with the linguistic aims. It is vital that contact time with pupils is stimulating and rich and based on the best pedagogical practices. Too often, timetabled sessions to enrich pupils' spoken language in English-medium schools are repetitive and ineffective.

Question 6 – Do you agree that a duty should be placed on the Welsh Ministers to define the category descriptions in regulations?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

By placing a duty on Welsh Ministers to define the descriptions, it will be ensured that regulations are in place to define the categories clearly and consistently, for example by referring to the percentage of provision that is expected to be delivered through the medium of Wales and, more importantly, stating the expectations in terms of pupils' level of proficiency in the Welsh language at the end of their time at the school. The proficiency levels could be defined in accordance with the linguistic continuum. Placing a duty on Welsh Ministers to define the descriptions would ensure consistency at a national level and would align with the principle that education providers have a vital role in contributing to the national target of a million Welsh speakers.

Question 7 – What are your views about including a minimum amount of Welsh language provision? What are your views on the effects of setting a minimum amount of provision on schools, learners and staff? Do you foresee any other effects?

Supporting comments

The above point must be communicated clearly and carefully to all stakeholders. There must be clear regulations to ensure fairness and consistency across all providers in all authorities. It is important that schools do not go below the minimum number of hours of Welsh-medium provision. However, when setting a minimum, these hours must be challenging and ambitious to enable the Welsh language to flourish in our schools. Care needs to be taken to not use vague language when referring to the time that Welsh is provided to ensure that all stakeholders agree on the definition – for example, specific lessons, registration session, collective worship, extra-curricular offer.

What is more important is to note what the expectations are in terms of pupils' bilingual skills in line with what is stated in the language continuum at the end of their time at the school in question. Outlining this clearly sets an unmistakable aim for the school to reach the target. This will also promote consistency from one school to the next. This information

would also be beneficial to parents when considering which school is suitable for their children.

We will give this element due attention in our inspections in terms of compliance with the hours provided and in terms of the quality of provision that is provided.

Question 8 – What is your opinion about the proposals in paragraphs 51 to 56 in relation to placing schools in a language category, and giving the local authority an approval role in the process?

Supporting comments

We believe that it is the local authority's role to set and approve the category of each school, but that obtaining a co-operation agreement with individual governing bodies is also part of the process. This will ensure that authorities will have a sound knowledge of their schools and that there will be better consistency in terms of school categories within authorities and from one authority to the next. Authorities need to plan provision strategically across a considerable geographical area. Delegating responsibility to governing bodies can impair the ability of authorities to realise the aims in their Welsh in Education Strategic Plans (WESPs).

Lines of accountability are also essential. We agree that clear structures are needed that give local authorities the right to make the final decision when determining the language categories of schools. This will avoid any confusion. Estyn will be able to play a leading part in monitoring provision in schools to ensure that they provide what is expected of them.

In terms of paragraph 55, we believe it is important that secondary and all-age schools list fully and accurately the courses they offer through the Welsh language in their prospectus to ensure that stakeholders have a complete understanding of the meanings of all categories. There must also be a distinction between 3T and 3P, for example, to ensure that schools provide full and comprehensive Welsh-medium provision. Stakeholders, such as parents, need to be clear about the meaning of the term 'Welsh-medium school' and that the term is used consistently when considering the categories.

Question 9 – Do you agree with the principle that all schools should increase their Welsh language provision over time?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree that this principle should be part of the fabric and mindset of the education system in Wales. A statutory duty would give the language status and a platform on which

to flourish and grow over time. It would also set a beneficial challenge to support all schools, including English-medium schools, to increase or enrich their current provision.

It is also important that support is provided for schools who commit to moving from one category to another. It is inevitable that additional resources will be needed e.g., to ensure that a dedicated strategy is in place which includes expanding Welsh-medium provision, developing a comprehensive professional learning plan, including participation in the Welsh Language Sabbatical Scheme etc. Additional resources would be an incentive and stimulus for schools to venture on this journey and provide better assurance that the journey will be successful.

Question 10 – What are your views on the proposals in paragraphs 57 to 60 on the process of increasing Welsh language provision in schools?

We agree that offering an aspirational category on top of the set category should also be an option. We also agree that the pace of this journey will vary but this sets a challenge for these schools to improve their Welsh language provision.

In paragraph 59, the importance of the demographics of the Welsh language in catchment areas is mentioned. We believe strongly that Welsh language provision is needed that is within reach of all children to ensure that they do not have to travel long distances to access Welsh-medium education, including when offering Welsh provision before statutory school age.

Paragraph 60 states that schools have a duty to identify how they will increase their Welsh language provision in practice. The points noted are very important in gaining a clearer picture of each school's Welsh language offer. However, this plan needs to be revisited annually as circumstances change, particularly in terms of staff recruitment. Authorities should monitor the accuracy of this plan and its impact annually.

Question 11 – Do you agree with the proposals in paragraphs 62 to 64 about monitoring school progress?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the proposals in the paragraph above. As an inspection body, we will be able to link the work of monitoring plans and provision as part of our core inspections or engagement visits. Our involvement with all Welsh authorities also allows us to share concerns if they are not on the right track in terms of realising the targets, and we will be ready as an inspection body to conduct rapid reviews should concerns arise.

Question 12 – What are your thoughts on how a local authority should decide whether a new school is to be a Welsh-medium school?

Supporting comments

By assigning the category of ‘Welsh-medium school’ to a new school from the outset, this lays a firm and definite basis for that school’s linguistic journey. It also shares a clear message with stakeholders about the school’s language category. In the process of reorganising, rationalising or merging schools, we support the intention of aiming for an ambitious language category to highlight the expectation that schools move along the linguistic continuum.

Question 13 – Do you agree with the proposal in this section about placing a duty on the Welsh Ministers to produce a statutory National Plan for the acquisition and learning of the Welsh language (providing direction for statutory local implementation plans)?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the proposal that Welsh Ministers should produce a statutory National Plan for the acquisition and learning of the Welsh language. We believe it is important that all activities to support pupils to acquire and learn the Welsh language are coherent and consistent. Occasional or piecemeal activities are not effective enough to develop individuals’ confidence and language proficiency when supporting pupils to acquire the Welsh language over a period of time. Therefore, the focus on developing Welsh language skills and that linguistic progression from one stage to the next is crucial, and it needs to be ensured that the childcare and early years education sector included in the plan, in addition to the post-16/higher education sector.

Question 14 – Do you agree with the proposals in paragraphs 73 and 74 to set national targets for the education workforce and to include them in the National Plan?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The white paper states that it will not be possible to expand Welsh-medium education or improve the linguistic outcomes of learners in all schools unless we have an education workforce with the necessary language skills. This is the greatest challenge in terms of realising the objectives of the Bill.

It is vital that initial teacher education and professional learning are planned carefully and in detail to ensure that more teachers and assistants with the necessary Welsh language

skills come through the system. For three years, the number of trainees with bilingual skills has not reached a third of the targets set by the training colleges, which underlines the challenge that currently exists within the system. It is also important that universities promote opportunities for learners to continue their studies through the medium of Welsh in various fields to enable a natural linguistic progression and support learners to build confidence when speaking Welsh.

We believe that the National Centre for Learning Welsh has a crucial role in developing and providing specific opportunities for trainee teachers and those who are newly qualified to acquire the language and that teachers, trainee teachers and newly qualified teachers in Wales should be expected to undertake such training.

Question 15 – Do you agree that the outcomes set out in paragraph 82 continue to provide a clear focus for both national and local planning?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The 7 outcomes within WESPs continue to provide a clear focus and continue to reflect a learner’s educational journey. It is important that actions for these outcomes are monitored robustly and regularly.

Question 16 – Do you agree with the proposal to introduce a duty for local authorities to review their Welsh in Education Implementation Plan (WEIP) after 5 years to align with the National Plan's 5-year progress report?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the proposal to introduce a duty on local authorities to review their Welsh in Education Implementation Plan (WEIP) after 5 years to align with the National Plan’s 5-year progress report. The above duty will be able to ensure that authorities’ plans remain up to date and that they can be adapted and refined, as necessary. Estyn has a role here in monitoring the plans in our regular discussions with local authorities and to undertake formal monitoring activities at the request of the Government, should the need arise.

Question 17 – Do you agree with the principle that Welsh in education targets should be imposed on local authorities by the Welsh Ministers?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree that including provision in the Bill that would give Welsh Ministers a specific power to set targets for proposed WEIPs in relation to Welsh-medium education is a good idea.

We also believe it is necessary to look closely at the linguistic demographics of Wales and recognise that the challenge and local objectives in terms of the Welsh language differ across the country. We believe there is a need to ensure that the targets set by Welsh Minister suit local circumstances but are also sufficiently ambitious.

Question 18 – Do you agree with the proposal for the Welsh Ministers to commission an external review of the content of a draft Welsh in Education Implementation Plan (WEIP) when appropriate?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

Where appropriate, we believe it would be beneficial to commission an independent external opinion before deciding whether to approve, approve with modifications or refuse to approve the draft WEIP. It is important that there is clarity surrounding the purpose of a review and what the potential outcomes would be, including deadlines for strengthening the draft, should the need arise.

Question 19 – Do you agree with the proposals to impose duties on local authorities in planning their workforce?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	--------------------------	-----------------	-------------------------------------	-----------------------------------	--------------------------

Supporting comments

Authorities can certainly assist in helping to plan the education workforce. We believe that more collaboration is needed, in this case between authorities, Welsh Ministers and initial teacher education institutions to increase the workforce. We welcome the work that has begun in relation to the 'Welsh in Education workforce plan'. Authorities can certainly play their part by gathering information about the number of Welsh-medium practitioners needed to weave this into their plans to grow Welsh-medium education or move schools along the linguistic categories in their areas. This would enable local authorities to feed information back to Welsh Government and other stakeholders to develop or refine national policies and interventions to expand or develop the workforce. However, this is not the duty of authorities alone. Financial investment, incentives and continuous

monitoring are essential to improve the situation, together with co-operation between authorities, Welsh Government and initial teacher education institutions. It is also necessary to consider the linguistic needs of the support workforce in schools, such as teaching assistants and experts in additional learning needs (ALN) and youth workers.

Question 20 – Do you agree with the proposals in paragraphs 100 to 102 about publishing reports on the implementation of the Welsh in Education Implementation Plans (WEIPs), and the progress made against National Plan targets?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We support the proposals made in the paragraphs above. By publishing the annual review reports, progress against targets can be reviewed and evaluated, and actions for the following year can be refined if progress is not robust enough.

We also agree with paragraph 102 that there should be a duty on Welsh Ministers to publish a national report on progress against the targets in the National Plan annually. We agree that the annual reports would provide a firm basis for planning the National Plan for the next 5 years.

HMCI's Annual Report reports on standards and provision in relation to the Welsh language across the sectors we inspect. The text provides a valid and important view of the situation, drawing attention to strengths and areas for development.

Question 21 – Do you agree with the proposal to give Estyn a role to conduct a rapid review and provide recommendations in situations where it appears there is a risk that an authority will not meet its targets?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the proposal to give Estyn a role in conducting a rapid review of the local authority and making recommendations to the authority and/or Welsh Ministers regarding the steps that should be taken. Publishing the report would also benefit the process and be a means of driving improvements. As an organisation, we are in a unique position in terms of being able to report on a national picture of progress regarding the Welsh language, based on direct engagement with providers across the sectors we inspect.

Question 22 – Do you have any other suggestions as to how to ensure that local authorities take reasonable steps to implement their Welsh in Education Implementation Plans (WEIPs)?

It needs to be ensured that school governing bodies have a leading role in monitoring school plans. For example, it would be beneficial to evaluate information provided by school leaders regarding progress towards recent targets annually.

Question 23 – Do you think a duty should be placed on local authorities to promote Welsh-medium education among parents and carers?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

It is vital that authorities promote and market Welsh-medium education to parents and carers. In order to improve this, messages and explanations need to be strengthened regarding what Welsh-medium education is, the advantages of Welsh-medium education and how provision varies from school to school. It must be ensured that parents and carers understand the offer of schools in their area and that their understanding and knowledge of Welsh education provision is clear. It must be ensured that the linguistic outcomes of the different models are understandable.

It is important to promote Welsh-medium education from the outset and we believe that working in partnership with key bodies is of great benefit. For the oldest learners, co-operation with Coleg Cymraeg Cenedlaethol is beneficial as they consider routes when leaving school. The benefits in terms of the relevance of the language to everyday life and the workplace also need to be promoted.

We also believe it is important that authorities promote their Welsh language immersion centres. For example, it needs to be ensured that parents or carers are aware of the opportunity that is available to their children to receive immersion education at different stages in their school career.

Question 24 – What support should the Welsh Ministers offer in terms of promoting Welsh-medium education?

Supporting comments

It is important that Welsh-medium education is promoted centrally in order to give it a national status and platform. It is vital that funding implications are considered to support the development of the aims of the WESP. These include, for example, when providing professional learning opportunities for practitioners and refining the transport policy in accordance with the School Organisation Code (2018), in expanding the provision of

immersion education and supporting the capital-dependent plans to build or expand Welsh-medium schools in a number of authorities across Wales.

A definitive professional learning strategy for teachers in English-medium schools needs to be developed to support them to contribute to creating new Welsh speakers. For example, it would be beneficial to develop national professional learning opportunities that focus on effective pedagogy when introducing language.

It also needs to be ensured that teachers who teach Welsh, in whatever context, are familiar with the most effective methodology and pedagogy for delivering the language.

New parents and carers need to be supported to make choices about the language medium of their children's education. Increasingly effective co-operation between health board and umbrella organisations, which support non-maintained settings, would have a positive effect on promoting the understanding of parents and carers of the benefits of being bilingual.

Welsh Government can ensure that up to date and accessible learning resources are available to support Welsh-medium education and immersion education.

Question 25 – Do you think a duty should be placed on local authorities to promote late immersion provision among parents, carers and learners?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the above question as it is important that authorities promote their immersion units so that parents or carers are aware that there is an opportunity for them to move their children to a school that offers more Welsh language provision, if they wish to do so.

This expectation goes hand in hand with many WESPs, which show that immersion units are an important centre within authorities to ensure the development of Welsh-medium education.

Question 26 – Do you think a duty should be placed on local authorities to provide late immersion for learners?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that it is important to place a duty on local authorities to provide late immersion for learners. Our thematic report on [Welsh Immersion Education - Strategies and approaches to support 3 to 11-year-old learners](#) outlines the advantages of immersion education and the benefit in supporting pupils to acquire the Welsh language. It would be advantageous to see such provision in every authority across Wales, as it is a valuable resource and plays such an important role in aiming for a million Welsh speakers by 2050.

Question 27 – Do you agree with the principle that specialist support for lifelong Welsh language learning, including schools, should be centralised within a single body?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We agree with the proposal to centralise specialist support for lifelong Welsh language learning, including school education, within one visible body. This would enable experts from all sectors to come together to plan linguistically across all sectors, providing consistency to the journey of learners of all ages along the language continuum.

Question 28 – Do you agree that the role of the National Centre for Learning Welsh should be expanded to undertake the role or is there another model that should be considered?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

The National Centre for Learning Welsh has expertise in language learning and acquisition and, during our inspections, we have noted that such expertise should be shared with other sector. We have also published case studies regarding the way in which the Welsh for Adults sector produces active Welsh speakers, for example

[Effective support helps learners become fluent Welsh speakers](#)

[Formal and informal learning approaches that enable learners to assimilate into the Welsh-speaking community](#)

[Turning learners into users of the Welsh language](#)

in addition to offering valuable training to the education workforce. [Increasing the number of Welsh-speakers in the education workforce.](#)

The Centre and the Welsh for Adults (WfA) sector are very familiar with the expectations and levels of the Common European Framework of Reference (CEFR). As a result, the national curriculum for the sector, which is based on CEFR, would be able to be considered and adapted as a basis for the language continuum in each sector. The National Centre is already responsible for Welsh language training for workforces through Work Welsh programmes. We therefore believe that it would be logical to extend the function of the National Centre, taking advantage of its experience and expertise, to create a body that would provide strategic and practical guidance across the education sectors.

Question 29 – Do you agree with the principle that sufficient Welsh language learning provision should be guaranteed, and that suitable structures should be in place to support learners of all ages?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

We believe that it is crucial for learners of all ages to have opportunities to begin or continue their journey towards becoming active Welsh speakers. Creating a single language continuum, in addition to specific schemes, such as the new scheme to offer free courses to people aged 16-25, would offer truly equal opportunities for learners of all ages to do so. We also believe that lifelong education, including adult community learning partnerships, needs to do much more than it is doing currently to provide equal opportunities to Welsh speakers, whether they are proficient learners or fluent speakers, to learn through the medium of Welsh and, as a result, improve and use their linguistic skills.

Questions from the document ‘An outline of costs and impacts that will form the basis of a Regulatory Impact Assessment for the Welsh Language Education Bill

Question 30 – Do you agree with our interpretation of the groups and bodies affected by the changes? Are there any other groups or bodies that fall within the scope of the changes apart from those identified in the outline of costs and impacts that will form the basis of a Regulatory Impact Assessment for a Welsh Language Education Bill?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

Supporting comments

--

Question 31 – Apart from the groups and bodies identified in the outline of costs and impacts that will form the basis of a Regulatory Impact Assessment for a Welsh Language Education Bill, which groups or bodies would have to pick up the costs?

Supporting comments

Question 32 – What other impacts (both financial and non-financial) are there relating to the proposed legislation that are not outlined in the outline of costs and impacts that will form the basis of a Regulatory Impact Assessment for a Welsh Language Education Bill?

Supporting comments

Question 33 – Are there any other comments on the outline of costs and impacts that will form the basis of a Regulatory Impact Assessment for a Welsh Language Education Bill?

Mandatory questions

Question 34 – We would like to know your views on the effects that the proposal in the White Paper would have on the Welsh language, in particular on opportunities for people to use the Welsh language and to not treat the Welsh language less favourably than English.

What effects do you believe it would have? How could the positive effects be increased and the negative effects mitigated?

Supporting comments

The aims of the Bill relate directly to increasing opportunities for people to use the Welsh language. We agree with almost all of the questions and, therefore, are of the clear opinion that the Bill would have a positive effect on the Welsh language. The Bill promotes bilingualism beneficially.

Question 35 – Please also explain how you believe the planned proposals could be drawn up or modified in order to: have positive effects on opportunities to use the Welsh language

and on not treating the Welsh language less favourably than English; and not to have adverse effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Supporting comments

Supporting comments 36 – We have asked a number of specific questions. If you would like to draw our attention to any related issues that we have not addressed, you can use the box below to do so:

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