

16 to 18 local curricula guidance

Consultation response form

Your name: Welsh Language Commissioner

Organisation (if applicable): Welsh Language Commissioner

email/telephone number: post@cyg-wlc.cymru

Your address:

Responses should be returned by 31 March 2026 to:

16-18 Learner Pathways
Learner Pathways Division
Tertiary Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

email: Dysgu.16-18.Learning@gov.wales

Consultation questions

Question 1

To what extent do you agree that the guidance for Medr on local curricula for 16 to 18 learners ('16 to 18 local curricula guidance') clearly sets out Medr's role in the formation of local curricula?

(Insert an x under the relevant heading)

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
			X	

Supporting comments

In the context of learning Welsh and learning through the medium of Welsh, we agree that the guidance clearly sets out Medr's role in forming local curricula. The rest of our response will focus on the guidance in the context of the Welsh language.

Question 2

To what extent do you agree that the 16 to 18 local curricula guidance will support the vision for 16 to 18 learning set out within it?

(Insert an x under the relevant heading)

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
			X	

Supporting comments

As part of the vision, it is noted that the local curricula that constitute 16-18 learning should plan for and provide increased opportunities and encourage demand for participation in learning Welsh and learning through the medium of Welsh. We support this recommendation, noting the need to be active in creating and fostering demand. To achieve the vision, it will be necessary to overcome the following challenges in the context of post-16 Welsh-medium education:

- lack of progression from the statutory sector to the tertiary sector, with a huge fall in the number of learners who receive a substantial proportion of their education through the medium of Welsh
- schools' lack of ability to provide a broad and attractive curriculum in the sixth form
- lack of qualifications, especially in vocational fields
- lack of accessibility of Welsh-medium education and transport difficulties for learners
- lack of effective collaboration between providers
- the need to foster learners' Welsh language skills as an advantage for the labour market in Wales

We discuss this further in our responses to questions 4 and 9 below.

Question 3

To what extent do you agree that the 16 to 18 local curricula guidance helps you understand the factors and priorities that Medr should take into account when working with local authorities, schools and further education institutions (FEIs) to form local curricula?

(Insert an x under the relevant heading)

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
			X	

Supporting comments

Reference is made to promoting Welsh-medium study, as one of Medr's strategic duties which are particularly relevant to its role in the formation of 16-18 local curricula. We support the emphasis the guidance places on this duty. We draw attention again to the importance of Medr's active role in creating and fostering the demand for Welsh-medium education.

Question 4

To what extent do you agree that the expectations of Medr and other organisations within the 16 to 18 local curricula guidance will lead to the formation of local curricula that provide learners with a broad choice of qualifications, which will enable them to progress onto their chosen next steps in education or employment?

(Insert an x under the relevant heading)

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
		X		

Supporting comments

To ensure that the guidance leads to the creation of local curricula that offer a wide choice of qualifications for learners, it will be necessary to consider the issues raised in our response to question 2 above.

At present, learners do not have sufficient or equal opportunities to continue studying through the medium of Welsh in tertiary education. Overall, the Welsh-medium provision in sixth forms is much stronger than what is offered by the vast majority of post-compulsory education providers in further education colleges. The proportion of learners who study through the medium of Welsh in further education colleges is very limited, and substantially lower than the percentage who study through the medium of Welsh within statutory education.

However, sixth form provision in general, and Welsh-medium provision in particular, are facing increasing challenges in terms of sustainability of provision and the ability to attract a sufficient number of pupils. Data highlights that there is a large reduction in the numbers who receive a substantial proportion of their education through the medium of Welsh in the tertiary education sector compared to the statutory sector.

In particular, the provision of vocational qualifications and courses remains an area of substantial weakness. Many vocational qualifications are offered to learners in Wales in English only, meaning that Welsh-medium learners do not have the same range or variety of

choices as their peers in the English-medium sector. As a result, learners who wish to follow vocational or technical routes often have to change the language of their studies, undermining the continuation of their education through the medium of Welsh and reducing the likelihood that they will continue to use the language in the world of work.

Although important policy and regulatory developments have been introduced in recent years – including new regulatory requirements on the availability of Welsh-medium qualifications, and grants targeted at awarding bodies to support the development of Welsh-medium qualifications – the actual increase in the number and range of available Welsh-medium or bilingual qualifications has been too slow to respond to current demand or to stimulate new demand. The gap between policy ambition and the reality of provision on the ground continues to limit learners' choices and the viability of post-16 Welsh-medium provision.

Without speeding up the process of developing and introducing Welsh-medium qualifications – especially in key vocational areas – there is a risk that the post-16 education system will continue to reinforce a pattern where the Welsh language is seen as a medium for a narrow academic path, rather than a viable medium across a full range of education, training and employment paths.

As well as expanding the provision in further education colleges, there is a need to reinforce the strong provision that currently exists in schools. It must be ensured that learners have opportunities to study a broad and attractive curriculum through the medium of Welsh throughout Wales. This should be the focus of the local curricula, preparing learners for their future careers, in a context where there is an increasing demand for a bilingual workforce.

By now around 135 organisations across Wales, including major employers in the public sector, are under a duty to comply with the Welsh language standards. The standards system, together with an increase in public awareness, have produced a substantial increase in the demand for staff who can work in Welsh or bilingually. This is also true in relation to the private sector where an increasing number of companies recognize the value of the Welsh language as an important skill. Considering this, it is essential that the education and training system produces enough bilingual individuals to fill these positions. However, there is a gap between this demand and the sector's ability to meet it.

One key priority is to develop Welsh language provision in the strategic areas of the economy where there is currently a shortage of Welsh language skills. For example, there is a lack of a bilingual workforce in sectors such as health and care, early years education, statutory and tertiary education, public services, technology and business – areas where there is a high demand for the Welsh language due to the nature of the services to the public or the added value of the Welsh language commercially. Consideration should also be given to how to help young people take advantage of the jobs that could result from the transformation of the green economy, especially in the western areas of Wales which have a high density of Welsh speakers and many relevant natural resources. This potential is referred to in a [position paper](#) and [report](#) by the Commission for Welsh-speaking Communities. As many of the areas where there is a high density of Welsh speakers are also areas where there is potential for net zero economic developments, there are specific considerations in terms of skills needs in these areas. It is crucial to ensure local curricula that understand the needs of the labour market and develop the skills needed, doing so bilingually.

Question 5

To what extent do you agree with the proposed policy within the 16 to 18 local curricula guidance on the use of English, Mathematics and Cymraeg GCSEs and of Essential Skills Wales qualifications within post-16 programmes?

(Insert an x under the relevant heading)

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
			X	

Supporting comments

We agree that learners aged 16 to 18 who have not achieved a level 2 pass in Cymraeg at school should be given the opportunity to do so as part of their post-16 programme. This would ensure a fair opportunity for them to gain a qualification in the Welsh language which could benefit them when joining the bilingual workforce in the future.

Question 6

To what extent do you agree with the proposed policy within the 16 to 18 local curricula guidance on the use of skills qualifications within post-16 programmes, including the Advanced Skills Baccalaureate Wales and Skills Suite qualifications?

(Insert an x under the relevant heading)

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
			X	

Supporting comments

We agree that learners aged 16-18 should be given an opportunity to complete skills qualifications through the medium of Welsh.

Question 7

We would like to know your views on the effects that the policy outlined in the 16 to 18 local curricula guidance will have on the school and FEI workforce, including any impact it might have on workloads.

Supporting comments

Cymraeg 2050 recognizes the need for a substantial increase in the post-16 education workforce that can teach through the medium of Welsh. The Welsh Language Commissioner's [research](#) into the experiences of post-16 learners in Welsh-medium or bilingual education showed that the lack of Welsh-medium provision in some fields continues to prevent learners from studying subjects through the medium of Welsh. To assist all our learners to reach their potential from a linguistic point of view, all teachers, assistants, lecturers and assessors in Wales should be encouraged and supported to develop their Welsh language skills step by step and use the Welsh language increasingly as a medium of instruction. We have also called for the development of the Welsh-medium [additional learning needs workforce](#). A lack of specialist staff with the appropriate linguistic skills is a major challenge in that area. The guidance should address these issues.

Question 8

We would like to know your views on the effects that the policy outlined in the 16 to 18 local curricula guidance will have on the diverse needs of individual learners, including those from disadvantaged backgrounds and those who share protected characteristics (as set out under the Equality Act 2010).

Supporting comments

Welsh-medium education continues to be a more difficult and onerous choice for most of the population of Wales. Because there is less Welsh-medium provision, learners, on average, live further from the provision. This means that, in many areas, attending post-16 education or training means having to travel further, which is also likely to have financial implications. While local authorities are obliged to provide transport to statutory education (depending on specific distance thresholds), post-16 transport is provided on a discretionary basis. Transport policies vary from one local authority to another, but we know that a number of local authorities do not provide free transport to post-compulsory education and training. We know of several examples where further education colleges offer free transport to learners, but the local authority does not provide transport to the sixth form which offers Welsh-medium education. Often, this has a disproportionate impact on learners who wish to attend Welsh-medium education, and particularly on learners from economically disadvantaged backgrounds. Inequality due to travel distances, and its impact on disadvantaged communities, is highlighted in the latest report by the Commission for Welsh-speaking Communities, [Cymraeg in every community, strengthening the Welsh language](#).

In the context of Additional Learning Needs (ALN), [evidence from the statutory education sector](#) shows that there are substantial shortcomings in the Welsh-medium provision throughout Wales. This means that Welsh speakers often do not get the support that they need, or otherwise that they have to receive English-medium support and education. It is likely that similar challenges exist in the post-16 sector as well. We believe that the section on ALN in the guidance should pay attention to Welsh-medium ALN provision specifically. The Additional Learning Needs and Education Tribunal (Wales) Act 2018 has established the principle that the ALN system in Wales should be bilingual, and therefore that the Welsh-medium provision is equal to the English language provision.

Question 9

What, in your opinion, would be the likely effects of the 16 to 18 local curricula guidance on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

Do you think that there are opportunities to mitigate any adverse effects?

Supporting comments

We welcome the marked attention given to the Welsh language in this guidance. Including more detail, as we suggest, would be a positive step forward from the point of view of the Welsh language.

We note the encouragement for Medr to try to help learners to be able to study through the medium of Welsh where such opportunities are not provided directly, including online and hybrid delivery options such as E-Sgol, and collaborative partnerships. Online study can offer a solution in such situations, but care should be taken as online options to study Welsh are not necessarily as popular as face-to-face lessons. Welsh language teachers have expressed concern about learners deciding not to study Welsh after provision changed to online lessons only. The Commissioner has [drawn attention](#) to this problem and other difficulties, including scheduling the subject in a way that makes it more difficult or less likely that learners will choose it, and not offering the subject at all. Decisions like these undermine the efforts that are in place to promote and market the Welsh language as a subject.

The guidance discusses the possibility that providers will need to assess value for money and local demand for subjects where potential uptake is low. A specific example of this is Welsh. Teachers have warned that the position of Welsh as a subject after GCSE has been fragile for quite some time and that the situation is getting worse. In recent years, there has been a reduction in the number of learners who choose to study A Level Welsh and A Level Welsh Second Language. StatsCymru data show that 304 learners studied A Level Welsh in 2008/9 and 489 studied A Level Welsh Second Language. By 2023/24 the figures had dropped to 207 studying Welsh and 111 studying Welsh Second Language. According to [WJEC](#) data, between 2015/16 and 2023/24 the number of centres offering A Level Welsh fell from 48 to 45. During the same period, the number of centres offering A Level Welsh Second Language fell from 71 to 55.

We support the requirement in the guidance to consider ensuring that learners can continue with their chosen pathways, such as through collaboration between providers, including across local authority boundaries. The [Commissioner](#) has called for planning and collaboration at a regional level between schools and further education colleges to ensure that adequate provision is available and promoted to increase the number of post-16 learners in Welsh-medium education throughout Wales. We emphasize that it is essential that this strategic planning takes place for the benefit of the Welsh language. Welsh language courses must be funded without the need to rely on a minimum number of learners to justify running those courses.

Many fluent Welsh speakers do not continue to receive education through the medium of Welsh after leaving school. For example, in 2023/24, of the 35,800 fluent Welsh speakers in further education, 20,550 of them were studying through the medium of English only. We strongly recommend that the guidance emphasizes that providers should ensure that the Welsh language is an easy and accessible choice for all learners. This should also be true for subjects and qualifications through the medium of Welsh.

Question 10

In your opinion, could the 16 to 18 local curricula guidance be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Supporting comments

There are substantial challenges with the Welsh-medium provision in post-16 education. In this context, it would be possible to strengthen the guidance by explaining some of the main challenges and obstacles that the local curricula should recognize and tackle. The local curricula need to consider linguistic progression, the breadth of the curriculum, the availability of qualifications and the needs of the labour market in terms of the Welsh language to try to overcome the inequality between Welsh-medium provision and English-medium provision in the post-16 sector in Wales.

Question 11

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:

Anonymity

Responses to the consultation may be published. Your response will be anonymous. However, if you would like your name to be published alongside your response, please insert an x in the box.

I agree to my name being published alongside my response to this consultation.	x
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