



cnpduneideann@gmail.com
By email

17 December 2021

Alison is Iain còire

Re: meeting on 14 December 2021

Thank you for meeting with Comann nam Pàrant (CnP), along with the Parent Council chairs of Bun-sgoil Taobh na Pàirce and James Gillespie's High School, on 14 December 2021. We appreciate the time taken by you and officers to update us on the ongoing discussions with the Scottish Government, and on the Council's plans for the Gaelic Medium Education (GME) Statutory Consultation.

In the meeting, CnP expressed the serious and growing uncertainty among parents regarding the proposals due to an absence of key information and their unanswered questions, and how this in turn is leading to a loss of faith in the Council. This presents a real risk to achieving a successful outcome for the statutory consultation process, which we urge the Council to acknowledge.

CnP reiterated that despite multiple letters and deputations over the past year, calling for the information parents require to inform them as they engage with the issues, no significant progress has been made, and that sufficient information has not been provided. CnP highlighted that the recent developments to include a standalone option make it even more necessary to address the existing gaps, such as clarity on curriculum offer and delivery, and any new gaps arising due to this late addition.

The proposed changes to GME provision in Edinburgh are unique and complex. They include many factors specific to the GME experience, in addition to the many interconnected variables and requirements mandated by the Schools (Consultation) (Scotland) Act 2010. They must be grounded in Education Scotland's guidance on GME, which has as its basis the principle of language immersion, and the delivery of a sufficient proportion of the curriculum through Gaelic.

It is with these complexities in mind that we remind the Council that it is the depth and breadth of the information provided to parents which is critical. This information must demonstrate quality through the required attention to detail, and substance in describing

the improvements specific to our children's education, in order to convince parents of the Educational Benefits of any proposal.

The stark reality is that, due to the ongoing information deficit and the recent decision by Councillors to set in motion a path to a premature consultation, there is an increase in the number of parents who view the proposal for a new GME high school as a risk they are unwilling to take. CnP asks the Council to consider the consequences of this.

The following pages include CnP's key questions and summarises the concerns of parents which were captured in our most recent survey in December 2021. We ask the Council to reflect on parents' concerns, and to provide answers to our questions urgently.

Questions from Comann nam Pàrant, pages 3-4

Summary of questions/issues raised by survey respondents, pages 5-6

Additional information, pages 7-11

We look forward to your responses.

Le dùrachdan

Comann nam Pàrant

(Dùn Èideann is Lodainn)

Comann nam Pàrant (Dùn Èideann is Lodainn) asks the Council to answer the following questions:

Scottish Government and financing

- Has the Scottish Government agreed to reach a conclusion regarding financing by 24 January 2022?
- Would a “full audit” of any proposed asset transfer be undertaken prior to 24 January 2022?
- How will each of the currently proposed sites be funded?
- Will the Council undertake a feasibility study on central, stand-alone sites?

Detailed information

- Can the Council provide assurances that each area of concern that has been highlighted by Comann nam Pàrant will be addressed in the statutory consultation?

Evidence

- Can the Council confirm that they will demonstrate an evidence-based approach to their proposals? CnP ask for evidence which:
 - Demonstrates the pros and cons with respect to the principle of immersion at any option.
 - Provides a detailed Location Assessment for each proposal is sought, covering the impact on travel times, the characteristics of each site, their suitability for a city-wide catchment to include equity and sustainability criteria, and ability to serve the Lothians.
 - Explains the criteria used to make recommendations, and how the location will link with the Gaelic Community, including primary provision, and serve a Gaelic Community Purpose.

Educational benefit and curriculum

- What will be the curriculum offer at each site?
- How will the curriculum be delivered in each option, if not by the staff of the GME secondary school?
- Can the Council confirm that the Educational Benefits statement will include a comparison to the current offering at JGHS/Darroch as well as a comparison of what will be on offer at each of the proposed options?

Action to be taken now

- Can the Council address any of the concerns prior to the start of the statutory consultation process, for example by providing parents with additional information or offering clarity on key issues that Comann nam Pàrant has raised throughout the past 12 months?

Experience

- What is the learning that the Council has gained from its engagement with Sgoil Ghàidhlig Glaschu and how has this informed their proposal?

(continued overleaf)

Engagement

- What are the Council's plans for parental engagement prior to the start of the statutory consultation?

James Gillespie's High School

- What is the GME staffing plan from August 2022 onwards?

Long-term view

- How does the Council plan to grow GME provision at the high school, against what timescale?

Summary of questions/issues raised by survey respondents

The questions submitted by respondents to the survey have been summarised by theme and will be more comprehensively considered in a further report on the survey findings in due course. For the purposes of City of Edinburgh Council, the most frequently submitted themes for each topic have been collated in the table below. This is intended to draw attention to the areas where GME families have indicated the most significant information gaps exist.

Location
A detailed Location Assessment for each proposal is sought, detailing impact on travel times, characteristics of each site, suitability for a city-wide catchment, and ability to serve the Lothians. In terms of co-located and standalone , justification is sought in terms of educational benefit, along with details of relationships with local EME schools including curriculum delivery. Greater explanation of Criteria used to make recommendations, and how the location will link with the Gaelic Community , including primary provision, and serve a Gaelic Community Purpose .
Curriculum
Detailed assessment of how a broad curriculum would be delivered at a dedicated GME high school from its inception, and what model of delivery would be used at each site.
Educational Benefits
Detailed assessment of the education benefits of each proposed site, concern around immersion and Detailed and transparent information from the Council minority language education best practice, information on how the offer is better than current provision at JGHS/Darroch.
Staffing
Detailed plans for how CEC plan to staff a dedicated GME high school with sufficiently fluent, suitably qualified Gaelic-speaking staff from its inception, taking into account the ongoing challenges in this area
Transitions
How would the negative impacts on a small initial GME cohort (e.g. not having older GME role models and being co-located with a large, EME high school with a full complement of learners) be minimised and mitigated?
Early Years and Cròileagan
How will CEC expand the numbers of early years GME places and the locations at which they can be accessed, taking into account the importance of early language acquisition ?
Primary Level

More detailed information about how locations, catchments, population served, forecasted GME growth and transport issues have been assessed?

Remaining GME at JGHS

How will CEC ensure that S3-S6 GME pupils remaining in JGHS are supported with their Gaelic fluency, and GME curriculum options (would they be expected to travel to a distant campus to take GME qualifications) and make sure they are not isolated from the GME community?

Active Travel

How will active travel options be supported at each site?

Timescales

Will the Council **Develop a Strategic Plan**, and provide **Detailed Timescales** grounded in **Educational Benefit**. Take the time to deliver a plan aligned to the Scottish Government commitments to Gaelic and allow GME at JGHS/Darroch to become stronger. Clarification on why factors such as rising rolls and council elections should influence planning.

Leadership

Why has CEC's financial planning for GME (e.g. pupil generation rate) been absent despite the agreement to establish TnP over a decade ago?

Other

Parents seek detailed and transparent information, greater engagement with and understanding of the GME community, and more information on the curriculum

Additional Information

Discussions with Scottish Government

We understand that the Council is involved in ongoing discussions with the Scottish Government about the potential for financial support towards the use of the former Royal Victoria Hospital site for a dedicated GME high school. The Scottish Government has asked for more information about the proposal for that site, including further detail on the finances involved, so that the proposal can be properly audited, and the Council has asked the Scottish Government to first confirm if they could financially commit to this option before a full audit is undertaken. Councillor Perry, you noted, in the meeting of 14 December 2021, that the former Royal Victoria Hospital site cannot be included in a statutory consultation unless there is guarantee from the Scottish Government that funding would be available to the Council to secure the site. Councillor Perry, you also asserted your belief that these discussions will be concluded prior to the start of any statutory consultation.

In Councillor Perry's recent letter to Cabinet Secretary for Education and Skills, dated 24 November 2021, he noted that 'If the capital grant is not forthcoming then a GME secondary school, irrespective of the site, becomes undeliverable because the Council does not have the capital funding to deliver a GME secondary school by itself.' Additionally, in the Council's report to the Education, Children and Families Committee on 7 December 2021, it states 'the uncertainty of whether or when the GME school will be delivered has been incorporated into the design process and resulted in limited opportunities for design and cost efficiency.'

We are keen for further clarity as, in discussions at our meeting of 14 December 2021, the implication from Councillor Perry was that the Liberton option is fully funded but the other two (Royal Victoria Hospital site and Castlebrae High School site in Craigmillar) are not. It is essential that the Council is able to confirm how each site would be funded, and to what extent each of these are reliant on financial support from the Scottish Government. We would expect options proposed within a statutory consultation to have guaranteed financial support.

Information

Lack of information was a fundamental issue raised during the meeting. Our recent deputations have highlighted the complexities, uncertainties and variables that are at play in the proposal for a new GME high school. We reiterated that parents cannot be asked to make a decision based on the level of information that has been provided to date. We asked the Council to fill the gaps, covering immersion, staffing, curriculum, finance and the development of Gaelic at both secondary and primary level.

We understand from our discussion that the statutory consultation paper to be presented will be significantly more detailed than the short, draft paper submitted to the Education, Children and Families Committee meeting on 28 May 2021. As per the statutory guidance for consultation on schools, it is the Council's responsibility to provide parents with high

quality consultation documents, underpinned by a high standard of information. With this guidance in mind, we look forward to receiving the robust documentation required.

An evidence-based approach

We noted that parents require an evidence-based approach from the Council when proposals are being put forward, specifically with reference to immersion and minority language best-practice, and that the Council recognises the needs which are specific to GME. We highlighted that many parents struggle to see how a co-located campus could best meet the needs of GME.

More broadly, parents are seeking an approach which is fair, independent and objective in its assessment, and not one which seems oriented towards the Council-preferred option of Liberton. We urged the Council to consider how parents' questions are treated and that these are answered as fully and as fairly as possible.

Educational benefit and curriculum

We highlighted that we cannot agree with the assertion that the educational benefit and curriculum offer will be identical regardless of where the school is located. A stand-alone school has educational benefits which are specific to GME. In addition, the overall curriculum offered at either a stand-alone school or shared campus is linked to their nearby EME school as that will potentially determine the curriculum offer where subjects are not initially available in GME.

We welcome the Council's commitment to providing a detailed educational benefits statement in any proposal, as is the statutory requirement. The educational benefits statement would need to be a statement of benefits as compared to the current offering at JGHS/Darroch as well as a comparison of what will be offered at each of the proposed sites.

Shared campus / Location

We noted that we have seen no evidence in the informal consultation process held in 2020-21 that indicates a majority of GME families would support the Liberton proposal at a statutory consultation. Indeed, it is clear that a significant number of parents would actively oppose it. Based on our most recent engagement with parents, this appears still to be the case.

We discussed how the consultation has often been focused on estates and a physical building; however, the quality of education and the level of immersion should continue to be the guiding principle when determining the educational benefits of any option.

As part of this discussion, we emphasised that setting is an important part of the equation, and that the different location options will have critical impacts on the level of immersion, the curriculum offered, well-being implications due to travel time, ability to participate in after-school activities, and links to the established Gaelic community. As such, it is not possible, or desirable, to focus on any single aspect of the proposal in isolation. Feedback

from parents reflects this, for example in references to the relationships between location and educational benefits.

Engagement

We had queried the extent to which formal engagement of parents will take place prior to 24 January 2022. Councillor Perry, you noted that you will update CnP and parents as soon as further information is available. We stress again that such informal engagement is vital and that the statutory consultation process itself is not the sole means by which to alleviate parents' significant concerns. We note that the time to undertake informal engagement is very short.

Comann nam Pàrant noted that the Council should look again at the written deputations submitted in May and December, and at our correspondence with the Council to date, all of which highlight the areas of concerns that we have raised repeatedly throughout the year and which need to be fully addressed. If there are concerns that the Council can address now, for example by providing parents with additional information or offering clarity on key issues, we advise that this is done as soon as possible rather than waiting until the start of the statutory consultation process.

Extent of parental concern

We noted that there are high levels of concern amongst parents, driven by a lack of confidence in the proposal itself and in the Council's plans to deliver their ambitions for a GME high school. In addition, there is a trust deficit: many parents do not believe the Council is actively listening to their concerns and responding appropriately (for example, through engagement, clarity or detail), nor do they feel the Council's proposal is driven by the desire to create a high school which best serves the needs of GME pupils and the wider GME community. As such, there is a widespread impression among GME parents that the Council is not acting with their best interests at heart, as reflected in parents' frustration at the Council's continual push for a shared campus at Liberton despite there being no evidence that this option would be supported by a majority of GME families.

Experience

Comann nam Pàrant is aware of the breadth of experience held by colleagues at the Council working in education. However, we did stress that, although staff can draw on their experience in consulting on changes to primary schools, there is no precedent for a GME high school in Edinburgh. This is a new venture and, as such, we remind the Council to keep at the forefront of their minds the distinct considerations that a GME high school requires and the cultural, social and historical context in which it exists. In addition, this is the creation of an entirely new high school rather than a refurbishment or a rebuild. As such, this brings additional challenges and considerations, as highlighted by parents, such as transition, staffing and recruitment, and GME development in the long term (including primary provision).

The Council noted that they work in partnership with others and seek external experience to inform their view, including Sgoil Ghàidhlig Glaschu. We would be keen to find out more about the ways in which the Council's engagement with Sgoil Ghàidhlig Glaschu has informed the Council's proposal.

James Gillespie's High School

Funding for staffing was raised at the Gaelic Implementation Group. Though we value the support for Grow Your Grown, there is still an issue around funding for GME staffing. It is also unclear whether the staffing schedule noted in the informal consultation outcome report is being undertaken or on track. This has an impact on the issue of educational benefit.

The Council was asked to bear in mind that the proposal affects parents of both GME and EME pupils at James Gillespie's High School. There are two different options with different timescales and the Council was urged to avoid a situation whereby the statutory consultation becomes an unpleasant process due to the Council citing rising rolls as a factor in determining the timescales.

Darroch

The move of GME pupils to Darroch in 2022 was also discussed. It was noted that this is a significant stepping-stone for GME on the journey towards a dedicated high school, and that it potentially provides a positive opportunity for GME to be strengthened prior to any move to a new location. For example, if implemented well, it could support the cohort of GME pupils to develop a Gaelic ethos and identity, improve opportunities for immersion, and consolidate a strong GME faculty. However, it was also noted that JGHS has lost a significant portion of its fluent, qualified Gaelic-speaking staff in recent years and, as a result, the proportion of the curriculum delivered through Gaelic has reduced at JGHS rather than increased.

We heard from the Council that there is a budget agreement (to be approved by the Finance and Resources Committee at a meeting on 3 February 2022), which is most welcome news, particularly if this funding is to be targeted at Darroch-based GME staffing. However, we also heard that the Council's experience with recruiting GME staff has identified specific challenges and can be a protracted process. Comann nam Pàrant suggested that GME parents are likely to have far greater confidence in the Council's ability to deliver a successful, well-staffed GME high school if they can see evidence of incremental improvements in GME provision at JGHS, prior to any consultation taking place, compared to being asked to rely on aspirations to that effect contained in a consultation report.

In short, GME parents will look to Darroch as a small-scale example of how well the Council can deliver against its ambitions for GME and, if done well, it has the potential to bolster confidence that GME will thrive at a new location.

Long term view

We noted the Council's view that parents must be aware of the limitations and to 'manage expectations' in terms of the proportion of the curriculum delivered in Gaelic. We strongly urge the Council to communicate this with parents as some will be unaware of these limitations, instead expecting a fully immersive S1-S6 provision and a timescale which reflects this. Comann nam Pàrant understand that examinations in Gaelic are not within the Council's control but we would urge the Council to work with SQA in order to provide parents with clear information on which subjects would be examined in Gaelic at the inception of the school and how any development of this within the larger national programme to increase the delivery of exams in Gaelic.

In addition, the Council must explicitly state the degree to which a GME high school would rely on a nearby EME school or whether the Council would propose to follow the Sgoil Ghàidhlig Glaschu model whereby the school employed its own non-Gaelic speaking teachers which allowed for the opportunity to steadily grow the Gaelic-speaking faculty as and when Gaelic-speaking staff were available to be taken on.

We seek assurances from the Council that they are fully committed to developing GME provision at the high school. We expect the Council to fully inform parents as to the percentage of the curriculum that would be delivered in GME when the school opens and, if this has limitations, we seek assurance that the Council is committed to growing this over time and request information from the Council as to how they plan to achieve this.