



Rhondda Cynon Taf County Borough Council
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05/11/2021

Dear Colleague,

Welsh in Education Strategic Plan 2022-2032

1. Opening remarks

- 1.1 In general, we believe that this strategic plan reflects the County's positive vision for the Welsh language in education. We welcome the actions included, and achieving the objectives and targets of this plan will be a significant step in the context of the county's contribution to the national vision of an increasingly bilingual Wales. While we are supportive of the targets and main pillars of the plan, we believe that the plan could be strengthened if the council were to address the matters raised in our response below. We look forward to working together further as the county implements the plan to achieve its vision for the Welsh language.
- 1.2 Naturally, our response below will focus primarily on the aspects of the plan that we believe could be strengthened. There are 2 main points in our response that must be emphasised (we will expand on these in our response to each outcome below):
- **Further detail and specific commitments for Outcome 1 and 2:** Due to the current situation and nature of the county's Welsh-medium provision, the success of this 10-year strategy depends to a large extent on the achievement of Outcome 1 and 2 objectives and targets. If the Council succeeds in ensuring the significant increase in the numbers of children attending Welsh-medium primary education during the lifetime of the plan, then naturally, there will be an increasing emphasis on the other Outcomes of the plan (particularly secondary provision). In this context we believe that more detail and clarity is needed for Outcome 1 and 2, particularly in terms of analysing the current situation, and in terms of the contribution of developments already underway to achieving the 10-year targets that have been

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set. At present, many of the action points are too vague and do not include a specific timetable for implementation. This is particularly true in terms of expanding early years care and education provision; the promotion of this provision; and ensuring effective transfer rates into Welsh-medium reception classes. It would also be possible to include more detail on the likely developments that will need to be considered and planned in the second half of the plan's lifespan (i.e. in addition to the plans already in place).

- **Include a clearer analysis of the current situation:** Linked to the above point, the consultation document indicates in a number of places a commitment to undertake a provision mapping exercise to identify weaknesses and to plan strategies for improving the situation. We agree that such mapping and analysis needs to be a permanent process. However, the Council already has a very detailed understanding of current provision as set out in the appendices, and we believe that the plan as a whole could refer more consistently and in greater detail to this knowledge and data as a basis for setting action points. This is particularly true in relation to Outcome 1 and 2. At present, these sections do not provide an effective explanation of the current situation in terms of Welsh-medium provision, the extent of the challenge in achieving the targets that have been set, and the contribution that specific commitments and plans will make towards achieving the targets. As a result, it is very difficult to come to a firm view on whether the plans are sufficient to achieve the challenging targets that have been set. Including more of the data set out in the appendix as part of the narrative for the different outcomes would be an initial step in terms of strengthening this aspect of the plan.

- 1.3** As a general point, we would like to emphasise the close relationship that exists between the requirements of producing a WESP, and the County's duties in accordance with the Welsh Language (Wales) Measure 2011.
- As you know, following the Welsh Language (Wales) Measure 2011 the County is required to comply with Welsh language standards. There are 5 types of relevant standards and these include policy making standards and standards that require the county to produce a 5-year strategy explaining how you intend to promote the Welsh language and to facilitate the wider use of the Welsh language in your area.
 - The policy making standards include requirements for a body to ensure that due consideration is given to the effects of policy decisions on opportunities to use the Welsh language and to treat the Welsh language no less favourably than the English language. The requirements of the policy making standards do not exist in a vacuum, separate from requirements arising from other legislation or duties, such as the School Standards and Organisation (Wales) Act 2013 and the duty on local authorities to publish their WESPs.



- We are of the view that there are clear benefits to the Council in considering its duties under the policy making standards alongside the duties relating to the WESP and the School Standards and Organisation (Wales) Act 2013. Ensuring that the vision and objectives of the WESP are central to the more general process of assessing the effect of the county's policy decisions will facilitate compliance with the policy making standards.
- Similarly, ensuring full compliance with the requirements of the policy making standards in assessing the effect of future policy proposals, will contribute to the realisation of the WESP's vision and objectives. The key point here is the need for the county to ensure a thorough process for assessing and revising future policy proposals to ensure as much positive impact as possible on the Welsh language and the achievement of the WESP. This applies to policy decisions in education in particular, but also policy decisions on a wider level, for example, in planning, the economy, or transport.
- However, it is important to recognise that the requirements to consider the effects of decisions on the Welsh language may differ under Welsh language standards compared to the duty under other legislation. It means that the requirements of the standards may require local authorities to take further steps to comply with the standards.
- In September 2020 the Welsh Language Commissioner published a good practice advice document on Policy Making Standards, which offers practical ideas and advice on how to go about complying with statutory language duties, particularly in relation to other legislative requirements relevant to the Welsh language. We are of the view that this advice document will help the Council, not only in complying with the requirements of the Welsh Language (Wales) Measure, but also to ensure that the county's vision for the Welsh language is embedded throughout the county's education agenda and policy decisions.

2. WESP Outcomes

Outcome 1: More nursery children/ three year olds receive their education through the medium of Welsh

- 2.1** We welcome the discussion on the many steps that have already been taken to ensure an increase in Welsh-medium pre-school and early years provision. As the consultation document notes, despite the steps the Council is already taking, there does not appear to have been much increase in the number of pre-nursery and nursery learners attending Welsh-medium provision over the last 5 years. It is therefore clear that the Council must introduce significant changes to how it plans and promotes Welsh-medium pre-school provision if the challenging targets that have been set are to be met (an increase from 21% in 2022 to 30% by 2031).



- 2.2** According to the latest data from Care Inspectorate Wales, in 2019-20 12% of childcare places in Rhondda Cynon Taf offered a Welsh-medium provision, and 8% offered a bilingual provision. This compares with 19.1% of Year 1 primary pupils taught through the medium of Welsh. Although the consultation document contains statistics on childcare provision in the county, it is not easy to understand the current situation of the Council's Welsh-medium childcare and early years provision, particularly in relation to the targets that have been set for the next ten years. We understand of course that the childcare situation and data can be complex, but it would be useful to have the Council's interpretation and views on the current situation. For example:
- Is there sufficient capacity within the provision to ensure the growth that the county wishes to see in terms of numbers receiving Welsh-medium primary education during the lifespan of the plan?
 - If capacity needs to be increased to achieve the strategic plan targets, then what is the scale of the task facing the council in this context, and which areas in particular will be targeted and when?
- 2.3** Linked to the above comments, we welcome the Council's success in securing capital grant funding for establishing and expanding Welsh-medium pre-school provision in the county. There is a detailed account of a number of the Welsh-medium projects that have been, or are in the process of being implemented. The consultation document states that the council anticipates a 65% increase in the number of Welsh-medium places as a result of these projects. Whilst we very much welcome this, it would be useful to understand the significance of these developments in the context of the targets included in the table at the end of page 14. In other words, will these developments be sufficient to ensure the necessary capacity that will lead to the targets being achieved, or will further plans be needed in some areas?
- 2.4** We understand the importance of grant funding for establishing Welsh-medium provision in the county, particularly in relation to any significant capital projects. However, the third paragraph on page 13 suggests that any further developments in establishing new provision (i.e. beyond the plans already funded and agreed) are dependent on additional funding being received in the future. As crucial as it is to secure adequate funding from the Welsh Government, we believe that the responsibilities and ability of the County to implement and fund plans for expanding Welsh-medium childcare also need to be acknowledged here.
- 2.5** We welcome the commitment to undertake a mapping exercise to better understand the level of current provision. However, it is frustrating that the mapping work was not undertaken during the process of drawing up this strategic plan, thus providing more detailed analysis and action points here. The WESP's action points should be drawn

up on the basis of detailed mapping and analysis, rather than including a commitment to undertake such mapping in the future. We therefore believe that it is key that this work is completed early in the lifespan of the strategy, so that action can be taken on the basis of the findings. It would therefore be useful to include a more specific timetable for starting and completing this crucial work, and also for adapting the strategic plan on the basis of the findings. For example, is it the Council's intention to use the next Childcare Sufficiency Assessment as a way of mapping in greater detail the Welsh-medium provision?

- 2.6** The consultation document states that the number of Cylchoedd Meithrin and the number of children attending Cylch Meithrin has decreased over the last 5 years. It would be useful to have more detail on the reasons for this, and how this will change as a result of the capital projects that have been completed, or are about to be completed. Looking at the tables in the appendix it appears that the numbers of cylchoedd meithrin have been consistent until 2019/20 and that attendance had been increasing until 2019/20. It is likely that the reduction in 2019/20 is mainly due to the effects of the Covid 19 pandemic, and possibly the narrative that numbers are decreasing is a little misleading?
- 2.7** Developing the capacity of the sector in the context of the targets is crucial, but it is also crucial to ensure that families take up this provision. In this context we welcome the attention given to issues relating to the promotion and sharing of information about Welsh-medium education. We believe that a more specific commitment is needed on including the promotion of Welsh-medium education as part of the Wellbeing and Resilience Service Health Programme. It may also be possible to expand here on the council's commitments in relation to marketing Welsh-medium education (as outlined at the end of the document on page 40). The main challenge is to persuade families to start their children on the journey through Welsh-medium education, and therefore particular attention is needed to promote and market Welsh-medium childcare and early years education provision. Linked to this, it is essential that any further mapping and research undertaken by the council considers issues relating to transport to Welsh-medium care provision. Ensuring that the provision is within a reasonable distance and is accessible to parents is key to ensuring that more families choose Welsh-medium education for their children.

Outcome 2: More reception class children/five year olds receive their education through the medium of Welsh

- 2.8** Linked to point 2.5 above, it is frustrating that there is a commitment here to undertake a Welsh-medium primary school mapping exercise for the area, to analyse the shortcomings, identify areas for improvement, and formulate strategies to achieve improvements. That is what this strategic plan should do. While there is some reference to data and the current situation in the draft document, we believe that

there is scope to strengthen this aspect of the plan. The Council already has the data and information and therefore such an analysis needs to be included as the basis for Outcome 2 commitments.

- 2.9** We welcome the number of significant capital projects currently being implemented in the county. Clearly these projects will expand the county's Welsh-medium provision, but it would be useful to receive more detail on this. In other words, what is the significance of these developments in the context of the Council's targets and their contribution to the target of 32% of reception/five-year-olds receiving their education through the medium of Welsh. In addition, these plans are already underway. We would like to know what the Council will do in addition to this in the future, after all, it would be very beneficial in terms of the Cymraeg 2050 Strategy if this target were passed.
- 2.10** We fully agree that there is a need to facilitate access to Welsh-medium education for learners of all ages, and that Welsh-language Immersion provision is essential in this context. However, the commitments on page 17 are ambiguous and state that the Council will consider creating an immersion class for latecomers. If the Council is not currently in a position to include a more concrete commitment, then we are of the view that it is necessary to set out more specifically the steps that the Council will take in order to be in a position to make a decision, as well as when this will happen. There is also some inconsistency here as the last sentence of paragraph 4, page 18 states that the 'Council will have created a Welsh language immersion class for latecomers' during the lifespan of the plan.
- 2.11** Overall, we do not consider that there is sufficient detail or concrete action points for this crucial outcome. This is particularly true given that the percentage of learners assessed in Welsh as a first language at the end of the Foundation Phase fell from 21% in 2015 to 18% in 2019. A detailed analysis of the current situation and the impact of existing capital projects on the capacity of the Welsh-medium sector is needed. The action points for achieving a significant increase in the number of reception class learners receiving Welsh-medium education during the lifespan of the plan are based on 3 action points that are, on the whole, quite vague. Firstly there is reference to the capital projects that have already been agreed and are in the process of being implemented. Secondly there is reference to additional funding that may be available for additional projects in the future, but without mention of the nature or location of these developments. And finally, there is a commitment to undertake more detailed mapping in the future. As it stands, this discussion does not persuade us that there are sufficiently robust plans in place for ensuring the significant increase in the number of reception class children attending Welsh-medium education. To support the general points made in 1.2 above we are of the view that one obvious area where the strategy could be strengthened is to provide greater detail and clarity in relation to the crucial work of expanding the provision of



early years care and education, promoting this provision, and ensuring effective transfer rates into Welsh-medium primary education.

Outcome 3: More children continue to improve their Welsh language skills when transferring from one stage of their statutory education to another

- 2.12** The consultation document states that 67.9% of children who had attended cylchoedd meithrin had transferred to Welsh-medium primary schools in 2019/20. Although this is a significant increase on the figure of 57.3% in 2015/16 it remains significantly below the national average of 88% for 2019/20. We welcome the fact that the strategic plan refers to the need to improve these transfer rates, and also that the development of childcare and early years settings so that they are co-located on Welsh-medium primary school sites is vital. It would be useful to have more detail on the plans/developments already being implemented, as well as a discussion about the potential effect of these developments on transfer rates and the likely numbers attending Welsh-medium primary schools.
- 2.13** We believe that further clarity and discussion is needed on the data contained on pages 22 and 23. We accept that the rates are generally very high and that maintaining such transfer rates would be positive. Perhaps it would also be possible to refer to numbers here, in order to illustrate the relationship between Outcome 2 targets and the numbers moving through to Welsh-medium secondary schools in the future?
- 2.14** The consultation document notes that transfer rates are not a cause for concern in the county, yet transfer rates between key stages 4 and 5 are much lower than previous stages. We accept that there are obvious reasons for this, but it would be useful to include a discussion on these transfer rates, including what the Council will do to try to improve these rates. There is clear scope here to discuss sixth form provision in the county's secondary schools, and also to discuss post-16 provision in further education colleges. We know that these issues are discussed to a certain extent under Outcome 4.

Outcome 4: More learners study for assessed qualifications in Welsh (as a subject) and subjects through the medium of Welsh

- 2.15** As the consultation document notes, increasing the numbers receiving primary education through the medium of Welsh (720 learners in year one by 2032) is unlikely to affect the position of secondary schools for several years. As there are also no bilingual secondary schools in the county, it is understandable that there are fewer clear actions for this outcome.



- 2.16** However, the table on page 28 sets out the Council's anticipated increase in numbers attending Welsh-medium secondary education if it succeeds in achieving targets for Outcome 2. Although this increase will not trickle through to the secondary sector for some years, it would be helpful if this section outlines the likely implications of this for the secondary sector in the future. While we accept that it may be early in terms of discussing specific projects and strategies to expand the county's secondary provision, it would be useful to understand more about the county's longer-term plans and vision in relation to Welsh-medium secondary provision.
- 2.17** We welcome the detail of the developments underway to expand the capacity of Welsh-medium schools where demand is currently high. It would be useful to set these developments in the context of the county's long-term plans – in other words, in terms of the capacity of the secondary sector to cope with the proposed increase in the number of pupils coming from the Welsh-medium primary sector over the next ten years.
- 2.18** There is no discussion here as regards to how the Council will work with English-medium schools to increase Welsh-medium provision. We know that some schools in the county, for example Treorchy Comprehensive School, offer provision through the medium of Welsh. The inclusion of a target and statement on these matters is a requirement of the Schedule to the Welsh in Education Strategic Plans (Wales) Regulations 2019, and is referred to in Government guidance.
- 2.19** The table on pages 24 and 25 sets out the number and percentage of secondary age learners assessed for Welsh and Welsh Second Language AS and A levels. However, there is no discussion on this data, nor is there a strategy for improving these numbers. It would be useful to include more specific plans in terms of ensuring an increase in the numbers studying Welsh as an A Level subject. This may include promotion strategies, as well as more practical matters, for example in which column(s) Welsh as a subject is set when pupils choose subjects to study at A Level.
- 2.20** Linked to point 2.14 above we believe that more attention should be given to the situation of post-16 Welsh-medium provision, whether in schools or in further education colleges. The lack of linguistic progression in this phase is a problem at national level. Further analysis of the situation in the county is needed, including more concrete actions in terms of how the Council will work with Welsh-medium schools and further education colleges to ensure an attractive curricular provision through the medium of Welsh. The consultation document accepts that options to improve Welsh-medium GCSE, AS and A level education provision need further examination, and refers to the E-sgol project. These commitments are too vague and more concrete action points with specific timescales need to be provided.
- 2.21** An important principle in our view is the need to ensure Welsh-medium education for all those who wish it. In the context of the county's secondary provision there is no

discussion of the extent to which Welsh-medium education is available and within reasonable travelling distance of all those who wish it. We understand that this can be challenging in terms of the geography of the county, but it would be useful to include more about how the county facilitates access to Welsh-medium education (for example, travel policies to Welsh-medium secondary and further education).

Outcome 5: More opportunities for learners to use Welsh in different contexts in school

- 2.22** We welcome the detail provided for this outcome, and have no further comments on the actions.
- 2.23** The consultation document refers to the fact that the Council has a Welsh Language Promotion Strategy, which was approved in 2016. We are pleased to see that the Council wishes to ensure that the Welsh in Education Strategic Plan is aligned with this strategy. The Council will be expected to produce and publish a revised version of the promotion strategy 5 years after the publication of the initial strategy. There are clear benefits in considering and developing the content of these strategies in parallel with each other.

Outcome 6: Increase in the provision of Welsh-medium education for pupils with additional learning needs ('ALN')

- 2.24** According to the consultation document the Council's Cabinet approved a report in 2019 outlining specific and significant proposals for changing ALN provision through the medium of Welsh. Due to the impact of the Covid-19 pandemic, the Council's Cabinet agreed to move forward with alternative plans – to fund mainstream secondary schools to establish their own alternative curriculum for learners with Social, Emotional and Behavioural Difficulties. It is not clear to us to what extent these alternative plans address the deficiencies in the ALN provision through the medium of Welsh which were outlined in 2019 report. We understand that the pandemic has significantly affected the Council's ability to operate in a number of areas, and we accept that plans may need to be changed and adapted as a result. However, it would be useful to understand if the Council intends to revisit the report's recommendations in 2019 in the future, and hopes to act on the recommendations?
- 2.25** The consultation document refers to the requirements of the Additional Learning Needs and Education Tribunal (Wales) Act 2018. A review of the adequacy of additional learning provision through the medium of Welsh, and also the Welsh-speaking workforce, are requirements under the Act. Paragraph 7.19 of the code also states that if a local authority considers that the additional learning provision available through the medium of Welsh is insufficient, it must take all reasonable steps to



rectify the matter. Whilst the consultation document clearly sets out the Council's aspiration to comply fully with the requirements of the Act, we believe that including a more detailed timetable of when the Council will review ALN provision through the medium of Welsh. Conducting a detailed review is absolutely key, and the findings of any such review would provide a clear opportunity to re-consider some of the recommendations of the report approved by the Council's cabinet in 2019.

Outcome 7: Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh

- 2.26** Section 5 of the consultation document provides useful data on the current situation of the education workforce in the county, including the results of the annual census of the education workforce. What is missing, however, is an analysis of what all this means in the context of the county's targets and vision for the Welsh language. In other words, we accept that the intention is to increase the number of teachers who are able to work through the medium of Welsh, but it is not clear what the scale of the challenge facing the county is in this regard. It would be useful to have a high level analysis of how much progress and development is needed in terms of the Welsh-medium workforce in order to be able to achieve the remaining objectives of the plan in question.
- 2.27** Although many positive action points are discussed in this section, some of the action points are very vague. For example how exactly will the Council work in conjunction with Mudiad Meithrin to ensure that there is an adequate childcare and early years workforce? It would be possible to include much more detailed and concrete commitments in terms of working with childcare qualification providers, as well as specific programmes from the National Centre for Learning Welsh and Mudiad Meithrin such as Work Welsh and Camau.

Yours sincerely,

We hope you find these comments useful as you strengthen the plan following the consultation.

Aled Roberts

Welsh Language Commissioner