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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation – Summary of responses

School categories according to Welsh-medium provision

September 2021

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Acronym	Expanded version
ITE	Initial Teacher Education
WESPs	Welsh in Education Strategic Plans

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Introduction

Arad Research was commissioned by the Welsh Government to analyse the responses received during the consultation on *School categories according to Welsh-medium provision*. This paper presents the findings of the analysis, and identifies the key messages and themes presented in consultation responses.

About the consultation

The consultation requested views on a non-statutory guidance document, the purpose of which is to:

- set out new arrangements for categorising schools according to the amount of Welsh-medium provision in the school;
- provide a clear and consistent national framework for categorising schools according to the amount of Welsh-medium provision; and
- support local authorities and schools to communicate the types of schools and Welsh-medium provision available to parents/carers.

The consultation was launched on 14 December 2020 and closed on 26 March 2021. The full text of the consultation is available at:

<https://gov.wales/school-categories-according-welsh-medium-provision>

Welsh Government received a total of 103 unique responses to this consultation:

- 73 were submitted through the online consultation;
- 30 were submitted via e-mail (eight of these responses did not directly follow the structure of the consultation questions);
 - These eight responses did not include answers to the closed questions, and are therefore not included in the quantitative analysis in this report. The qualitative responses were reviewed, and excerpts from these were assigned to the individual questions to which they were most relevant and then analysed alongside the other responses.

Welsh Government also received responses through two campaigns:

- 225 identical responses were submitted through one campaign; and
- Two identical responses were submitted through the second campaign.

The responses received through the two above campaigns are included in the analysis as two individual responses, one for each campaign.

It is important to note that not all respondents provided answers to every closed or open question. Respondent numbers are included alongside each question in this report.

Methodology

The quantitative data (i.e. data based on closed questions) from the responses which followed the structure of the consultation questions was analysed. These quantitative responses to questions 1-6 of the consultation comprised 'yes', 'no' or 'neither agree nor disagree' / 'not sure' answers. A chart showing the responses to each closed question is included at the start of the analysis for each of these questions.

A thematic analysis of the qualitative data (data based on open-ended questions) in the consultation responses was undertaken. The thematic analysis categorised the opinions, comments, statements and issues raised by respondents into overarching themes. The analysis aimed to identify the themes into which the consultation responses most frequently fall. The process for undertaking this analysis was as follows:

1. A random sample of responses for each question was reviewed by two researchers (each reviewing a different half of the sample). The size of the sample was determined by the number of responses received to each question and comprised at least 30 per cent of the total responses per question.
2. The responses in the sample were coded thematically by the two researchers, to identify the themes arising most frequently. The researchers compared the themes identified and agreed on a set of codes to be utilised for the remaining responses.
3. One of the researchers then reviewed all the remaining responses to each question to verify that the themes that had been identified in Step 2 remained relevant.
4. This process ensured that all consultation responses were reviewed during the analysis.

Limitations of the methodology

The responses received are indicative of the views of those respondents who elected to complete the consultation questionnaire. This means that the responses cannot be considered representative of the general population, or the stakeholders affected by this policy (e.g. schools, parents).

The findings reflect the most frequent themes emerging from the comments made by respondents, including their comments on themes which they were not directly asked questions about. This means that some of the themes identified in the analysis go beyond the scope of the questions asked in the consultation.

Reporting findings

This report therefore presents key themes arising frequently within consultation responses. These themes are based on a wealth of evidence provided in the responses to the consultation. **Throughout the report the themes and points presented are drawn from comments made by consultation respondents and do not represent the views of the report authors.**

Interspersed throughout the report is a selection of quotes to illustrate the points and themes raised. Quotes submitted in Welsh have been translated to English, with the original quote included as a footnote in Welsh.

Summary of overarching themes

This initial section presents overarching themes which arose frequently across the consultation in its entirety. Although the consultation questions focused on different elements of the proposals, the analysis identified overarching or recurring themes which were raised across multiple questions and/or were repeated on multiple occasions by respondents.

- Respondents tended to agree with the need to revise the school categorisation policy and with the principles behind the proposals. Respondents more often expressed agreement with the proposals relating to primary school categorisation than those relating to secondary schools. There was general agreement with the inclusion of transitional categories for primary schools, but a range of views were expressed on the detailed categories and thresholds proposed.¹
- Respondents were more likely to raise concerns in relation to the proposals for secondary schools, particularly relating to the breadth of the categories. Respondents considered the proposed categories to be too broad and felt that some of them encompass a broader range of schools than is appropriate to include in a single category. This was particularly the case for the proposed category 3 for secondary schools, although issues were also raised in relation to other categories. There were concerns among respondents that the proposals for category 3 secondary schools could incentivise some schools (mainly those with a high proportion of Welsh-medium provision) to reduce this provision, or limit their ambition to increase it.
- Strengthening the proposals was a priority for some respondents, who felt the policy should be more ambitious and provide greater incentives for schools to increase the amount of Welsh-medium provision they offer. Respondents suggested examples of how this could be achieved, such as setting more ambitious targets, creating an additional category for schools that offer higher proportions of Welsh-medium provision or providing more support and resources to schools in transition. Respondents considered that aligning the proposals with Welsh in Education Strategic Plans (WESPs) was important to help reach the goals set out in *Cymraeg 2050*.² A few respondents felt the proposals should be made statutory and that they should include reference to wider considerations including schools' ethos in relation to the Welsh language.
- Respondents identified a need for more detail in order to fully appraise the proposals. This included detail on the timescales (particularly in relation to time spent within transitional categories), linguistic outcomes, monitoring arrangements, funding and the nature of support available to schools to help them move between categories. Respondents also emphasised the importance of maintaining flexibility to account for variety in the linguistic profile of communities in different regions.

¹ The consultation document includes proposals for category thresholds based on the percentage of provision delivered through the medium of Welsh in schools.

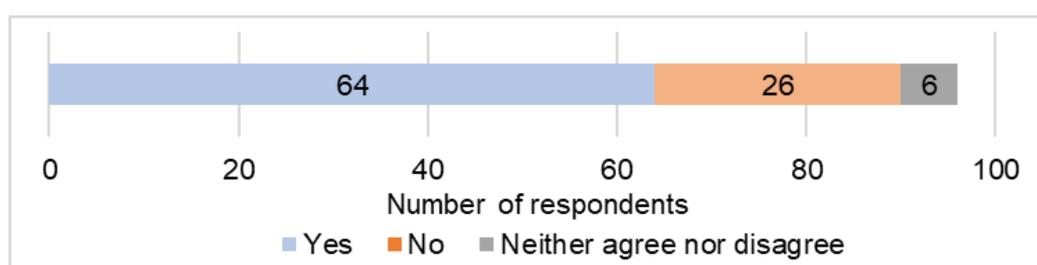
² Welsh Government (2017). *Cymraeg 2050: A million Welsh speakers*.

Question 1

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

Around two-thirds of respondents (64 out of 96, or 67 per cent) agreed with the need to revise the policy around school categories according to Welsh-medium provision with just over a quarter (26 out of 96, or 27 per cent) disagreeing and 6 out of 96 neither agreeing nor disagreeing.

Figure 1: Responses to the question: 'Do you agree with the need to revise the policy around school categories according to Welsh-medium provision?'



N=96

A total of 54 respondents submitted written comments in response to this question. The most common themes emerging from these are set out below.

Among those who agreed with the need to revise the policy, there was a recognition that there is a need to simplify the categories to make them clearer. The current categories were considered to be too complex and should be simplified, particularly for parents. Respondents also commented that the current categories are used inconsistently and that they would welcome greater standardisation in the policy and its implementation.

'At present, the school categories for Welsh-medium education are ambiguous and complex to understand. They do not sufficiently support parents to make an informed decision regarding the linguistic journey of their child's educational pathway.'

Respondents considered that the school categories should be aligned with WESPs, the *Cymraeg 2050* strategy and the Curriculum for Wales. They felt it was timely to revise the policy at the same time as the WESPs are being revised and the Curriculum for Wales is being designed.

*'The current system covers many categories (particularly in the secondary sector) - extending an opportunity for schools to interpret requirements and expectations in quite a broad way. It is therefore timely to re-evaluate what is suitable for the future.'*³

Some respondents expressed general agreement with the need to revise the policy while others went on to provide more detailed comments on the proposals themselves, noting that they would need to see further details before coming to a judgement on the policy. Some felt the proposals were not ambitious enough and expressed a desire for stronger measures to be included in the policy. These included more resources for schools to increase the

³ Translated from Welsh. Original text: 'Mae'r system bresennol yn cwmpasu llawer o gategoriâu (yn enwedig yn yr uwchradd) - gan estyn cyfle i ysgolion ddehongli gofynion a disgwyliadau'n reit lydan. Mae'n amserol felly i ail-gloriannu'r hyn sydd yn addas ar gyfer diben y dyfodol.'

amount of Welsh-medium provision they offer. A few felt there was a need for greater focus on wider issues relating to Welsh-medium education policy, including more Welsh-medium early years provision and a greater focus on Welsh language oracy.

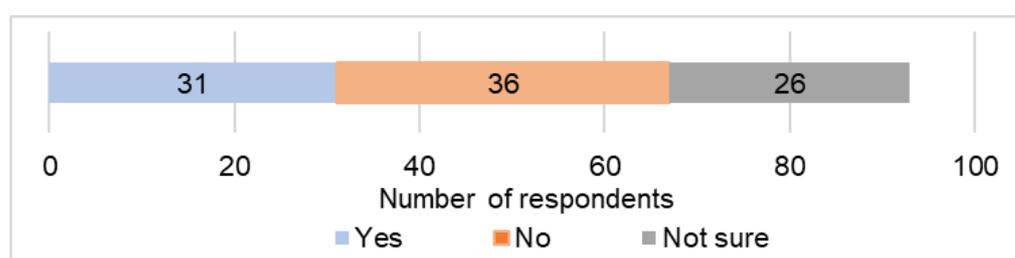
Among the minority who answered 'no' to the question, there were comments expressing the view that revising the policy was not currently a priority or expressing general disagreement with the proposals. A few commented on a perceived risk of over-simplifying the policy and school categories. A few felt the policy risked reducing the choice available to parents who wanted to choose English-medium education for their children. Others expressed negative views on Welsh-medium education and Welsh language policies more generally.

Question 2

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

Over a third of respondents (36 out of 93 or 39 per cent) responded 'no' when asked whether or not the changes proposed encourage and support schools to increase the amount of Welsh-medium provision; a third of respondents (31 out of 93, or 33 per cent) responded 'yes', and just over a quarter (26 out of 93 or 28 per cent) said they were not sure.

Figure 2. Responses to the question: 'Do the changes proposed encourage and support schools to increase the amount of Welsh-medium provision?'



N=93

A total of 56 respondents submitted written comments in response to this question. The most common themes emerging from these are set out below.

Respondents felt the proposals were insufficiently ambitious and should be strengthened to increase the likelihood of schools increasing the amount of Welsh-medium provision they offer and thereby 'moving along the linguistic continuum'. This was raised in relation to both primary and secondary categories. A few respondents felt that one of the policy's 'core principles', namely that schools should not offer less Welsh language provision than was offered in the past, should be strengthened.

*'The principle of not moving backwards should be strengthened, so that it makes it clear that the expectation is that schools will not offer less Welsh-medium provision in the future than has been done in the past, either by moving a category or reducing its provision within the range of its current category.'*⁴

Respondents felt the proposals did not provide incentives for schools to increase Welsh-medium provision, with a few proposing that there should be greater incentives for schools to do so. A few respondents provided examples of incentives such as:

- setting more ambitious targets for schools;
- creating an additional category for schools offering a higher percentage (e.g. over 80 per cent) of their provision through the medium of Welsh;
- providing additional resources for schools to support them to increase their Welsh-medium provision; and

⁴ Translated from Welsh. Original text: 'Dylid cryfhau'r egwyddor o beidio symud yn ôl, fel ei fod yn ei wneud yn glir mai'r disgwyliad yw na fydd ysgolion yn cynnig llai o ddarpariaeth Gymraeg yn y dyfodol nag a wnaethpwyd yn y gorffennol, naill ai drwy symud categori neu leihau ei darpariaeth oddi fewn ystod ei chategori presennol.'

- requiring schools to increase their Welsh-medium provision.

*'The guidance would benefit from explaining and clarifying the incentives for schools to move along the continuum.'*⁵

Respondents described the proposed categories and related thresholds as being 'too broad', and felt this did not adequately reflect the variety of provision in different regions. Examples were provided by respondents to explain how, in their view, the proposed categories could potentially incentivise some schools to reduce their Welsh-medium provision. Respondents most often mentioned this issue in relation to category 3 in the secondary sector, noting that some schools who currently provide 80-100 per cent of their provision in Welsh could be provided with a disincentive to increase or maintain levels of Welsh-medium provision.

*'The proposal to introduce 70% of the curriculum for 70% of pupils would weaken and undermine Welsh-medium education, and would be a vehicle for some schools, which are already increasing the use of Welsh, to slip back. It would be a misstep to implement this definition as it currently stands.'*⁶

A need for additional resources to support the growth of Welsh-medium education was raised by respondents who felt the changes proposed would be insufficient on their own. Increased funding and the availability of workforce training for Welsh-medium education were raised as examples of factors that could influence schools' likelihood of increasing their Welsh-medium provision.

Respondents identified a need for more information to be provided about the changes, with some expressing a desire for more guidance alongside the proposals. Some felt that there should be a greater focus on linguistic outcomes in the policy, with some expressing a desire for more focus on schools' Welsh language ethos and policies on the social use of Welsh.

*'No consideration is given to the ethos and culture of a school. Two schools can be within the same category in the same county but because of a stronger ethos that sustains the language in a number of different domains, [one school could be] ultimately producing more speakers.'*⁷

Some respondents expressed their general support for the proposals, particularly those for primary schools. Respondents welcomed the inclusion of the transitional sub-categories and the proposal that at least 10 per cent of the curriculum is taught in category 1 schools.⁸ A few of these respondents noted that the proposals aligned with their WESP.

⁵ Translated from Welsh. Original text: 'Byddai'r canllawiau'n elwa o weld y cymhellion i ysgolion symud ar hyd y continwrm yn cael eu hegluro a'u gwneud yn fwy eglur.'

⁶ Translated from Welsh. Original text: 'Byddai'r cynnig i gyflwyno 70% o'r cwricwlwm i 70% o'r disgyblion yn gwanhau a thanseilio addysg Gymraeg, a byddai'n gerbyd i rhai ysgolion, sydd eisoes yn cynyddu'r defnydd o'r Gymraeg, i lithro yn ôl. Cam gwag fyddai gweithredu'r diffiniad hwn fel y saif ar hyn o bryd.'

⁷ Translated from Welsh. Original text: 'Ni roddir unrhyw ystyriaeth i ethos a diwylliant ysgol. Gall dwy ysgol fod o fewn yr un categori yn yr un sir ond oherwydd ethos cryfach sydd yn cynnal yr iaith mewn nifer o wahanol beuoedd, [gallai un fod yn] yn cynhyrchu mwy o siaradwyr yn y pendraw.'

⁸ The consultation document includes transitional sub-categories which are described as 'bridging categories' that enable schools to be flexible as they increase their Welsh-medium provision and move between categories.

*'We welcome the intention to deliver 10% of the curriculum through the medium of Welsh in English-medium schools/streams, which is a step forward from the current situation of learning Welsh solely as a subject.'*⁹

Some respondents expressed general disagreement with the proposals and noted that, in their view, the changes should not be a priority. A few of these respondents disagreed with the proposals because they felt the changes could place additional pressure on schools.

'I'm more concerned about getting pupils back safely, to even consider Welsh provision right now.'

Other respondents who disagreed with the proposals cautioned that the proposals risked over-simplifying the school categorisation policy and did not fully account for the variety of Welsh-medium delivery models in schools.

*'It is fair to acknowledge that one fit across Wales is going to be difficult to achieve but it can be argued that this proposed model does not adequately address the differences that currently exist.'*¹⁰

⁹ Translated from Welsh. Original text: 'Rydym yn croesawu'r bwriad o gyflwyno 10% o'r cwricwlwm drwy gyfrwng y Gymraeg mewn ysgolion/ffrydiau cyfrwng Saesneg, sy'n gam ymlaen o'r sefyllfa bresennol o ddysgu'r Gymraeg fel pwnc yn unig.'

¹⁰ Translated from Welsh. Original text: 'Mae'n deg cydnabod bod un ffit ar draws Cymru yn mynd i fod yn anodd ei gyrraedd ond gellir dadlau nid yw'r model arfaethedig yma'n mynd i'r afael â'r gwahaniaethau sydd yn bodoli ar hyn o bryd yn ddigonol.'

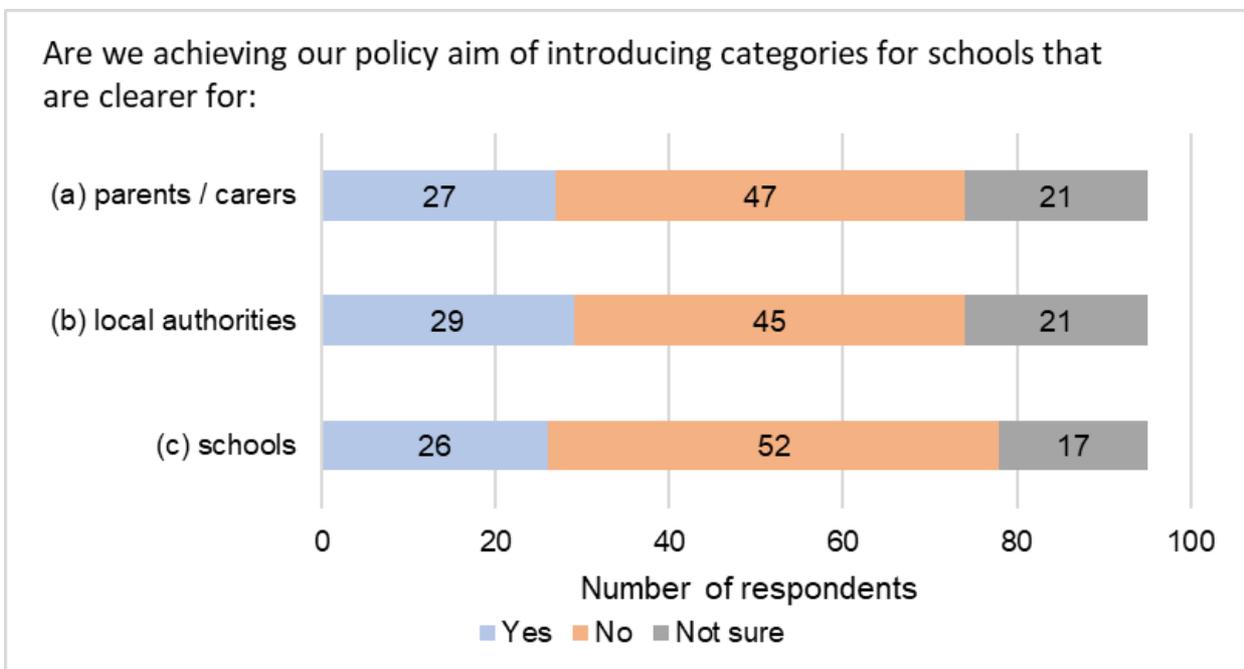
Question 3

Are we achieving our policy aim of introducing school categories that are clearer for:
(a) parents/carers?
(b) local authorities?
(c) schools?

When asked whether or not Welsh Government is achieving the policy aim of introducing school categories that are clearer for various groups, respondents' views were as follows:

- For parents/carers:
 - Around half of respondents answered 'no' (47 out of 95 or 49 per cent);
 - Around a quarter answered 'yes' (27 out of 95 or 28 per cent)
 - Around a fifth said they were not sure (21 out of 95 or 22 per cent)
- For local authorities:
 - Around half of respondents (45 out of 95 or 47 per cent) answered 'no';
 - Around a third answered 'yes' (29 out of 95 or 31 per cent);
 - Around a fifth said they were not sure (21 out of 95 or 22 per cent).
- For schools:
 - Around half of respondents (52 out of 95 or 55 per cent) answered 'no';
 - Around a quarter answered 'yes' (26 out of 95 or 27 per cent);
 - Around a fifth said they were not sure (17 out of 95 or 18 per cent).

Figure 3. Responses to the question: 'Are we achieving our policy aim of introducing school categories that are clearer for: (a) parents/carers? (b) local authorities? (c) schools?'



N=95

A total of 43 respondents submitted written comments in response to this question. The most common themes emerging from these are set out below.

Respondents expressed concern that the proposed categories are too broad and lack sufficient detail for parents / carers, local authorities and schools. As a result, respondents felt that the proposed categories would not provide sufficient clarity about the nature of provision and expected linguistic outcomes within schools and, at worst, mislead parents/carers, local authorities and schools. They expressed concern that schools offering very different proportions of Welsh-medium provision would be placed into the same category.

In a few cases, respondents clarified that these concerns were aimed particularly at the proposed secondary school categorisation, rather than the primary school categorisation. The proposed categories for primary schools were generally seen as clear for parents/carers, local authorities and schools. However, not all respondents clarified whether their concerns referred to the primary or secondary school proposals.

Examples were provided by respondents of the type of detail which would be necessary to ensure the categories are clear to parents / carers, local authorities and schools. For example, detail should be provided on the language medium of teaching and learning inputs and further elaboration on expected linguistic outcomes is needed, particularly where the linguistic outcomes would vary within a category depending upon the exact provision taken up by each pupil.

On the other hand, some respondents expressed more positive views regarding the proposed categories, identifying potential benefits in clarifying the situation for the key stakeholders. They felt the proposed categories bring clarity to the system and make it easier for parents/carers, local authorities and schools to understand expected linguistic outcomes. A few respondents noted that the proposed categories are clearer than the current system and represent a positive step forward.

'It is helpful and clearer that the percentage of the curriculum in the primary sector which is taught in Welsh is stipulated, for example 80%. This allows leaders and governing bodies to plan, develop and monitor the provision effectively. In the secondary sector, the model is based on input and output which again gives the same expectations on leaders and governing bodies to ensure that the quantitative targets are actioned and adhered to in each school's language policy.'

Respondents highlighted key considerations for implementing the proposed categorisation effectively. These included:

- ensuring that all key stakeholders interpret the categories consistently;
- establishing monitoring systems that will ensure standardisation across Wales;
- considering appropriate timescales for moving through transitional categories; and
- considering the resources needed.

A few respondents also provided ideas about how to further clarify the proposed approach, for example providing exemplification within each category or developing a user-friendly guide for parents/carers (see also question 6).

Some respondents also expressed concerns that the proposed categories would not create a solid foundation for linguistic continuity between the primary and secondary sectors and are not sufficiently ambitious in terms of encouraging Welsh-medium education. They highlighted a risk that schools could revert to delivering less of their provision through the medium of Welsh and that the current proposals do not sufficiently support national objectives for Welsh-medium education.

*'The categories will be so broad as to be misleading to parents, would undermine Local Authority strategies to move schools along a path towards Welsh-medium education, and the categories so broad that schools would be left to find their own route as was the situation before the 1980s.'*¹¹

Concerns were raised regarding the proposed category for Welsh-medium secondary schools (category 3). Respondents emphasised that, despite the rationale set out in the documentation for the category's definition, the category as currently defined would weaken Welsh-medium provision. These concerns were based primarily upon the proposed minimum percentage threshold for this category and subsequent broad range of schools which would be included, making linguistic outcomes unclear and allowing schools (particularly those with a high percentage of Welsh-medium provision) to reduce their Welsh-medium provision while remaining within category 3.

A few drew attention to specific elements of the proposed categories that they felt would be difficult for stakeholders to understand. For example, transitional categories and the concept of schools being in two different categories were seen as difficult for parents to understand, and respondents felt parents would require further explanation of these elements.

In addition, a few respondents took this opportunity to state their opposition to categorising schools by language medium and/or commented that, in their view, other issues were of a greater priority than this policy.

¹¹ Translated from Welsh. Original text: 'Bydd y categorïau mor eang nes bod yn gamarweiniol i rieni, yn tanseilio strategaethau Awdurdodau Lleol i symud ysgolion ar hyd llwybr tuag at addysg Gymraeg, a'r categorïau mor eang nes gadael ysgolion i gael hyd i'w llwybr eu hunain yn unol â'r sefyllfa cyn y 1980au.'

Question 4

Do you agree with:

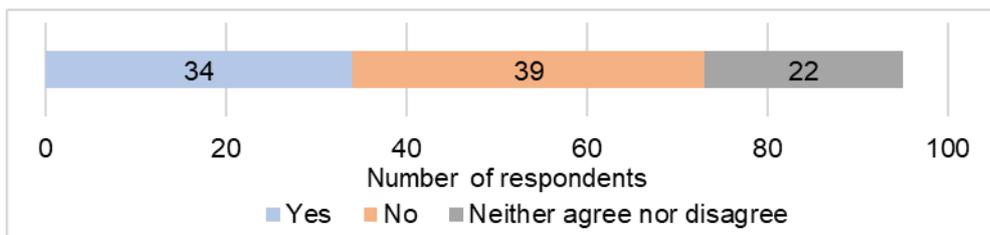
- (a) the use of numbering for categories?
- (b) having fewer categories but broader descriptions?
- (c) more focus on the linguistic outcomes descriptions for each category?
- (d) the introduction of sub-categories to facilitate transition?
- (e) the different approaches to categorising primary and secondary school provision

A total of 50 respondents submitted written comments in response to this question but not all provided comments on each of the elements of the question (a – e). The most common themes emerging from these are set out below.

A) The use of numbering for categories

A little under half of respondents (39 out of 95 or 41 per cent) disagreed with the use of numbering for categories, while just over a third (34 out of 95 or 36 per cent) agreed and just under a quarter (22 out of 95 or 23 per cent) neither agreed nor disagreed.

Figure 4. Responses to the question: 'Do you agree with the use of numbering for categories?'



N=95

A total of 20 respondents submitted written comments relating to the use of numbering for categories.

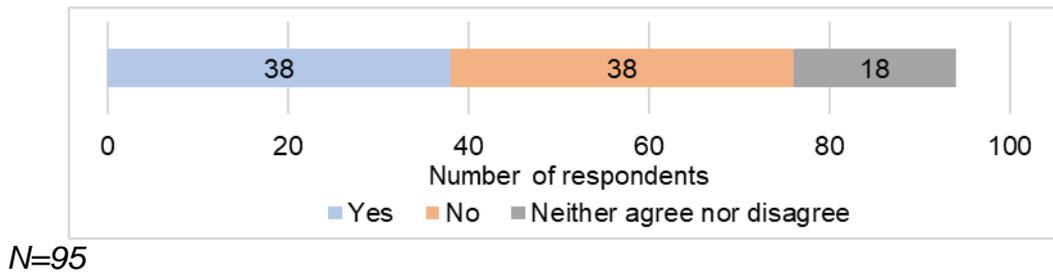
Respondents primarily commented that they felt the proposed numbering of categories should be reversed, both to maintain continuity with the current system and because Welsh-medium provision should be seen as the number one, or 'strongest' / 'highest', category; respondents felt this could encourage schools to make progress in enhancing Welsh-medium provision.

A few respondents made the case for using appropriate labels indicating the expected medium of provision rather than numbering, to make the categories clearer for stakeholders.

B) Having fewer categories but broader descriptions

Over a third of respondents (38 out of 95 or 40 per cent) agreed with having fewer categories but broader descriptions, while over a third (38 out of 95 or 40 per cent) disagreed. Around a fifth (18 out of 95 or 19 per cent) neither agreed nor disagreed.

Figure 5. Responses to the question: ‘Do you agree with having fewer categories but broader descriptions?’



A total of 25 respondents submitted written comments relating to having fewer categories but broader descriptions.

As discussed in previous sections of this report (see ‘summary of overarching themes’ and findings from Questions 2 and 3), respondents used this opportunity to re-iterate their concerns that the proposed categories are too broad and lack sufficient detail. As a result, respondents felt that the proposed categories would not provide sufficient clarity about the nature of provision and expected linguistic outcomes within schools.

Respondents also re-iterated their concerns regarding the proposed category for Welsh-medium secondary schools (category 3). They expressed disagreement with the proposed minimum percentage threshold and the subsequent breadth of schools which would be placed in the same category, as well as identifying a risk that schools would be able to reduce their provision while remaining in the same category.

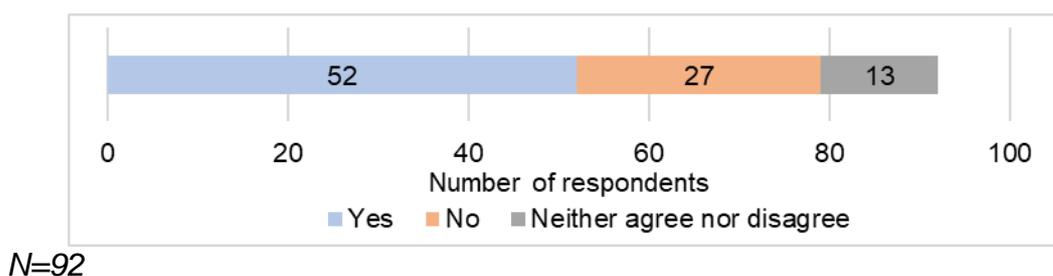
A few examples of details that respondents felt it was necessary to include in the categories were provided, such as consideration of school ethos and extracurricular activities, and reference to progression steps within the new Curriculum for Wales.

There were a small number of positive comments regarding the potential benefits of the proposed broader categories, with respondents noting that the proposed categories are clearer than the current categories.

C) More focus on the linguistic outcomes descriptions for each category

Over half of respondents (52 out of 92 or 57 per cent) agreed with placing more focus on linguistic outcomes descriptions, while a little over a quarter (27 out of 92 or 29 per cent) disagreed and a small proportion (13 out of 92 or 14 per cent) neither agreed nor disagreed.

Figure 6. Responses to the question: ‘Do you agree with more focus on the linguistic outcomes descriptions for each category?’



A total of 7 respondents submitted written comments relating to placing more focus on linguistic outcomes.

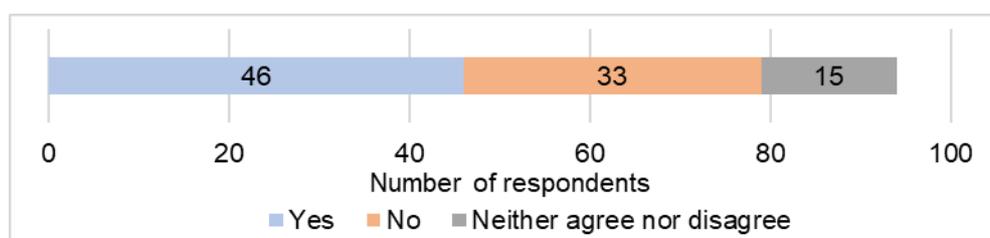
A few respondents were broadly positive regarding the proposal to focus on linguistic outcomes, noting that this focus will support parents/carers to make decisions and schools to be clear about their purpose, and will be necessary in order for the categories to support linguistic progression.

A few made suggestions about how the focus on linguistic outcomes could be strengthened, primarily noting that more detail on specific linguistic outcomes is needed (particularly when different cohorts of pupils might be accessing different provision within a school).

D) The introduction of sub-categories to facilitate transition

Just under half of respondents (46 out of 95 or 48 per cent) agreed with the introduction of sub-categories to facilitate transition, while just over a third (33 out of 95 or 35 per cent) disagreed and a small proportion (15 out of 95 or 16 per cent) neither agreed nor disagreed.

Figure 7. Responses to the question: 'Do you agree with the introduction of sub-categories to facilitate transition?'



N=95

A total of 15 respondents submitted written comments relating to the introduction of sub-categories to facilitate transition.

The comments provided in relation to the proposed sub-categories were broadly positive, with respondents noting that the transitional arrangements would encourage and support schools to increase their Welsh-medium provision along a purposeful trajectory.

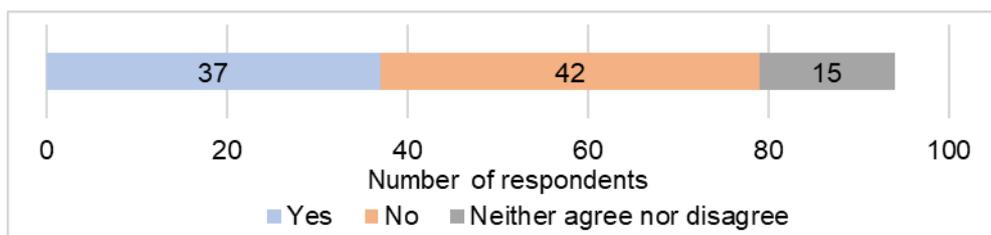
'The introduction of sub-categories for schools in transition is welcome because it clarifies the intention of the school to increase Welsh-medium provision and recognises formally where the school is along that trajectory. This flexibility will support schools and local authorities to be responsive to increased demand for Welsh-medium provision in line with the local context.'

Some also emphasised that further consideration should be given to how the sub-categories would be implemented in practice. For example, a few considered ten years to be too long to spend within a transitional category, while others emphasised that schools and staff would need sufficient support to move between categories.

E) The different approaches to categorising primary and secondary school provision

A little under half of respondents (42 out of 94 or 45 per cent) disagreed with the different approaches, while a little over a third (37 out of 94 or 39 per cent) agreed and a small proportion (15 out of 94 or 16 per cent) neither agreed nor disagreed.

Figure 8. Responses to the question: ‘Do you agree with: the introduction of sub-categories to facilitate transition?’



N=94

A total of 22 respondents submitted written comments relating to the different approaches.

A potential negative impact on progression pathways was identified by some respondents. This included a potential weakening of transition routes between primary and secondary schools. Respondents also expressed concerns that the differences between primary and secondary would not be clear to parents, making it difficult and confusing to identify an appropriate linguistic progression path for their child.

‘The proposals regarding differentiating between primary and secondary school categorisation also raises questions with regard to consistency, clarity and progression. Linguistic progression is an important element of the WESPs. Up to a third and more of pupils in some areas have been turning from first to second language...Do the definitions provide a considered way of responding to this?’¹²

A few respondents also queried whether the categories meet the needs of all-through schools, noting that further consideration should be given to how the categories meet their needs.

A few also emphasised more generally that the categories for both sectors should be consistent, with respondents noting that secondary school categories should follow the same structure as primary school categories.

¹² Translated from Welsh. Original text: ‘Mae’r hyn a gynigir o safbwynt gwahaniaethu rhwng categorieiddio ysgolion cynradd ac uwchradd hefyd yn codi cwestiynau o safbwynt cysondeb, eglurder a dilyniant. Mae dilyniant ieithyddol yn agwedd bwysig o’r CSGAau. Mae hyd at draean a rhagor o ddisgyblion rhai ardaloedd wedi bod yn troi o iaith gyntaf i ail iaith...Ydy’r diffiniadau yn cynnig ffordd ystyrlon o ymateb i hyn?’

Question 5

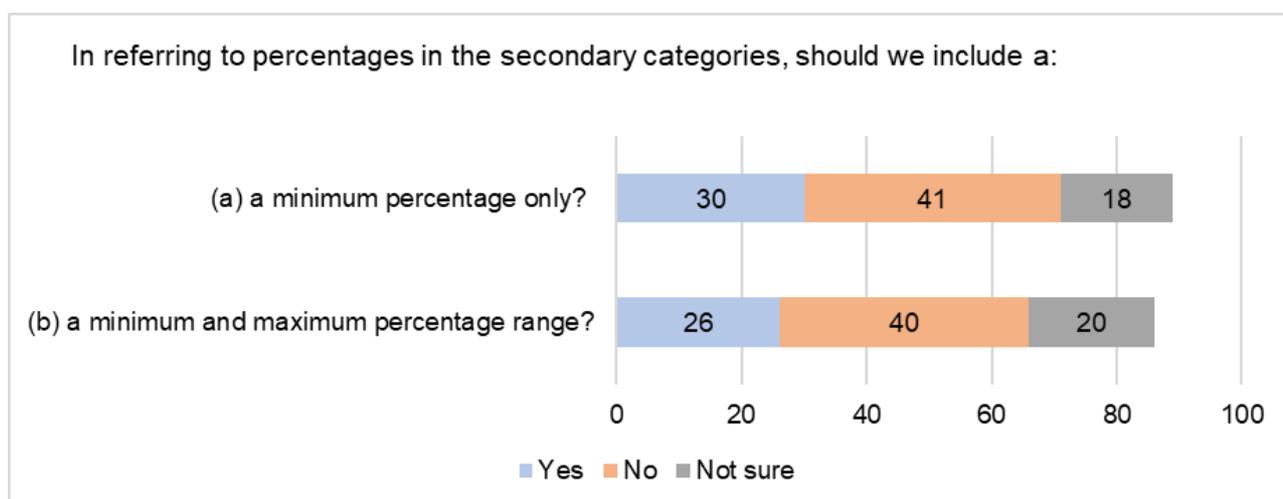
In referring to percentages in the secondary categories, should we include a:

- (a) a minimum percentage only?
- (b) a minimum and maximum percentage range?

About a third of respondents (30 out of 89 or 34 per cent) thought a minimum percentage only should be included in the secondary categories, while just under half of respondents (41 out of 89 or 46 per cent) disagreed and a fifth (18 out of 89 or 20 per cent) said they were not sure.

Similarly, about a third of respondents (26 out of 86 or 30 per cent) thought a minimum and a maximum percentage range should be included in the secondary categories, while just under half (40 out of 86 or 47 per cent) disagreed and just under a quarter (20 out of 86 or 23 per cent) neither agreed nor disagreed.

Figure 9. Responses to the question: 'In referring to percentages in the secondary categories, should we include a: (a) a minimum percentage only? (b) a minimum and maximum percentage range'



N = 89 (a), 86 (b)

A total of 41 respondents submitted written comments in response to this question. The most common themes emerging from these are set out below.

Some respondents disagreed with both options presented. Some of these respondents expressed concerns that the proposed approach would have a negative impact on Welsh-medium provision, while others disagreed with the need to prioritise categorising the language medium of schools in general.

Some reasons were given as to why a **minimum percentage only** would be preferable. Respondents primarily felt that including a maximum percentage (as well as a minimum) would create an 'artificial ceiling' for the amount of Welsh-medium provision a school may choose to offer. A couple of respondents also noted that a maximum percentage would be unnecessary as the minimum percentage in the adjacent category serves the same purpose.

*'Welsh [-medium] provision should not have a maximum since the message should be clear that there is no cap on progress.'*¹³

One reason in particular was given as to why **both a minimum and a maximum percentage** would be preferable; respondents believed that including such a range would be aspirational, encouraging schools to move beyond the minimum percentage rather than maintaining provision at the threshold level.

'By defining a minimum percentage [only], it does not encourage all stakeholders to aspire to develop or increase the percentage of learners following areas of learning through the medium of Welsh. By referring to a minimum and maximum percentage range, it would encourage schools to aim to reach an aspirational target which would align with the WESP.'

A few respondents also took this opportunity to highlight concerns and suggest amendments to the proposed percentage approach.

- They re-iterated their concerns about the low threshold percentage for the Welsh-medium secondary category (category 3).
- They identified a need to amend the percentages which define category 1 or 2 provision (for example requiring at least 20 per cent of the curriculum to be taught in Welsh in category 1 schools, rather than 10 per cent) or a need to amend the wording which describes the balance between English and Welsh-medium provision.
- They identified additional factors to consider when calculating percentages, in particular the language medium of qualifications rather than subjects.
- They requested further guidance or consideration of how the proposals would be implemented in practice.

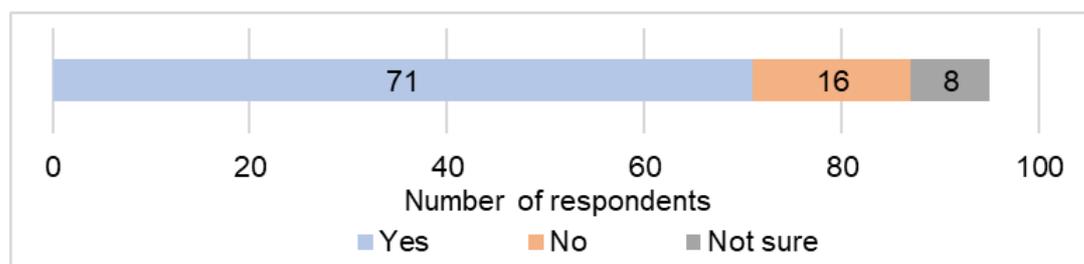
¹³ Translated from Welsh. Original text: 'Ni ddylai darpariaeth Gymraeg gael uchafswm gan dylai'r neges fod yn gyson nad oes cap ar y cynnydd.'

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?

Three quarters of respondents (71 out of 95 or 75 per cent) answered 'yes' when asked whether or not there was a need to publish additional guidance. A small number (8 out of 95 or 8 per cent) said they were not sure while 16 of the 95 (17 per cent) answered 'no'.

Figure 10. Responses to the question: 'Do we need to publish additional guidance tailored towards specific groups such as schools and parents/carers following the final publication of this guidance?'



N=95

A total of 42 respondents submitted written comments in response to this question, with around a quarter of these only providing a general remark supporting the principle of providing further tailored guidance. Some commented that additional guidance would certainly be needed eventually, but that further work was needed on the proposed categorisation first.

*'We agree with the principle that an additional guide (s) would, in due course, be useful to provide the necessary detail. But not based on the current definitions, unfortunately.'*¹⁴

Respondents provided suggestions for the content and/or appearance of any additional guidance developed. Some of these comments echoed responses made to other questions (e.g. question 3). Suggested content included the use of illustrative case studies, succinct descriptions, explanations of linguistic outcomes and the benefits of Welsh-medium education. Respondents proposed that use should be made of infographics and digital media to communicate any guidance developed to different audiences.

Respondents recommended preparing versions of the guidance suitable for children and young people, ITE providers and for governors in addition to the schools and parents named in the question. A small number of respondents commented on the need to tailor the guidance to take account of variations in the linguistic profile of local areas, while others emphasised that consistent information across Wales is essential.

¹⁴ Translated from Welsh. Original text: 'Cytunwn gyda'r egwyddor y byddai canllaw (iau) ychwanegol maes o law yn ddefnyddiol i ddarparu'r manylion angenrheidiol. Ond nid yn seiliedig ar y diffiniadau presennol, yn anffodus.'

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?

A total of 74 respondents submitted written comments in response to this question. The most common themes emerging from these are set out below.

Respondents commented on wider issues relating to Welsh-medium education in their response to this question. These included their views on the importance of:

- increasing the availability of Welsh-medium early years provision;
- increasing the availability of Welsh language immersion provision;
- increasing the amount of Welsh-medium post-16 pathways for learners; and
- providing more Welsh-language workforce training for practitioners to help increase the supply of practitioners who can work through the medium of Welsh.

'We feel that it will raise aspirations to use Welsh in everyday life, and encourage more equal provision in schools. Positive effects can be increased by access to adequate funding for training for teachers and other school staff to learn and develop their Welsh language skills where this is needed. This would include early years provision as the earlier Welsh is used as the language of learning and communication the more seamlessly immersion in Foundation Phase can take place.'

Respondents commented that the proposals would increase the opportunities for learners to use Welsh and to see the value of the Welsh language. Some expressed their general agreement with the proposals without commenting on their effect on opportunities to use Welsh.

'The proposals are likely to have a positive impact on opportunities for people to use Welsh, as schools take steps towards increasing provision. An increase in provision would provide more opportunities for parents and the wider community to become more engaged in the Welsh language through expansion in local schools.'

Other respondents felt the proposals would have a limited effect on the opportunities to use Welsh unless they were strengthened. A few provided examples of ways in which they could be strengthened, such as including a greater focus on linguistic outcomes and schools' Welsh language ethos.

Some respondents re-stated concerns they had raised in responses to previous questions about the proposed categories, and noted that there could be a negative effect on opportunities to use Welsh if these were not addressed. These included:

- a perceived risk that the categories could lead to some schools reducing the amount of Welsh-medium provision they offer;
- that the categories are too broad;
- specific comments on the thresholds for some of the categories; and

- that the proposals were reliant on the commitment of staff and governing bodies to increase the amount of Welsh-medium provision.

A few respondents commented that the proposals would help ensure that the Welsh language is treated no less favourably than the English language. A few commented more generally on the importance of this principle and factors that could influence whether or not the proposals would be equitable (e.g. availability of training).

'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.'

Others raised concerns about how equitable the proposals were, commenting on the importance of maintaining families' opportunity to choose English-medium educational provision. Other respondents re-stated more general concerns or disagreement with the proposals, noting that revising the policy should not be a priority.

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.

A total of 60 respondents submitted written comments in response to this question. Many of these used this question to reiterate or summarise points raised in previous sections, in particular those points already made regarding the approach to categorising secondary schools and a need to focus on school ethos. Most respondents did not split their answer according to (i) positive effects and (ii) no adverse effects.

Respondents suggested that the policy should be amended to take into account schools' roles in promoting and supporting the social use of Welsh. It was suggested that giving this aspect of schools' activity greater prominence in the policy could have positive effects on opportunities for people to use the Welsh language. Examples of issues that respondents suggested should be referenced in the policy included:

- addressing parent and community attitudes to using Welsh;
- acknowledging the importance of *Siarter Iaith* and *Cymraeg Campus*¹⁵;
- providing opportunities for parents to learn and/or practice Welsh; and
- making sure that the guidance includes arrangements to increase the use of Welsh across extracurricular activities.

Linked to the above points, some respondents repeated their concerns that there was not enough of a focus on schools' ethos in the proposals (see answers to questions 2 and 4). Respondents also commented that the guidance should be linked to materials and campaigns aimed at promoting and explaining the benefits of Welsh-medium education to parents.

Concerns were raised by some respondents that, without adequate training and funding to support changes, the potential positive effects would be constrained. On the theme of training, there were recommendations by respondents to extend and strengthen the Welsh language sabbatical scheme, and to encourage the use of the National Centre for Learning Welsh's courses to help develop the Welsh language skills of existing staff. It was suggested that a Welsh language skills audit should be undertaken for all staff who work in and support schools, not just teachers. It was suggested that this type of skills audit could help:

- identify what skills are already in place and where there are gaps;
- identify where additional investment is needed to support the proposed policy; and
- inform more robust workforce planning.

Respondents also set out suggestions as to how to expand the teaching workforce, from the pre-school stage onwards. These comments included suggestions for attracting new entrants to the sector, expanding courses to increase the confidence of existing staff to teach through the medium of Welsh, and attracting Welsh speakers from other professions

¹⁵ *Siarter Iaith* and *Cymraeg Campus* are part of the Welsh Language Charter, a project to encourage the use of Welsh socially in primary schools in Wales.

to undertake Welsh-medium teaching qualifications and vocational qualifications for working in pre-school settings.

A few respondents explained that there was a need for flexibility in the guidance, including providing local authorities with the flexibility to extend deadlines where significant progress is being made in increasing Welsh-medium provision, especially to aid longer-term planning and avoid negative unintended consequences.

'The guidance needs to provide flexibility for the kind of longer-term cluster planning to deliver transition from T1 to bilingual. Otherwise, a cluster could have spent 8 years doubling or tripling the number of Welsh speakers through a truly transformational cluster approach, only for the secondary school to take a heavy financial hit by just about failing to hit the bilingual category within the 10-year deadline.'

Other points raised by a small number of respondents included the need for a focus on pupil outcomes, and a need to scrutinise and check what is offered by schools.

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.

A total of 49 respondents submitted written comments in response to this question. Respondents tended to re-state their views on the proposals, with some raising additional considerations. The themes most commonly raised by respondents are set out below.

Respondents reiterated a number of issues or concerns relating to the proposals which they had raised in earlier responses. These respondents explained why they disagreed with the categorisation proposals, or why they felt they would not be effective. Concerns raised by these respondents were mostly related to the proposed categories for secondary schools, with a few respondents commenting that they felt there could be a risk of schools reducing their levels of Welsh-medium provision because the categories were, in their view, too broad.

Respondents raised wider issues relating to Welsh-medium education, and particularly concerns about:

- securing adequate funding for increasing Welsh-medium provision;
- the availability of teachers who can teach through the medium of Welsh;
- a need for workforce training to increase the number of teachers who can teach through the medium of Welsh;
- providing transport to Welsh-medium schools;
- ensuring progression between key stages; and
- how the factors above could affect whether the *Cymraeg 2050* strategy is successful.

A few of the respondents who raised the above issues believed that other education legislation would need to be reviewed to ensure it aligned with the school categorisation policy.¹⁶

Respondents re-stated a desire for additional information to provide clarity on the categories. A few respondents felt that the proposed categories should be placed on a statutory basis and queried which relevant parties would ultimately be responsible for local decisions on increasing Welsh-medium provision. A few respondents felt that robust monitoring arrangements needed to be implemented alongside the policy.

'There is also a need for consistent and robust monitoring systems to be established as part of these guidelines. There will be a need to ensure that the data that is reported is clear and that it is reported in a way which facilitates the comparison of developments across Wales'.¹⁷

Respondents re-stated their support for categorisation and support for the proposals, particularly the proposed primary school categories. A few respondents commented on the need for some flexibility to account for local variations in models of provision and differences in the profile of learners and families. A few raised concerns that implementing the

¹⁶ Examples given by respondents included the Curriculum and Assessment (Wales) Act 2021, School Standards and Organisation (Wales) Act 2013 and Learner Travel (Wales) Measure 2008.

¹⁷ Translated from Welsh. Original text: 'Rhaid hefyd sicrhau bod yna systemau monitro cyson a chadarn yn cael eu gosod fel rhan o'r canllawiau hyn. Bydd angen sicrhau bod y data sy'n cael ei adrodd yn glir ac yn cael ei adrodd mewn ffordd sydd yn hwyluso cymharu datblygiadau ar draws Cymru'

categories without such flexibility could lead to unintended consequences (e.g. secondary schools who were growing Welsh-medium provision from a low baseline becoming ineligible for funding if they narrowly failed to meet target thresholds).

A few respondents proposed a delay to implementing the proposals to enable schools to focus on recovery following the Covid-19 pandemic.