

EL PROFESORADO DE LAS ENSEÑANZAS DE Y EN LENGUAS EXTRANJERAS EN LOS CENTROS DE EDUCACIÓN INFANTIL Y PRIMARIA. COMUNIDAD AUTÓNOMA DE ARAGÓN.

TEACHING STAFF FOR FOREIGN LANGUAGE INSTRUCTION AND INSTRUCTION THROUGH FOREIGN LANGUAGES IN EARLY CHILDHOOD AND PRIMARY EDUCATION SCHOOLS. AUTONOMOUS COMMUNITY OF ARAGÓN.

M.^a Marta Benito Iritia

Inspectora de Educación de Zaragoza.

Comunidad Autónoma de Aragón

ORCID: 0009-0006-7421-1849

Resumen

Una de las principales líneas de innovación del sistema educativo español en las últimas décadas ha sido la enseñanza bilingüe, al objeto de mejorar la competencia lingüística del alumnado y prepararlo para un contexto globalizado: todo ello alineado con las tendencias educativas europeas que, estratégicamente

van introduciendo la lengua extranjera desde edades tempranas por ser propicias para su adquisición.

En este contexto, la Comunidad Autónoma de Aragón apostó desde 2001 por proyectos de innovación orientados a anticipar la enseñanza de lenguas extranjeras en los centros de Educación Infantil y Primaria (Orden de 22 de mayo de 2001), regulando su implantación a partir de los 4 años en Educación Infantil y en el primer ciclo de Primaria, así como la anticipación de una segunda lengua extranjera en el tercer ciclo.

Asimismo, tras asumir en 1999 el Programa de Currículo Integrado español-inglés implantado desde 1996, en 2006 se autorizó la implantación experimental del programa bilingüe español-francés, ampliándolo en 2007 al español-alemán. La progresiva incorporación de centros a estos programas evidenció la necesidad de una regulación integral, materializada en la Orden de 14 de febrero de 2013 (PIBLEA) y, posteriormente, en la Orden ECD/823/2018 (modelo BRIT-Aragón).

Durante este proceso han surgido diversas figuras docentes —profesor colaborador, asesor lingüístico, maestro bilingüe, maestro especialista—, suscitando dudas sobre las funciones, competencias y requisitos de titulación de cada uno de ellos que, en muchas ocasiones, generan errores que son detectados por la Inspección en la supervisión del Documento de Organización de Centro (DOC).

Palabras clave: *Inspección, supervisión, titulación, acreditación, bilingüismo, lengua extranjera, funciones.*

Abstract

One of the main lines of innovation in the Spanish education system over recent decades has been bilingual education, aimed at improving students' linguistic competence and preparing them for a globalised context. This approach

is aligned with European educational trends, which strategically promote the early introduction of foreign languages, as these ages are considered particularly favourable for language acquisition.

In this context, the Autonomous Community of Aragón has, since 2001, promoted innovation projects focused on the early introduction of foreign languages in Early Childhood and Primary Education schools (Order of 22 May 2001), regulating their implementation from the age of four in Early Childhood Education and in the first cycle of Primary Education, as well as the introduction of a second foreign language in the third cycle.

Furthermore, after taking over in 1999 the Spanish-English Integrated Curriculum Programme introduced in 1996, the experimental implementation of a Spanish-French bilingual programme was authorised in 2006, later extended in 2007 to Spanish-German. The progressive incorporation of schools into these programmes highlighted the need for comprehensive regulation, which materialised in the Order of 14 February 2013 (PIBLEA) and subsequently in Order ECD/823/2018 (BRIT Aragón model).

Throughout this process, various teaching roles have emerged—such as collaborating teacher, language assistant, bilingual teacher and specialist teacher—giving rise to uncertainties regarding their functions, competences and qualification requirements. These uncertainties often lead to errors that are identified by the Inspectorate during the supervision of the School Organisation Document (DOC).

Keywords: *Inspection, supervision, certification, accreditation, bilingualism, foreign language, functions.*

1. INTRODUCTION

The case addresses an issue frequently identified during the supervision carried out by the Educational Inspectorate, at the beginning of each school year, of the School Organization Document (DOC) in schools implementing a bilingual program, whether under the British Council model or the BRIT Aragón model. This concerns the teaching staff responsible for delivering the bilingual program, the Foreign Language subject, and even the early introduction of a second Foreign Language in the third cycle of Primary Education.

Specifically, the case involves an Early Childhood and Primary Education School (CEIP) in the Autonomous Community of Aragón where the British Council model is implemented, together with the early introduction of French in the third cycle of Primary Education. The school leadership team is newly appointed, under an extraordinary appointment, and may lack sufficient knowledge of the regulations governing the requirements and roles of specialist teachers, bilingual teachers, and language assistants or advisors involved in these programs.

Following the supervision of the School Organization Documents (DOC) and the Annual General Program (PGA), the inspector assigned to the school issues a report on the irregularities identified in order to bring them to the attention of the Provincial Director of Education, recommending that the school be notified of these deficiencies, required to correct them, and requested to submit updated timetables.

INSPECTION REPORT

2. FACTS AND BACKGROUND OF THE CASE

On 30 September 2025, the School Organization Document (DOC) and the Annual General Program (PGA) of CEIP XXXXX, corresponding to the 2025–2026 academic year, were submitted to this Provincial Education Office.

In addition to the analysis of the aforementioned documentation, a specific review has been conducted of the school's Bilingual Program (BP) under the British Council model, as well as of the School Time Organization Project approved in 2017, among other documents.

FIRST. – Curriculum. Weekly timetable by class:

- The analysis carried out confirms that the school complies with the weekly distribution of subject hours established in Annex IIIA of the current curriculum regulations, and no improper division of subjects among two or more teachers has been identified.
- No irregularities have been detected, from a regulatory standpoint, in relation to group timetables or the teaching periods allocated to the different subjects.
- The justification for the school's autonomous teaching time is considered to be aligned in light of the needs of the students.

SECOND. – Programs:

- CEIP XXXXX is part of the British Council program. It has been verified that no modifications have been introduced in the bilingual pathway, with 40% of the curriculum being delivered in English in the subjects of Natural Sciences, Social Sciences, Visual and Plastic Arts, as well as English as a Foreign Language. In addition, a range of complementary bilingual activities has also been planned.

- The school has a School Time Innovation Project, and it has been confirmed that workshops are scheduled in accordance with the number of operational units, as established by current regulations, and that an implementation calendar is in place.

THIRD. – Teaching staff:

- It is confirmed that the timetable of the school management team, with regard to teaching hours with student groups at CEIP XXXXX, complies with the minimum teaching periods established by the applicable regulations.
- With regard to the teaching periods that may be assigned to staff in order to address the various duties established by the applicable regulations, it is noted that the corresponding periods have been duly allocated.
- However, the analysis of the individual teacher timetables has revealed the following irregularities:
 - The language assistant, Ms. YYYYYY, within the British Council program, has been assigned responsibility for teaching and assessing the English subject (Literacy) across the entire Year 1 of Primary Education.
 - Ms. ZZZZZ, a teacher specializing in Early Childhood Education, tutor of Year 2B of Infant Education, and holder of a DELF B2 certificate in French, is teaching the French subject in Year 6B of Primary Education.
 - Mr. PPPPP, a temporary civil servant specializing in Music and appointed to a bilingual Music post (MU2), teaches not only Music and the bilingual subjects in Year 4A of Primary Education, but also the English subject (Literacy).

3. APPLICABLE LEGAL FRAMEWORK

3.1. NATIONAL LEGISLATION

- Organic Law 2/2006 of May 3 on Education, as amended by Organic Law 3/2020 of December 29.

- Royal Decree 1594/2011 of November 4, establishing the teaching specializations of the Corps of Teachers serving in the Early Childhood Education and Primary Education levels, as regulated by Organic Law 2/2006 of May 3 on Education.

- Royal Decree 1041/2017 of December 22, establishing the minimum requirements for Basic Level certification, setting the core curriculum for the Intermediate B1, Intermediate B2, Advanced C1, and Advanced C2 levels of Official Language Education regulated by Organic Law 2/2006 of May 3 on Education, and establishing the equivalencies between the different Official Language Education curricula and those regulated by this Royal Decree.

- Resolution of March 3, 2021, of the Technical General Secretariat, publishing the Agreement between the British Council Delegation in Spain and the Government of Aragón for the implementation of integrated curriculum projects and joint educational activities, as subsequently extended by the Resolution of January 22, 2025.

3.2. REGIONAL LEGISLATION (ARAGÓN)

- Order of June 26, 2014, of the Regional Minister for Education, Universities, Culture, and Sport, approving the Instructions governing the organization and operation of Public Early Childhood and Primary Education Schools and Public Special Education Schools in the Autonomous

Community of Aragón, as subsequently amended by the Order of December 21, 2015, and Order ECD/598/2016.

- Order ECD/853/2022 of June 13, approving the curriculum and the characteristics of assessment for Early Childhood Education and authorizing its implementation in educational institutions of the Autonomous Community of Aragón.

- Order ECD/1112/2022 of July 18, approving the curriculum and the characteristics of assessment for Primary Education and authorizing its implementation in educational institutions of the Autonomous Community of Aragón, as amended by Order ECD/866/2024.

- Order ECD/934/2025 of July 24, approving the instructions for Public Early Childhood and Primary Education Schools and Public Special Education Schools in the Autonomous Community of Aragón for the 2025–2026 school year.

- Order of June 17, 2010, of the Regional Minister for Education, Culture, and Sport, regulating the authorization procedure for teaching a Second Foreign Language in Early Childhood and Primary Education schools in the Autonomous Community of Aragón.

- Order ECD/823/2018 of May 18, regulating the Aragón BRIT Model for the development of communicative competence in and through foreign languages in public non-university educational institutions of the Autonomous Community of Aragón.

- Order ECD/63/2016 of February 16, regulating the implementation of educational projects for the organization of school time in Early Childhood and Primary Education schools and Special Education schools in the Autonomous Community of Aragón supported by public funds, and announcing the call for applications for the 2016–2017 school year.

- Resolution of June 15, 2020, of the Director General for Planning and Equity and the Director General for Innovation and Vocational Education and Training, authorizing the consolidation of the educational projects for the organization of school time approved by the Resolution of March 28, 2017, of the Director General for Planning and Vocational Education and Training and the Director General for Innovation, Equity, and Participation.

4. ANALYSIS AND ASSESSMENT IN ACCORDANCE WITH THE APPLICABLE REGULATIONS

First. – Regarding the assignment of the English subject to the language assistant in the first year of Primary Education

CEIP XXXXX implements the British Council program in accordance with the provisions set out in the Resolution of March 3, 2021 of the Technical General Secretariat, publishing the Agreement between the British Council Delegation in Spain and the Government of Aragón for the implementation of integrated curriculum projects and joint educational activities.

This Resolution establishes that the integrated curriculum must be delivered by qualified teachers, expressly distinguishing between civil servant teaching staff and language assistants, and setting out the functions of the latter in Annex III.

In accordance with this Annex, the functions of language assistants are limited to advisory tasks, collaboration, the development of teaching resources, and support for teachers in achieving the objective of developing students' communicative competence in English through teaching strategies that facilitate the delivery of the integrated curriculum of the Bilingual Education Program.

This staff, pursuant to Section Two of the Resolution of June 5, 2018, of the Director General for Innovation, Equity, and Participation, authorizing the incorporation of public non-university educational institutions in the Autonomous Community into the Aragón BRIT Model for the development of communicative competence in and through a foreign language from the 2018–2019 school year onward, are also subject to the functions established in article 36 of Order ECD/823/2018 of May 18, regulating the Aragón BRIT Model, including the following:

- a) Promoting, together with the foreign language teacher, the active participation of pupils in order to enhance the development of oral competence.
- b) Encouraging flexible grouping arrangements (small groups or split classes without the presence of the class teacher), preferably in the foreign language and exceptionally in AELEX.
- c) Collaborating with foreign language teachers in assessing students' progress in oral competence.
- d) Participating in evaluation alongside the IB teaching staff for the groups of pupils they support.

e) Promoting the improvement of linguistic and methodological competence among IB teaching staff.

From the foregoing, it follows that under no circumstances does the applicable legislation assign to language assistants the responsibility for directly teaching the English subject as a First Foreign Language, even where such assistants may individually hold the required qualifications.

Furthermore, and in accordance with article 93 of the Organic Law on Education (LOE), as amended by the Organic Law 3/2020 (LOMLOE), holding the qualification of Primary Education Teacher or an equivalent degree is a mandatory requirement for teaching in Primary Education. The aforementioned provision also expressly establishes that the teaching of foreign languages must be carried out by teachers with the appropriate specialization or qualification.

Having reviewed the file of Ms. YYYYYY, held by this Provincial Service, it has been established that, by virtue of the recognition of her qualifications by the Ministry of Education and Science, she is authorized to teach in Secondary Education in the subjects of English, Spanish and French, exclusively in private schools.

However, Ms. YYYYYY holds the position of Language Assistant within the British Council program at CEIP XXXXX; therefore, her role must be limited to the functions established in the Resolution governing the program, which in no case include the direct teaching of curricular subjects.

CEIP XXXXX has, in the current 2025–2026 academic year, a sufficient number of teachers with the required qualifications for these roles: five permanent teachers specialized in Foreign Language (English – BRIT) for the delivery of the foreign

language and bilingual subjects; one permanent teacher with PR2 specialization (Primary Education with B2 level in English); one temporary teacher with MU2 specialization (Music with B2 level in English) for bilingual subjects; and three permanent teachers with EI2 specialization (Early Childhood Education with B2 or dual specialization EI+FL).

Second. – Regarding the teaching of the French subject in the sixth-grade, Group B, Primary Education class by Ms. ZZZZZ, an Early Childhood Education teacher holding a DELF B2 certificate in French

Article 3.2 of the Royal Decree 1594/2011 establishes the requirement to hold the corresponding specialization in order to teach a Foreign Language in Primary Education.

Ms. ZZZZZ holds a Degree in Early Childhood Education and possesses a DELF B2 certificate in French; however, there is no evidence of the acquisition of any additional qualification or teaching authorization.

The Annex to the aforementioned Royal Decree sets out the requirements for the acquisition of new teaching specializations or the recognition of teaching authorizations, specifying, among the requirements for the Foreign Language (French) specialization, that the applicant must "hold an Advanced Level Certificate or a Certificate of Aptitude issued by the corresponding Official School of Languages".

These two certificates refer to those issued under the regulations established by the Royal Decree 1629/2006 of 29 December (Advanced Level Certificate) and the Royal Decree 967/1988 of 2 September (Certificate of Aptitude), both of which

correspond, in equivalence terms, to an Intermediate B2 level certificate established by the Royal Decree 1041/2017 of December 22.

It must also be noted that the regulation expressly requires such certification to be issued by an Official School of Languages; therefore, certificates issued by other institutions attesting a B2 CEFR level are not considered valid for this purpose.

Furthermore, her degree does not qualify her to teach in the Primary Education stage.

It is therefore concluded that the teacher does not meet the required qualifications, both in terms of specialization and linguistic certification, in accordance with the established regulatory requirements.

Third. – Regarding the teaching of the English (Literacy) subject in the fourth-grade, Group A, Primary Education class by Mr. PPPPP, a temporary Music teacher occupying a bilingual Music position (MU2):

Mr. PPPPP is assigned, for the current school year, to a vacant bilingual Music position in English (MU2). He holds the Music teaching specialization, which qualifies him to teach the Music subject and the subjects corresponding to the Primary Education specialization, as provided for in article 3.3 of the Royal Decree on Teaching Specializations.

Additionally, by holding a B2-level certification in English according to the CEFR, and pursuant to article 29 of Order ECD/823/2018, he is authorized to teach non-linguistic subjects in English within the bilingual program.

However, teaching the English subject as a Foreign Language (Literacy) requires the corresponding specific specialization or teaching qualification, as established in article 93 of the LOE/LOMLOE. Since the teacher neither belongs to the Foreign Language specialization nor holds the corresponding teaching authorization, the assignment of that subject is not in accordance with the law.

5. CONCLUSIONS

In light of the foregoing, it is concluded that:

First: The integrated curriculum of the British Council Program must be delivered by properly qualified teaching staff. The language assistants must therefore be limited role to providing support, advice, and collaboration, without assuming the teaching responsibilities inherent to the formal instruction of the Foreign Language subject.

Second: The teaching of the Second Foreign Language (French) in the third cycle of Primary Education corresponds to teachers holding the relevant specialization in French or the corresponding teaching qualification, as established by the Royal Decree 1594/2011.

Third: Likewise, the Foreign Language subject –English (Literacy)– within the British Council Program must be delivered by teachers with a specialization in English or the corresponding qualification. This is without prejudice to Primary Education teachers holding a B2-level under the CEFR being authorized to teach non-linguistic subjects within the bilingual program.

Consequently, the timetables of the teaching staff analysed must be reviewed and modified in order to ensure full compliance with current regulations.

6. PROPOSAL

In light of the foregoing, the undersigned Inspector considers it appropriate to notify CEIP XXXXX of the irregularities identified, together with the corresponding legal grounds, requiring the adoption of the necessary measures to remedy them, as well as the submission of the duly revised teaching timetables.

Zaragoza, on the date of electronic signature

APPROVED BY THE CHIEF INSPECTOR
EDUCATION

THE INSPECTOR OF

Signed:

Signed:

TO THE PROVINCIAL DIRECTOR OF EDUCATION, SCIENCE AND
UNIVERSITIES OF ZARAGOZA

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