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Minister for Lifelong Learning and Welsh Language  
Welsh Government  
Cathays Park  
Cardiff  
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31/01/2017

Dear Alun

### Welsh in Education Strategic Plans

I write to you regarding the strategic plans that local authorities are currently preparing, before you decide whether or not to approve the plans.

The Welsh Language Commissioner is a statutory consultee on these plans. In accordance with that role, I have considered the strategic plans that have been published so far and responded to them. I have shared those responses with your officials.

As stated in the Welsh Government's draft Welsh Language Strategy, education will be the key to achieving the target of one million Welsh speakers by 2050. Within the current framework for Welsh-medium education, the Welsh in Education Strategic Plans are one of the main vehicles for improving the availability and standard of Welsh-medium education and for increasing the numbers that receive their education through the medium of Welsh. In acknowledging how crucial these plans are to the future of the Welsh language, I would like to offer some general impressions of the plans that I have examined. The list of comments enclosed is based on an examination of 19 strategic plans so far and I hope that these comments will be of interest and assistance. In general, I do not believe the majority of the plans are adequate as they do not fully meet the requirements of the School Standards and Organisation (Wales) Act 2013 nor the supplementary guidance which you provided to the authorities last year. I do not believe that the majority of these plans will lead to a significant increase in Welsh-medium education provision, nor in the number of children and young people who receive their education through the medium of Welsh. As a result, I fail to see how these plans will make a meaningful contribution towards achieving the Welsh Government's objectives for the Welsh language.

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Comisiynydd y  
Gymraeg  
Welsh Language  
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I trust the enclosed comments will be of assistance to you in deciding whether or not to approve Welsh in Education Strategic Plans.

Yours sincerely,

**Meri Huws**

The Welsh Language Commissioner

CC: Lynne Neagle AM, Chair of the National Assembly for Wales' Children, Young People and Education Committee  
Bethan Jenkins AM, Chair of the National Assembly for Wales' Culture, Welsh Language and Communications Committee

# The Welsh Language Commissioner's comments on Local Authorities in Wales' Welsh in Education Strategic Plans, 2017-2020

The School Standards and Organisation (Wales) Act 2013 places a statutory duty on local authorities in Wales to prepare Welsh in Education Strategic Plans. The purpose of these plans is to improve the way that authorities plan Welsh-medium education and improve the standards of Welsh-medium education and the teaching of Welsh.

From October 2016 until February 2017 local authorities in Wales consulted on new draft plans. The Welsh Language Commissioner is a statutory consultee on these plans and has provided each individual authority with comments on their draft plans. Below are some general impressions of the plans responded to so far.

## 1. The process of developing the plans

The School Standards and Organisation (Wales) Act 2013 sets a statutory arrangement for consulting on strategic plans as they are being drawn. Local authorities have a responsibility to consult with a range of persons when preparing their plans, including the Welsh Language Commissioner. Some authorities did not consult with me when drawing up their plans and it is possible that those authorities also failed to consult with other statutory consultees. A request had to be made for the draft plans of some authorities in order to be able to respond to them.

Some authorities chose to consult publicly on their draft strategic plans by including relevant information on their websites and inviting comments from any persons. Others did not do so, leading to inconsistencies between counties with regards to opportunities for individuals and organizations who are not statutory consultees to contribute to the planning process.

The plans that were consulted upon varied greatly with regards to their completeness. At least some of the information that is required in accordance with the act and the Welsh Government's supplementary statutory guidance was missing in the majority of the plans, with some very significant omissions. For example, under the Government's guidance, plans are required to include targets for growth over time. Targets were missing from a number of the plans that were consulted upon and it was not easy to form an opinion regarding the adequacy of some plans due to the volume of information that was missing.

Four local authorities conducted a consultation on strategic plans that were only available in English, without providing a Welsh language version.

## 2. The basis for planning for Welsh in education

Two principles underpinned the Welsh Government's Welsh-medium Education Strategy 2010-2015, namely meeting the demand for Welsh-medium education and promoting Welsh-medium education. From the plans that I have examined, meeting the current demand for Welsh-medium education seems to be the main aim of the majority of local authorities when planning for Welsh in education. That is unfortunate for many reasons. The majority of schools in Wales are English-medium which is likely to have a considerable impact on parental choices when measuring the demand for Welsh-medium education. I understand that local authorities tend not to share information about the

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availability and advantages of Welsh-medium education when measuring demand. Furthermore, a framework for planning growth which is solely based on meeting demand does not in itself guarantee long term growth.

The Government's guidance acknowledges the need to go further than just meeting the demand for Welsh-medium education, namely by promoting and increasing the demand. But very few of the strategic plans include any specific measures to do so. There is no evidence in the majority of the strategic plans that local authorities have accepted and adopted the concept of creating demand by promoting the benefits of bilingualism. A change of mindset will be needed in order to increase the numbers who receive their education through the medium of Welsh on the scale needed to reach a million speakers. These latest draft plans are not rooted in that mindset.

### 3. Lack of ambition in the schemes

Despite the fourth National Assembly for Wales' Children, Young People and Education Committee's recommendation that strategic plans should reflect national objectives for Welsh-medium education, the draft plans seen were lacking in ambition.

- **Targets** – the targets set by some of the authorities in their plans decrease over time, rather than aiming for growth and improvement as is required. For example, one of the desirable outcomes of these plans is that more 7 year old pupils receive their education through the medium of Welsh. In relation to that, some authorities have set targets which show a decrease in both numbers and percentages over time. Others aim to just maintain current numbers and very few authorities aim for significant growth with regards to that particular target and others. Of course, I accept that these plans only span three years and there are challenges associated with achieving considerable growth in a short period. However, in general, the targets of the draft strategic plans show a lack of ambition and that will need to be challenged in order to ensure significant growth over the coming years.
- **Infrastructure** – very few of the strategic plans mention any intention to expand the infrastructure for Welsh-medium education, for example by opening new Welsh-medium education institutions or changing the language in which pupils are taught within existing institutions. There are very few references to explicit plans for using capital from the 21st Century Schools Programme for expanding the infrastructure for Welsh-medium education.
- **Proposals for improvement** – Rather than proposing 'proposals for improvement' as is required under the School Standards and Organisation (Wales) Act 2013, the majority of plans focus on describing the Welsh-medium education provision that already exists. Where authorities have succeeded in developing Welsh-medium education in recent years, it is understandable that they wish to mention that in the strategic plans as historical developments affect future achievement. At the same time, the focus should be on 'proposals for improvement' and, in this regard, the plans do not, on the whole, meet the requirements of the act.

### 4. Pre-school Childcare

Research conducted between myself and the Welsh Government shows that a clear relationship exists between when someone learns Welsh and the likelihood of becoming fluent in Welsh. On average, those who learnt Welsh primarily at nursery school are far

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more likely to be fluent than those who learnt Welsh primarily at primary school, secondary school or later in their lives. This highlights the importance of the childcare sector in the effort to create new fluent Welsh speakers. Also, transmission rates from Welsh-medium childcare to Welsh-medium statutory education tend to be high, where Welsh-medium statutory education is easily accessible to children who are starting school. It may be assumed therefore that ensuring growth in the number of children who receive Welsh-medium childcare is likely to be key to ensuring growth in the number who receive their statutory education through the medium of Welsh. Despite this, there is insufficient focus on pre-statutory education in the majority of the draft strategic plans. It does not appear that authorities fully understand the essential role that growth in that sector plays in the effectiveness of their strategic plans. It should be ensured that authorities place a greater emphasis on working with other persons such as childcare providers and health visitors to increase the number of children who receive their childcare through the medium of Welsh.

## 5. Progression

Creating fluent and confident Welsh speakers may depend on retaining them within the Welsh-medium education sector throughout their journey through education. Creating a bilingual workforce for the future will depend to a degree at least on ensuring that children and young people continue to learn through the medium of Welsh at the later stages, for example when studying A level and post 16 qualifications. It is therefore a concern that the strategic plans, as a whole, do not include robust measures for ensuring progression in Welsh-medium education from one educational phase to the next. For example, there is very little mention of efforts to encourage pupils to continue learning through the medium of Welsh upon leaving school. There is no clear indication in the strategic plans that authorities will work with further education institutions and apprenticeship providers to expand Welsh-medium provision in that sector. Without ensuring improvement in progression rates, particularly from school to post 16 education, one cannot see these strategic plans making a meaningful contribution towards creating the bilingual workforce required to achieve many of the objectives found in the Welsh Government's draft Welsh Language Strategy.

## 6. Transport

Around a quarter of schools in Wales are Welsh-medium, with the majority of those remaining being English-medium schools. It stands to reason, therefore, that pupils and students within Welsh-medium education are more reliant than others on transport. Research conducted by myself into transport for post 16 education confirms this<sup>1</sup>.

Section 10 of the Learner Travel (Wales) Measure 2008 places a duty on local authorities to promote access to education and training through the medium of Welsh and they are required to include a statement regarding the accessibility of their Welsh-medium education provision in their strategic plans. There are references to that duty in the draft plans as authorities discuss the challenge associated with continuing to provide transport in the future beyond what must be provided. The draft plans do not interpret the significance of promoting access to Welsh-medium education when discussing changes to transport policies over the next few years. Instead, they only reference the duty, without explaining how they intend to put the duty into practice when examining transport policies. The plans should explain how local authorities will safeguard transport for Welsh-medium education in order to ensure that a lack of transport will not deter parents from choosing Welsh-medium education for their children in the future.

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<sup>1</sup><http://www.comisiynyddygyymraeg.cymru/English/Publications%20List/20150724%20DG%20S%20Adroddiad%20arolwg%20cludiant%20i%20ddysgwyr%20ol-16.pdf>

## **7. Additional Learning Needs provision through the medium of Welsh**

The guidance on preparing strategic plans provided to local authorities by the Government last year ask for the plans to include objectives for improving ALN provision through the medium of Welsh. Information that I am currently collating from local authorities, jointly with the Children's Commissioner for Wales, show severe geographical variations in the availability and standard of ALN provision through the medium of Welsh. Despite this, very few strategic plans include robust measures for improving provision. The Additional Learning Needs and Education Tribunal (Wales) Bill which is currently laid before the National Assembly for Wales places a duty on local authorities to provide support through the medium of Welsh for children and young people who have additional learning needs. The 2017-2020 strategic plans should include robust measures for improving provision where necessary.

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