Response to City of Edinburgh Council Consultation on the draft Gaelic Language Plan 2018-2022

Prepared by

Comann nam Pàrant (Dùn Èideann)

Parent Council Bun-sgoil Taobh na Pàirce

Introduction	. 3
Summary	3
Engagement with Parents and the Gaelic Community	4
Detailed Consultation Questions	. 5
Question 4: Comments and Suggestions about the Vision and Principles	5
Question 5: Comments and Suggestions relating to the six Strategic themes and Commitments	5
Question 6: Comments and Suggestions relating to Service Standard Commitments	6
Questions 7-9: GME pre 0 – 6 Months	6
Questions 10-12: GME 0 – 3 Years	7
Questions 13- 15: GME 3-5 Years	7
Questions 16 – 18: GME 5-11 Years	8
Questions 19 – 21: GME 11-18 Years	11
Conclusion	16
Appendix 1: Response to the draft National Gaelic Language Plan 2017-22	17
Appendix 2: Sustainable GME development	26
Appendix 3: Secondary GME vision	35

Introduction

We are writing in response to the City of Edinburgh Council's consultation on the draft Gaelic Language Plan – Second Edition, February 2018 to September 2022 ("the GLP").

Comann nam Pàrant is a constituted voluntary organisation which represents parents and carers with children in all stages of Gaelic-medium education ("GME"). Comann nam Pàrant (Dùn Èideann) ("CnPDE") is part of a network of local parent groups, which are represented on a national committee – CnP Nàiseanta.

Parent Council Bun-sgoil Taobh na Pàirce ("the Parent Council") is a voluntary organisation which represents families attending Bun-sgoil Taobh na Pàirce and Sgoil-àraich Taobh na Pàirce (Edinburgh's Gaelic-medium primary and nursery schools).

Much of GME development over the years has been parent-led and parents provide a significant amount of expertise about the challenges which face GME development.

Throughout this response we make reference to the term *expansion of GME*. This refers to:

- An increase in capacity, i.e. the number of GME school places available.
- An increase in the number of teachers capable of delivering GME immersion education.
- An increase in the number of subjects delivered through Gaelic at secondary.

Summary

Feedback from GME families at engagement events has established the following agreed positions:

- We are positive about the benefits of the collaborative approach used to produce a significant part of the draft GLP. The draft GLP is aspirational and positive and reflects the collaborative co-production process.
- We recognise that the educational aspirations in the draft GLP will only be achieved by increasing and improving GME teacher recruitment and retention.
- We support the position that GME should remain open to all families in Edinburgh
 who wish it for their children. To support this position GME will need expansion in
 capacity, in numbers of teachers at all levels, and in subjects being delivered at
 secondary level.
- We will support a plan to expand capacity only if it is accompanied by a detailed plan from Edinburgh Council outlining the numbers of teachers required to meet projected growth and showing how they will recruit and retain the required number of teachers.
- We would like the GLP to more specifically recognise that children in GME are entitled to an immersive education as detailed with the current legal framework.

GME provision must follow the best practice of immersion as outlined in the Foghlam Alba/ Education Scotland Advice on Gaelic Education:

Children and young people need to experience high-quality total immersion as part of Gaelic Medium Education until they have a secure foundation in the language and a level of fluency that will enable them to build on the progress made in Gaelic.

(Page 15 Foghlam Alba/ Education Scotland Advice on Gaelic Education)

- We expect to see a detailed plan for any expansion in capacity, teachers and increased subject delivery, which includes people responsible for each action and dates it is to be achieved. We believe that the Council's Gaelic Implementation Group ("GIG") should monitor and manage this.
- We welcome the very strong focus on GME in the GLP, and our parent group is naturally most concerned with GME. However, we recognise the huge importance of GLE to Gaelic development in the city and would like to see much more detail and aspiration around the part it can play in the next five years.
- To support the above, and achieve the aims of the GLP, the current resource of only
 a part-time Gaelic Development Officer needs to be supplemented by at least one
 additional full time Gaelic Development Officer with a specific remit for
 implementing the Educational aspects of the GLP.

Engagement with Parents and the Gaelic Community

CnPDE and the Parent Council engage with GME parents and other members of the Gaelic community in Edinburgh through regular open meetings. Publicly available documents produced to respond to consultations are circulated to all parents prior to submission, and therefore can be considered a consensus view of the GME parent group in Edinburgh.

Two well-attended meetings were held during October 2017 to discuss the content of the draft GLP and our response. The focus of these meetings was to consider what GME parents and the Gaelic community would like to see in the final version of the GLP.

The key questions discussed were:

- What should GME provision in Edinburgh look like in 2022?
- How will we provide a basis for development for the ten years after that?
- What are the key actions that we need to see happen to provide certainty of pathway for GME families in the future?

A further two meetings were held in late November specifically to discuss this draft response with parents.

Earlier in November 2017 an open meeting was held to gain more information about the development of GME in Glasgow, and in particular the transition to a GME secondary school. The speakers were Dr Donalda McComb, Head Teacher of Sgoil Ghàidhlig Ghlaschu (SGG), and Donald Iain Brown, chair of the Parent Council during the transition. The experience of Glasgow development is helping to inform views about the future development of GME in Edinburgh.

Important parent meetings took place earlier this year to discuss our response to the consultation on the draft National Gaelic Language Plan 2017-22. The result of these discussions and parents' views are set out in our formal response to the consultation (Appendix 1) and attached document on Sustainable GME development (Appendix 2).

During 2015 we held a series of meetings to discuss the future direction of secondary GME in Edinburgh. The results of these discussions are set out in our summary secondary vision (Appendix 3). We have returned to the question of GME secondary development on many occasions since 2015, and we can confirm that the priorities of parents have not changed.

Detailed Consultation Questions

The following points are arranged to correspond with the questions in the online response survey for the draft GLP:

Question 4: Comments and Suggestions about the Vision and Principles

The vision is very positive about support for Gaelic.

The principles reflect well that the Gaelic community is diverse and thriving. The community is also growing with both new adult and new young speakers.

The principles rightly reflect the equal status in law of the language. The special status of Edinburgh as our capital city should be reflected, with a commitment to work with national institutions to improve visibility and promotion of the language.

Question 5: Comments and Suggestions relating to the six Strategic themes and Commitments

Overall the strategic themes and commitments are positive.

Education:

There should be a commitment to providing certainty of pathway for children within GME, i.e. in ensuring that children can transition with certainty from one stage to the next.

There should be a commitment to the continuing growth and development of Gaelic education and the Gaelic language in Edinburgh. Alongside this, families want to see a focus on the quality of the Gaelic education being delivered, and a recognition of the entitlement of children in GME to an immersion education.

Supporting co-production approaches in the delivery of community commitments is a good strategic idea as it has been shown to work effectively with education.

Edinburgh Council's GLP should also include a commitment to increase the visibility of Gaelic in the city.

Culture and Arts and Heritage:

We agree that this is an important strategic theme and consider that there should be much more ambition and detail in relation to the commitment on a future Arts strategy. The draft GLP currently focuses on children going through GME as part of its overall vision of developing more fluent and confident speakers. However, those children cannot become confident adult speakers of the language if it is confined to being a language of the classroom and thus it will be difficult to achieve that vision without greater out-of-school and community activity including an arts strategy. Arts-related activities help bring different parts of the Gaelic community together (Strategic theme 3: community) and offer the opportunity for children to encounter Gaelic-speaking adults of all ages.

The draft Gaelic Language Plan currently being consulted on by Glasgow Council sees Gaelic arts as one of its priorities, and the many ways in which Gaelic arts are included in the wider life of the city are acknowledged. We would welcome similar weight being given to arts and culture in Edinburgh Council's plan. This would best be supported by the appointment of a Gaelic Arts officer tasked with the creation and delivery of an arts strategy for Edinburgh.

A plan, which aims to create a thriving Gaelic culture in the city of Edinburgh, would help to strengthen the Gaelic speaking community and support the delivery of the draft GLP's other aims. It would also help in the recruitment and retention of GME teachers by making Edinburgh an attractive city for Gaelic speakers to live in.

Question 6: Comments and Suggestions relating to Service Standard Commitments

The service standard commitments are positive in that they aim to increase the visibility of Gaelic in the city, and are sensitive to the children who are being raised as Gaelic speakers.

Questions 7-9: GME pre 0 – 6 Months

It is difficult to rate the future state actions in order of importance, as it will be necessary for a number of different actions to take place simultaneously to achieve the aims of the GLP.

The most important aspect of education at this very early stage is to ensure that families have an awareness that Gaelic is part of the education system, and that they are able to access opportunities to learn the language and participate in Gaelic community events.

Consideration should be given to best practice in the delivery of minority languages elsewhere in Europe for this age group.

Questions 10-12: GME 0 – 3 Years

It is difficult to rate the future state actions in order of importance, as it will be necessary for a number of different actions to take place simultaneously to achieve the aims of the GLP. For example, it may not be possible to expand Cròileagan services without doing more to develop and encourage staff.

Engagement with Cròileagan families shows that they value accessibility of playgroups, certainty of progression to Sgoil-àraich, and resources to support their family learning. The actions should focus on these themes.

Further actions could be taken to support families who are not able to access Cròileagan with their children due to working hours, but may wish to start learning Gaelic as a family when their children are very young. Families in this position may be able to access Gaelic community events, playgroups and learning opportunities at weekends. Support for these should be considered in the plan.

Questions 13- 15: GME 3-5 Years

It is difficult to rate the actions in order of importance, as it will be necessary for a number of different actions to take place simultaneously to achieve the aims of the GLP. It is also important to note that an expansion of capacity of Sgoil-àraich provision, and expansion of staff to deliver this, is important to meet the aim of continuing to provide access to GME – it is not necessarily helpful at this stage to rate one type of expansion over another. All practical options should be considered.

The key point of concern to parents with children in this age group is the lack of capacity. This needs to be addressed urgently. As the data shows, younger **children are unable** to access Gaelic-medium pre-school care for the full period of their entitlement. In our engagement with parents the lack of capacity is a current problem that is affecting families.

Immersion in the early years is very important in preparing the children for school and ensuring that all the children entering primary school are doing so with a solid background in Gaelic. Denying some children access to GME for a period of their education disadvantages them individually but also disadvantages their peers who may have had access to GME and makes full-immersion from C1 difficult for teachers to achieve.

Of the current cohort of Clas 1s (17/18) – 26 of the 79 children did not attend Sgoil-àraich (Gaelic nursery). Having a third of the children with little or no Gaelic at the start of Clas 1 presents an additional challenge to Bun-sgoil Taobh na Páirce, on top of the challenges already presented by having such a large year group in what had been a two stream school.

We note that the decision to increase the funded hours available to families of nursery aged children is a positive development, but unless capacity of provision and staffing is increased this will have a negative effect on delivery of GME. Sgoil-àraich would have to double

capacity just to cope with current numbers. Current capacity does not meet current demand and is resulting in disadvantage to children's entitlement to GME.

In order to properly address capacity concerns, the key points to consider are location, staffing, and the existence of wraparound care on site to allow accessibility for working families.

There is no specific action that recognises the importance of a Gaelic-medium wraparound service on site. This is a key factor in the accessibility of nursery provision and the creation of an immersion environment.

The GLP should also reflect that Edinburgh Council would support and welcome investigation of potential methods of addressing this need for capacity, for example private nurseries who are looking for partner provider status.

Questions 16 – 18: GME 5-11 Years

It is difficult to rate the future state actions in order of importance, as it will be necessary for a number of different actions to take place simultaneously to achieve the aims of the GLP. For example, a new Bun-sgoil will require an increase in the number of teachers, so actions relating to recruitment and retention of teaching staff should rate just as highly as any actions relating to expansion of physical capacity. It is not possible to separate the two and to rate them differently.

It is not appropriate to include Additional Support Needs within the 5-11 Actions. Additional Support Needs requires a separate section and should be considered throughout the whole period of education. GME schools require additional resource to support Gaelic literacy in addition to other learning support needs.

An increase to primary school GME capacity is very important. In our engagement with parents and carers this issue was raised consistently. This second site should be in another part of the city to allow wider access to GME. Expansion of both staff and physical capacity will ensure GME stays open to all and will support development at secondary level.

The type of school (new build or refurbishment) is not as important as ensuring there is adequate staffing to deliver an immersion education. Location is important to ensure accessibility throughout the city, as is the provision of onsite wraparound care.

The key action that requires urgent attention is to ensure there are adequate numbers of Gaelic speaking staff to deliver the GME entitlement of Gaelic immersion. As parents and carers we are aware that none of the children at Bun-sgoil Taobh na Pàirce are receiving a fully immersive experience. The school management has had to be creative with class cover as it is not possible to fully staff the school with fluent Gaelic speaking teaching staff.

The responsibility for teacher recruitment and retention lies with the education authority, as set out the Statutory Guidance on Gaelic Education:

2.57 The recruitment and deployment of teachers, including GME teachers, is a matter for education authorities who are responsible for providing a complement of teachers, including GME teachers, which meets the needs of each of their schools and its pupils in light of the resources available.

We consider that Edinburgh Council needs to be more proactive and creative about how we recruit Gaelic speaking teachers. We understand there are challenges, but there are actions that the Council can take to make Edinburgh more attractive for GME teachers. Recruitment and retention requires a more strategic approach, and more focus from an additional full-time dedicated education Gaelic Development Officer.

As can be seen in Appendix 2: Sustainable GME development, CnPDE has given consideration to this issue and proactively suggested strategies that could be in place, at both a national and a local level. Implementation of these measures for teacher recruitment and retention would result in a more effective immersion experience.

Edinburgh housing costs can be prohibitive for teachers, particularly in comparison with Glasgow, which now has two GME primary schools and is planning to open a third. Teachers considering working and living in Edinburgh are making realistic decisions based on how far their salary goes in each city. An independent cost of living website illustrates how cost of living compares in Edinburgh to Glasgow:

- Consumer Prices in Edinburgh are 4.50% higher than in Glasgow
- Consumer Prices Including Rent in Edinburgh are 8.55% higher than in Glasgow
- Rent Prices in Edinburgh are 19.95% higher than in Glasgow
- Restaurant Prices in Edinburgh are 4.71% higher than in Glasgow
- Groceries Prices in Edinburgh are 10.87% higher than in Glasgow
- Local Purchasing Power in Edinburgh is 14.77% lower than in Glasgow

Source: https://www.numbeo.com/cost-of-

living/compare_cities.jsp?country1=United+Kingdom&city1=Glasgow&country2=United+Kingdom&city2=Edin burgh

This comparison is for two major cities. Smaller locations, with much lower costs of living, offer teachers a better quality of life.

"New research from Bank of Scotland shows that Edinburgh is the most expensive property location on a per square metre basis at £2,492 compared to the Scotlish average of £1,529. Edinburgh is the only town in Scotland to have an average house price per square metre higher than the British average of £2,260."

(Scottish Business News Network 31/7/17, "So where is the most expensive place to live in Scotland")

Precedent exists for a local authority offering a financial incentive to attract GME teaching staff. Aberdeen has offered a financial incentive to fill a GME secondary post at Hazlehead Academy, and in addition Argyll & Bute offers an attractive relocation package to all teachers.

Similar measures should be considered by Edinburgh Council to attract and retain teachers.

We want to see specific, measurable actions in the plan for how this issue will be dealt with, such as:

- Offering financial incentives to teachers to move to Edinburgh.
- A full time Gaelic Development Officer working specifically in education, in addition to the current part-time post.
- Strengthening of representation from Edinburgh Council on GIG. It is important that the representatives from all Council Departments are involved with GIG, including HR, Estates, Management, Signage, Arts and Culture as well as Education. While the Stakeholders who attend GIG are in a position to inform and advise on Gaelic issues it is the officers from these areas within Edinburgh Council who are in a position to implement Action points of the GLP.

The timing of any additional provision needs to be clear. By November 2017, 75 children were enrolled for Clas 1 for August 2018. The result is that Bun-sgoil Taobh na Pàirce will be at capacity in 2018 or 2019 (if space is used creatively).

It is essential that we have in place concrete proposals for additional primary GME provision by April 2018.

Failure to provide additional capacity once Bun-sgoil Taobh na Pàirce reaches capacity and failure to provide the GME teaching staff required at primary will result in a situation where children are denied access to GME and those in GME are denied their entitlement to an GME immersion education.

Consideration must be taken of the needs of staff in the GME context, with an understanding that delivering CfE through Gaelic requires additional input of teacher time and increases their workload. When Edinburgh Council commits to delivering GME, it also needs to commit to supporting staff, both recognising the extra workload required to deliver GME and making time for them to maintain and improve their Gaelic skills in language and literacy. For example:

- Staff with fluent language and literacy are often required to develop their own teaching materials to deliver GME. This is an additional workload not required of teachers in non-GME schools.
- Staff who do not have fluent Gaelic language and literacy skills but are motivated to improve, need to be given time within their workload to develop.

Supporting this will increase the number of teachers capable of delivering GME and help in the long term to increase the quality of immersion education. The extra time and workload involved needs to be financially rewarded. Recognition of this requires a specific action point in the GLP.

Facing the challenge of recruiting and retaining GME staff, Bun-sgoil Taobh na Pàirce has, in the current academic year, introduced a new multi- teacher arrangement in the upper primary school. While we welcome the creative approach of the school to dealing with the

problem of finding suitable GME teachers, we are concerned that the language acquisition of pupils may be compromised. These arrangements are being forced upon the school due to lack of adequate resources in terms of recruitment and retention of teachers and are not based on any model or research suggesting that a multi-teacher arrangement is advantageous to pupils in this age group.

As Bun-sgoil Taobh na Pàirce is unique within Edinburgh Council's schools it is difficult to have peer related school to school evaluations as happens with other schools within cluster groups. It is therefore difficult to evaluate standards and practices. We ask that Edinburgh Council engage with other local authorities delivering GME to make arrangements for GME based peer review evaluations and sharing of best practice.

Out of school activities:

The inclusion of Sradagan and out of school activities is not appropriate in this section. There should be a separate section of the GLP to cover support for out of school activities. Out of school activities need to be addressed separately as they are important to ensure children see Gaelic as more than a language of the classroom.

Questions 19 – 21: GME 11-18 Years

We welcome the inclusion of positive and wide-reaching actions on the delivery of 11-18 GME and consider that these can form an effective core of the future development of secondary GME in Edinburgh.

It is difficult to rate the future state actions in order of importance, as it will be necessary for a number of different actions to take place simultaneously to achieve the aims of the GLP.

As is noted in the engagement outcomes detailed in the GLP, an important priority for parents is that there will be certainty in the delivery of GME in the future for their children and that this will include a secure and enhanced Gaelic-medium experience at secondary school.

We are aware from our engagement with parents and carers that there is a great deal of anxiety about what the future of GME will look like, particularly for those whose children are in C4 and C5 which are the first large year groups following the opening of Bun-sgoil Taobh na Pàirce. It is therefore a very positive step forward to see the focus in this part of the GLP on future actions which aim to enrich and develop secondary GME and place it on a secure footing on an established site into the future. This includes, in particular, commitments:

- To enhance the GME unit at JGHS and to expand the GME curriculum base (Action 1);
- To consider the transfer of secondary GME to a site with capacity to deliver GME for at least 20 years, only once the expansion of provision is delivered at JGHS (Action 3); and

• To enter discussions with the Scottish Government and Bord na Gaidhlig about resourcing of options for future secondary expansion by 2022 (Action 6)

Current secondary GME arrangements:

The various actions in the GLP which support the development of the current secondary GME arrangements at JGHS are welcomed. Under the new GLP there is the real possibility of positive developments for secondary GME in its current setting and it is our position that this is essential for the future of GME both at JGHS and at any other site in the future.

Subject areas

A core concern in the future development of secondary GME is that a greater percentage of the timetable should be delivered through the medium of Gaelic, as is acknowledged in the GLP. As matters currently stand there are no certificated subjects offered in Gaelic, other than Gàidhlig, and the recent loss of a teacher has meant that classes expected to take National 5 examinations in Nuadh-Eòlas (Modern Studies) through Gaelic have been transferred to the English-language curriculum. There is therefore a clear and urgent need both that more subjects are taught through Gaelic, and that certificated subjects in Gaelic can be offered.

We welcome the inclusion of an aim of delivering more Curriculum for Excellence subjects through Gaelic (Action 5). However, the formulation of a measurable objective in the form of a commitment to a specific number of subjects delivered through Gaelic and offered as certificated courses would make this a more concrete demonstration of the GLP's aims.

We propose that a minimum of six subjects should be offered through Gaelic with at least four of those being certificated subjects. An unambiguous objective such as this would help future planning by focussing efforts on the enhancement and expansion of GME. Without a specific measurable objective there is the risk that expansion of subject provision, which all wish to see, will once again fail to occur.

The development of e-sgoil and its inclusion in secondary GME in Edinburgh could play an important part in curriculum development and the effective delivery of subject areas through Gaelic. However, there needs to be an understanding that this could not act as a replacement for Gaelic-speaking teachers, but could act as a supplement for the delivery of specific course material and subject areas.

Staffing

It is recognised in the GLP and the establishment of a unit at JGHS which can deliver curriculum depth and strength is an essential part of the future enhancement of secondary GME. It is of concern that recent proposals to create such a unit have not been progressed and we would like to see this fundamental issue addressed immediately.

We note that an action from the last GLP to survey staff within the authority to establish if there are existing Gaelic speaking teachers who may be able to teach through Gaelic was

not carried out. We welcome the inclusion of an action point in the current GLP which would see this taking place, and in addition look at barriers to the movement of teachers into GME (Action 10) and ask that this be undertaken as an immediate priority. This is a potentially important source of teaching staff but until such a survey is carried out it is not possible to assess its actual significance.

Recruitment and retention of staff has in the past proved difficult and it is recognised that those qualified to teach secondary GME are a small group. It is therefore important that a specific strategy to encourage relevant staff into GME in Edinburgh should be elaborated and that this should go beyond standard advertising practices. This could include engagement with relevant students in teacher training and the offer of incentives to work in Edinburgh.

We also consider that a creation of a strong and positive plan for GME in Edinburgh which includes specific targets for growth in secondary teacher numbers and subject areas will also help encourage GME teachers into Edinburgh.

Over and above core classroom teaching and the provision of a broader range of subjects in Gaelic, other action points in the GLP which aim at making GME a more immersive experience with increased levels of fluency for pupils (such as Action 5 and Action 10) are grounded in the provision of appropriate staff numbers and this also makes staffing a core issue in secondary GME.

Transition to new secondary arrangements:

We welcome the inclusion of an action point (3) elaborating a vision for transition of secondary GME to another school site based on:

- the expansion of provision of JGHS in advance of transition through the establishment of a GME unit
- the importance of taking into consideration of any expansion in primary GME numbers
- the need to incorporate long-term planning to ensure both quality of provision and also the capacity for expansion of GME
- the need to provide a site which would suitable for use for up to 20 years.

We consider that it is vital that future planning for a transition to new secondary arrangements on a new site are underpinned by proper embedding of a GME unit at JGHS which includes increased staff numbers, a broad curriculum of subjects delivered through Gaelic and a staff member or members with specific responsibility for delivery of the GME curriculum. Failure to create a coherent and ambitious GME arrangement at JGHS before any move takes place creates a risk that both transition and new secondary arrangements may themselves fail.

Any change in current secondary arrangements will require detailed planning and a collaborative process involving Edinburgh Council, parents and GME staff. Although transition to a new site is a physical process, with all that entails, it should be guided by the educational needs of the children, which is its core purpose, and education should be

integral to all planning connected with a move. Some of the main issues which we expect to be included as part of transition planning are:

- Establishment of functioning GME unit at JGHS with staff able to deliver a minimum of six subjects through Gaelic, four of which should be certificated courses.
- Discussions with all stakeholders on location of new school and visibility of detailed transition plan
- Employment of senior staff (Head teacher or Deputy Head Teacher) well in advance of transition to lead on educational issues be involved in transition planning.
- Detailed transition arrangements for C7 for new school
- Planning for the maintenance of GME at JGHS for children remaining at JGHS
- An additional Edinburgh Council Gaelic Development Officer employed on a full-time basis and tasked with delivery of the plan to expand GME.

By the end of the period covered by this GLP, there will be over 200 children in secondary GME. Delivering six subjects through the medium of Gaelic to these children, and working across two physical sites, will require a **significant increase in the current staffing numbers**. This requires initial and ongoing investment.

It is essential that a long-term plan for any new secondary arrangements is discussed, created and articulated prior to those arrangements being put in place. It is necessary for parents with children transitioning to secondary to have a clear view of how long those arrangements will be in place and how they are to develop, which will allow them to take decisions for all of the children in their family. That is the reason why a robust and durable arrangement that will be viable for at least 20 years is so important to GME families.

Our expectation is that Edinburgh Council will lead in the creation of a detailed plan and timeline for transition of secondary arrangements, and will demonstrate that adequate staff numbers will be in place (including senior level staff) to allow course planning, smooth transition, and a maintenance of educational standards.

Glasgow model:

We consider that a valuable insight into how a successful transition to a GME secondary school might be carried out can be gained from the experience in Glasgow. This is the closest comparable situation to the one which faces secondary GME in Edinburgh at present. Understanding the issues faced there and how they were dealt with provides an important and constructive guide. In particular, the following are of particular significance:

- Detailed projection of numbers were taken into account and a site was identified that would allow for the projected growth of the school well into the future.
- A detailed transition plan was put in place well in advance of opening the school which took into account the needs of pupils already in the GME unit at Hillpark secondary.

- Expansion of both staff and of GME subject provision at Hillpark prior to the opening of SGG which then formed the basis of staff at SGG.
- A speculative advertisement for secondary staff already working within the authority yielded an unexpected number of existing teachers available to be transferred to SGG.
- The need for and ability of members of staff to teach more than one subject.
- A support programme for GME teachers which included;
 - o time for teachers to prepare materials;
 - classes to increase confidence in teaching through the medium of Gaelic;
 - help with literacy in Gaelic;
 - opportunities to network with GME teachers already teaching in other places in Scotland;
 - o help with preparing to deliver an additional subject;
 - full-time employment even though actual teaching time was significantly less than this;
 - up to four months of employment before the secondary opened to give time for this support and development.
 - Fixed-term contracts were used (and still are) for non-Gaelic speaking teachers where an appropriate Gaelic speaking member of staff could/cannot be recruited.
- The key role played by a Quality Improvement Officer with specific responsibility for GME and for supporting and delivering the school.

It is noted that an important part of the success in establishing and developing SGG was the possibility of offering a wide range of subjects from the outset, including the provision, through the medium of Gaelic of Geography, History, Gàidhlig, English, Mathematics, French, Home Economics, Religious Education, English, Drama, Science (Physics and Biology), ICT, Business, Science, PSE, Art and Music. The school had 14 teachers, one DHT and a Head Teacher.

As noted above, we agree strongly with the overall vision for Gaelic expressed in the GLP, that Edinburgh is a city that develops and supports more fluent and confident Gaelic speakers. Secondary GME is a key part of that vision as it is the main pathway for children coming from primary GME to develop fluency as adults. It is therefore essential to the success of the GLP's vision that secondary GME is strong and confident with a clear path for the future.

We welcome the very positive action points for secondary GME in the draft GLP. However, there is a need to ensure that the final version of the GLP includes very specific and measurable actions to take forward the enhancement and expansion of secondary GME. Without definite commitments and real evidence of a durable plan which can be taken forward into the future, it will be difficult for parents to buy into a vision of secondary growth and for the objectives of the GLP to be realised.

Conclusion

Our community welcomes and is positive towards this draft Gaelic Language Plan. It reflects a Council that rightly celebrates what Gaelic brings to Edinburgh as a community and is appropriate for the special status of Edinburgh as our capital city.

The proposals in this draft reflect that the co-production process has worked effectively with regard to Gaelic education, and the level of ambition matches that of the Gaelic community in Edinburgh. For this ambition to be realised, the GLP needs to adequately reflect the investment and planning that is necessary for these proposals to succeed.

Specifically:

- The attraction and retention of Gaelic speaking teaching staff to deliver the GME entitlement of Gaelic immersion.
- The appointment of an additional full time Gaelic Development Officer working specifically in education to help support planning and delivery of GME.
- Thought and forward planning to match any capital investment in the expansion of GME at all levels to help ensure success of the system and to provide certainty to families of the pathway through GME from 0-18.
- A wider reflection of the community and cultural importance of Gaelic, outside education. In terms of culture, art and heritage there should be much more ambition and detail.

An Dùbhlachd / December 2017

Appendix 1: Response to the draft National Gaelic Language Plan 2017-22

Response to the Public Consultation on the National Gaelic Language Plan 2017-22

Comann nam Pàrant (Dun Èideann) (CnPDE) is a voluntary organisation representing parents and carers with children at all levels of Gaelic-medium education (GME) in Edinburgh. We welcome the opportunity to comment on and provide input for the draft National Gaelic Language Plan 2017-22 (the Plan). Our comments will focus mainly on the aspects of the Plan which are concerned with Gaelic education in general and GME in particular. We will in addition make general comments on other areas.

This response is submitted on behalf of an organisation and is also endorsed by Taobh na Pàirce Comhairle nam Pàrant (Bun-sgoil Taobh na Pàirce Parent Council).

Appended to this consultation response is our CnPDE discussion paper on *Sustainable GME Development March 2017* (CnPDE Discussion Paper), which sets out our expectations of the entitlement of children in GME to an immersion education and the challenges to be overcome in meeting that entitlement. Our response should be read in conjunction with this document, as we believe that meeting the challenges currently facing GME should be the main focus for Gaelic development in the next five years.

1. Tha cumadh a' Phlana a' gabhail a-steach amas, cuspairean, prìomh raointean agus gealltanasan. A bheil beachd agaibh air cumadh a' Phlana agus air an àrd-amas againn?

The structure for the Plan consists of an aim, priority areas and commitments. Do you have any comments on how we have structured the Plan and the overall aim we have selected?

As an overall structure, we believe that it is sensible to have a high level aim, which is then backed up by priorities and commitments. We believe it is important for the Plan to contain a level of detail sufficient for the success of the aim and the underlying commitments to be measurable. Where targets are set, we believe that there should be clarity as to what steps will be taken to achieve these targets, and the timescale for taking such steps.

"Our aim is to increase the number of people speaking, using and learning Gaelic in Scotland and the number of situations in which it is used." (Plan p.6)

CnPDE believes that this high level aim is appropriate for the Plan. Parents of children in GME would consider an increase in the number of Gaelic speakers a very positive step forward. It would be particularly beneficial for GME children to see an increase in the number of situations in which Gaelic is used.

The Plan includes lengthy introductory remarks. We accept that this is necessary in a national level document which we hope will have a wide audience, some of whom will have little prior knowledge of Gaelic.

GME parents, and other experts in Gaelic, are looking for this high level approach to be supported by a measurable action plan to deal with very specific issues. Other organisations at both national and local levels are required to produce GLPs with detailed action plans, including timescales for delivery. It would be appropriate for the National Plan to contain such an action plan.

For example, the Plan includes GME at primary and secondary levels as a priority area; supported by the commitment to increase the number of Gaelic schools and to recruit, educate and retain Gaelic teachers. We believe that these commitments should be further supported by a detailed action plan to demonstrate the steps that will be taken to successfully meet these commitments.

Action plan steps might include for example a specific year on year target for increasing the number of recruits into Gaelic teaching courses.

Without such a detailed action plan, it is not possible to evaluate the success of the implementation of the Plan's aims, or to make necessary corrections as the five year period of the Plan progresses. Without the addition of specific goals, the Plan risks being only a list of worthy, but nebulous, objectives, and of little concrete use in supporting those tasked with implementing the Plan.

2. Tha sinn dhen bheachd gu bheil e riatanach gum bi deagh ìomhaigh aig a' Ghàidhlig agus gum bi na raointean shuas a' cur gu mòr ri sin. A bheil beachdan agaibh fhèin air na raointean a thagh sinn no càil eile co-cheangailte ris a' chuspair seo?

We believe that the promotion of a positive image for Gaelic is essential and we think that the areas above are the key areas that can make a contribution to this. Do you have any comments on the areas we have selected or alternative suggestions?

CnPDE agrees that the promotion of a positive image for Gaelic is very important. We believe that positive views of Gaelic are best achieved through increasing the number of Gaelic speakers and the opportunities for them to use the language. This will assist with the promotion of Gaelic as a useful, living language.

For children in GME a positive image of Gaelic is essential to encourage them to use the language outside of school and to continue the revitalisation of Gaelic through use in their own homes as they grow to adulthood. As children become older and more aware of views of others outside their own circle, we must be aware of the effect of negative and inaccurate reports about Gaelic in the press, and consider a strategy to counter this

issue.

Bòrd na Gàidhlig has an opportunity to influence the promotion of a positive image for Gaelic through its approval of GLPs from other organisations. How are local authorities and national organisations being encouraged or required to promote Gaelic positively? Organisations such as the National Museum of Scotland could play a significant role in helping to normalise and positively promote the language, and this can be monitored through their GLPs.

Gaelic is gradually becoming more visible in the public domain, but CnPDE is concerned that some national cultural organisations still have a weak commitment to Gaelic with low levels of visibility and promotion. There can be a tendency to use Gaelic only where there is a specific "Gaelic" subject interest, rather than in relation to their service more generally. This has a detrimental effect on Gaelic's visibility in national life and, which is more concerning, severely limits the opportunities for children being educated through Gaelic to engage in educational experiences outside of school – which is essential to achieve the outcome of fluency in the language.

CnPDE believes that organisations such as Fèisean, and activities supported by Comunn na Gàidhlig, are crucial to give GME children the opportunity to meet children from other GME schools and to participate in fun Gaelic activities outside the classroom. We trust that these activities, which are highly reliant on voluntary effort and national funding, will continue to be supported and expanded.

3. Tha sinn dhen bheachd gu bheil foghlam agus ionnsachadh na Gàidhlig aig cridhe a' Phlana seo. Tha sinn air liosta a dhèanamh de na prìomh raointean airson leasachadh san àm ri teachd. A bheil beachdan agaibh air seo, agus air na prìomh raointean a thagh sinn airson ionnsachadh na Gàidhlig?

We believe education and Gaelic learning are central to this Plan. We have also listed the priority areas that we believe should be a focus for ongoing activity. Do you have any comments on this emphasis and on the priority areas selected for learning Gaelic?

We believe that Gaelic education and learning should be the central focus of the Plan. With the aim of the Plan being to increase the number of people who can speak and use the language, special focus should be given to GME. Immersion learning is proven as a highly effective method of language acquisition, and the effective delivery of GME is crucial in increasing the number of fluent speakers of Gaelic.

It is important to emphasise that increasing the number of learners does not necessarily lead to an increase in the number of adult Gaelic speakers. It would be useful to establish a means of evaluating the outcomes from GME schools, and the relevant factors contributing to success or otherwise.

Our views on the development of GME are set out in our attached CnPDE Discussion Paper where we set out the challenges facing GME development, and how these challenges might be addressed.

We believe that the Plan needs to be clearer in recognising that there is currently a critical shortage of GME teachers, which threatens to seriously disrupt the immersion education of many GME children by removing them from GME during periods of their primary education.

Furthermore, having an increasing number of non Gaelic-speaking teachers in classrooms in GME settings could increase the workload and impact on the morale of Gaelic-speaking staff. This would work against the commitment to recruit and retain GM teachers.

The key outcome for GME of producing fluent and confident speakers of Gaelic will not be met without the staff shortages in GME being addressed.

4. Tha sinn dhen bheachd gu bheil na raointean a chaidh a thaghadh cudromach airson cleachdadh na Gàidhlig a bhrosnachadh. A bheil beachdan agaibh air mar a dh'fhaodamaid piseach a thoirt air ìre cleachdaidh na Gàidhlig?

We believe the areas selected are important for promoting the increased use of Gaelic.

Do you have any comments or suggestions you would like to make in relation to promoting the increased use of Gaelic?

The Plan notes that there are growing Gaelic communities based around GME schools in lowland urban centres of population (Plan p.16). These centres of population may require a different approach to community promotion and support than the traditional rural Gaelic speaking areas. There is a strong argument for a community and education development officer to be based in the central belt, as the population centres of Glasgow and Edinburgh are likely to be the locations of the largest number and fastest growth rates of new speakers.

We believe that Gaelic would also be better promoted by providing easy to access translation facilities. This would help to encourage organisations and companies without fluent Gaelic speakers to use Gaelic in printed or online materials.

5. Ann an ceistean 2, 3 is 4, chaidh iarraidh oirbh ur beachdan a thoirt air na prìomh raointean a chaidh a chomharrachadh. Anns a' cheist seo, bu mhath leinn ur beachdan fhaighinn air na prìomh ghealltanasan a chomharraich sin agus air gealltanasan a bharrachd a bu chòir a bhith ann gus an dèanar adhartas ann a bhith a' leasachadh na th' ann de dhaoine a tha a' labhairt, cleachdadh is ionnsachadh na Gàidhlig ann an Alba agus ann a bhith a'

leudachadh nan suidheachaidhean anns am bi i air a cur gu feum?

In questions 2, 3 and 4, you were asked about your views on the priority areas identified. In this question, we would like to hear any views or suggestions you may have on the key commitments we have identified and views on any key commitments you think should be included in order to make progress with the aim of increasing the number of people speaking, using and learning Gaelic in Scotland and the number of situations in which it is used?

Promoting Gaelic

The Plan includes a commitment to produce a strategy for equality and diversity issues connected to Gaelic. In the context of GME, a move towards more equality requires a focus on children with additional support needs.

Children in GME who require additional support with Gaelic literacy are often let down by a lack of resource and funding. With local authority education budgets already stretched, there may be a need to look national level at how Gaelic specific grant budgets are allocated to ensure that additional support needs are a priority.

It is recognised that funding for Gaelic TV does not adequately allow for new programming in a variety of areas identified by MG Alba, including children's programmes. That being the case however, CnPDE would like to see a positive approach to Gaelic programming for children, including specific schools programming to support children learning through Gaelic.

Learning Gaelic

Our key comment is that the Plan requires a clearer focus on the outcomes of GME, namely that GME will produce fluent and confident speakers of the language, who will go on to use Gaelic in their adult lives, and pass it on to their own families.

The Plan also lacks acknowledgement of the critical lack of GME staff that is threatening the effective delivery of GME. There is a disconnect between the support for parents in their requests for GME and the encouragement of GME to grow, and the reality of the lack of GME teachers.

With regard to GM Early Learning, it should be recognised that a lack of capacity and difficulties with organising wraparound childcare can make GM nursery level inaccessible for families. It is really important that solutions are put in place to address these issues, so that all children who enter GME at P1 level have had access to high quality GM preschool education.

Where children enter P1 without having attended Sgoil-àraich, it may be appropriate to consider providing a special conversion class. In Welsh-medium education "reception classes" are used for this purpose.

CnPDE recognises the important steps forward that have been taken within the life of

the previous National Plan to clarify some key areas of discussion in GME. We acknowledge the importance of the two key documents:

- 1. The document produced by Bord na Gaidhlig dated February 2017: *Statutory Guidance on Gaelic Education* (Statutory Guidance).
- 2. The document produced by Education Scotland / Foghlam Alba dated February 2015: Advice on Gaelic Education (Advice).

We consider the Statutory Guidance to be a very positive step towards the aim of making GME a right for all parents in Scotland who wish it for their children. Given that the Statutory Guidance places a statutory duty on local authorities, the National Plan should provide specific detail about how the Statutory Guidance will be enforced.

The Foghlam Alba Advice is also a very useful document for parents in clarifying the entitlement of children of children in GME to a continuing immersion education. The Plan needs to include more detail about how the level of immersion in GME schools will be monitored, maintained and improved.

One of the commitments is for the number of Gaelic schools to increase from six to ten over the life of the Plan. Although GME parents see the positive side of an increasing number of GME pupils and the opportunities that gives our children to use their Gaelic in adult life, there is an understandable level of unease given the current issues with staffing.

A significant amount of additional detail is required to be added to the Plan to demonstrate how the proposed new Gaelic schools will be established without adverse effect on the children who are pupils in existing GME schools. The Plan does not even give detail as to whether the proposed schools are primary or secondary.

Assuming that four new primary schools are to be established, this could represent a notable increase in GME capacity nationally. Given that it is likely that a significant proportion of future GME teachers will come from a GME background, it is worth looking at the pool of potential recruits for the GME teaching profession, how the pool of potential teachers is expanding, and whether such a rapid capacity expansion is manageable.

The establishment of the initial tranche of GME schools was highly successful and led to an immediate uplift in the entrants to GME. In Edinburgh we saw a significant uplift in the 2014 P1 intake. These children, were they to choose to train as teachers, would be coming into the workplace by around 2032. At CnPDE we believe that the long term picture for GME looks positive, if there is a focus on best practice immersion in GME schools.

However, there needs to be an acceptance that simply expanding capacity will not necessarily meet the required outcome of producing more fluent Gaelic speakers. A strategic approach to expansion needs to be in place to ensure that expansion in capacity does not result in children being removed from immersion learning. Our attached CnPDE

Discussion Paper provides further detail.

In terms of the primary GME experience, we would also like to see more commitment to an enrichment of the quality for children.

There is a need for greater and more focused support for literature for children in Gaelic, both for use in the school, but also for reading for pleasure. There is little available beyond Early Years and at the point that English reading is introduced into the curriculum there is no counterbalance of Gaelic reading books to keep children engaged in Gaelic, although it is their first reading language. This has a serious effect on children's level of comfort with Gaelic reading and with extending their effective Gaelic vocabulary, and helps to reinforce the idea that Gaelic is only for use in school.

CnPDE also believes that there should be key commitments around Secondary GME to try and bring secondary in line with the best practice contained in the Advice. According to the Advice, GME immersion should continue to the end of Broad General Education (S2 or S3). The Plan should consider investigating how many GME children currently do not receive this level of immersion, and consider solutions for the staffing issues at secondary.

We would like to see more focus on the ability of secondary schools to produce Gaelic-speaking adults at the end of secondary education. It is not clear, from the numbers entering secondary from a GM primary education, how many will continue using and learning Gaelic throughout secondary and what their level of fluency will be at the end of their secondary education. It would be worthwhile to introduce some form of longitudinal study of children in GME to track the outcomes from GME entrants at Early Years and Primary stage, and to identify the important factors in terms of supporting children to adult fluency.

CnPDE has concerns about the lack of opportunity for children to use and learn through Gaelic at secondary, other than during Gàidhlig lessons, and the fragility of provision when one teacher leaving a school can mean that a whole subject area is lost.

There is a clearer strategy needed to ensure sufficient numbers of secondary teachers are available to teach through the medium of Gaelic, with focus particularly required on the subject areas for which the SQA offers Gaelic subjects (Nuadh-eòlas, eachdraidh, Cruinn-eòlas, matamataig agus Gàidhlig). There is also a need for a more imaginative and far-reaching approach to how secondary GME should be delivered in an environment which for many GME pupils will be largely English-speaking. At the moment an ad-hoc approach is taken by different schools and the Statutory Guidance is very broad in this regard. Such an approach is unlikely to deliver fluent adult speakers and therefore undermines the core aim of the Plan.

We support the e-sgoil initiative and hope to see it available nationally, with training provided for teachers in user schools. The e-sgoil will be a useful supplement for GME secondary pupils but should not be seen as an alternative to recruiting additional qualified GME staff at secondary level.

In terms of out of school activities, it can be difficult to maintain the interest of teenagers in Gaelic. There is a need for a youth strategy to ensure there is something available for everyone to keep their interest in the language.

6. Tha na ceistean co-chomhairleachaidh a nochd na bu tràithe air a bhith rudeigin mionaideach. Ma tha sibh airson puingean eile a thogail, agus mura robh cothrom agaibh sin a dhèanamh thuige seo, nach sgrìobh sibh iad gu hìosal.

The earlier consultation questions have been fairly specific. If there are any other points you would like to make and feel you have not had the opportunity to do so, please write them below.

As noted above, CnPDE would like to see an Action Plan associated with the Plan which sets out detailed, measurable steps to achieve the Plan's commitments. This is particularly the case with regard to education targets.

CnPDE understands that local authorities have the key responsibility for the delivery of education, and that Bòrd na Gàidhlig may be limited in terms of its authority. However, we believe that the Bòrd has a crucial role to play in terms of strategic leadership to address the critical and urgent shortage of GME staff, and the positive delivery of GME outcomes.

Some basic actions could be taken immediately. These actions might include:

- An immediate census of all education authorities to determine the number of GME pupils who are not receiving their entitlement to an immersion education, and to assist with workforce planning.
- Support for all education authorities to carry out a survey of English-medium education teaching staff to identify Gaelic speakers who could be supported to transfer to GME.
- The establishment of a new conversion course at an appropriate level to reflect the stage of Gaelic of teachers who most usually wish to convert to GME. This may require funding teachers for a significant period of study possibly a year spent in Gàidhlig immersion, followed by a conversion course such as GIfT.
- Enhancements to Continuing Professional Development/ Continuing Lifelong
 Professional Learning to recognise the additional requirements of GME teachers to
 continually develop their language skills (particularly literacy and grammar skills) in
 order to deliver the curriculum through Gaelic. For example, GME specific courses
 should be developed for in-service days.
- Support for the development of the e-sgoil, including the delivery of training for teachers in user schools nationally.

- The appointment of a full time graduate-level GME Development Officer to work in the central belt region, alongside local education authorities, to manage workforce planning and deliver national level initiatives.
- Targets for all universities in Scotland offering teacher education programmes to ensure a percentage of places are allocated to GME teachers.
- A social media strategy as a starting point for beginning to counter negative and inaccurate reports about Gaelic.

Appendix 2: Sustainable GME development

March 2017

Introduction

Comann nam Pàrant is a constituted voluntary organisation which represents parents and carers with children in all stages of Gaelic-medium education (GME). Comann nam Pàrant (Dùn Èideann) (CnPDE) is part of a network of local parent groups, which are represented on a national committee – CnP Naiseanta.

Much of GME development over the years has been parent-led and parents provide a significant amount of expertise about the issues facing GME. The issue we currently face is how to ensure that all children in GME receive their entitlement to an immersion education, become fluent speakers of Gaelic, and meet educational attainment goals, while continuing to ensure GME remains an option for all families who wish their children to be educated through Gaelic.

GME is central to the National Gaelic Language Plan (National GLP), both in its current version and within the proposed plan for 2017-22 (currently in the process of public consultation). GME is a prioritised area of the National GLP and will make a crucial contribution to meeting outcomes relating to increasing the number of fluent speakers. References to the National GLP below are to the consultation draft 2017-22.

Although GME to date has been a great success story, a shortage of qualified fluent staff presents the risk that in future GME will not deliver the outcome of an increased number of fluent Gaelic speakers. Primary GME children are being removed from Gaelic immersion for periods of time to be taught by English-medium class teachers, a situation which results in reduced fluency and failure to meet the goal of equal confidence in English and Gaelic. If there is a continuation of the current staff shortages, there is a risk that local authorities may have no choice but to restrict the number of children entering GME.

It is necessary for an urgent renewed emphasis on workforce planning to ensure that immersion can be properly resourced and sustained for children currently in GME and for rapidly growing intakes.

1. Summary

The provision of GME has to date been reactive to demand from families and has been dependent on the motivation of individual local authorities. Estates management issues have in many cases determined the direction of GME development over the years.

CnPDE has consistently supported the introduction of a statutory entitlement for parents who wish to have their children educated through the medium of Gaelic. We view as a positive step forward the recent production of *Statutory Guidance on Gaelic Education* (further discussed below).

There is now an urgent requirement for a discussion to take place about the quality of the delivery of GME, and in particular a discussion about workforce planning. We need to move away from a reactive approach towards a proactive plan to have a trained workforce in place that can ensure that **all** children in GME receive their entitlement to an immersion education.

GME development must continue, but in a sustainable manner that meets national outcomes and provides immersion in line with educational best practice.

Sustainable development should ensure:

- That GME will produce fluent Gaelic speakers.
- That all children in GME will benefit from the educational best practice of immersion.
- That workforce is in place to deliver best practice.
- That teachers are able to work in a more rewarding immersion environment.
- That there is efficient usage of both local authority and Scottish Government resource.

All avenues around workforce planning should be explored before there is consideration of limiting entry to GME. Any proposal to limit entry must be temporary, and included only as part of a strategy to ensure an immersion education for all GME children and a plan to make GME available to all children in future years.

Local authorities have a significant level of responsibility to ensure the delivery of GME in line with best practice, but leadership at national level is also crucial as the GME workforce is a national resource.

These issues are discussed in more detail below.

2. GME outcomes

GME is based on the principles of immersion. The curriculum delivered is Curriculum for Excellence and covers the same subjects as in English-medium education (EME) local authority schools. By delivering the curriculum through the medium of Gaelic, children in GME should end up equally confident in the use of both Gaelic and English.

Equal confidence in the use of both languages is most effectively achieved where immersion is delivered through formal education and supported in the home from the ages of 0-18. For the purposes of this discussion we will focus mainly on primary school GME.

Discussion of best practice draws significantly from two documents:

- 3. The document produced by Bòrd na Gàidhlig dated February 2017: *Statutory Guidance on Gaelic Education* ("Statutory Guidance").
- 4. The document produced by Education Scotland / Foghlam Alba dated February 2015: *Advice on Gaelic Education* ("Advice").

The Statutory Guidance has been prepared under Section 9 of the Gaelic Language (Scotland) Act 2005, as amended by the Education (Scotland) Act 2016, and states that: Relevant public authorities must have regard to this Guidance where their functions relate to Gaelic education or the provision of Gaelic education. (Statutory Guidance, Introduction).

It is important for local authorities to recognise that the guidance is **statutory**, and that they are **required** to have regard to it in the delivery of GME.

The National GLP includes as an aim: We will ensure that the Guidance on Gaelic Education is promoted, widely used and is the recognised authority on Gaelic education. (National GLP p22).

The Advice sets out Gaelic Education policy (Advice, 3.1-3.6) which includes references to Curriculum for Excellence and Language Learning in Scotland, and is an important best practice document which is used by school inspectors and other key stakeholders. It is implicit that parents expect their children in GME to achieve the best they are able academically and to become confident and contributing members of society.

It is however also important to recognise that GME has a part to play in the national policy of supporting and developing the Gaelic language. *The Scottish Government recognises that the only way to create a secure future for Gaelic in Scotland will be by increasing the numbers of those learning, speaking and using the language, and Gaelic Education in particular has a key role in achieving this aim. (Advice 3.6).*

GME therefore has the additional responsibility of producing fluent and confident speakers of Gaelic. The production of a National GLP every five years by Bòrd na Gàidhlig is required by the Gaelic Language (Scotland) Act 2005. The consultation draft of the National GLP 2017-22 includes GME as a priority area in the contribution towards reaching the core aims of increasing the learning and usage of Gaelic.

When looked at from the perspective of educational best practice and delivering national outcomes in relation to the Gaelic language, GME development must ensure that children in GME are educated in line with GME best practice as set out in the Statutory Guidance on Gaelic Education, and the successful delivery of outcomes as set out in the National GLP 2017-22.

Local authorities must give regard to this when planning the resource for GME intakes and when projecting future intakes.

3. GME best practice

The principle of immersion learning at GME primary level is supported in the Statutory Guidance 2.10-2.13.

Discussing the time that children spend learning in schools, the Advice states: *During this time they have an entitlement to receive high quality experiences as part of Gaelic Medium Education. Central to this experience is children's and young people's learning in Gaelic Medium Education being based on the principles of language immersion. (Advice 4.4).*

During the early years and primary phase of GME, this is divided into two phases:

- 1. "Total immersion" learning exclusively through the medium of Gaelic other than in exceptional circumstances.
- 2. "Immersion phase" beginning in primary 3 or 4, transferring Gaelic language skills to reading and writing in the English language. During this phase, the curriculum in its entirety should continue to be taught through the medium of Gaelic.

3.1. Immersion

The Advice is clear that:

Total immersion leads to total fluency. **Alternative models lead to the dilution of fluency** and are as such non-compatible with the development of strong and sustained Gaelic Medium Education. ... There needs to be a clear understanding that bilingualism is an outcome of Gaelic Medium Education and not a learning and teaching approach. ... There is a substantial and convincing body of evidence from inspection that partial immersion is not effective in developing fluency. (Advice 4.7).

It is very important to recognise that the introduction of English literacy during the immersion phase (from primary 3 or primary 4 onwards) should not change the level of immersion. In best practice, in the immersion phase teachers lead learning in all curriculum areas, including the newly introduced English, through the medium of Gaelic. (Advice 8.3).

And from the Statutory Guidance: From P4-P7, English language and literacy outcomes should be introduced through the medium of Gaelic. In order for pupils to maintain and develop Gaelic fluency and make progress with the language, it is recommended that schools should aim for all aspects of the curriculum to be delivered through the medium of Gaelic. (Statutory Guidance 2.12).

In best practice, staff cover for non-contact time and all support staff should be confident and fluent Gaelic speakers.

Children should not be removed from immersion for a period of time, such as spending a primary school year with a non Gaelic-speaking teacher. GME requires a continuous development of language skills and vocabulary across all areas of the curriculum in order to achieve the outcome of equal confidence in both languages. This continuous development can only take place successfully if the principles of immersion are followed consistently.

Given the principles of immersion, it is a very basic entitlement of children in GME that they all have a class teacher who is a fluent Gaelic speaker. The entitlement of children in GME to an immersion education is a continuing entitlement throughout the whole of primary school.

A priority for Scottish Government and local authorities should be to plan resources to support projected numbers.

3.2. Additional Support Needs

As in EME, children educated through GME will often require access to additional support in their learning.

Education authorities should demonstrate through their workforce planning that they are considering how additional support is provided to children and young people in GME. (Statutory Guidance 2.34).

There is recognition that it can be challenging to provide some support through the medium of Gaelic, however: *The aims and goals of Curriculum for Excellence and the Children and Young People (Scotland) Act 2014 place a responsibility on all staff to meet the needs of all learners.* (Advice 14.4). We consider that this does include the delivery of additional support for learning in the language through which children are being educated.

The provision of additional support for learning through the medium of Gaelic may require additional funding at national level. Local authorities may require financial support to be able to deliver adequate support for learning in GME schools and units.

4. Challenges to the delivery of GME best practice

The key challenge to be overcome in the delivery of GME best practice is the availability of GME staff.

In offering GME and admitting children to GME schools and units, local authorities need to be clear that they are committing to the delivery of a consistent immersion experience for all children in the GME school or unit.

The Statutory Guidance emphasises that education authorities which provide GME have a duty to support GME. The duty of support requires an education authority to take reasonable steps to ensure that teachers in any class providing GME or GLE have such resources, training and opportunities as are reasonably necessary to provide that education adequately and effectively. It is recommended that this should include providing teaching staff in GME with adequate support to ensure that their fluency levels are up to the standard required to maintain immersion. (Statutory Guidance 1.69).

The Statutory Guidance also requires education authorities to consider that it may be appropriate for GME class sizes to be smaller than those set as the national maximum, or the local authority's standard ratio, stating that, there are particular requirements placed on the GME teacher whose aim is to develop and maintain fluency in Gaelic in the early stages of primary education. (Statutory Guidance 2.49).

Local authorities which provide GME are as an absolute minimum making the commitment to provide each child with a GME class teacher for the duration of their primary schooling, and access to Gaelic learning support when required.

In order to provide a fully comprehensive and effective GME experience, class teachers should be supported by Gaelic-speaking classroom assistants and support and administrative staff. Where composite classing structures exist, children in the total immersion phase (P1-P3) should ideally be educated separately from children in the immersion phase.

4.1. National leadership

CnPDE has previously suggested that a national approach should be taken towards GME staff recruitment, training, allocation and retention. We recognise that teacher recruitment and retention is not an issue that affects only GME, and we recognise that local authorities are responsible for employment and recruitment of education staff in their own areas.

However, we continue to believe that GME staffing issues require national level leadership for the following reasons:

- GME plays an important role in meeting national goals relating to Gaelic language revitalisation. These outcomes will only be achievable if the principles of immersion are followed.
- The infrastructure of GME schools is supported by the Scottish Government through the Gaelic Schools Capital Fund, and annual revenue costs are supported through the Specific Grants Scheme. These funds are a national resource and it is important that they are used to support GME and the revitalisation of Gaelic. Where GME immersion principles are not followed, it could be argued that the funds are not being used for their correct purpose.
- There is currently a lack of transparency about the national number of GME staff and the national number of GME pupils. A better understanding of these numbers and how they are projected to change on a national basis would help to inform strategic decisions about the timing of planning and investing in new Gaelic schools.
- National level leadership could assist with the sharing of resources and ideas to address similar issues which occur in different local authorities.

Some resources do currently exist at national level to support education authorities in the recruitment and retention of GME staff. For example, the Statutory Guidance suggests that: Education authorities ... should consider a survey of the teaching workforce to identify the level of interest and ability in Gaelic, and to see if there are any teachers who would like to consider transferring from English medium education to GME. A template for this purpose is available from Bòrd na Gàidhlig. (Statutory Guidance 2.65).

Teaching staff who wish to transfer from EME to GME can be supported through existing programmes such as STREAP and GIfT. Advanced leaners will have different needs from teachers already fluent in Gaelic who have made the decision to work within EME schools. These groups will require different levels of support to encourage them into GME.

Workforce planning for GME should be factored into Scottish Government's annual teacher workforce planning which takes place each autumn: to estimate how many student teachers should be enrolled by the relevant universities in the following year to ensure that we maintain an adequate supply of teachers to meet local authorities' and schools' requirements. (http://www.gov.scot/Topics/Education/Schools/Teaching/Staffing).

A more strategic approach is needed to ensure that universities offer appropriate courses and maintain continuity of staffing. "Relevant universities" should refer to all universities

offering teacher education programmes, and all of these course providers should be required to demonstrate how they are contributing to the national requirement for a significantly higher number of GME teachers.

Although secondary GME is not covered in detail in this paper, strategic workforce planning is also crucial at the secondary stage to ensure continuity of the immersion experience, the maintenance of fluency, and continuity of subject delivery. Initiatives such as the e-sgoil should be supported as a valuable additional resource for teachers working in secondary GME.

Scottish Government and Bòrd na Gàidhlig must demonstrate that they are working together with universities to plan for future national workforce requirements.

4.2. Strategic planning for GME

The City of Edinburgh Council (CEC) is currently leading a process of producing a strategic plan for the future of GME in Edinburgh, which will be included in its Gaelic Language Plan (GLP) 2017-22.

Councillors, council officials, GME parents and members of Edinburgh's Gaelic community are involved in this process.

Glasgow City Council is about to begin a formal consultation on a third site for GME in Glasgow with the aim of increasing the physical space available for GME in the city. Engagement events have been organised and views collected from parents to inform this process.

Given that the two largest population centres are involved in strategic planning for the future of GME, we have a need for current and transparent information about the numbers of GME staff and pupils.

Scottish Government and Bord na Gaidhlig could take simple steps to support this by:

- 1. Conducting an immediate census of all education authorities to determine:
 - As of a set date this academic year:
 - o GME primary pupils numbers
 - o FTE GME primary teacher requirement
 - FTE GME primary teachers employed
 - FTE GME primary teacher vacancies
 - o FTE GME primary teacher roles currently filled with EME teacher
 - 2017 18
 - Projected primary pupil numbers
 - Projected FTE GME primary teachers requirement

- What is the Gaelic learning support provision in each school in terms of staffing hours?
- 2. Supporting all education authorities in carrying out a survey of their current teaching workforce to determine Gaelic speaking teaching staff working in EME and whether any could be supported to transition to GME.

A transparent comparison of the number of staff and the number of staff vacancies in GME would help to inform a discussion about whether it is feasible to meet the projected demand for GME from families.

If new GME infrastructure and annual revenue budgets are to be supported by Scottish Government, it needs to be clear that it is possible for GME to be delivered in these schools in line with best practice and national policy goals. This will only be possible if sufficient GME staff exist or will exist to deliver GME in line with the principles of immersion.

5. Sustainable development – Impact on GME primary places

Parents and others have for many years campaigned to keep GME open to all children and CnPDE continues to believe that this is best and most equitable approach, and necessary for the expansion in the numbers of Gaelic speakers required to meet national outcomes.

However, GME must conform to the standards of best practice and achieve the outcome of providing children with fluency in the language via immersion and the use of Gaelic as the main classroom language. Without better workforce planning, this may result in some families being denied access to GME in certain years.

Where there has been inadequate planning and there are a limited number of Gaelic-speaking teachers, the total immersion phase of primary is prioritised (P1-3). If the number of pupils in these year groups were to be particularly high in any one school or unit, there is the danger that children in the immersion phase (from P4 onwards) will be allocated a non Gaelic-speaking teacher for a year or longer. As discussed above, this is not in line with best practice, does not constitute the proper delivery of GME, damages fluency, and does not support the revitalisation of the Gaelic language in line with national goals.

5.1. Entry criteria for GME

CnPDE continues to believe that GME should be open to all families who wish it for their children, and that adequate planning should be in place to resource the entitlement to continuing immersion in primary school.

Without adequate planning and resource, local authorities may have to take the unwelcome step of considering imposing a temporary limit on the number of children entering GME, and may have to consider implementing entry criteria.

We consider that there are many difficulties with entry criteria, and a real risk that criteria could discriminate against certain demographics. However, workforce planning to date at both national and local levels has not proven adequate to meet the current demand for GME, and therefore it may be necessary to discuss temporary entry criteria.

It is recognised that individual local authorities are responsible for the placement of children in their own school estate. It could however be useful to establish a nationally consistent approach towards entry criteria. Scottish Government and Bòrd na Gàidhlig may wish to lead discussions with local authorities about the establishment of entry criteria which best support the delivery of GME best practice and outcomes surrounding Gaelic language revitalisation, if the situation should arise that staffing does not allow provision of GME to all who wish it. If this situation were to arise, it would be important that local authorities formed a proper policy specifically for GME, and did not simply apply standard EME policies which would not be appropriate for GME.

It remains the position of CnPDE that GME should be open to all, and that adequate resourcing and advance planning should be put in place to avoid even temporary restrictions on numbers.

6. Conclusion

CnPDE, along with other GME parent groups in Scotland, fully supports the continued development of GME. We would like to see open access to GME for every family who wishes to have their children educated through Gaelic, and expect forward planning and resource management to be put in place to enable this.

GME sustainable development must ensure that children in GME are educated in line with GME best practice as set out in the Statutory Guidance on Gaelic Education, and the successful delivery of outcomes as set out in the National GLP 2017-22.

It must be ensured that all pupils in GME receive their continuing entitlement to a Gaelic immersion education. Consistent immersion is the only method through which pupils in GME will become fluent and confident speakers of Gaelic, and the only method through which we will meet the national attainment levels and policy goals aimed at revitalising Gaelic in Scotland. It remains our aspiration that immersion GME should be available to all families who request it.

We consider that local authorities responsible for delivering GME need to recognise their responsibilities for properly resourcing immersion GME schools and units at sustainable levels, but that this is also a national issue and one that will require national level leadership by Bòrd na Gàidhlig and Scottish Government.

Appendix 3: Secondary GME vision

Summary of Parents' Views on Secondary Gaelic-medium education November 2015

Overall Development Vision

GME parents have agreed on the following statements:

- 1. Parents share the vision of a much enhanced and improved Gaelic-medium experience for our children at secondary school. This would include a greater percentage of the timetable to be delivered through the medium of Gaelic.
- 2. Parents share the vision of a growing Gaelic-medium community at secondary school, and the vision of this community staying together in one school.

These statements are the basis for developing a long term vision for secondary GME in Edinburgh.

Defining Secondary GME

Parents have largely agreed that the following points are important in the definition of a Gaelic-medium secondary education:

- A Gaelic education should produce fluent, confident speakers of the language.
- A Gaelic education should aspire to a level of immersion in the language Gaelic speakers should be kept together at high school.
- Gaelic should be spoken and heard every day at school.
- Some subjects should be delivered in Gaelic. Pupils should ideally have a choice of subjects in Gaelic.
- There should be the opportunity to take exams and gain qualifications in Gaelic.
- Learning support should be available in Gaelic.

Geàrr-iomradh air Beachdan Phàrantan air Foghlam tron Ghàidhlig aig Ìre Àrd-sgoile An t-Samhain 2015

Sealladh Farsaing air Leasachadh

Tha pàrantan FTG air aonta a ruighinn air na puingean a leanas:

- Tha sealladh coitcheann aig pàrantan gum bu chòir leasachadh is leudachadh mòr fhaighinn do ar cuid cloinne a thaobh FTG àrd-sgoile. Ghabhadh sin a-steach cuibhreann nas motha den chlàr-ama a bhith air a theagasg tro mheadhan na Gàidhlig.
- 2. Tha sealladh coitcheann aig pàrantan gum bu chòir don choimhearsnachd mheadhain-Ghàidhlig àrd-sgoile fàs, agus gum bu chòir don choimhearsnachd seo fuireach ann an aon sgoil.

Tha na prionnsabalan seo mar bhunait do leasachadh sealladh fad-ùine do FTG àrd-sgoile an Dùn Èideann.

Mìneachadh FtG aig Ìre Àrd-sgoile

Tha pàrantan air aonta a ruighinn, gu ìre mhòr, gu bheil na puingean a leanas cudromach anns a' mhìneachadh air foghlam àrd-sgoile meadhain-Ghàidhlig:

- Bu chòir do dh'fhoghlam Gàidhlig luchd-labhart fileanta, misneachail a chruthachadh.
- Bu chòir do dh'fhoghlam Gàidhlig a bhith ag amas air àrainneachd bogaidh anns a' chànan bu chòir luchd-labhairt na Gàidhlig a chumail còmhla aig an àrd-sgoil
- Bu chòir a' Ghàidhlig a bhith air a bruidhinn agus air a cluinntinn a h-uile latha aig an sgoil.
- Bu chòir cuid de na cuspairean a lìbhrigeadh tron Ghàidhlig. Bhiodh e na b' fheàrr nam biodh roghainn chuspairean tron Ghàidhlig aig sgoilearan.
- Bu chòir cothrom a bhith ann deuchainnean a dhèanamh agus teisteanasan a chosnadh anns a' Ghàidhlig.
- Bu chòir taic ionnsachaidh tron Ghàidhlig a bhith ann.