Bòrd na Gàidhlig

Draft Statutory Guidance on Gaelic Education

31st October 2016

Comann nam Pàrant (Dùn Èideann) is a voluntary organisation which represents parents and carers of children in Gaelic-medium education in Edinburgh.

Attached is a response on behalf of Comann nam Pàrant (Dùn Èideann) to Bòrd na Gàidhlig's Draft Statutory Guidance on Gaelic Education.

Le dùrachdan

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Consultation survey questions:

Are there any further details you feel would help to clarify any steps in the Gaelic Medium Primary Education assessment process (Paragraphs 1.1-1.56)?

- This guidance is a positive step forward towards the aim of giving parents in Scotland a right to GME.
- Local authorities should all be required to refer to this guidance within their own GLPs and provide a named person to support parents through the process of submitting requests.
- BnG should carefully monitor the manner in which local authorities deal with requests.

Do you have any further suggestions about how you feel the duty on education authorities to promote and support Gaelic education in schools (Paragraphs 1.61-1.65) could or should be fulfilled?

 The guidance could include reference to local authorities promoting the possibility of providing GME in their area as part of the assessment process following a parental request for GME.

Do you have any additional comments on any particular sections in Part 1?

- 1.6 Some of the provisions around early years are not totally clear and there is some confusion between the playgroup stage (0-3) and the more formal pre-school stage (3-5). Given that local authorities are required to provide care from the age of 3, parental requests for GME should be permitted for pre-school (3-5) as well as GMPE. GMPE is significantly more successful, and far more practical for teachers to deliver when children have attended Gaelic pre-school. Early years plays an important strategic role in GME and should be included as a fundamental part of any guidance.
- 1.17 onwards. The paragraphs around assessment areas are particularly relevant in Edinburgh and other urban areas. Capacity issues are more likely to arise in big centres of population. There could be an inclusion of additional guidance for urban local authorities. An assessment in an urban area should take into account the proven evidence of enhanced uptake of GME when provision is put in place.
- 1.39 There could be a recognition here that urban areas can see great fluctuations in pupil roll year on year. Housing developments and changing demographics can change the number of families with school age children in a particular area significantly. Leaving it to local authority discretion as to whether an assessment is undertaken does not give adequate support to parents who will only have one opportunity to access GME for their children.

• 1.53 It is a positive step that the guidance provides support for effective entitlement to GME. Although the bar is set high for an education authority, it is still at the discretion of that authority as to whether to comply with the guidance. This is a good step forward but we should look to further steps in future.

Part 2 offers Guidance on a number of matters relating to Gaelic education. Are there any additional topics you feel should be included?

- Guidance on transitioning from GME delivered in a two stream school to a standalone school.
- Guidance on the provision of transport to GME schools.
- The role of the wider Gaelic community and support that Gaelic organisations can provide within the framework of the Curriculum for Excellence.

Are there any issues in Part 2 which you feel would benefit from further clarification?

- It should be made clear that part 2 is also statutory guidance. It should be made clear that the Education Scotland guidance (February 2015) on delivery of GME should be followed by local authorities. They should be measuring progress against this guidance in their GLPs.
- The paragraphs referring to enrolment policies and placing requests in GME (2.54) are not clear. Given the national priority to support the Gaelic language, which still exists in a very fragile state, we should not be supporting any limitation on entry to GME.
- The growth of immersion language schooling gives Gaelic its best chance of long term survival and GME parents have consistently supported keeping GME open to all. An underlying principle that GME should remain open to all families who request it for their children should be established.

Do you have any additional comments on any particular sections in Part 2?

- 2.2 It is very clear that early years provision (particularly for the 3-5 age group) is an
 essential part of GME. Language acquisition through immersion should begin as
 early as possible. Children in mainstream education are offered an appropriate preschool experience as part of the Curriculum for Excellence and children in GME
 should receive the same. It is should not be an aspiration to provide nursery level
 GME but a fundamental part of the provision.
- The paragraphs relating to the delivery of secondary education 2.14-2.17 leave too
 much to the discretion of individual local authorities. There is no doubt that where
 resources are so scarce, school should be collaborating (2.16) but to make this a
 reality will require a national structure, with for example local authorities being
 required to buy-in to initiatives such as distance learning.

- Additional support needs 2.32-2.37 are too often seen as a supplementary subject, but there are a large number of children in GME requiring additional support, and ASN should be a fundamental part of any GME strategy. Children in GME usually require support in both Gaelic and English, and local authorities should be required to provide support for learning specialists in both languages. This will require additional funding. The workload of support for learning teachers in GME is significant as each child will have different needs in each language. Where the local authority provides a bilingual education, it needs to support the children through that education, which will mean additional staffing for support for learning. There should be national guidance as to how children with literacy support needs can continue with GME through secondary education, while having their English literacy also supported.
- 2.56 The long term issues with recruitment and retention of teachers should be continually addressed with a national strategy to ensure collaboration.
- While the initiatives to train additional teachers are welcome, the issue of post availability at secondary school level will need to be addressed. Currently, a GME qualified teacher cannot be recruited by a mainstream school which also delivers secondary GME unless a post is available. Additional funding is needed to create additional Gaelic-specific posts in these schools.

Working with partners we intend to prepare supporting documents for the implementation of the Guidance. Are there any particular areas you feel supporting documents would help?

- Information for parents on the level of demand that they are expected to evidence in their initial request, guidance on how to obtain this evidence of demand and what support they should expect from local authority and Gaelic organisations at this stage.
- Guidance on implementation of a national strategy in early learning and childcare which will support effective delivery in the 0-3 sector.
- Advice to Local Authorities on strategic planning to meet demand for GME including enrolment policies and how to manage over subscription
- The role of 'language assistants' including training and job description
- National Strategy for promotion of GME
- Guidance for transition in GME and how local authorities can best sustain pupil numbers 0-18, including planning for locations of provision
- Guidance for families on their commitment to GME and what is expected of them and advice for local authorities and organisations on how best to support family learning
- Guidance to support Gaelic organisations engage with education in order to develop language skills outwith school

- Guidance for local authorities on how to best manage teacher workforce in order to help cope with current national shortage. Include advice on tracking teachers and sustaining posts for newly qualified teachers.
- Guidance for local authorities on how to plan strategically to meet demand for GME
- Guidance to support universities to meet the current demand for a Gaelic speaking workforce
- Guidance on 'Gaelic school' definition and the status of Gaelic within these schools (including Gaelic language policy).
- Guidance on issues of status and ethos of Gaelic when GME is located within an English medium school

Do you have any additional thoughts on the Guidance that are not covered by the questions above?

- It is a positive step forward to see National Guidance being established for GME. The hope is that this will assist in addressing parental concerns over the process for gaining access to GME, and in ensuring the quality of GME provision.
- It would be useful to have a firm monitoring procedure by the Bòrd to ensure that local authorities understand the various pieces of guidance and are supported in their implementation.
- It would also be useful to establish some fundamental principles to underpin all the
 various pieces of guidance which can become confusing with all the detail. For
 example, the principle should be in place that all families should be able to access
 GME from the age of 3. We should not limit access to GME, we should provide
 support in Gaelic and English to all children throughout their schooling, and we
 should ensure that children are leaving GME age 18 as fluent adult speakers of
 Gaelic.
- GME issues should be considered at national level and not just considered by individual education authorities. Where resources and teaching staff are such a scarce resource, national support should be in place for local authorities which deliver GME.