

Response to Consultation on Welsh Language Standards

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Colegau Cymru
Uned 7 Cae Gwyrdd
Greenmeadow Springs
Tongwynlais, Caerdydd CF15 7AB
Ff: 029 2052 2500
E: hello@colegaucymru.ac.uk
W: www.colegaucymru.ac.uk

Colleges Wales
Unit 7 Cae Gwyrdd
Greenmeadow Springs
Tongwynlais, Cardiff CF15 7AB
T: 029 2052 2500
E: hello@collegeswales.ac.uk
W: www.collegeswales.ac.uk

Introduction

1. This paper has been drawn up by ColegauCymru in response to the consultation of the draft Standards as set out in the Welsh Language (Wales) Measure 2011 and led by the new Welsh Language Commissioner. The content has been considered by FE college principals and by those with direct responsibility for the Welsh language in FE colleges in Wales.
2. ColegauCymru represents the 17 further education (FE) colleges and two FE institutions in Wales¹.
3. ColegauCymru welcomes the opportunity to respond on the draft Standards and has appreciated the opportunity to raise questions at the public meetings held by the Commissioner. In addition, ColegauCymru is particularly pleased to have had an opportunity to meet with the Commissioner during the course of the consultation period (23 July 2012) in order to discuss the specific implications of the Standards to the post-16 education sector.

Our commitment to bilingualism

4. The FE sector accepts the principles underpinning the Standards and is committed to engendering a bilingual workforce through enhancing opportunities for both students and staff to develop and use their Welsh language skills as part of, or alongside, their educational programmes of study or their teaching.
5. On behalf of the FE colleges, ColegauCymru published a National Strategy for Bilingualism in FE (referred to henceforth as 'the Strategy') in January 2010. The Strategy has been approved by all colleges and is now in the process of being implemented. Delivering bilingual education across the FE sector in Wales is part of our core business and it is being prioritised.
6. This delivery is supported by ColegauCymru's appointment of a permanent Director of Bilingualism and the formation of an all-Wales Steering Group on Bilingualism, which is chaired by a member of the ColegauCymru Board of Directors: the Principal of Coleg Morgannwg, Judith Evans.
7. The significance of these ColegauCymru developments are reflected in the reference made by the Minister for Education and Skills, Leighton Andrews AM in his Priorities Letter for FE Colleges (for 2012/13 and 2013/14) issued on 21 May 2012.
8. The three main strands of the Strategy are:

Strand 1: The development of a Welsh ethos at the college

Strand 2: The development of bilingual communication skills to augment English medium provision

¹ In this paper the term 'FE college' or 'college' is used to cover the FE colleges and FE institutions in Wales.

Strand 3: The development of Welsh-medium or bilingual provision for post-14 learners.

9. Following the adoption of the Strategy, ColegauCymru supported colleges in their development of college-specific action plans – a key delivery mechanism. With the support and approval of the Welsh Language Board, colleges' action plans have been integrated with their Welsh Language Schemes. Colleges' statutory reports to the Welsh Language Board therefore have included progress reports on the National Strategy action plans.
10. With financial support by the Welsh Government, colleges are appointing Bilingual Champions. The Bilingual Champions programme commenced in 2005 as a pilot project (through a competitive bidding process for Welsh Government funds). The three colleges that were funded to deliver the pilot were: Coleg Llandrillo (by now part of Grŵp Llandrillo Menai), Coleg Llysfasi (by now merged with Deeside College) and Coleg Sir Gâr. During the pilot phase, Neath Port Talbot College also became part of the project. In 2011, four further colleges were allocated funding to appoint a champion: Coleg Gwent, Cardiff and Vale College/YMCA/WEA South (a joint appointment), Coleg Ceredigion and Yale College, Wrexham. In 2011 the Welsh Government announced a roll-out of the Bilingual Champions programme, with a view to all colleges having access to the programme by the end of 2013.

Comments on the Welsh Language Standards

11. It is ColegauCymru's understanding that FE colleges are covered directly by four out of the five draft Standards: Service Delivery Standards, Policy Making Standards, Operational Standards and the Record Keeping Standards.

The Service Delivery Standards

12. Following a meeting between ColegauCymru and the Commissioner in July, it is our understanding that these Standards refer to administrative activities rather than to direct educational delivery. This is a particularly important distinction.
13. ColegauCymru supports the Service Delivery Standards as they apply to administrative activities.
14. Standards that refer to the visibility and Welsh-medium ethos of bodies are crucially important. We agree that visible Welsh, with bilingual signs, promotional material and websites, are vital and colleges are currently striving to meet this requirement at present.
15. A literal interpretation of the draft Standards (particularly Service Delivery Standard 2, 5 & 8 when read through 'Relevant Activity' xxii), however, also expects teaching and learning to comply with the Standards. That suggests that every education provider in Wales (schools: both Welsh- and English-medium, FE colleges, universities) should plan for every one of their programmes to be potentially delivered through the medium of Welsh on the basis that a learner (service user) may choose to receive all services through the medium of Welsh.

16. Colleges do have action plans in place which are included in their Welsh Language Schemes in order to increase Welsh and bilingual delivery in order to meet the Welsh Government's targets within the Welsh Medium Education Strategy. This is covered in Strands 2 and 3 of the Strategy. But issues relating to the Welsh Government's funding of FE courses, linguistic expertise of vocationally expert staff, critical mass of Welsh-speaking students who choose to follow their educational courses through the medium of Welsh (to, for example, enable teamworking for the completion of elements of coursework), awarding bodies (see below), and the availability of educational resources militate against all colleges in all parts of Wales being able to deliver all courses through the medium of Welsh on the demand of any service user.
17. The role of the Commissioner's forthcoming Code of Practice for the interpretation of each of the Standards will clearly be important. It would be helpful for this Code to be published as early as possible to assist those covered by the Standards with their planning in relation to the commencement of the Standards. The Code may helpfully clarify certain matters, such as how compliance with the Standards (as they are currently drafted) will be assessed in relation to the Welsh-speaking demographic of the areas covered by individual FE colleges where a very small number of the learner cohort may be Welsh speakers. Funding and human resource policies will need to be considered where there may only be a very small number of students wishing to learn through the medium of Welsh.
18. There is a particular issue with Awarding Bodies for vocational or academic qualifications, who are named among those who will comply with the Service Delivery Standards. The key awarding bodies for vocational qualifications, for example, are private sector companies or charities whose headquarters are in England or overseas. Wales' overall market share is small. The Welsh-medium market share is smaller still. A number of awarding bodies do currently offer a limited number of qualifications through the medium of Welsh. Because of the very small market share, the development by awarding bodies of qualifications through the medium of Welsh are in many cases supported by public funds – either via colleges' core funding, or direct funding by the Welsh Government or in some cases European funding.
19. The Welsh Government has identified six priority areas for the development of bilingual vocational qualifications and educational resources. They are: childcare, health and social care, business administration, media and performing arts, leisure & tourism, agriculture.
20. The Welsh Government publishes a list of approved qualifications in Wales on the "Database of Approved Qualifications in Wales" (DAQW). This list identifies qualifications that are available through the medium of Welsh. Around 80 or more awarding bodies are listed. Many are specialist awarding bodies (most of which but not all are headquartered in England) which have developed technical qualifications for specific vocations. It will be vitally important for Wales' economy and future prospects of Wales' students and employees that these technical qualifications will still be available for colleges in Wales to teach after the introduction of the Standards. It would not be in the

educational or economic interests of Wales if particular awarding bodies would decide not to operate in Wales in order to avoid the need to comply with the Standards.

21. At our meeting with the Commissioner on 23 July, we understood that the Commissioner is aware of these issues. The Commissioner's Office may wish to revisit the wording of Service Delivery Standards 2, 5 and 8 (and/or the interpretation of them in the Code of Practice) insofar as they apply to the delivery of teaching and instruction to learners in order to ensure that the introduction of the Standards do not have an unreasonable or disproportionate effect.

Policy Making Standards

22. ColegauCymru welcomes the Policy Making Standards. They will raise the profile of the Welsh language within institutions by mainstreaming the Welsh language. With respect to colleges, their strategies and business plans need to take account of their impact on the Welsh language. For example, long term planning might include investment in raising the Welsh language skills levels of staff to enable individual colleges to deliver more courses through the medium of Welsh.

Operational Standards

23. ColegauCymru welcomes the principle that the Welsh language must be treated no less favourably than the English language in the delivery of services and that no one's freedom to communicate in Welsh should be interfered with. These principles are a significant step forward for Wales. The ramifications of these principles are that a non-Welsh speaker has to recognise and accept the wishes of those choosing to communicate through the medium of Welsh.
24. It may be helpful to revise the draft operational Standards to make clearer the fact of the co-existence of two languages (English and Welsh) but with a strong emphasis on improving opportunities for those wishing to communicate through the medium of Welsh. As they stand, these draft Standards present a challenge for many colleges. ColegauCymru agrees that we need to promote the opportunity for individuals to use their Welsh in the workplace, but many workplaces currently are not be able to cope with the requirements in the draft Standards, not least because a transition period has not been suggested. ColegauCymru would advise that the Standards or the Code of Practice upon which the Standards will be interpreted could differentiate between communication with regards to institutional procedures and communication and those between individual workers with each other on a less formal basis.

Record Keeping Standards

25. Colleges would expect to monitor their progress against the standards and having effective record keeping is an essential component to this. These records should be regularly maintained and updated, and provide clear evidence that the standards are

being met. This is a key part of openness and transparency. At the same time, record keeping must be kept as simple as possible. Reporting should be short and concise, ensuring that the reporting procedures themselves serve the broader objectives of meeting the other Welsh Language Standards and the overall aims of the Commissioner.

Conclusion

26. ColegauCymru hopes and expects that the introduction of clear Standards will give Welsh speakers the confidence to use their Welsh in public. With the majority of large employers in Wales also having to conform to the Standards, the importance of developing a bilingual workforce will be enhanced, and the profile of the Welsh language will be raised.
27. FE colleges in Wales support the principles enshrined in the draft Standards but at the same time, they consider that the implementation of the Standards should recognise colleges' proactive planning in delivering the National Strategy for Bilingualism in FE over a period of time.
28. Colleges aim to be full and proactive partners in the planning and delivery of a post-14 education and training system that provides appropriate opportunities for learners to study and learn through the language of their choice, thereby preparing them for work and life in a bilingual Wales. Colleges endeavour to ensure provision to satisfy the needs and aspirations of learners on the basis of equal opportunity across Wales.
29. We look forward to working with the Commissioner to ensure that the implementation of the Standards is a success. We see opportunities for colleges and for Wales when the Standards are fully implemented. Notwithstanding the regulatory role of the Commissioner's Office, we would wish to pursue the process of implementation of the Standards in a spirit of partnership with the Commissioner.