

Consultation on non-statutory guidance around school categories according to Welsh-medium provision

Consultation response form

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Responses should be returned by **26 March 2021** to

Consultation on non-statutory guidance around school categories according to Welsh-medium provision
Welsh Language Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: UnedlaithGymraegWelshLanguageUnit@gov.wales

About NEU Cymru

The National Education Union Cymru (NEU Cymru) stands up for the future of education. It brings together the voices of teachers, lecturers, support staff and leaders working in maintained and independent schools and colleges to form the largest education union in Wales.

The National Education Union is affiliated to the Trades Union Congress (TUC), European Trade Union Committee for Education (ETUCE) and Education International (EI). It is not affiliated to any political party and seeks to work constructively with all the main political parties.

Together, we'll shape the future of education.

NEU Cymru response

NEU Cymru welcomes the opportunity to respond to this consultation. We have answered the questions below.

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

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

The existing policy around ‘School Categories According to Welsh-Medium Provision’ is quite complex as it has five categories in the Primary sector, and four categories in the Secondary sector, with one category, Bilingual Secondary School, having a further four sub-categories. We agree that the current categories are often misinterpreted, causing unnecessary confusion for parents/ carers, and therefore does not always provide parents and carers with clear information around the amount of Welsh medium provision at schools in their area for them to make an informed, correct choice for the child in their care.

The new policy seems to be much easier to follow with a closer alignment between the primary and secondary categories. It also provides some clarity around the differences between the two sectors.

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

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

Whilst we welcome the transitional categories which are aimed to increase the provision of Welsh medium education, we are not sure if the changes encourage schools, especially those in Category 1, to increase the amount of Welsh medium provision.

Whilst we support the Welsh Government goal of one million Welsh speakers, as set out in Cymraeg 2050, we believe that there needs to be an incentivised approach to this – whilst ensuring that everyone in the education workforce can undertake training to the appropriate level.

Please see our comments on each sector below.

Primary
 To move from Category 1 to Category 2, the school must increase its provision of Welsh medium education by at least 40%, which is a big increase, especially in some areas.
 Similarly, to move from Category 2 to Category 3, the school must increase its provision of Welsh medium education by at least 30%, which again is a big increase.

In Category 1 we would recommend further consideration around the percentage taught in Welsh and think Welsh Government should consider ‘around’ 10% of the curriculum is taught in Welsh, to allow for circumstances where this isn’t possible, and allow the greatest amount of flexibility for the school to focus on the learners. We also think this could avoid unnecessary bureaucracy.

Secondary
 To move from Category 1 to Category 2, the school must increase its provision of Welsh medium education by 30%, which is a big increase, especially in some areas.

Similarly, to move from Category 2 to Category 3, the school must increase its provision of Welsh medium education by at least 30%, which again is a big increase.

The ability of the school to transition to the next category is dependent upon the categories of its feeder Primary schools. Secondary schools who want to transition to the next category must consult with their feeder schools to assess if this transition is possible within the maximum 10-year period allowed.

In Category 1 we would recommend further consideration around the percentage taught in Welsh and think Welsh Government should consider 'around' 10% of the curriculum is taught in Welsh, to allow for circumstances where this isn't possible, and allow the greatest amount of flexibility for the school to focus on the learners. We also think this could avoid unnecessary bureaucracy.

We welcome that there is no requirement for schools to move between categories. However, the consequences to the school if, after entering T2 or T3, it is unable to move up to the next category, for whatever reasons, after the specified time has elapsed need to be made clear. Schools should be given the utmost support to move between categories, ensuring all staff have access to training at the appropriate level to meet any additional language requirements.

We would be extremely concerned schools do not lose any members of staff during this transition but allow them to learn Welsh. This will help ensure continuity for children and young people, and the community, as well as teaching, leadership, and support staff expertise are not lost.

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

(a) parents/carers?

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

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

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

The new policy seems to be much easier to follow with a closer alignment between the primary and secondary categories. It also provides some clarity around the differences between the two sectors.

However, it must be made clear what support is available for schools who wish to move between categories.

Question 4 – Do you agree with:

(a) the use of numbering for categories?

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

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

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

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

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

As we have already stated:

In Category 1 we would recommend further consideration around the percentage taught in Welsh and think Welsh Government should consider 'around' 10% of the curriculum is taught in Welsh, to allow for circumstances where this isn't possible, and allow the greatest amount of flexibility for the school to focus on the learners. We also think this could avoid unnecessary bureaucracy.

We welcome that there is no requirement for schools to move between categories. However, the consequences to the school if, after entering T2 or T3, it is unable to move up to the next category, for whatever reasons, after the specified time has elapsed need to be made clear. Schools should be given the utmost support to move between categories, ensuring all staff have access to training at the appropriate level to meet any additional language requirements.

We would be extremely concerned schools do not lose any members of staff during this transition but allow them to learn Welsh. This will help ensure continuity for children and young people, and the community, as well as teaching, leadership and support staff expertise are not lost.

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

(a) a minimum percentage only?

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

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

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

There needs to be more flexibility built into the system, which allows schools to transition towards increasing Welsh medium provision. As the document says: “arrangements would enable schools to be flexible as they develop the way of increasing Welsh-medium provision in the method that is most suitable to them.”

Allowing a school to decide if it wants to make provision for more than the minimum percentage is also important as this will allow them to assess, in consultation with their feeder primary schools and the Local Authority, if they should move into transition with the goal of attaining the minimum level in the next category.

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?

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

Part 3 of the guidance is informative but not detailed. Publishing additional, possibly more detailed guidance, for schools which can also explain the requirements and procedures to allow transition in more depth would be very beneficial.

Publishing additional, detailed guidance for parents/carers is important as that can be used to explain all they need to know about the categories so that they can then make an informed decision as to which category they would like their child(ren) to attend.

Taking this out of the hands of the school will relieve them of the workload of producing this type of guidance, as they already have a lot of work to do to prepare for the new curriculum and the new Additional Learning Needs reforms. However, it is important for schools to communicate with parents/carers and prospective parents/carers about the category in which the school is positioned and their aims, if any, of moving into transition to enter the next category, and this will be done via the school prospectus as mentioned in the guidance.

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

It is vital that there is parity of provision in both languages and that provision should reflect the linguistic nature of the school and its catchment area. Training needs to be made available to members of the education profession to ensure that the Welsh Government's aim of a million Welsh speakers by 2050 is met.

The guidance will also be available in Welsh, for those Welsh medium and bilingual schools, and this will ensure that Welsh is treated no less favourably than English.

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 Question 7.

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.

Flexibility to encourage schools to consult with their local communities and meet the needs of learners is critical here. Support for schools from the Welsh Government and local authorities should ensure schools are enabled to meet the needs of the next generation of young people in Wales. This must be a positive, supportive approach, which values everyone in education for their skills, and supports those to learn Welsh who are not yet able to use Welsh to the expected level.

As schools will be placed in the relevant category with effect from September 2022 it is vital that local authorities establish which schools do not wholly align with a category so that those schools can consult on options with their local authority to ensure they are put into the correct category for the school and their community. According to the table in section 3.8, mapping should start from July 2021, which allows one academic year to ensure plans are in place for September 2022.

Key Outcome 7 of the Welsh Government's *Guidance on Welsh in Education Strategic Plans*¹, which will also come into force in September 2022, states that Local Authorities need to "Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh." This makes the mapping of school staff, to establish which category a school aligns with, a matter of urgency."

This Key Outcome will make having at least one or two fluent Welsh speakers in educational establishments (nursery, primary, secondary, and further education) compulsory. Welsh Government and local authorities must therefore identify which establishments need Welsh speakers and address this issue urgently. Schools have faced significant budget cuts over the last few years and most of them do not have the budget to employ an extra member of staff unless extra funds are made available to them. Therefore, the local authority must support the school to ensure current staff are given enough time to improve their Welsh language skills to the necessary standard.

One of the planning considerations for Local Authorities in Key Outcome 7 in the guidance is "How will you work with regional consortia and initial teacher education providers to ensure an adequate supply of Welsh-medium teachers?" Putting measures into place to attract Welsh speaking graduates and under graduates into teaching should be the responsibility of Welsh Government, not local authorities.

The National Education Union Cymru supports its members by offering Welsh language courses via the current and previous three Wales Union Learning Fund (WULF) projects. The purpose of these courses is exactly what has been set out in Paragraph 18 of the *Schedule to the Welsh in Education Strategic Plans (Wales) Regulations 2019*². The Union is committed to this until at least 2022 when the current project comes to an end and plans to apply for more WULF funding to continue with these courses at that time. Since 2013, over 800 education professionals have benefited from these courses, through the former NUT and now NEU Cymru.

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:

¹ <https://gov.wales/sites/default/files/publications/2021-01/guidance-on-welsh-in-education-strategic-plan.pdf>

² <https://www.legislation.gov.uk/wsi/2019/1489/made>