

Consultation Response Form

The draft Welsh in Education Strategic Plans Regulations (Wales) 2019 and Guidance

Please return this form to reach the Welsh Government no later than 2 September 2019.

The email address for responses or queries is:
UnedlaithGymraegWelshLanguageUnit@gov.wales

Postal responses should be sent to:
Consultation on Welsh in Education Strategic Plans Regulations
Welsh Language Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

This form can be downloaded from the Welsh Government consultation webpage here:
gov.wales/consultations

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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:

About the National Education Union Cymru:

- The National Education Union 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), Wales TUC (WTUC), 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 – We would like to know your views on our proposals to:

- (a) extend the implementation period of a Welsh in Education Strategic Plan to 10 years
- (b) commence the next Plan in 2021 and for progress to be reported according to the academic school year

Supporting comments

- (a) (a) We note the proposals to extend the implementation period of a Welsh in Education Strategic Plan to 10 years. However, if that were to occur, we feel that it's important to ensure that all Local Authorities review their plans annually as per the proposed Welsh in Education Strategic Plans (Wales) Regulations 2019.
- (b) We have no objection to the proposal to commence the next plan in 2021. It will then coincide with the next Census and will allow the Welsh Government to monitor the success of the 10-year plan based on the Census results, and to ascertain if they are on course to meet the *Cymraeg 2050: a million Welsh speakers* strategy. We also have no objection to progress being reported according to the academic school year.

Question 2 – We would like to know your views on our proposals to:

- (a) remove the duty for local authorities to Plan their provision of Welsh-medium education based on the results of a parental assessment
- (b) replace this duty with a new provision in the regulations for local authorities to set their own targets in their Plans to increase the percentage of Year 1 learners taught through the medium of Welsh.
- (c) require local authorities to have due regard to Welsh Government guidance when calculating the targets to be included in the local authority Plan.

Supporting comments

- (a) We have no objection to this proposal. However, we feel it's important that all Local Authorities are open to receiving and accommodating requests from parents for Welsh-medium education for their children. We also feel it's important that Local Authorities advise parents that they can request Welsh-medium education for their children and know that their request can be accommodated.
- If Welsh Government is to achieve its ambitious *Cymraeg 2050: a million Welsh speakers* strategy, we have no objection to points (b) and (c).

Question 3 – We would like to know your views on:

- (a) the new statements included in the Schedule to the Welsh in Education Strategic Plans (Wales) Regulations 2019
- (b) setting out in statutory guidance what supporting information local authorities should be including in their Plan

Supporting comments

- (a) The statements are fit for purpose and reflect what’s required in relation to the new proposed 10-year Plan.
- (b) The guidance supporting the proposal is detailed and could prove to be very useful for Local Authorities.

Question 4 – We would like to know your views on our proposals to:

- (a) require local authorities to review their Plans annually and submit an annual progress report to the Welsh Ministers based on the review.
- (b) the requirement that local authorities to submit their revised Plan to the Welsh Ministers for approval within 4 months of the review if the local authority deems it necessary to revise the Plan.

Supporting comments

- (a) We agree that’s it’s important to ensure that all Local Authorities review their plans annually as per the proposed Welsh in Education Strategic Plans (Wales) Regulations 2019.
- (b) We agree.

Question 5 – Do you have any other comments on the draft 2019 Regulations and statutory guidance?

Supporting comments

Statement 18
Since 2013, the National Union of Teachers, and now the National Education Union, has supported 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 this statement. 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.

Question 6 – We would like to know your views on our approach for the Regulatory Impact Assessment. Do you have any comments regarding the costs outlined for the options, or any comments regarding the benefits and dis-benefits identified for both options?

Supporting comments

The approach to both options available is sensible.

It would be good to know what the ‘negligible’ differences in costs between the options are (increase or decrease), and whether this is a Welsh Government or Local Authority cost. As Local Authority budgets have been cut year on year and are very tight, any increase in costs which isn’t fully funded would have a negative affect on the Local Authority.

Point 2.27 mentions that there “*may be a need for an additional Welsh-medium teaching capacity in some areas*”. The outcomes under option 2 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 don’t have the budget to employ a new member of staff unless extra funds are made available to them. The only other option is to utilise a willing current staff member and ensure they are given enough time to improve their Welsh language skills to the necessary standard. Please see answer for Question 5 on how the Union can assist.

The three main benefits of option 2 (paragraph 2.31) would make the adoption of option 2 a logical and sensible one. Please see our answer to question 2(a) in relation to the dis-benefit of option 2.

Question 7 – We would like to know your views on our approach for the Impact Assessments. We would particularly value your view on the proposed impacts on groups with protected characteristics.

Supporting comments

We have no concerns with the Equality Impact Assessment. We are particularly pleased to see that Local Authorities will be required to provide support for anyone wishing to access Welsh medium education. We are also pleased to see that Local Authorities are required to provide immersion provision for newcomers or latecomers into Welsh medium education. This service is vital if Welsh Government is to achieve its ambitious *Cymraeg 2050: a million Welsh speakers* strategy.

Question 8 – We would like to know your views on the effects that the draft 2019 Regulations 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

We are committed in principle to the *Cymraeg 2050: a million Welsh speakers’* strategy. The targets set by the Local Authorities should be challenging but realistic and should take into account factors such as prevalence of Welsh within the community, Additional Learning Needs and English as a Second Language, all of which may affect a school’s ability to ensure all children are learning Welsh to a specific level.

Question 9 – Please also explain how you believe the proposed policy for the draft 2019 Regulations 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

Please see answer above.

Question 10 – 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.